Funding Strategy Statement consultation responses

Consultation closed 23.59 on 3 October 2025

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## Abbey Grange C of E Academy (Abbey MAT) - Executive Head Teacher

Re: Funding Strategy Statement Consultation – Abbey Multi Academy Trust Response

I am writing as Executive Principal within Abbey Multi Academy Trust to provide our response to the Funding Strategy Statement (FSS) consultation. Thank you for the opportunity to contribute; I wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members. Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees’ pensions.

This change would have a devastating impact on Abbey Grange Academy. With school budgets already stretched to breaking point, and with a national SEND crisis, our most vulnerable students will be the ones who suffer most.

Academy 1 year reduction 6% 3 years reduction 6%

Abbey Grange £138,331 £414,993

Bishop Young £140,353 £421,059

Lightcliffe Academy £118,569 £355,708

Lightcliffe Primary £60,345 £181,046

Manston St James £52,551 £157,654

Christ Church £36,345 £109,033

Holy Trinity £37,895 £113,686

St Chads £36,770 £110,311

Central £111,868 £335,604

Total Trust Saving £733,027 £2,199,094

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.

With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?

The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

• What is WYPF’s process for reviewing and responding to employer feedback?

• Will a working group be established to review responses?

• How will responses be reflected in the final decision?

• Is there sufficient time and resource to review all feedback before decisions are made?

The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that you extend the current consultation so that all employers within the West Yorkshire Pension Fund have time to respond and that all future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Abbey MAT – CEO

Re: Funding Strategy Statement Consultation - Abbey Multi Academy Trust Response

I am writing as Co-Chief Executive Officer of Abbey Multi Academy Trust to formally respond to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to raise several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have outlined how financial conditions have improved significantly since the last actuarial valuation in 2022, resulting in a stronger funding position for WYPF. We anticipate substantial improvements in funding levels and a marked reduction in employer contribution rates over the next three years.

Request for Reduced Contributions

Given these improvements, we respectfully request that the valuation approach enables a reduction in our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members. We believe this reduction is both appropriate and achievable without negatively impacting the fund or our employees' pensions.

This reduction would have a meaningful impact across our Trust enabling our academies to invest in resources to support our students to flourish e.g. investment in resources to support students with special educational needs, additional funds to enhance curriculum resources, additional expenditure to respond to an ever-changing technological landscape and funds to add to our staff professional development offer. These savings would allow us to redirect vital resources towards supporting our pupils and staff.

Stability

While we understand WYPF's focus on stability, the current cost pressures facing academies mean that surplus funds would be better used to support educational outcomes. Stability is not our priority at this time, and we are confident in our ability to manage future fluctuations in contribution rates.

Prudence

We note WYPF's intention to build in additional prudence to its funding strategy. Given the strong funding position, we do not believe this is justified. We urge WYPF to release some of this prudence to enable lower employer contribution rates. Specifically:

* The Probability of Funding Success should not be increased and could be returned to previous levels.
* The funding buffer is no longer necessary.
* The period over which surplus is used to reduce employer contributions could be shortened

Key Technical Points and Questions

* Why is an 80% Probability of Funding Success now considered appropriate, when 76% and 69% were acceptable in previous valuations?
* Why retain the 105% buffer when it was introduced for specific circumstances in 2022?
* Why propose a 22-year surplus run-off period when a shorter period would reduce contributions further?
* Why phase in contribution changes over six years when immediate implementation from April 2026 is feasible?
* Can Scheme surplus be used to pre-fund redundancy payments to help stabilise these costs?

Consultation Process

We are concerned by the lack of sensitivity analysis and limited engagement with employers prior to the draft FSS. I ask:

* What is WYPF's process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will feedback be reflected in the final decision?
* Is there sufficient time and resource to review all responses?

The timing of this consultation- commencing during the summer holidays-was not ideal for Multi Academy Trusts. I would like to request an extension to ensure all employers have time to respond, and that future consultations are better timed and communicated.

I respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Abbey MAT – Trust Board

Re: Funding Strategy Statement Consultation - Governance and Value for Money Concerns

As the Board of Trustees for Abbey Multi Academy Trust, we write from a governance perspective as stewards of public funds. Our Trust's strategic priorities - Our People, Our Organisation, Our Educational Standards, Our Christian Mission and Our World - guide every decision we make.

Ensuring value for money is central to our ability to deliver on these priorities and to maximise the impact of every pound spent for our pupils, staff and wider community.

We are concerned about the high levels of employer contribution rates proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for Money and Use of Public Funds

Our advisers have explained that financial conditions have changed substantially since the 2022 valuation, resulting in a much stronger funding position for WYPF. In this context, we would expect to see significant reductions in employer contribution rates over the next three years. We are concerned that, despite this improved picture, all levers within the FSS appear to have been used to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children we serve.

Impact on Abbey MA T's Strategic Priorities

A reduction in employer contributions would have a direct and positive impact on our ability to invest in our strategic priorities:

Request for Reduced Contributions

Given the improved funding position, we respectfully request that the employer contribution rate be reduced to 6% for the next three years, up to the next valuation. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our schools.

Key Technical Concerns

Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.

Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?

Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Governance and Consultation Process

We are also concerned about the consultation process itself. No sensitivity analysis has been provided and there appears to have been limited engagement with employers before setting the draft FSS. We ask:

* What is WYPF's process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?

The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We therefore request that the consultation period is extended to allow all employers within WYPF time to respond and to ensure that the process is robust and meaningful.

We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

Conclusion

Given our responsibilities as stewards of public funds and our commitment to delivering excellence across all our strategic pillars, we urge WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions - specifically to 6% - reflecting the improved funding position and that unnecessary prudence is not built into the strategy at the expense of value for money for schools and pupils.

A reduction in employer contributions would enable Abbey Multi Academy Trust to invest more in our people, our organisation and our pupils - delivering greater value for money and supporting our mission to transform lives.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

## Abbey MAT – Head of HR

I am writing as a representative of Abbey Multi Academy Trust to provide my response to the Funding Strategy Statement (FSS) consultation. We appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees’ pensions.

Impact on Our Organisation

A reduction in employer contributions would have a meaningful impact on our organisation, freeing up resources that could be redirected to essential services and support for our staff and beneficiaries. In the current climate, where budgets are increasingly stretched, every pound saved on pension contributions can be used to maintain and improve the services we provide. As Head of HR, budgetary pressures are leading to very uncomfortable choices impacting staff workload and wellbeing and then inevitably our children and young people in terms of their choices and experiences.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that employers are currently experiencing, we believe that money could be better spent supporting our staff and the communities we serve, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as an organisation we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

• The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

• The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.

• With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?

• The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Abbey MAT – Head Teacher

Re: Funding Strategy Statement Consultation – Abbey Multi Academy Trust Response

I am writing as Head Teacher within Abbey Multi Academy Trust to provide our response to the Funding Strategy Statement (FSS) consultation. Thank you for the opportunity to contribute; I wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members. Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees’ pensions.

This is a crucial moment for our school Christ Church Upper Armley, and a reduction in these rates would have a direct and meaningful impact on our budget. The savings generated could allow us to employ two additional Teaching Assistants, significantly enhancing our capacity to support the growing needs of our most vulnerable pupils. It would also enable us to subsidise residential trips, ensuring that all children can access enriching experiences regardless of their financial background.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.

With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?

The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

• What is WYPF’s process for reviewing and responding to employer feedback?

• Will a working group be established to review responses?

• How will responses be reflected in the final decision?

• Is there sufficient time and resource to review all feedback before decisions are made?

The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that you extend the current consultation so that all employers within the West Yorkshire Pension Fund have time to respond and that all future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Abbey MAT – Senior Management Accountant

Re: Funding Strategy Statement Consultation – Abbey Multi Academy Trust Response

I am writing on behalf of Abbey Multi Academy Trust in my capacity as Senior Management Accountant to provide our response to the Funding Strategy Statement (FSS) consultation. We appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees’ pensions.

Financial Impact on Our Organisation

As a Senior Management Accountant, I am acutely aware of the pressures on public sector budgets. A reduction in employer contributions would allow us to reallocate resources to frontline services and staff support. For example, reduce the need for any staff restructures just to save money, increase funding to help support staff and student mental health and wellbeing. These are just a couple of areas where financial flexibility can make a tangible difference.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that employers are currently experiencing, we believe that money could be better spent supporting our staff and the communities we serve, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as an organisation we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence and Surplus Management

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

• The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

• The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.

• With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?

• The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Abbey MAT – Chief Financial Officer

Thank you for the opportunity to respond to the consultation on the Funding Strategy Statement (FSS) for the West Yorkshire Pension Fund (WYPF). This consultation comes at a critical time, given the significant changes in the funding and investment landscape since the last valuation.

It is essential that the Fund carefully considers employers’ views to ensure the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders. I respectfully ask that you give serious consideration to my response and the points raised, and I am open to meeting with you to discuss these in more detail if helpful.

Impact Statement

As an organisation with three secondary and five primary schools, our WYPF contributions represent a significant proportion of our overall budget. As stewards of public funds, we have a duty to ensure value for money in all areas, including pension contributions. Every pound saved can be redirected to support our students and staff.

A reduction in pension contributions would enable us to:

• Hire additional staff, improving classroom support and reducing workloads.

• Enhance mental health services for students, addressing post-pandemic needs.

• Provide better support for vulnerable learners, particularly those with SEN.

• Invest in educational resources, technology, and enrichment activities.

• Stabilise operational costs, such as redundancy payments, allowing for better long-term planning.

Given the improved funding position of the LGPS, reducing contribution rates is both financially prudent and morally right. It would allow us to invest more in education without compromising the scheme’s stability or members’ benefits.

Request

I request that you consider enabling a reduction in our contributions to 6% for the next three years, in line with member contributions. This would provide much-needed financial flexibility and allow us to redirect vital resources back into our schools. Our contributions over the past three years have helped create the current surplus, and it is critical that these funds are not allowed to accumulate further while we face staffing reductions.

I also refer to the collective views expressed in the letter shared with the WYPF Advisory Panel on 24th July, and to the similar positions taken by local authorities, including Leeds and Calderdale Councils.

We have dedicated substantial time to upskilling ourselves to fully understand the process and to ensure we are aware of the implications of requesting a reduction in employer contributions.

Key Points

Stability of Contributions

While I understand the importance of stability, it is not my key priority at this valuation. The significant improvements in the Scheme’s funding position mean that maintaining current contribution rates for the sake of stability is not appropriate. Overfunding the Scheme at a time when public funds are needed elsewhere is not justifiable. I would prefer to see contributions re-set to reflect the true cost of providing benefits, without additional prudence.

Short-Term Reduction

The improved funding position should support a significant reduction in contributions in the short term, allowing us to recoup overpayments. This approach has been adopted by other LGPS funds.

Technical Questions and Concerns

1. Why has the Probability of Funding Success been increased? Is this solely to maintain employer contributions at current levels?

2. How was the 80% rate chosen, and why is it considered appropriate when lower rates were previously accepted?

3. The 105% buffer prevents use of surplus below this threshold to reduce contributions. Why is this buffer still needed?

4. Why is a 22-year period suggested for running off the surplus, rather than a shorter period such as six years?

5. Is it possible to use the Scheme surplus to pre-fund redundancy payments, to stabilise these costs?

Clear responses to these questions are essential for a transparent and robust consultation.

Consultation Process

I have several observations about the consultation process:

No sensitivity analysis has been provided.

There appears to have been limited engagement with employers before setting the draft FSS.

The timing of the consultation, over the summer holidays, was not ideal for Multi Academy Trusts, this is the second time a consultation has been opened in the run up to school holidays.

There is an assumption that the consultation will reach the right people within MATs, which is not always the case.

I request that you:

1. Clarify how employer responses will be used.

2. Consider establishing a working group to review feedback.

3. Explain how responses will be reflected in final decisions.

4. Ensure sufficient time and resources are allocated to review all responses.

5. Extend the consultation deadline and directly contact all finance contacts within the West Yorkshire Employers Pool.

I urge you to ensure the consultation process is transparent, robust, and genuinely responsive to employer feedback.

## Airedale Academy Castleford Trust – Headteacher

I am writing as Head Teacher of Airedale Academy, part of Castleford Academy Trust, to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

To illustrate the scale of the impact, an 11.4% reduction in employer contributions to 6% would mean £200,000 per year could be redirected back to the education of Airedale Academy pupils. This could enable us to employ the equivalent of 2.5 additional teachers. Such a change would make a huge difference to our academy.

Stability We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Airedale Infants & Airedale Junior Academies Castleford Trust – Headteacher

I am writing as Head Teacher of Airedale Infants & Airedale Juniors Academies, part of Castleford Academy Trust, to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees' pensions.

To illustrate the scale of the impact, an 11.4% reduction in employer contributions to 6% would mean £123,000 per year could be redirected back to the education of pupils at Airedale Infants & Airedale Juniors Academies. This could enable us to employ the equivalent of 1.5 additional teachers. Such a change would make a huge difference to our academy.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

• The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

• The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.

• With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?

• The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

• Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

• What is WYPF’s process for reviewing and responding to employer feedback?

• Will a working group be established to review responses?

• How will responses be reflected in the final decision?

• Is there sufficient time and resource to review all feedback before decisions are made?

• The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Aspire Schools Trust – Chief Financial Officer

There appears to be a clear opportunity to provide a significant benefit to contributing employers via a reduction in the contribution rate. The funding levels as of 31st March 25 appear to be very healthy and, even when considering current economic forecasts, there does not appear to be a long-term need to hold such levels. I appreciate however that a long term view is often taken and without understanding the more detailed aspects of the risk profiles attached to the fund it would be difficult to comment as to whether or not the current funding level is considered good or bad.

The harsh reality of finances in the education sector must surely be a key consideration and any strategy that could unlock funds over the next three years would be welcomed by the sector. A balance between a reduction in contribution rates and risk can be achieved.

## Atlas Community Primary School – Headteacher

Re: Funding Strategy Statement Consultation – Governance and Value for Money Concerns

As the Headteacher of Atlas Community Primary School, I write from governance and operational perspectives as stewards of public funds. We have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community. We are therefore concerned about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for Money and Use of Public Funds

Our advisors have explained that financial conditions have changed substantially since the 2022 valuation, resulting in a much stronger funding position for WYPF. In this context, we would expect to see significant reductions in employer contribution rates over the next three years. We are concerned that, despite this improved picture, all levers within the FSS appear to have been pulled to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children we serve.

Request for Reduced Contributions

Given the improved funding position, we respectfully request that the employer contribution rate be reduced to 6% for the next three years, up to the next valuation. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our schools.

Key Technical Concerns

• Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

• 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.

• Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?

• Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

• Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Governance and Consultation Process

We are also concerned about the consultation process itself. No sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS. We ask:

• What is WYPF’s process for reviewing and responding to employer feedback?

• Will a working group be established to review responses?

• How will responses be reflected in the final decision?

• Is there sufficient time and resource to review all feedback before decisions are made?

• The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

Conclusion

Given our responsibilities as stewards of public funds, we urge WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions—specifically to 6%—reflecting the improved funding position, and that unnecessary prudence is not built into the strategy at the expense of value for money for schools and pupils.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

## Baildon C of E Primary School, BDAT – Chair of Governors

I write as Chair of Governors of Baildon C of E Primary School, part of the BDAT Multi Academy Trust to respond to the FSS consultation.

BDAT has collaborated with 25+ Trusts across West Yorkshire and with our professional advisors (ISIO) we are now challenging the new 3 year valuation.

The last 3 year valuation in 2022 which had the fund in a 105% surplus saw employer contribution rates increase from 16.4% to the current rate of 17.0%. This has increased the fund surplus 120%. I note that WYPF are suggesting increasing prudence and further increasing surplus funds with a slight reduction in pension contributions.

We have been professionally advised that the fund could go be reduced significantly for nearly 20 years and still be 100%+ funded. Hence our position in requesting the employer’s rate be reduced saving thousands for every school in our Trust.

The amount this would save for my school could for example prevent the need for any future restructure or support 2 additional teaching assistants at a time when school budgets are increasingly stretched. The savings would have such a positive impact on pupil wellbeing allowing schools to spend more on the children.

Key points to note

* Changes in the pensions landscape – our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation was carried out in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates due over the next 3 years
* Request – we understand that this improvement can mean there is an opportunity for WYPF to significantly reduce our contributions – and we ask that the valuation approach allows this to happen – maybe to zero for three years when we know they will be re-assessed
* Stability – it has been highlighted that in setting employer contribution rates, stability is the key focus for the WYPF. However, given the cost pressures that academies are currently experiencing, money could be better spent elsewhere than building up additional surplus within the WYPF. As such, stability is not a priority at this point for us, although more information on what might happen if we pay nothing for three years would be very valuable
* Prudence – we understand that the WYPF is considering building in additional prudence to its funding strategy. Given the strong position the WYPF and its participating employers find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and it could be reduced to what it has been in the past. There does not need to be a funding buffer either. And the period over which surplus is used to reduce employer contributions should also be reduced)

I trust that our concerns and requests will receive your due consideration in this matter and look forward to hearing of a positive outcome in support of my school and the outstanding staff and pupil provision there.

## Baildon C of E Primary School, BDAT – Business Manager

I am writing, as an employer, in response to the FSS consultation, as this is an important matter for our Multi Academy Trust.

Our advisors have highlighted that financial conditions have changed since the last actuarial valuation in 2022, resulting in a significant improvement in the funding position of WYPF. Consequently, we anticipate substantial improvements in funding levels and a considerable reduction in employer contribution rates over the next three years.

The impact of this on our school budget would be highly beneficial. It would enable us to employ additional support staff, bringing direct benefits to our school and making a meaningful difference to the development of all pupils.

I therefore request that WYPF substantially reduces our contributions, and that the valuation approach provides for this outcome - potentially reducing contributions to zero for the next three years, at which point they can be reassessed.

Thank you for considering this request.

## Baildon C of E Primary School, BDAT – Deputy Headteacher

I am writing, as an employer, in response to the FSS consultation. This matter is of great significance to our Multi Academy Trust and to the pupils and families we serve.

Our advisors have outlined that since the last actuarial valuation in 2022, financial conditions have shifted considerably. These changes have led to a marked improvement in the funding position of WYPF. Based on this, we anticipate not only much stronger funding levels but also the potential for a substantial reduction in employer contribution rates over the coming three years.

For schools such as ours, the impact of this would be transformative. Every pound released from employer contributions would be directly reinvested into our core mission: supporting children's learning and development. Specifically, reduced contributions would allow us to recruit additional support staff, providing targeted assistance in classrooms, improving outcomes for pupils, and relieving pressure on teachers. This is a direct and tangible benefit for the young people in our care, and by extension, for the communities we serve.

In light of these improvements to WYPF's financial position, I strongly urge that employer contributions be significantly reduced, with the valuation approach designed to make this possible. A reduction - potentially even to zero for a three-year period before reassessment - would not only reflect the improved funding position but would also free up vital resources for schools at a time when demand for support has never been higher.

Thank you for considering this request and for recognising the difference such a decision could make to pupils, staff, and families across our Trust.

## Baildon C of E Primary School, BDAT – Foundation Governor

As a Governor at Baildon C of E Primary School, part of the Bradford Diocesan Academies Trust (BDAT), I am writing to you concerning the West Yorkshire Pension Fund - Funding Strategy Statement Consultation.

BDAT has collaborated with 25+ Trusts across West Yorkshire and with our professional advisors (ISIO) we are now challenging the new 3 year valuation.

The last 3 year valuation in 2022 which had the fund in a 105% surplus saw employer contribution rates increase from 16.4% to the current rate of 17.0%. This has increased the fund surplus 120%. I note that WYPF are suggesting increasing prudence and further increasing surplus funds with a slight reduction in pension contributions.

We have been professionally advised that the fund could go from 17% to 6% for nearly 20 years and still be 100%+ funded. Hence our position is that we want the employer’s rate to reduce to 6% saving thousands for every school and £1.6m per annum for the Trust.

The amount this would save for my school would potentially prevent the need for any restructure or could support 2 additional teaching assistants.

Key points

* Changes in the pensions landscape – our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation was carried out in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates due over the next 3 years
* Request – we understand that this improvement can mean there is an opportunity for WYPF to significantly reduce our contributions – and we ask that the valuation approach allows this to happen – maybe to zero for three years when we know they will be re-assessed
* Stability – it has been highlighted that in setting employer contribution rates, stability is the key focus for the WYPF. However, given the cost pressures that academies are currently experiencing, money could be better spent elsewhere than building up additional surplus within the WYPF. As such, stability is not a priority at this point for us, although more information on what might happen if we pay nothing for three years would be very valuable
* Prudence – we understand that the WYPF is considering building in additional prudence to its funding strategy. Given the strong position the WYPF and its participating employers find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and it could be reduced to what it has been in the past. There does not need to be a funding buffer either. And the period over which surplus is used to reduce employer contributions should also be reduced)

I trust that our concerns and requests will receive your due consideration in this matter and look forward to hearing of a positive outcome for my school and the outstanding staff and pupil provision there.

## Bradford Diocesan Academies Trust – Board of Trustees

On behalf of the Board of Trustees of Bradford Diocesan Academies Trust (BDAT), we write in response to the consultation on the draft Funding Strategy Statement (FSS) issued in August 2025. We appreciate the opportunity to respond to this important formal consultation following our early engagement with West Yorkshire Pension Fund.

Proposal for Employer Contribution Rate Adjustment

We note with interest the Fund’s strong financial position, with an indicative surplus funding level of £2,970m based on the most recent valuation, and the adoption of a risk-based funding approach that concentrates prudence in the discount rate while applying best-estimate assumptions elsewhere. The proposed increase in prudency of 80% (2025) probability of funding success up from 76% (2022) to support long term stability of the fund seems to be over cautious with such a large surplus balance.

In light of this, BDAT formally proposes that the employer contribution rate be reduced to 6%, aligning with the employee contribution rate. This recommendation is grounded in the following considerations:

* Alignment with FSS Objectives: The FSS prioritises solvency, stability of employer rates, and long-term cost efficiency. A reduction in employer contributions is consistent with these principles, particularly given the Fund’s surplus position and the actuarial confidence underpinning the current valuation.
* Actuarial Support: Aon’s valuation methodology, as outlined in the FSS, supports stable contribution outcomes through a trajectory period of 20 years and a discount rate of 4.5% for secure employers. This provides sufficient headroom to accommodate a lower employer rate without compromising the Fund’s integrity.
* Trust-Level Financial Impact: BDAT operates 21 academies across Bradford and is a significant contributor to the Fund. A reduction in the employer rate to 6% would yield annual savings in excess of £1.7m (equivalent of 68 full time teaching assistants), based on current payroll levels. These savings would be reinvested directly into:
  + Recruitment and retention of frontline teaching staff
  + Recruitment and retention of frontline teaching assistants supporting our most vulnerable students
  + Enhancement of educational outcomes across our schools
  + Enhancement of cultural capital opportunities
  + Increased educational resources supporting the latest curriculum

This reallocation would materially strengthen our capacity to deliver high-quality education across our 21 academies in Bradford.

Impact on employer risk

As informed employers we appreciate there is always a risk that contributions may need to increase in the future. We also accept that paying lower contributions now means there is a greater chance of contributions needing to increase in the future as we are not continuing to build up an even larger cushion of surplus in the Scheme. We believe the risk is, in large part, driven by the investment strategy.

We would like to engage with the Administering Authority to understand the options for how the surplus and investment strategy can be managed to lower risk of future contributions increasing. We would ask that you consider how we can engage on this subject.

Request for Extension to Consultation Period

We respectfully request that WYPF consider an extension to the consultation deadline. The proposed changes are complex and have significant implications for employers across the fund. An extension would:

* Allow for more time to consider the wider LGPS who are consulting later than West Yorkshire Pension Fund.
* Enable time for the newly formed sub-committee of the Pension Panel to consider greater employer engagement.
* Time to reflect on the wider aspects of value for money for public funds across the education sector
* Support WYPF in receiving more informed and representative feedback from its employer base

This would be in keeping with the Fund’s stated commitment to employer engagement and transparency, as outlined in the FSS.

Conclusion

BDAT has supported the strategic direction of the West Yorkshire Pension Fund via the FSS over many years and acknowledges the sound actuarial principles. However, this proposal in the FSS of increased stability and prudence of the funds seems unnecessarily cautious. This will lead to increased funds across the next 3 years adding to the already large surplus of £3b. We believe that a reduction in the employer contribution rate to 6% remains both financially prudent and operationally beneficial, and we urge WYPF to give this proposal due consideration. We also request an extension to the consultation period to ensure that all employers can provide robust and thoughtful responses.

BDAT as an employer within the fund would like the WYPF to consider how we could support any investment strategies supporting long-term stability of lower employer contribution rates.

We remain committed to working in partnership with WYPF to ensure the continued success of the Fund and the wellbeing of our staff and communities.

## Bradford Diocesan Academies Trust – Chief Financial Officer

As Chief Financial Officer of Bradford Diocesan Academies Trust (BDAT), I am writing to formally respond to the consultation on the draft Funding Strategy Statement (FSS).

We appreciate the Fund’s continued commitment to actuarial rigour, transparency, and employer engagement, and welcome the opportunity to contribute to this important process.

1. Actuarial Context: 2025 Triennial Valuation

The 2025 valuation, prepared as at 31 March 2025, will determine employer contribution rates for the period 1 April 2026 to 31 March 2029. Aon Hewitt, reappointed as Fund Actuary until 2033, has proposed a funding methodology that concentrates prudence in the discount rate, while setting all other assumptions at best estimate. This aligns with the principles of the LGPS Regulations and the Scheme Advisory Board’s guidance.

Key assumptions include:

* Discount rate: Derived using a stochastic model targeting an increase to 80% probability of funding success for secure scheduled and subsumption body employers.
* CPI inflation: Used for pension increases and revaluation of pension accounts.
* Mortality assumptions: Updated to reflect the latest CMI 2024 model, with consideration of post-pandemic longevity trends.
* Past service liability uplift: A one-off 10% uplift

The Fund’s current funding level of 117.5% (31 March 2025) indicates a surplus position, and the proposed methodology supports stable primary rates in accordance with Regulation 62(5) of the LGPS Regulations.

The continued reference to the 105% buffer means any surplus below this threshold cannot be used to reduce our contributions. This buffer was introduced last time to reflect the specific circumstances of the 2022 valuation. It is not needed this time, and we should be able to use our full surplus to reduce contributions.

**2. Proposal: Reduction of Employer Contribution Rate to 6%**

BDAT proposes a reduction in the employer contribution rate to **6%**, aligning with the employee contribution rate. This recommendation is supported by:

* **Actuarial Justification**: The Fund’s surplus position and Aon’s valuation model provide sufficient headroom to reduce the primary rate without compromising solvency. The use of probabilistic funding targets and employer-specific discount rates ensures that risk is appropriately managed.
* **Covenant Strength**: BDAT is a secure scheduled body with a strong covenant and long-term participation in the Fund. Our liabilities are not expected to crystallise in the short term, justifying a lower contribution rate under the Fund’s risk-based framework.
* **Funding Strategy Alignment**: The FSS prioritises solvency, stability, and cost efficiency. A reduced rate supports these objectives and reflects the Fund’s actuarial and investment strength.
* **Investment Strength**: A strong investment strategy will maintain long-term stability in lower employer contribution rates
* **105% Buffer:** The continued reference to the 105% buffer means any surplus below this threshold cannot be used to reduce our contributions. This buffer was introduced last time to reflect the specific circumstances of the 2022 valuation. It is not needed this time, and we should be able to use our full surplus to reduce contributions.

**3. Financial Impact Analysis: BDAT Trust-Level Savings**

BDAT comprises 21 academies (16 primary, 5 secondary), educating over 10,800 pupils and employing approximately 1,600 staff. Based on current payroll data and contribution rates, a reduction in the employer rate to 6% would generate annual savings of approximately £1.7 million.

These savings would be reinvested directly into educational delivery and operational sustainability:

|  |  |  |
| --- | --- | --- |
| **Academy** | **Estimated Annual Savings (£)** | **Strategic Impact** |
| Buttershaw Business & Enterprise College | £210,000 | SEND provision and safeguarding capacity, |
| Immanuel College | £185,000 | Expansion of KS4/KS5 curriculum and pastoral support |
| Bradford Forster Academy | £170,000 | Staff retention and enrichment programmes |
| St Oswald’s CE Primary | £65,000 | Early years investment and phonics intervention following PEIA strategies |
| St John’s CE Primary | £60,000 | Literacy and numeracy catch-up initiatives |
| Christ Church Academy | £58,000 | Digital learning and pupil premium support |
| East Morton CE Primary | £55,000 | Inclusion and wellbeing programmes |
| St Philip’s CE Primary | £52,000 | CPD and leadership development |
| Remaining 14 BDAT Academies | £845,000 | Collective investment in SEND CPD for staffing. |

These figures are based on proportional payroll allocations and reflect the strategic priorities of each academy. The savings would materially enhance BDAT’s ability to deliver high-quality education, particularly in areas of high deprivation.

**4. Request for Extension to Consultation Period**

Given the complexity and significance of the proposed changes, BDAT formally requests an extension to the consultation deadline beyond early October 2025. This would:

* Allow for more time to consider the wider LGPS who are consulting later than West Yorkshire Pension Fund.
* Enable time for the newly formed sub-committee of the Pension Panel to consider greater employer engagement.
* Time to reflect on the wider aspects of value for money for public funds across the education sector
* Support WYPF in receiving more informed and representative feedback from its employer base

This request aligns with the Fund’s collaborative ethos and the updated guidance issued by MHCLG.

**5. Conclusion**

BDAT has supported the strategic direction of the West Yorkshire Pension Fund via the FSS over many years and acknowledges the sound actuarial principles. However, this proposal in the FSS of increased stability and prudence of the funds seems unnecessarily cautious. This will lead to increased funds across the next 3 years adding to the already large surplus of £3b. We believe that a reduction in the employer contribution rate to 6% remains both financially prudent and operationally beneficial, and we urge WYPF to give this proposal due consideration. We also request an extension to the consultation period to ensure that all employers can provide robust and thoughtful responses.

BDAT as an employer within the fund would like the WYPF to consider how we could support any investment strategies supporting long-term stability of lower employer contribution rates.

We also request an extension to the consultation period to ensure that all employers can provide thoughtful and data-driven responses.

## Bradford Diocesan Academies Trust –Director of Secondary Education

Re: Funding Strategy Statement Consultation – Bradford Diocesan Academies Trust Response

I am writing as Director of Secondary of Bradford Diocesan Academies Trust to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees’ pensions.

Educational Impact

The financial strain on schools and academies has never been more critical. Rising costs, unfunded pay awards, and inflationary pressures have made balancing school budgets increasingly difficult. If WYPF were to reduce employer contribution rates, it would allow schools those that I support real, tangible outcomes that matter deeply to our school community such as:

* Preserve and protect staffing levels
* Avoid redundancy and restructure programmes
* Invest in pupil enrichment activities such as school trips, mental health and wellbeing support, extracurricular clubs, and counselling services
* Provide academic interventions and further support learning recovery
* Improve school facilities and ensure a safe, inclusive learning environment

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Bradford Diocesan Academies Trust – Head of Safeguarding

Re: Funding Strategy Statement Consultation – Bradford Diocesan Academies Trust Response

I am writing as the Head of Safeguarding at Bradford Diocesan Academies Trust to provide a response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

The world of funding and finance is not my area of expertise but I would like to begin by outlining some of the points that I feel are pertinent in this regard, before moving on to the impact that the decisions could have on the lives of children and young people.

Changes in the Pensions Landscape

The financial leaders within my organisation have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022.

Request for Reduced Contributions

It is my understanding that these improvements create an opportunity for WYPF to significantly reduce the employer contributions. This would directly increase the budgets of our schools and, therefore, their ability to safeguard and promote the welfare of pupils, particularly the most vulnerable.

I respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we would not wish to pay less than WYPF members.

Stability

Stability is naturally a key focus for WYPF when setting employer contribution rates. Given the cost pressures that academies are currently experiencing, however, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can

budget for potential future increases and will be able to meet our contributions as they fall due. We have extremely rigorous budgeting and audit processes in place that support this, and our Trust Board are hyper-vigilant in holding financial leaders to account in this area.

Prudence

It is my further understanding that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, I do not feel this is justified. This is also coming from an individual who has a pension with the WYPF.

Instead, I would request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

What Impact Could this Have?

As previously stated, in recent years school budgets have been, and continue to be, under extreme pressure. Ultimately, schools have to ensure that they have a sufficient number of teachers in classrooms to provide education for the pupils and supervise them safely. Resources are allocated accordingly.

The unfortunate, and frankly heartbreaking, consequence of this is that support staff are not able to be retained in staffing structures in order to make budgets balance. These people are teaching assistants, learning mentors, mental health support workers, safeguarding officers, pastoral leads and welfare managers.

Job titles might differ from one school to the next, but one thing remains consistent – these are the people who support the most vulnerable children to give them the best chance of achieving and thriving in school, and going on to become successful adults who contribute positively to society and communities.

It may be children who have learning difficulties and need a bit of extra help to learn to read and write, perhaps those who suffer a shock bereavement of a family member and need someone to provide them with a listening ear and comforting words, or those who are experiencing horrific abuse of any kind, who need a champion to protect them, advocate for them and step in when they are experiencing harm.

The ability of teachers to fulfil these roles whilst also trying to teach English, Geography or Physics to 29 other children, simply pales in comparison to the ability of having dedicated and specialist staff who are trained, and have the capacity, to dedicate to these children.

Children with additional needs, those from disadvantaged backgrounds and those who experience trauma, already face significant barriers that other children do not. You have the opportunity to be an organisation that helps us to do whatever we can to support these children, to give them the life chances that surely every child deserves.

One of your commitments clearly states your belief that, ‘companies need to understand a broader array of stakeholder interests, not solely those of its shareholders and should seek to make a positive contribution to the welfare of employees, the communities in which they operate, and to the economy and society more broadly’.

I would put it to you that a decision not to reduce contributions as we are requesting would be entirely at odds with this commitment. It is no secret that schools are doing more and more to support children, families and communities, amongst the most challenging and complex landscapes educators have ever experienced.

What are you going to do to help?

## Woodlands C of E Primary School (BDAT) – Headteacher

I wish to highlight the following points for consideration in the pension valuation consultation:

Financial conditions have improved significantly since the 2022 actuarial valuation, resulting in a stronger funding position for WYPF. This creates an opportunity to reduce employer contribution rates—potentially to zero for a three-year period—subject to future reassessment. While stability is usually prioritised, current financial pressures on academies make surplus contributions less appropriate. We urge a valuation approach that reflects this context.

We do not support increased prudence in the funding strategy. The current strength of WYPF justifies a more flexible approach, including lowering the Probability of Funding Success and shortening the surplus amortisation period.

Redirecting savings from pension contributions would have a transformative impact on our school. Funds could be reinvested in:

* Educational Trips – Enriching learning through visits to museums, theatres, and historical sites.
* Staffing & Support – Hiring more teachers and support staff for personalised learning and wellbeing.
* Mental Health Services – Expanding counselling and wellbeing programmes.
* Enrichment Activities – Offering sports, music, coding, and drama to build confidence and creativity.
* Learning Environments – Upgrading classrooms, technology, and facilities.
* Support for Vulnerable Pupils – Targeted help for SEND and disadvantaged students to close attainment gaps.

Every pound saved is a pound that can directly enhance pupil outcomes, wellbeing, and future prospects. This is not just a financial decision—it’s an investment in education.

## Beckfoot Heaton School – Headteacher

I am writing as Head Teacher of Beckfoot Trust to provide our response to the Funding Strategy Statement {FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees' pensions.

Your support would impact significantly on our school, particularly as we have had a 50% increase in children admitted to school with complex educational and health needs over the last two years – the number of children with Educational, Health and Care Plans has doubled. Every day, we find ourselves balancing meeting the needs of our most vulnerable children and maintaining a high quality, interactive curriculum which enables all children to meet their potential.

In addition to this, the complexity of need in Early Years mirrors main school but this is an extra challenge in the nurseries due to the ratio requirements. Reducing the contribution rate for us, would enable us to buy 4 more full time staff to support the most vulnerable children from the outset, which will help us close the disadvantage gap from the outset.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As ,such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
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* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there. appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF's process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation Was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask· that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Beckfoot Phoenix School – Headteacher

I am writing as Head Teacher of Beckfoot Phoenix, as part of the Beckfoot Trust to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

The reduction in rate for Beckfoot Phoenix could have a considerable impact on the lives of the children who our school serves. As a Headteacher I am faced with making difficult decisions when allocating our budget, and all too often the enrichment activities are those that we are forced to cut. As a special school we are receiving more pupils on reduced funding as there are not enough spaces in the local authority to meet the needs of the children. We are looking to have a reduction of £135,645.43. This would massively impact and dilute the offer that the children receive whilst in our care.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

· The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

· The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.

· With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?

· The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

· Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

· What is WYPF’s process for reviewing and responding to employer feedback?

· Will a working group be established to review responses?

· How will responses be reflected in the final decision?

· Is there sufficient time and resource to review all feedback before decisions are made?

· The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Beckfoot Priestthorpe Primary School – Headteacher

I am writing as Head Teacher of Beckfoot Trust to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

This reduction would save us £27,814.55 which in our current staffing/budget crisis would allow us to appoint an additional member of staff to provide class cover, teach additional groups and run much needed interventions.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
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* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Beckfoot Trust – Headteacher

I am writing as Head Teacher of Beckfoot Trust to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

The additional funds would make an incredible difference to our school most especially our ability to meet the needs of our most vulnerable students through such things as staffing, training, wider school experiences and resources.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due. 2

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

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* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Beckfoot Thornton School – Headteacher

I am writing as Head Teacher of Beckfoot Thornton, as part of the Beckfoot Trust, to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

The reduction in rate for Beckfoot Thornton could have a considerable impact on the lives of the students who our school serves. As we serve a high level of deprivation, £224522.53, and this shift could help provide immediate financial relief in a period when budgets are difficult. As a Headteacher I am faced with making difficult decisions when allocating our budget, and all too often the enrichment activities are those that we are forced to cut. As a school we are committed to developing students knowledge, cultural capital and character so taking students on things such as Duke of Edinburgh, visits to the theatre, providing additional counselling support and supporting families at difficult times make a huge difference to their lives.

Stability We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
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* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Beckfoot Trust – Board of Trustees

As the Board of Trustees for Beckfoot Trust, we write from a governance perspective as stewards of public funds. We have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community. We are therefore concerned about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation, and the fact that we have little visibility of, or control over the decisions made by LGPS/WYPF regarding the use of the money we pay into the fund on behalf of members.

Value for Money and Use of Public Funds

Our advisors have explained that financial conditions have changed substantially since the 2022 valuation, resulting in a much stronger funding position for WYPF. In this context, we would expect to see significant reductions in employer contribution rates over the next three years. We are concerned that, despite this improved picture, all levers within the FSS appear to have been pulled to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children we serve.

Request for Reduced Contributions

Given the improved funding position, we respectfully request that the employer contribution rate be substantially reduced to 6% for the next three years, up to the next valuation date. This reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our schools.

Key Technical Concerns

Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

* 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.
* Inadequate consultation: We consider many aspects of this consultation to have been poorly handled; lack of transparency, little time for schools to respond, and with an unacceptably short period od for your consideration of responses following consultation closure. The timing of this consultation was not ideal for School Trusts, as it coincided with the summer holidays.
* No sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

We ask specifically:

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* Future consultations are better organised, supported with more information and more timely and effective communication to ensure all relevant stakeholders are reached.

Conclusion

Given our responsibilities as stewards of public funds, we urge WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions—specifically to 6% or less, reflecting the improved funding position, and that unnecessary prudence is not built into the strategy at the expense of value for money for schools and pupils.

Our Chair has advised that he will be writing to the Chair of the WYPF to further expand on these points.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

## Beckfoot Trust – Chief Executive Officer

As Chief Executive Officer and Accounting Officer of Beckfoot Trust, I write to set out our formal response to the Funding Strategy Statement (FSS) consultation. We recognise the importance of this process and appreciate the opportunity to contribute our perspective on behalf of our Trust Board, our staff, and the children and families we serve. As Accounting Officer I am accountable directly to parliament for scrutiny of all spend and for securing value for money and as such, I am very invested in securing a proper consultation in relation to the WYPF funding strategy.

Strategic and Financial Impact

Beckfoot Trust is responsible for the education and welfare of over seven thousand pupils across our schools. We serve some of the highest areas of deprivation in the country and provide an education to children with profound learning and medical needs in our two special schools. The scale of our pension contributions to the West Yorkshire Pension Fund means that any changes to the funding strategy have a direct and material impact on our ability to deliver high-quality education and support. In the current context, where schools face unprecedented financial pressures and rising student need, it is imperative that public funds are deployed with maximum efficiency and impact.

Technical Observations and Concerns

Upon review of the draft FSS, I wish to highlight several technical matters that, in our view, require urgent reconsideration:

* The proposed increase in the Probability of Funding Success is not justified by the current funding position. This adjustment appears to serve primarily to maintain employer contributions at their present level, rather than reflecting the improved financial health of the Scheme. We request a clear rationale for this change, particularly as lower probabilities have been deemed sufficient in previous valuations.
* The continued application of a funding buffer restricts the use of surplus to reduce contributions. This buffer was introduced for the specific circumstances of the previous valuation and is not warranted in the current environment. We urge the Fund to allow employers to benefit fully from the surplus that has accrued.
* The suggestion to run off the Scheme surplus over an extended period is excessively cautious. A shorter period would enable more immediate and meaningful reductions in contributions, without increasing risk to the Fund.
* The proposal to phase in revised contribution rates over several years is not appropriate given the significant improvements in funding. We request that new, lower rates are implemented in full at the earliest opportunity.
* We would welcome the opportunity to use Scheme surplus to pre-fund redundancy payments, which would help us manage these costs more effectively and provide greater financial stability for our schools.

Governance and Consultation Process

I am concerned by the lack of sensitivity analysis and the limited engagement with employers prior to the release of the draft FSS. The short window between the consultation closing and the advisory panel meeting raises questions about the Fund’s ability to thoroughly review and act upon employer feedback. We therefore request:

* Clear communication on how employer responses will be reviewed and incorporated into the final decision-making process.
* The establishment of a working group to consider feedback in detail.
* An extension to the consultation period to ensure all employers have a fair opportunity to participate, particularly given the timing over the summer holidays.
* A commitment to more effective and inclusive engagement in future consultations.

Summary and Position

In summary, Beckfoot Trust does not currently support the general approach of increasing prudence. The Fund is in a strong financial position, and the pursuit of further overfunding is not in the interests of employers, members, or the wider community. We do not believe that overfunded Local Government Pension Schemes are currently justifiable. The approach of increasing prudence is not achieving an appropriate balance between the needs of all stakeholders. We urge the Fund to adopt a more proportionate and transparent approach, which recognises the improved funding position and enables employers to redirect resources to where they are most needed.

My Chief Finance Officer (CFO) is currently working hard to better engage with you. Her letter sets out in detail both the current challenges in our sector and how you could better support us in addressing them.

We remain committed to constructive engagement and would welcome the opportunity to further discuss our responses.

## Beckfoot Trust – Chief Financial Officer

Please find below my response to the Funding Strategy Statement (‘FSS’) consultation for the West Yorkshire Pension Fund (‘WYPF’). I welcome the opportunity to engage with you on this important matter. This consultation comes at a particularly significant time, given the new funding and investment landscape created by the substantial market changes since the last valuation.

I believe it is critical that the Fund carefully considers the views of employers as part of this process, to ensure that the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders.

As you are aware, over the last year Beckfoot Trust has been working collaboratively with other multi academy trusts, investing significant time and working with Isio to ensure we are an informed employer. This consultation is particularly significant to Beckfoot Trust and the staff and children within it, given the positive impact it could have on our pension contributions and, consequently, what this could mean for our schools.

We respectfully ask that you consider our response seriously and reflect on the points we have raised when making your final decisions for the valuation. We are also open to meeting with you to present our views in more detail, should you find this helpful.

Impact Statement

As a Trust with four secondary schools, four primary schools and two special schools, our West Yorkshire Pension Fund contributions make up a significant proportion of our overall budget. As we are dealing with public funds, I feel a strong duty to ensure that there is value for money from these contributions, just as we do with every other penny we spend. This is critical because it has a direct impact on the children in our schools—every penny we save can be redirected back into their education.

There is currently an SEN crisis, and in Bradford in particular, we are struggling to provide enough places for our most vulnerable learners. This is manifesting in overly crowded and underfunded schools, a dangerous situation. Schools are facing significant challenges in the aftermath of the pandemic, they are a fundamentally different place, children are fundamentally different as are families. All of this requires resource in order to better support our children. I believe that education is vital not only for individual children but for the future of our society. Having the right money in our schools now has never been more critical and WYPF has the opportunity to benefit schools and society massively without damaging itself or its members access to a fantastic pension. In short dropping the contribution rate now is morally the right thing to do.

To illustrate the scale of impact, a 11% reduction in pension costs would mean £1.4 million could be redirected directly back into the education of Beckfoot Trust children per year. This would enable us to employ the equivalent of 30 extra teaching assistants or 17 teachers, and provide other much needed but expensive services such as additional mental health services to support our children. In short, such a change would make a huge difference in our schools.

Overview

I believe that the improved funding position of the West Yorkshire Pension Fund can support an immediate and significant reduction in pension contributions, without any increase in the level of risk that Beckfoot Trust and other employers pose to the Scheme. We are solid employers, having regular government income, we also have the DFE guarantee. We have high levels of accountability and scrutiny and do not pose any risk to the Fund.

In light of this, we request that you consider an approach that enables us to reduce our contributions to 6% for the next three years, as we do not wish to pay less than members. This would provide much-needed financial flexibility and allow us to redirect vital resources back into our schools.

As part of the Multi Academy Trust group, I would also like to reference the letter shared with the WYPF Advisory Panel meeting on 24th July, which sets out the collective views of the group. I hope that these perspectives will be given due consideration as you finalise the Funding Strategy Statement.

I am also aware that local authorities have expressed similar views regarding the importance of achieving value for money and the potential for reducing employer contributions. I note, in particular, the signature of Steven Mair of Bradford Council, in the letter that was also shared with the WYPF Pensions Advisory Panel.

Key Points

Stability of Contributions

I understand that a key focus of WYPF is the stability of employer contributions, and that this has been reflected in the approach being proposed for the 2025 valuation. I also recognise that the proposed valuation assumptions and approach are more prudent than those used in the 2022 valuation, with the aim of keeping employer contributions at a similar level.

While I can appreciate the benefits of stability and the certainty it can bring to both WYPF and employers—and why this is relevant for the Scheme—stability is not my key priority at this valuation. Given the significant changes in market conditions since the last valuation and the extent of the funding improvements seen in the Scheme, I do not believe that the usual approach of maintaining stability is appropriate at this time.

I do not think we should continue to anchor to the current contribution rates purely to maintain short-term stability, especially if this results in overfunding the Scheme and requiring employers to pay more at a time when additional cash (which is public money) could be vital elsewhere. If contributions continue at a similar level and WYPF only offers a small reduction, I expect that similar discussions will arise at the next valuation, when contributions will again need to come down—an approach that does not provide true long-term stability.

Instead, I would prefer to see contributions re-set now to a level that reflects the true cost of providing benefits, without increasing prudence as is currently being proposed, and to arrive at a new, stable rate going forward. Given the underlying funding improvements in the Scheme, making this change and reducing

contributions does not pose any more risk to the Scheme than the position agreed at the 2022 valuation, which was considered acceptable at that time.

Short Term Reduction

The financial market changes that created the funding improvements for the Scheme occurred towards the end of 2022. Whilst I acknowledge that a valuation only takes place every three years, if a valuation had happened sooner, we could have reduced our contributions earlier. As a result, Beckfoot Trust has effectively been overpaying into the Scheme since then.

Given this context, I believe the improved funding position should support a more significant reduction in contributions in the short term, allowing us to recoup these overpayments. This is an approach that I am aware has been adopted by other LGPS funds.

As an informed employer, I fully understand that what I am asking for may result in an increase in contributions in the future. However, I am comfortable that Beckfoot Trust can support a future increase if required and will budget appropriately. What we do not need is an overly prudent approach from the Fund, which would effectively reduce our effectiveness as an organisation whose sole aim is to provide the best possible outcomes for our children, simply to provide additional cushioning for the Fund.

Technical Questions and Concerns

I would also like to raise several technical questions regarding the proposed approach in the draft Funding Strategy Statement:

* You have proposed an increase in the Probability of Funding Success from the last valuation.
* Is this change being made purely to maintain employer contributions at a similar level?
* This increases the prudence of WYPF’s approach, and I do not believe additional prudence is needed now, given the improved funding position and the reduced risk of employers being unable to fund benefits.
* How has WYPF chosen the rate of 80%, and why is this considered the right rate when you were comfortable with 76% last time and have previously accepted 69%?
* The continued reference to the 105% buffer means any surplus below this threshold cannot be used to reduce our contributions. This buffer was introduced last time to reflect the specific circumstances of the 2022 valuation. It is not needed this time, and we should be able to use our full surplus to reduce contributions.
* As there is a surplus, running this off over, for example, six years would reduce our contributions further. Why is a 22-year period being suggested?
* The FSS notes that any changes to contributions are typically phased in over six years. We do not want this level of stabilisation and do not believe it is necessary given the significant improvements seen. We request that our revised contribution rate is payable immediately from April 2026.
* Is there a way of using the surplus in the Scheme to pre-fund the cost of redundancy payments? It would be extremely helpful to stabilise these costs rather than having to pay them as a one-off lump sum.

I would appreciate clear responses to these questions, as they are central to ensuring the consultation is robust, transparent, and genuinely responsive to employer needs.

Consultation Approach

I would like to raise several concerns regarding the consultation process for the Funding Strategy Statement. Firstly, no sensitivity analysis has been provided as part of the consultation, and there appears to have been an assumption about what employers want, without any real engagement to understand our actual views before setting the draft FSS.

There are only 14 working days between the consultation closing date and the fund advisory panel meeting. Presumably papers need to be released a week in advance giving only 9 working days to collate responses and to reflect on them and action any changes as a result.

To ensure this consultation is meaningful and not simply a pre-determined outcome, I would appreciate clarity on the following points:

* What is WYPF doing with employer responses to this consultation?
* Is there a plan to set up a working group to review the feedback?
* How will WYPF respond to each employer’s submission?
* How will employer responses be reflected in the final decision-making process?
* Does WYPF have sufficient time and resource to review all responses thoroughly before decisions are made?
* Can you and will you extend the consultation to ensure employers views are heard

I also wish to highlight that the timing of this consultation was not ideal for Multi Academy Trusts, as it took place over the summer holidays. Given that a large proportion of your employers are MATs, and this issue was pointed out in advance, I would ask that you reconsider the timing of future consultations to ensure all employers have a fair opportunity to engage, I would also ask you to extend the period of consultation now to ensure it has been fair and transparent. There is also an assumption that the consultation will automatically reach the right people within MATs, but our group’s experience has shown that this is not always the case.

I urge you to take these points seriously and ensure that the consultation process is transparent, inclusive, and genuinely responsive to employer feedback.

I look forward to receiving your feedback on my letter.

## Beckfoot Trust – employee and scheme member (1)

I am writing as an employee of Beckfoot Trust and a member of WYPF because I care deeply about how our school’s money is spent and the impact this has on our pupils and colleagues. I am concerned about the high level of employer pension contributions being proposed, especially since I understand the West Yorkshire Pension Fund is in a much stronger financial position than it was at the last valuation.

Things have got much harder in schools as budgets have become tighter. Every year, we are being asked to do more with less, and it is getting harder to provide the support and opportunities our children deserve. If employer pension contributions were reduced, it would make a real difference in our schools—freeing up money that could be used directly to support pupils, staff, and essential services.

I understand that financial conditions have improved a lot since 2022, and this means the Fund is much better funded. Because of this, I would expect to see a real reduction in the amount our school has to pay into the pension scheme over the next few years. I am worried that, instead, the Fund seems to be keeping contributions high when this money could be better spent supporting our pupils and staff.

I can see that the Fund wants to be careful and keep things stable, but right now, with all the cost pressures schools are facing, I believe it would be better to reduce contributions and use that money to help children and staff directly. I also understand that the Fund is thinking about being even more cautious than before, but I don’t think this is needed given how strong the Fund’s position is now.

I would like to see the Fund allow for a bigger reduction in contributions. I know this might mean contributions could go up again in the future if things change, but I am confident our school could manage that if needed.

Thank you for considering my views. I hope you will take this feedback seriously and make changes that will help schools like ours make the best use of public money.

## Beckfoot Trust – employee and scheme member (2)

I am writing as an employee of Beckfoot Trust and a member of WYPF because I care deeply about how our school’s money is spent and the impact this has on our pupils and colleagues. I am concerned about the high level of employer pension contributions being proposed, especially since I understand the West Yorkshire Pension Fund is in a much stronger financial position than it was at the last valuation.

Things have got much harder in schools as budgets have become tighter. Every year, we are being asked to do more with less, and it is getting harder to provide the support and opportunities our children deserve. If employer pension contributions were reduced, it would make a real difference in our schools—freeing up money that could be used directly to support pupils, staff, and essential services.

I understand that financial conditions have improved a lot since 2022, and this means the Fund is much better funded. Because of this, I would expect to see a real reduction in the amount our school has to pay into the pension scheme over the next few years. I am worried that, instead, the Fund seems to be keeping contributions high when this money could be better spent supporting our pupils and staff.

I can see that the Fund wants to be careful and keep things stable, but right now, with all the cost pressures schools are facing, I believe it would be better to reduce contributions and use that money to help children and staff directly. I also understand that the Fund is thinking about being even more cautious than before, but I don’t think this is needed given how strong the Fund’s position is now.

I would like to see the Fund allow for a bigger reduction in contributions. I know this might mean contributions could go up again in the future if things change, but I am confident our school could manage that if needed.

Thank you for considering my views. I hope you will take this feedback seriously and make changes that will help schools like ours make the best use of public money.

## Beckfoot Trust – employee and scheme member (3)

I am writing as an employee of Beckfoot Trust and a member of WYPF because I care deeply about how our school’s money is spent and the impact this has on our pupils and colleagues. I am concerned about the high level of employer pension contributions being proposed, especially since I understand the West Yorkshire Pension Fund is in a much stronger financial position than it was at the last valuation.

Things have got much harder in schools as budgets have become tighter. Every year, we are being asked to do more with less, and it is getting harder to provide the support and opportunities our children deserve. If employer pension contributions were reduced, it would make a real difference in our schools—freeing up money that could be used directly to support pupils, staff, and essential services.

I understand that financial conditions have improved a lot since 2022, and this means the Fund is much better funded. Because of this, I would expect to see a real reduction in the amount our school has to pay into the pension scheme over the next few years. I am worried that, instead, the Fund seems to be keeping contributions high when this money could be better spent supporting our pupils and staff.

I can see that the Fund wants to be careful and keep things stable, but right now, with all the cost pressures schools are facing, I believe it would be better to reduce contributions and use that money to help children and staff directly. I also understand that the Fund is thinking about being even more cautious than before, but I don’t think this is needed given how strong the Fund’s position is now.

I would like to see the Fund allow for a bigger reduction in contributions. I know this might mean contributions could go up again in the future if things change, but I am confident our school could manage that if needed.

Thank you for considering my views. I hope you will take this feedback seriously and make changes that will help schools like ours make the best use of public money.

## Bishop Young C of E Academy - Principal

Re: Funding Strategy Statement Consultation – Abbey Multi Academy Trust Response

I am writing as a Principal within Abbey Multi Academy Trust to provide our response to the Funding Strategy Statement (FSS) consultation. Thank you for the opportunity to contribute; I wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members. Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees’ pensions.

If employer contributions were reduced to 6%, the impact for Bishop Young Academy would be transformative. A reduction of £140,353 in the first year alone, and £421,059 over three years, would release substantial resources back into the school. These funds could be redirected towards addressing the significant cost pressures we currently face, such as recruiting and retaining high-quality staff, providing targeted support for pupils with additional needs, and ensuring we can continue to deliver a broad and balanced curriculum. The scale of this saving would make a tangible difference to our school community, directly benefitting both pupils and staff.

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.

With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?

The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?

The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that you extend the current consultation so that all employers within the West Yorkshire Pension Fund have time to respond and that all future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Bolton Brow Primary Academy (Together Learning Trust) – Headteacher and Chair of the Local Governing Committee

As the Chair of Governors and Head Teacher for Bolton Brow Primary School, we are committed to ensuring that public funds are used efficiently to benefit our pupils, staff, and communities. We therefore wish to raise concerns about the approach taken in the draft Funding Strategy Statement (FSS).

Despite the significantly improved financial position of WYPF since the last valuation, the draft FSS maintains employer contribution rates at unnecessarily high levels. In our view, this does not represent value for money and diverts resources away from education.

We respectfully request that employer contributions be reduced to 6% for at least the next three years, reflecting the stronger funding position and ensuring a fairer balance between prudence and affordability.

We are informed by the CFO of the Trust that a 11% reduction to our contribution rate would see a reduction of £40k each year for the next 3 years which would be directly invested back into the classroom. This could allow us to employ additional staff to support the learning of our children or invest the additional funds in resources and/or the school environment. Each £26k reduction would allow the school to employ a teaching assistant which is desperately needed to meet increasing need within the school.

We therefore challenge elements of the strategy which appear overly cautious, including:

* The increased Probability of Funding Success.
* Continued use of the 105% buffer.
* A 22-year surplus run-off period.
* Phasing of contribution changes rather than immediate implementation.

Revising these elements would make available cash to the school to enable school leaders to meet the needs of its pupils, staff and wider community.

In addition, we are concerned about the consultation process. Engagement with employers has been limited, as we understand from the CFO of Together Learning Trust MAT no sensitivity analysis has been provided, and the timing of the consultation has made it difficult for Multi Academy Trusts to participate fully and has not allowed time to consult with schools.

We ask for greater transparency in how employer feedback will be reviewed and reflected in the final FSS.

We ask that the consultation period is extended to enable employers to respond fully and for the WYPF to review in depth the views of the employers.

In conclusion, we urge WYPF to adopt a more balanced valuation approach that reduces contributions, avoids unnecessary prudence, and delivers better value for money for schools and pupils.

## Bradford Forster Academy (BDAT) – Principal

I am writing on behalf of Bradford Forster Academy in response to the consultation on the West Yorkshire Pension Fund (WYPF) Draft Funding Strategy Statement (FSS) 2025. We appreciate the opportunity to contribute to this important process, which will have a significant impact on the financial sustainability of schools and academies across the region.

Context: Severe Financial Pressures on Schools

Schools and academies are currently facing unprecedented financial challenges. Rising costs, real-terms reductions in funding, and increasing demands on resources mean that every pound spent must be carefully justified. Pension contributions represent a substantial and growing cost for employers in the education sector. Any opportunity to reduce these costs, even temporarily, would provide vital breathing space and help protect frontline education services.

Key Points Supporting a Reduction in Employer Contributions

Significant Improvement in Funding Levels

Since the last actuarial valuation in 2022, financial markets have improved markedly. This has led to a substantial increase in the funding level of the WYPF, as acknowledged by your own advisors and reflected in the draft FSS. The improved funding position means that the Fund is now in a much stronger position to meet its long-term liabilities, reducing the need for high employer contributions.

Opportunity to Release Surplus and Reduce Contributions

The draft FSS sets out that surplus above 105% funding can be used to reduce employer contributions. Given the current strong funding position, we urge WYPF to go further and allow for a significant reduction in employer contributions for the next three years.

For example, our school spends £272,748 annually on employer pension contributions at the current rate. If the rate were reduced to 6%, our annual pension costs would fall to £99,785.85, saving £172,962.15 per year—a 63.4% reduction. This would make a substantial difference to our ability to protect jobs and maintain educational standards.

Stability vs. Affordability

While we recognise the Fund’s desire for stability in contribution rates, the current financial pressures on schools mean that affordability must take precedence. Building up further surplus within the Fund at a time when schools are struggling to balance their budgets is not in the best interests of our pupils or communities.

Prudence and Probability of Funding Success

The draft FSS proposes maintaining or even increasing prudence in the funding strategy (e.g., raising the Probability of Funding Success). Given the Fund’s strong position, we do not believe additional prudence is justified at this time. We request that the Fund releases some of this prudence to allow for lower employer contributions, as has been done in previous valuations.

Conclusion

We urge WYPF to take full account of the improved funding position and the acute financial pressures facing schools. Reducing employer pension contributions for the next three years would provide essential support to the education sector, helping to safeguard jobs and maintain the quality of education for our children.

We would welcome the opportunity to discuss these points further and to see detailed modelling of the impact of different contribution scenarios.

Thank you for considering our response.

## Bradford Girls Grammar School (BDAT)- Headteacher

I am writing on behalf of Bradford Girls' Grammar School in response to the West Yorkshire Pension Fund’s (WYPF) Funding Strategy Statement (FSS) consultation, which forms part of the 2025 actuarial valuation for the Local Government Pension Scheme (LGPS). This consultation is of significant importance to our school and wider Multi-Academy Trust, and we appreciate the opportunity to contribute.

We understand that the 2025 valuation will not affect employee contribution rates or the level of benefits promised—both of which are set by government. However, the valuation does directly impact employer contribution rates, and we believe there is a compelling case for these to be significantly reduced.

Our advisors have highlighted that financial conditions have improved markedly since the last valuation in 2022. These changes have strengthened the funding position of the WYPF, and we are optimistic that this will result in substantial reductions to employer contributions over the next three years.

At Bradford Girls' Grammar School, a reduction in employer contributions could generate savings of approximately £70,000 per annum. This is not a trivial figure - it represents a lifeline for our school. These savings could:

* Prevent the need for any staff restructuring, preserving stability and morale.
* Fund up to three members of support staff, directly enhancing classroom, attendance or safeguarding support and student outcomes/welfare.
* Fund an additional specialist teacher, directly enhancing the provision/quality of intervention and therefore student outcomes.
* Enable further, much needed, investment in our buildings and facilities, ensuring a safe, modern learning environment.
* Expand enrichment opportunities for our students, including extracurricular activities, trips, and specialist workshops that broaden horizons and raise aspirations.

While we understand that stability is a key focus for WYPF, we believe that in the current climate of financial pressure on schools, surplus contributions are better directed toward frontline education. We therefore urge WYPF to consider a valuation approach that allows for maximum flexibility and reduced contributions, with reassessment thereafter.

We also question the need for additional prudence in the funding strategy. Given the strong financial position of the WYPF and its participating employers, we do not believe further buffers or increased Probability of Funding Success are justified. Instead, we advocate for releasing prudence to support lower employer contributions, enabling schools like ours to reinvest in education where it is most needed.

We appreciate your consideration of this response and hope that the final strategy reflects the realities and priorities of the education sector.

## Brighouse High School Academy Trust – Headtecher & Governors

We are writing on behalf of Brighouse High School Academy Trust and thank you for providing an opportunity to record our response to the Funding Strategy Statement (FSS) consultation. We appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration. We are responding to this consultation as leaders and governors who have a responsibility for the efficient and effective use of public funds. We understand that we have a duty to ensure that every pound spent delivers value for money for our students, staff and the wider community and we are significantly concerned about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), particularly in light of the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we would expect to see significant improvements in funding levels and substantial reductions to employer contribution rates over at least the next three years. We are therefore concerned that, despite

this improved picture, all moves within the FSS appear to have been taken to maintain contribution rates at their current high levels, rather than allowing for a reduction that would significantly benefit schools and the life chances of the young people and families we serve.

We are reliably informed that a more than affordable 10% reduction to our contribution rate would see a significant reduction each year for the next 3 years which would be directly invested back into the classroom. This would allow us to employ additional staff to support the learning of our children or invest the additional funds in resources and/or the school environment which, in a building which has failing boilers, leaking roofs and aged furniture would be greatly appreciated. For a trust which is funded, in real terms, at over £1 million less than it was fifteen years ago, this would mean vital funding would be put back into resourcing and repairing our school.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions as an employer. Given this improved funding position, we do not wish to pay less than members and therefore respectfully ask that our contributions are reduced to 6% for the next three years, up to the next valuation.

We believe that reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees’ pensions.

Impact on Our Organisation

A reduction in employer contributions would have a meaningful impact on our organisation, freeing up resources that could be redirected to essential services and support for our staff and beneficiaries. In the current climate, where budgets are increasingly stretched, every pound saved on pension contributions can be used to maintain and improve the services we provide.

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that employers are currently experiencing, we believe that money could be better spent supporting our staff and the communities we serve, rather than building up additional surplus within the WYPF.

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Concerns

* Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested? When schools are underfunded now.
* Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Governance and Consultation Process

We are also concerned about the consultation process itself. No sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS. We ask:

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Single or Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders such as Trustees and Governors are reached and consulted with.

We ask that the consultation period is extended to enable employers to respond fully after consulting with Trustees and Governors and leaders of the Trust and schools and to enable WYPF to review in depth the views of the employers.

Given our responsibilities as stewards of public funds, we urge WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions—specifically to 6%—reflecting the improved funding position, and that unnecessary prudence is not built into the strategy at the expense of value for money for schools and pupils.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

## Buttershaw Business and Enterprise College (BDAT) – Senior Deputy Headteacher

I am writing to challenge the new three-year pension fund valuation. The last three-year valuation in 2022, which had the fund in a 105% surplus, saw employer contribution rates increase from 16.4% to the current rate of 17.0%, which increased the fund surplus 120%. I have been advised that contributions could go from 17% to 6% for nearly twenty years and still be over 100% funded, therefore my position is for the employer’s rate to reduce to 6%, saving thousands for every school per annum.

For Buttershaw Business and Enterprise College, of which I am Senior Deputy Headteacher, this would save £160,000 per annum, potentially preventing the need for any staffing restructure in the near future, or enabling us to employ up to six additional teaching assistants at a time when SEND provision nationally is in crisis.

In recent years we have had to significantly reduce the opportunities available to our students, who we serve within an area of significant deprivation. Trips and visits have been cancelled and cultural capital experiences reduced when our young people need them most. This area is crucial to reduce the privilege gap for our students and ensure they have equal opportunities post 16. These are in addition to the other financial restraints imposed, with increased class sizes and our support mechanisms in attendance, welfare and Special Educational Needs at saturation point. All of these affect students from deprived areas most.

The WYPF is considering building additional prudence to its funding strategy, which I do not believe is justified. There have been significant changes in the pensions landscape over the last three years, with significantly improved funding of WYPF since the last actuarial valuation was carried out in 2022. I believe that this is a real opportunity for employer contributions to be reduced considerably, enabling money to be spent on the activities and resources mentioned above.

## Buttershaw Business and Enterprise College (BDAT) – School Business Manager

The West Yorkshire Pension Fund (WYPF) is currently considering introducing additional prudence into its funding strategy. While caution is often warranted in financial planning, I do not believe this level of prudence is justified at this time.

Over the past three years, the pensions landscape has undergone significant change. Since the last actuarial valuation in 2022, WYPF’s funding position has improved markedly. This progress presents a timely and meaningful opportunity to reassess employer contribution levels.

Reducing employer contributions would not only reflect the fund’s strengthened position but also unlock vital resources for schools and services operating in areas of high deprivation. These funds could be redirected toward restoring enrichment activities, reducing class sizes, and strengthening support for attendance, welfare, and Special Educational Needs—areas that are currently stretched to their limits.

For Buttershaw Business and Enterprise College, such a reduction would equate to an annual saving of £160,000. This is not a marginal figure—it is transformative. It could prevent the need for any staffing restructure in the near future, preserving continuity and morale. Alternatively, it could enable us to employ up to six additional teaching assistants, directly addressing the national crisis in Special Educational Needs and Disabilities (SEND) provision.

The impact on student outcomes would be profound. Increased support in classrooms enhances teaching and learning, raises attainment, and expands future career opportunities for our young people—many of whom face significant barriers outside of school. In a community marked by deprivation, this is not just a financial decision; it is a moral one.

In recent years, we have faced increasingly severe financial constraints that have forced us to make difficult decisions about the opportunities we can offer our students. Serving a community marked by significant deprivation, we have seen firsthand how vital enrichment experiences—such as educational trips, cultural visits, and extracurricular activities—are to broadening horizons and building aspirations. Yet these are precisely the opportunities we’ve had to reduce or cancel.

At a time when our young people need these experiences most, we are grappling with rising class sizes and overstretched support systems. Our teams in attendance, welfare, and Special Educational Needs are operating at saturation point, doing everything they can with limited resources to meet growing and complex needs.

This is not simply a matter of budget—it is a matter of equity. Our students deserve the same access to cultural capital, personal development, and academic support as any other child. We remain committed to advocating for the resources and recognition that will allow us to restore and expand these vital opportunities.

The proposed increase in prudence within the West Yorkshire Pension Fund’s funding strategy, while well-intentioned, does not reflect the current financial reality. Since the last actuarial valuation in 2022, WYPF’s funding position has significantly improved. This presents a rare and timely opportunity to reduce employer contributions without compromising long-term stability.

In short, this is a moment to invest in our young people, not to over-insure against hypothetical risks. A more proportionate funding strategy would allow us to meet our pension obligations while also fulfilling our duty to provide equitable, high-quality education and support.

We urge WYPF to consider the broader implications of its strategy. A more proportionate approach would allow schools like ours to invest in the futures of the children we serve, rather than diverting scarce resources into unnecessary reserves.

## Buttershaw Business and Enterprise College (BDAT) – Headteacher

I am writing to challenge the new three-year pension fund valuation.

The last three-year valuation in 2022, which had the fund in a 105% surplus, saw employer contribution rates increase from 16.4% to the current rate of 17.0%, which increased the fund surplus 120%.

I have been advised that contributions could go from 17% to 6% for nearly twenty years and still be over 100% funded, therefore my position is for the employer’s rate to reduce to 6%, saving thousands for every school per annum.

For Buttershaw Business and Enterprise College, of which I am Headteacher, this would save £160,000 per annum, potentially preventing the need for any staffing restructure in the near future, or enabling us to employ up to six additional teaching assistants at a time when SEND provision nationally is in crisis.

In recent years we have had to significantly reduce the opportunities available to our students, who we serve within an area of significant deprivation. Trips and visits have been cancelled and cultural capital experiences reduced when our young people need them most. These are in addition to the other financial restraints imposed, with increased class sizes and our support mechanisms in attendance, welfare and Special Educational Needs at saturation point.

The WYPF is considering building additional prudence to its funding strategy, which I do not believe is justified. There have been significant changes in the pensions landscape over the last three years, with significantly improved funding of WYPF since the last actuarial valuation was carried out in 2022. I believe that this is a real opportunity for employer contributions to be reduced considerably, enabling money to be spent on the activities and resources mentioned above.

## Calderdale Council – Leader of the Council

Thank you for the opportunity to respond to the consultation on the Funding Strategy Statement (FSS) for the West Yorkshire Pension Fund (WYPF).

As Leader of Calderdale Council, I must stress the importance of balancing stability with affordability. While we recognise the Fund’s commitment to stability, long-term cost efficiency must carry equal weight—especially given the significant impact contribution rates have on local authority budgets.

The Fund has maintained a growing surplus for several years, with an increased forecast surplus position at 31 December 2019, 2022 and 2024, with the 2024 forecast reaching £2.3bn. In light of this, we urge WYPF to carefully consider the affordability implications of increasing prudence levels. Alternatively, maintaining the current assumptions would enable a reduction in employer contribution rates to a level that maintains a prudent surplus—around 105%—while easing financial pressure on councils.

Calderdale currently contributes £18m annually. A 4% reduction from April 2026 would protect vital services without compromising the Fund’s integrity. We ask that this be seriously considered.

## Carlinghow Academy – Principal

I am writing as Principal of Carlinghow Academy to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is achievable without having a negative impact on the fund or on our employees' pensions.

By reducing to 6%, this would mean a saving of £72,456. Carlinghow entered a deficit budget of -£200K, this saving would help with offsetting this deficit. Carlinghow’s SEND pupils is 28.57% which is above national average (18.20%), additional support and resources would directly help support these students.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Castleford Academy (Castleford Trust) – Headteacher

I am writing as Head Teacher of Castleford Academy, part of Castleford Academy Trust, to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

To illustrate the scale of the impact, an 11.4% reduction in employer contributions to 6% would mean £280,000 per year could be redirected back to the education of Castleford Academy pupils. This could enable us to employ the equivalent of 3.5 additional teachers. Such a change would make a huge difference to our academy.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited

engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Castleford Academy (Castleford Trust) – Chair of Trustees

As the Board of Trustees for Castleford Academy Trust, we write from a governance perspective as stewards of public funds. We have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community. We are therefore concerned about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for Money and Use of Public Funds Our advisors have explained that financial conditions have changed substantially since the 2022 valuation, resulting in a much stronger funding position for WYPF. In this context, we would expect to see significant reductions in employer contribution rates over the next three years. We are concerned that, despite this improved picture, all levers within the FSS appear to have been pulled to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children we serve.

Request for Reduced Contributions Given the improved funding position, we respectfully request that the employer contribution rate be reduced to 6% for the next three years, up to the next valuation. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our schools.

Key Technical Concerns

* Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Governance and Consultation Process We are also concerned about the consultation process itself. No sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS. We ask:

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

Conclusion Given our responsibilities as stewards of public funds, we urge WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions—specifically to 6%—reflecting the improved funding position, and that unnecessary prudence is not built into the strategy at the expense of value for money for schools and pupils.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

## Castleford Academy (Castleford Trust) – Chief Financial Officer

Please find below Castleford Academy Trust’s response to the Funding Strategy Statement (FSS) consultation. We welcome the opportunity to engage at this important time, particularly given the new funding and investment landscape shaped by significant market changes since the last valuation.

As a Trust committed to financial sustainability and educational excellence, we have invested considerable time and resources working with Isio and other WYPF employers to become an informed and proactive participant in this consultation. The potential impact of this process on our pension contributions is significant — not only for our financial planning but for the future of our schools and the communities we serve.

We ask that our response be taken seriously and that the points raised are reflected in your final decisions. We would welcome the opportunity to meet and present our views in more detail.

Financial Pressures

Castleford Academy Trust, comprising three secondary and six primary schools, faces increasing financial pressures. Rising costs and constrained funding have direct consequences on staffing levels, particularly in roles supporting vulnerable pupils such as teaching assistants and SEND staff. For many of our schools, LGPS contributions represent a substantial proportion of total staffing costs.

We believe the improved funding position of WYPF can support a significant and immediate reduction in employer contributions, without increasing the level of risk we pose to the Scheme.

Our request: We ask that WYPF consider an approach that enables us to reduce our contributions to 6% for the next three years, aligning with member contributions and reflecting the true cost of benefits provision. To illustrate the scale of impact, an 11.4% reduction in employer pension costs would mean £1.15 million per year could be redirected back to the education of Castleford Academy Trust children. This could enable us to employ the equivalent of 14 additional teachers. Such a change would make a huge difference across our Trust.

As part of a wider Multi Academy Trust group, we support the collective views shared in the letter presented to the WYPF Advisory Panel on 24th July, and we echo the sentiments expressed by local authorities — including the councillor signatures included in their submission — regarding the need for meaningful change.

A reduction in contributions would allow us to redirect public funds to frontline education, improving value for money and protecting jobs and services in our local area.

Stability of Contributions

We understand WYPF’s focus on stability and recognise the benefits it can bring. However, stability is not our key priority at this valuation.

The market changes since the last valuation have led to substantial funding improvements. Anchoring to current contribution rates purely for short-term stability risks overfunding the Scheme and diverting vital public money away from schools.

If only a small reduction is offered now, similar discussions will inevitably arise at the next valuation. We believe it is more appropriate to re-set contributions now to reflect the true cost of benefits, without increasing prudence unnecessarily.

This change does not increase risk to the Scheme compared to the 2022 valuation position, which WYPF deemed acceptable.

Short-Term Reduction

The financial improvements occurred in late 2022. Had a valuation taken place sooner, contributions could have been reduced earlier. We have effectively been overpaying since then.

We propose a temporary reduction to 6% for the next three years, acknowledging this may need to be reviewed at the next valuation. We are confident in our ability to support future increases if required and will budget accordingly.

This approach — adopted by other LGPS funds — would allow us to recoup overpayments and better support our schools during a challenging financial period.

Consultation Approach

We ask that this consultation be treated as a genuine opportunity for employer engagement, not a pre-determined outcome. Specifically, we would appreciate clarity on:

* How employer responses will be reviewed and incorporated into decision-making
* Whether a working group will be established to consider feedback
* How WYPF plans to respond to individual submissions
* Whether sufficient time and resource has been allocated to this process

Questions on Proposed Valuation Approach

We have several questions regarding the valuation assumptions:

* The proposed increase in the Probability of Funding Success from 76% to 80% appears to be a mechanism to maintain current contribution levels. Why is this increase necessary given the improved funding position?
* The continued use of the 105% buffer restricts the use of surplus to reduce contributions. This was specific to the 2022 valuation and should be reconsidered.
* Why is a 22-year surplus run-off being suggested when a shorter period (e.g. 6 years) would allow greater contribution reductions?
* We do not support phasing changes over six years. Given the improvements, we request that revised contribution rates be implemented immediately from April 2026.
* Is there scope to use Scheme surplus to pre-fund redundancy costs? This would help us stabilise these costs and avoid one-off payments.

We appreciate the opportunity to contribute to this consultation and urge WYPF to consider our response carefully. We remain committed to working collaboratively and constructively to ensure the Scheme remains sustainable and fair for all stakeholders.

## Calderdale Schools Forum – Chair

I am writing to you as The Chair of Calderdale’s Schools Forum. The school’s forum acts as a consultative body on some issues and a decision-making body on others and is predominately involved with the financial aspects of running of all Calderdale schools, including both maintained and academy.

Schools Forum remit includes changes to or new contracts affecting schools. The consultation on the funding strategy and the potential change in the employer contribution rate is therefore in my view of interest to Schools Forum.

The forum is also advised on arrangements for pupils with special educational needs, in pupil referral units, and in early years provision.

A reduction to the WYPF employer contribution rate would enable additional spending on special needs, which is underfunded compared to present needs.

Unfortunately, the length and timing of the consultation have prevented this issue to be presented officially to Schools Forum but will be presented retrospectively so that all schools are aware of the present situation.

Schools’ Forum members are representatives for all Calderdale schools and are made up of school heads, bursars, trustees and governors and therefore have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community.

It is therefore concerning regarding the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

West Yorkshire Pension Fund Advisory Panel - Thursday, 24 July 2025

In writing this response I am aware of the letters presented to the above panel from the West Yorkshire CFO’s and ISIO on behalf of the MAT Collective.

I am fully supportive of the points made in each of these letters and ask that the Advisory Panel consider the representations carefully in reaching a decision on future Employer Contributions.

Value for Money and Use of Public Funds I am aware that advisors to the MAT Collective, have explained that financial conditions have changed substantially since the 2022 valuation, resulting in a much stronger funding position for WYPF. In this context, one would expect to see significant reductions in employer contribution rates over at least the next three years. Despite this improved picture, all levers within the FSS appear to have been pulled to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children we serve.

As highlighted above schools are facing serious underfunding and each million pounds freed up from lowering the contribution rate would equate to approximately 38 teaching support assistants, a vital resource to deal with the increased pressures of SEN and vulnerable children within our schools. A reduction in the employer rate would be welcomed by schools to help in alleviating budget pressures, protecting the employment of members of the fund and supporting the local economy.

Given the improved funding position, a reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our schools.

Governance and Consultation Process There appears to have been limited engagement with employers before setting the draft FSS.

It would therefore appear to be reasonable to ask that the consultation period is extended to enable employers to respond fully after consultation with all stakeholders.

Conclusion As a steward of public funds, I urge WYPF to reconsider the approach taken in the draft FSS.

## Crofton Academy – Headteacher

I am writing as Head Teacher of Crofton Academy, part of Castleford Academy Trust, to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

To illustrate the scale of the impact, an 11.4% reduction in employer contributions to 6% would mean £160,000 per year could be redirected back to the education of Crofton Academy pupils. This could enable us to employ the equivalent of 2 additional teachers. Such a change would make a huge difference to our academy.

Stability We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Cullingworth Village Primary School (BDAT) – Headteacher and Executive Academy Business Leader

We are writing in response to the consultation on the Funding Strategy Statement (FSS) as part of the 2025 actuarial valuation for the Local Government Pension Scheme (LGPS). This consultation is of significant importance to our Multi-Academy Trust (MAT), and we appreciate the opportunity to contribute.

We respectfully request that a valuation approach is adopted that reflects the current strong financial position and allows for meaningful reductions in employer contributions. This would be a game-changing decision for school budgets and would demonstrate a commitment to supporting education at a time when it is most needed.

We see firsthand how budget constraints affect the quality of education and support we can offer our pupils. A reduction in pension contributions would allow us to redirect funds into areas that directly benefit children - such as desperately needed classroom support, mental health support and extracurricular trips. These investments are vital for creating a nurturing and stimulating learning environment, especially in times of austerity.

We strongly support the proposal to reduce employer contribution rates, and we urge WYPF to consider a substantial reduction in light of the following key points:

1. Exceptional Funding Position: The surplus of over £100 billion nationally presents a unique opportunity to ease financial pressures on schools without compromising pension security.

2. Long-Term Sustainability: Professional advice indicates that the fund could sustain a reduction in employer contributions from 17% to 6% for nearly 20 years while remaining fully funded. This would save our Trust approximately £1.6 million annually and individual schools like Cullingworth around £35,000 per year—potentially avoiding restructures and enabling the hiring of additional support staff.

3. Prudence vs. Practicality: While we understand the importance of prudence in pension funding, we believe that increasing prudence at this stage is unnecessary and counterproductive. Releasing some of the surplus would allow schools to reinvest in critical areas such as pupil wellbeing, enrichment activities, and staffing.

4. Support Staff and SEND Crisis: The role of support staff in classrooms—particularly those working with pupils with SEND—is absolutely critical. These professionals provide tailored assistance, emotional support, and help maintain inclusive learning environments. However, the ongoing SEND support crisis, compounded by budget cuts, has left many schools struggling to meet the needs of vulnerable pupils. A reduction in employer pension contributions would enable schools to retain and recruit more support staff, ensuring that children with additional needs receive the attention and care they deserve.

We respectfully request that WYPF adopts a valuation approach that reflects the current strong financial position and allows for meaningful reductions in employer contributions. This would be a game-changing decision for school budgets and would demonstrate a commitment to supporting education at a time when it is most needed.

Thank you for considering our response.

## Department for Education

Thank you for consulting the Department for Education (DfE) on West Yorkshire Pension Fund’s (WYPF) Draft Funding Strategy Statement (FSS).

As the guarantor for the academy and college sector within LGPS, DfE has a responsibility to ensure that funding strategies applied to these institutions are transparent, equitable, and consistent with those applied to other secure scheduled bodies. In considering individual pension fund FSS’s, DfE’s response to this consultation is from the position that there is:

* Full recognition of both DfE Guarantees: The DfE expects administering authorities to fully recognise the DfE guarantees when setting employer contribution rates and deficit recovery periods.
* Equitable treatment of academies and bodies in the FE sector: The DfE expects administering authorities to treat academies and colleges equitably with local authority-maintained schools, ensuring consistency in the approach to rate setting and deficit recovery periods.

Questions regarding West Yorkshire Pension Fund’s FSS:

* Prudence Level  
  There appears to be a change in the prudence level between the 2022 and 2025 valuations, specifically, an increase in the probability of funding success from 76% to 80%. We would not expect a change in prudence level unless clearly justified. Could you please confirm whether the prudence level has changed, and if so, provide the rationale?  
  The Department for Education Guarantees provide a safeguard against funding shortfalls on closure of an academy trust or FE college, which reduces the need for heightened prudence. In light of this, we would welcome your view on whether the current prudence level change from 76% to 80% is appropriate given the protections provided by the DfE Guarantees.
* Linked Documents  
  It is the Department’s position that all linked documents, including cessation and exit credit policies, should be incorporated within the FSS itself. This ensures accessibility, transparency, and completeness for all stakeholders.

We look forward to your response.

## Dixons Academies Trust – Chair of the Finance Committee

As the board of trustees for Dixons Academies Trust we write from a governance perspective as stewards of public funds. We have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community. We are therefore concerned about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for money and use of public funds

Our advisors have outlined how the pensions landscape has evolved since the last actuarial valuation in 2022. Financial conditions have improved markedly, and we understand that this has led to a substantial strengthening of the West Yorkshire Pension Fund’s (WYPF) funding position. In light of this, we anticipate significant improvements in funding levels and believe there is a clear opportunity for large reductions in employer contribution rates over the next three years.

We respectfully request that the valuation approach adopted by WYPF reflects these improvements and facilitates a reduction in our employer contributions to 6% for the period leading up to the next valuation. We wish to emphasise that this request is made with the understanding that our contributions should not fall below those made by members.

Key technical concerns

* Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* 105% buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* Surplus run-off period: With a surplus in the scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* Phasing of contribution changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Use of surplus for redundancy costs: Is there a way to use scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We trust that our comments will be given due consideration and would welcome further dialogue on this matter. Thank you for your attention to this important issue.

## Dixons Academies Trust – School and College Trust Leader

Please find below our response to the Funding Strategy Statement (‘FSS’) consultation for the West Yorkshire Pension Fund (‘WYPF’).

We welcome the opportunity to engage with you at this important time, given the new funding and investment landscape created by the significant market changes since the last valuation.

As a trust, we have invested considerable time and resources working with Isio and other participating employers to become an informed and responsible stakeholder in WYPF. This consultation is of significant importance to us, given the potential positive impact on our pension contributions and the wider implications for our schools and communities. We ask that our response be considered seriously and that the points raised are reflected in your final decisions for the valuation. We would also welcome the opportunity to meet with you to present our views in more detail.

Financial pressures and contribution impact

Our trust continues to face substantial financial pressures, with rising costs impacting staffing levels and the delivery of essential services. A reduction in pension contributions would allow us to redirect vital resources to our mission to challenge educational and social disadvantage in the North.

We believe the improved funding position of WYPF can support an immediate and substantial reduction in employer contributions without increasing the level of risk we pose to the scheme. Accordingly, we request that you consider an approach that enables us to reduce our contributions to 6% for the next three years, in line with employee member contributions.

As part of the wider multi academy group working together to become informed employers, we support the views expressed in the letter shared with the WYPF Advisory Panel meeting on 24 July 2025. We also note that similar views have been expressed by local authorities, and we acknowledge the support of councillors who signed the letter submitted to the same panel. These shared perspectives reinforce the importance of value for money and the need for a fair and responsive funding strategy.

Stability of contributions

We understand that stability of employer contributions is a key focus for WYPF and that this has influenced the proposed valuation approach. While we recognise the benefits of stability, particularly in providing certainty for employers and the scheme, we do not believe it should be the overriding priority at this valuation.

The significant improvements in market conditions and funding levels since 2022 warrant a departure from the usual approach. Anchoring to current contribution rates purely for short-term stability risks overfunding the scheme and misallocating public funds at a time when they are urgently needed elsewhere. If contributions remain largely unchanged, similar discussions will inevitably arise at the next valuation, undermining long-term stability.

We would prefer to re-set contributions now to reflect the true cost of providing benefits, without increasing prudence. This would allow us to establish a new stable rate that is both sustainable and fair. Given the underlying improvements in the scheme’s funding position, this change does not introduce additional risk compared to the 2022 valuation.

Short-term reduction

The financial market changes that led to the improved funding position occurred towards the end of 2022. While we acknowledge that valuations are conducted every three years, had a valuation taken place sooner, we could have adjusted our contributions earlier. As a result, we have effectively been overpaying into the scheme since then.

We believe this overpayment justifies a more significant short-term reduction in contributions to recoup the excess. This approach has been adopted by other LGPS funds and is both reasonable and fair. We therefore reiterate our request to pay 6% for the next three years, in line with member contributions.

We acknowledge that this rate may need to be temporary and reviewed at the next valuation. Should the long-term stable rate be higher than 6%, we are confident in our ability to support a future increase and budget accordingly.

Consultation process

We would like to emphasise the importance of a transparent and meaningful consultation process. To that end, we ask:

* How will employer responses be used in the decision-making process?
* Is there sufficient time and resource allocated to properly review responses before decisions are finalised?

We trust that this consultation is not a pre-determined outcome and that our views, along with those of other employers, will be genuinely considered.

We appreciate your consideration of our response and look forward to your feedback.

## Dixons Broadgreen Academy – Principal

am writing as a principal of Dixons Academies Trust in response to the current consultation on the Funding Strategy Statement (FSS). As a significant employer within the education sector, this matter is of considerable importance to our trust, and we appreciate the opportunity to contribute to the discussion.

Our advisors have outlined how the pensions landscape has evolved since the last actuarial valuation in 2022. Financial conditions have improved markedly, and we understand that this has led to a substantial strengthening of the West Yorkshire Pension Fund’s (WYPF) funding position. In light of this, we anticipate significant improvements in funding levels and believe there is a clear opportunity for large reductions in employer contribution rates over the next three years.

Request for reduced contributions

We respectfully request that the valuation approach adopted by WYPF reflects these improvements and facilitates a reduction in our employer contributions to 6% for the period leading up to the next valuation. We wish to emphasise that this request is made with the understanding that our contributions should not fall below those made by members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

While we recognise that stability has traditionally been a key focus in setting employer contribution rates, the current financial pressures facing academies necessitate a different approach. Resources are increasingly constrained, and we believe that funds could be more effectively deployed in supporting frontline education rather than accumulating additional surplus within the WYPF. Therefore, stability is not our priority at this time. We would welcome further information on the implications of a scenario in which no employer contributions are made for three years, to better understand the potential impact.

We also understand that WYPF is considering incorporating additional prudence into its funding strategy. Given the strong financial position of the fund and its participating employers, we do not believe this is warranted. We urge WYPF to release some of the prudence built into the strategy to allow for lower employer contribution rates. Specifically, we recommend that the Probability of Funding Success not be increased and could, in fact, be returned to previous levels. We also see no need for a funding buffer and suggest that the period over which surplus is used to reduce employer contributions be shortened.

Consultation process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We trust that our comments will be given due consideration and would welcome further dialogue on this matter. Thank you for your attention to this important issue.

## Dixons Music Primary – Acting Head of School

I am writing as Acting Head of School of Dixons Academies Trust in response to the current consultation on the Funding Strategy Statement (FSS). As a significant employer within the education sector, this matter is of considerable importance to our trust, and we appreciate the opportunity to contribute to the discussion.

Our advisors have outlined how the pensions landscape has evolved since the last actuarial valuation in 2022. Financial conditions have improved markedly, and we understand that this has led to a substantial strengthening of the West Yorkshire Pension Fund’s (WYPF) funding position. In light of this, we anticipate significant improvements in funding levels and believe there is a clear opportunity for large reductions in employer contribution rates over the next three years.

Request for reduced contributions

We respectfully request that the valuation approach adopted by WYPF reflects these improvements and facilitates a reduction in our employer contributions to 6% for the period leading up to the next valuation. We wish to emphasise that this request is made with the understanding that our contributions should not fall below those made by members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

While we recognise that stability has traditionally been a key focus in setting employer contribution rates, the current financial pressures facing academies necessitate a different approach. Resources are increasingly constrained, and we believe that funds could be more effectively deployed in supporting frontline education rather than accumulating additional surplus within the WYPF. Therefore, stability is not our priority at this time. We would welcome further information on the implications of a scenario in which no employer contributions are made for three years, to better understand the potential impact.

We also understand that WYPF is considering incorporating additional prudence into its funding strategy. Given the strong financial position of the fund and its participating employers, we do not believe this is warranted. We urge WYPF to release some of the prudence built into the strategy to allow for lower employer contribution rates. Specifically, we recommend that the Probability of Funding Success not be increased and could, in fact, be returned to previous levels. We also see no need for a funding buffer and suggest that the period over which surplus is used to reduce employer contributions be shortened.

Consultation process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

What is WYPF’s process for reviewing and responding to employer feedback?

* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We trust that our comments will be given due consideration and would welcome further dialogue on this matter. Thank you for your attention to this important issue.

## Dixons Unity Academy – Principal

Re: Funding Strategy Statement consultation – Dixons Academies Trust response

I am writing as a principal of Dixons Academies Trust in response to the current consultation on the Funding Strategy Statement (FSS). As a significant employer within the education sector, this matter is of considerable importance to our trust, and we appreciate the opportunity to contribute to the discussion.

Our advisors have outlined how the pensions landscape has evolved since the last actuarial valuation in 2022. Financial conditions have improved markedly, and we understand that this has led to a substantial strengthening of the West Yorkshire Pension Fund’s (WYPF) funding position. In light of this, we anticipate significant improvements in funding levels and believe there is a clear opportunity for large reductions in employer contribution rates over the next three years.

Request for reduced contributions

We respectfully request that the valuation approach adopted by WYPF reflects these improvements and facilitates a reduction in our employer contributions to 6% for the period leading up to the next valuation. We wish to emphasise that this request is made with the understanding that our contributions should not fall below those made by members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

While we recognise that stability has traditionally been a key focus in setting employer contribution rates, the current financial pressures facing academies necessitate a different approach. Resources are increasingly constrained, and we believe that funds could be more effectively deployed in supporting frontline education rather than accumulating additional surplus within the WYPF. Therefore, stability is not our priority at this time. We would welcome further information on the implications of a scenario in which no employer contributions are made for three years, to better understand the potential impact.

We also understand that WYPF is considering incorporating additional prudence into its funding strategy. Given the strong financial position of the fund and its participating employers, we do not believe this is warranted. We urge WYPF to release some of the prudence built into the strategy to allow for lower employer contribution rates. Specifically, we recommend that the Probability of Funding Success not be increased and could, in fact, be returned to previous levels. We also see no need for a funding buffer and suggest that the period over which surplus is used to reduce employer contributions be shortened.

Consultation process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We trust that our comments will be given due consideration and would welcome further dialogue on this matter. Thank you for your attention to this important issue.

## Exceed Academies Trust – Chair of the Board of Trustees

As the Board of Trustees for Exceed Academies Trust, we write from a governance perspective as stewards of public funds. We have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community. In every part of our work with Exceed Academies Trust. We are therefore concerned about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for Money and Use of Public Funds

Our advisors have highlighted that financial conditions have improved considerably since the 2022 valuation, leaving WYPF in a much stronger funding position. In light of this, we believe there is a clear case for a meaningful reduction in employer contribution rates over the next three years.

We are concerned, however, that the approach set out in the FSS appears designed to preserve contribution rates at their current high levels, rather than reflecting the improved funding position. This risks diverting valuable public funds away from schools and the children we support—at a time when every pound should be directed towards frontline education and services.

Request for Reduced Contributions

Given the improved funding position, we respectfully request that the employer contribution rate be reduced to 6% for the next three years, up to the next valuation. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our schools.

Key Technical Concerns

* Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Governance and Consultation Process

We are also concerned about the consultation process itself. No sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS. We ask:

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

Conclusion Given our responsibilities as stewards of public funds, we urge WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions—specifically to 6%—reflecting the improved funding position, and that unnecessary prudence is not built into the strategy at the expense of value for money for schools and pupils.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

## Exceed Academies Trust – Chief Financial Officer

Please find below my response to the Funding Strategy Statement (‘FSS’) consultation for the West Yorkshire Pension Fund (‘WYPF’). I welcome the opportunity to engage with you on this important matter. This consultation comes at a particularly significant time, given the new funding and investment landscape created by the substantial market changes since the last valuation.

I believe it is critical that the Fund carefully considers the views of employers as part of this process, to ensure that the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders.

As you are aware, over the last year Exceed Academies Trust has invested a significant amount of time working collaboratively with other multi academy trusts, working with Isio to ensure we are an informed employer. This consultation is particularly significant to Exceed Academies Trust and the staff and children within it, given the positive impact it could have on our pension contributions and, consequently, what this could mean for our school budgets.

We respectfully ask that you consider our response seriously and reflect on the points we have raised when making your final decisions for the valuation. We are also open to meeting with you to present our views in more detail, should you find this helpful.

Impact Statement

Exceed Academies Trust has ten primary academies, 2 alternative provision academies, one all through academy and a secondary special as well as a SCITT and Teaching School Hub, with almost 6000 pupils and employing 1000 members of staff, of which a significant number are members of the West Yorkshire Pension Scheme. Our employer contributions make up a significant proportion of our overall budget. I take my duty in being responsible in overseeing the spending of public funds extremely seriously and ensure that there is value for money in every penny our academies spend for on pupils that the money was intended for. This includes our employer contributions to WYPF. This is critical because it has a direct impact on the children in our schools—every penny we save can be redirected back into their education.

The SEN crisis is particularly severe in Bradford, where all schools, including those in Exceed Academies Trust are struggling to secure enough places for our most vulnerable learners. This is leading to overcrowded and underfunded schools—a situation that poses real risks. Added to this, the pandemic has fundamentally altered schools, children, and families, creating new and complex challenges. Meeting these needs requires significant additional resources funded by school budgets.

Education is not only essential for each child, but also for the future of our society. For that reason, ensuring schools have the right funding now is more critical than ever. The West Yorkshire Pension Fund has the opportunity to deliver enormous benefits to schools and communities—without compromising the quality of pensions for members. Reducing the contribution rate at this moment is not only sensible, but the morally right course of action.

To illustrate the scale of impact, a 10% reduction in pension costs would mean £1.2 million could be redirected directly back into the education of Exceed Academies Trust children per year. This would enable us to employ the equivalent of 40 extra teaching assistants or 22 teachers across our schools, and provide other much needed but expensive services such as additional mental health services to support our children. In short, such a change would make a huge difference in our schools.

Overview

I believe that the improved funding position of the West Yorkshire Pension Fund can support an immediate and significant reduction in pension contributions, without any increase in the level of risk that Exceed Academies Trust and other employers pose to the Scheme. We are solid employers, having regular government income, we also have the DFE guarantee. We have high levels of accountability and scrutiny and do not pose any risk to the Fund.

In light of this, we request that you consider an approach that enables us to reduce our contributions to 6% for the next three years, as we do not wish to pay less than members. This would provide much-needed financial flexibility and allow us to redirect vital resources back into our schools.

As part of the Multi Academy Trust group, I would also like to reference the letter shared with the WYPF Advisory Panel meeting on 24th July, which sets out the collective views of the group. I hope that these perspectives will be given due consideration as you finalise the Funding Strategy Statement.

I am also aware that local authorities have expressed similar views regarding the importance of achieving value for money and the potential for reducing employer contributions. I note, in particular, the signature of Steven Mair of Bradford Council, in the letter that was also shared with the WYPF Pensions Advisory Panel.

Key Points

Stability of Contributions

I understand that a key focus of WYPF is the stability of employer contributions, and that this has been reflected in the approach being proposed for the 2025 valuation. I also recognise that the proposed valuation assumptions and approach are more prudent than those used in the 2022 valuation, with the aim of keeping employer contributions at a similar level.

While I can appreciate the benefits of stability and the certainty it can bring to both WYPF and employers—and why this is relevant for the Scheme—stability is not my key priority at this valuation. Given the significant changes in market conditions since the last valuation and the extent of the funding improvements seen in the Scheme, I do not believe that the usual approach of maintaining stability is appropriate at this time.

I do not think we should continue to anchor to the current contribution rates purely to maintain short-term stability, especially if this results in overfunding the Scheme and requiring employers to pay more at a time when additional cash (which is public money) could be vital elsewhere. If contributions continue at a similar level and WYPF only offers a small reduction, I expect that similar discussions will arise at the next valuation, when contributions will again need to come down—an approach that does not provide true long-term stability.

Instead, I would prefer to see contributions re-set now to a level that reflects the true cost of providing benefits, without increasing prudence as is currently being proposed, and to arrive at a new, stable rate going forward. Given the underlying funding improvements in the Scheme, making this change and reducing contributions does not pose any more risk to the Scheme than the position agreed at the 2022 valuation, which was considered acceptable at that time.

Short Term Reduction

The financial market changes that created the funding improvements for the Scheme occurred towards the end of 2022. Whilst I acknowledge that a valuation only takes place every three years, if a valuation had happened sooner, we could have reduced our contributions earlier. As a result, Exceed Academies Trust has effectively been overpaying into the Scheme since then.

Given this context, I believe the improved funding position should support a more significant reduction in contributions in the short term, allowing us to recoup these overpayments. This is an approach that I am aware has been adopted by other LGPS funds.

As an informed employer, I fully understand that what I am asking for may result in an increase in contributions in the future. However, I am comfortable that Exceed Academies Trust can support a future increase if required and will budget appropriately. What we do not need is an overly prudent approach from the Fund, which would effectively reduce our effectiveness as an organisation whose sole aim is to provide the best possible outcomes for our children, simply to provide additional cushioning for the Fund.

Technical Questions and Concerns

I would also like to raise several technical questions regarding the proposed approach in the draft Funding Strategy Statement:

* You have proposed an increase in the Probability of Funding Success from the last valuation.
  + Is this change being made purely to maintain employer contributions at a similar level?
  + This increases the prudence of WYPF’s approach, and I do not believe additional prudence is needed now, given the improved funding position and the reduced risk of employers being unable to fund benefits.
  + How has WYPF chosen the rate of 80%, and why is this considered the right rate when you were comfortable with 76% last time and have previously accepted 69%?
* The continued reference to the 105% buffer means any surplus below this threshold cannot be used to reduce our contributions. This buffer was introduced last time to reflect the specific circumstances of the 2022 valuation. It is not needed this time, and we should be able to use our full surplus to reduce contributions.
* As there is a surplus, running this off over, for example, six years would reduce our contributions further. Why is a 22-year period being suggested?
* The FSS notes that any changes to contributions are typically phased in over six years. We do not want this level of stabilisation and do not believe it is necessary given the significant improvements seen. We request that our revised contribution rate is payable immediately from April 2026.
* Is there a way of using the surplus in the Scheme to pre-fund the cost of redundancy payments? It would be extremely helpful to stabilise these costs rather than having to pay them as a one-off lump sum.

I would appreciate clear responses to these questions, as they are central to ensuring the consultation is robust, transparent, and genuinely responsive to employer needs.

Consultation Approach

I would like to raise several concerns regarding the consultation process for the Funding Strategy Statement. Firstly, no sensitivity analysis has been provided as part of the consultation, and there appears to have been an assumption about what employers want, without any real engagement to understand our actual views before setting the draft FSS.

To ensure this consultation is meaningful and not simply a pre-determined outcome, I would appreciate clarity on the following points:

* What is WYPF doing with employer responses to this consultation?
* Is there a plan to set up a working group to review the feedback?
* How will WYPF respond to each employer’s submission?
* How will employer responses be reflected in the final decision-making process?
* Does WYPF have sufficient time and resource to review all responses thoroughly before decisions are made?

I also wish to highlight that the timing of this consultation was not ideal for Multi Academy Trusts, as it took place over the summer holidays. Given that a large proportion of your employers are MATs, and this issue was pointed out in advance, I would ask that you reconsider the timing of future consultations to ensure all employers have a fair opportunity to engage. There is also an assumption that the consultation will automatically reach the right people within MATs, but our group’s experience has shown that this is not always the case.

I urge you to take these points seriously and ensure that the consultation process is transparent, inclusive, and genuinely responsive to employer feedback.

I look forward to receiving your feedback on my letter.

## Focus Trust – Chief Financial Officer

Please find below my response to the Funding Strategy Statement ('FSS') consultation for the West Yorkshire Pension Fund ('WYPF'). I welcome the opportunity to engage with you on this important matter. This consultation comes at a particularly significant time, given the new funding and investment landscape created by the substantial market changes since the last valuation.

I believe it is critical that the Fund carefully considers the views of employers as part of this process, to ensure that the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders.

As you are aware, over the last year Focus-Trust has been working collaboratively with other multi academy trusts, investing significant time and working with lsio to ensure we are an informed employer. This consultation is particularly significant to Focus-Trust and the staff and children within it, given the positive impact it could have on our pension contributions and, consequently, what this could mean for our schools.

We respectfully ask that you consider our response seriously and reflect on the points we have raised when making your final decisions for the valuation. We are also open to meeting with you to present our views in more detail, should you find this helpful.

As a Trust with fifteen primary schools, seven of which are part of West Yorkshire Pension Fund our West Yorkshire Pension Fund contributions make up a significant proportion of our overall budget. As we are dealing with public funds, I feel a strong duty to ensure that there is value for money from these contributions, just as we do with every other penny we spend. This is critical because it has a direct impact on the children in our schools-every penny we save can be redirected back into their education.

There is currently an SEN crisis, we are struggling to provide enough places for our most vulnerable learners. This is manifesting in overly crowded and underfunded schools, a dangerous situation.

Schools are facing significant challenges in the aftermath of the pandemic, they are a fundamentally different place, children are fundamentally different as are families. All of this requires resource in order to better support our children. I believe that education is vital not only for individual children but for the future of our society. Having the right money in our schools now has never been more critical and WYPF has the opportunity to benefit schools and society massively without damaging itself or its members access to a fantastic pension. In short dropping the contribution rate now is morally the right thing to do To illustrate the scale of impact, a 10% reduction in pension costs would mean £566k could be redirected directly back into the education of Focus-Trust children per year. This would enable us to employ the equivalent of 18 extra teaching assistants or 1 O teachers, and provide other much needed but-expensive services such as additional mental health services to support our children. In short, such a change would make a huge difference in our schools.

Overview

I believe that the improved funding position of the West Yorkshire Pension Fund can support an immediate and significant reduction in pension contributions, without any increase in the level of risk that Focus-Trust and other employers pose to the Scheme. we are solid employers, having regular government income, we also have the DFE guarantee. We have high levels of accountability and scrutiny and do not pose any risk to the Fund.

In light of this, we request that you consider an approach that enables us to reduce our contributions to 6% for the next three years, as we do not wish to pay less than members. This would provi.de much-needed financial flexibility and allow us to redirect vital resources back into our schools.

As part of the Multi Academy Trust group. I would also like to reference the letter shared with the WYPF Advisory Panel meeting on 24th July, which sets out the collective views of the group. I hope that these perspectives will be given due consideration as you finalise the Funding Strategy Statement.

I am also aware that local authorities have expressed similar views regarding the importance of achieving value for money and the potential for reducing employer contributions. I note, in particular, the signature of Steven Mair of Bradford Council, in the letter that was also shared with the WYPF Pensions Advisory Panel.

Key Points

Stability of Contributions

I understand that a key focus of WYPF is the stability of employer contributions, and that this has been reflected in the approach being proposed for the 2025 valuation. I also recognise that the proposed valuation assumptions and approach are more prudent than those used in the 2022 valuation, with the aim of keeping employer contributions at a similar level.

While I can appreciate the benefits of stability and the certainty it can bring to both WYPF and employers-and why this is relevant for the Scheme-stability is not my key priority at this valuation.

Given the significant changes in market conditions since the last valuation and the extent of the funding improvements seen in the Scheme, I do not believe that the usual approach of maintaining stability is appropriate at this time.

I do not think we should continue to anchor to the current contribution rates purely to maintain

short-term stability, especially if this results in overfunding the Scheme and requiring employers to pay more at a time when additional cash (which is public money) could be vital elsewhere. If contributions continue at a similar level and WYPF only offers a small reduction, I expect that similar discussions will arise at the next valuation, when contributions will again need to come down-an approach that does not provide true long-term stability.

Instead, I would prefer to see contributions re-set now to a level that reflects the true cost of providing benefits, without increasing prudence as is currently being proposed, and to arrive at a new, stable rate going forward. Given the underlying funding improvements in the Scheme, making this change and reducing contributions does not pose any more risk to the Scheme than the position agreed at the 2022 valuation, which was considered acceptable at that time.

Short Term Reduction

The financial market changes that created the funding improvements for the Scheme occurred towards the end of 2022. Whilst I acknowledge that a valuation only takes place every three years, If a valuation had happened sooner, we could have reduced our contributions earlier. As a result, Beckfoot Trust has effectively been overpaying into the Scheme since then.

Given this context, I believe the improved funding position should support a more significant reduction in contributions in the short term, allowing us to recoup these overpayments. This is an approach that I am aware has been adopted by other LGPS funds.

As an informed employer, I fully understand that what I am asking for may result in an increase in contributions in the future. However, I am comfortable that Focus-Trust can support a future increase if required and will budget appropriately. What we do not need is an overly prudent approach from the Fund, which would effectively reduce our effectiveness as an organisation whose sole aim is to provide the best possible outcomes for our children, simply to provide additional cushioning for the Fund.

Technical Questions and Concerns

I would also like to raise several technical questions regarding the proposed approach in the draft Funding Strategy Statement:

* You have proposed an increase in the Probability of Funding Success from the last valuation.
  + Is this change being made purely to maintain employer contributions at a similar level?
  + This increases the prudence of WYPF's approach. and I do not believe additional prudence Is needed now, given the improved funding position and the reduced risk of employers being unable to fund benefits.
  + How has WYPF chosen the rate of 80%, and why is this considered the right rate when you were comfortable with 7 6% last time and have previously accepted 69%?
* The continued reference to the 105% buffer means any surplus below this threshold cannot be used to reduce our contributions. This buffer was introduced last time to reflect the specific circumstances of the 2022 valuation. It is not needed this time, and we should be able to use our full surplus to reduce contributions.
* As there is a surplus, running this off over, for example, six years would reduce our contributions further. Why is a 22-year period being suggested?
* The FSS notes that any changes to contributions are typically phased in over six years. We do not want this level of stabilisation and do not believe it is necessary given the significant improvements seen. We request that our revised contribution rate is payable immediately from April 2026.
* Is there a way of using the surplus in the Scheme to pre-fund the cost of redundancy payments? It would be extremely helpful to stabilise these costs rather than having to pay them as a one-off lump sum.

I would appreciate clear responses to these questions, as they are central to ensuring the consultation ls robust, transparent, and genuinely responsive to employer needs.

Consultation Approach

I would like to raise several concerns regarding the consultation process for the Funding Strategy Statement. Firstly, no sensitivity analysis has been provided as part of the consultation, and there appears to have been an assumption about what employers want, without any real engagement to understand our actual views before setting the draft FSS.

There are only 14 working days between the consultation closing date and the fund advisory panel meeting. Presumably papers need to be released a week in advance giving only 9 working days to collate responses and to reflect on them and action any changes as a result.

To ensure this consultation is meaningful and not simply a pre-determined outcome, I would appreciate clarity on the following points:

* What is WYPF doing with employer responses to this consultation?
* ls there a plan to set up a working group to review the feedback?
* How will WYPF respond to each employer's submission?
* How will employer responses be reflected in the final decision-making process?
* Does WYPF have sufficient time and resource to review all responses thoroughly before decisions are made'?
* Can you and will you extend the consultation to ensure employers views are heard

I also wish to highlight that the timing of this consultation was not ideal for Multi Academy Trusts, as it took place over the summer holidays. Given that a large proportion of your employers are MATs, and this issue was pointed out in advance, I would ask that you reconsider the timing of future consultations to ensure all employers have a fair opportunity to engage, I would also ask you to extend the period of consultation now to ensure it has been fair and transparent. There is also an assumption that the consultation will automatically reach the right people within MATs, but our group's experience has shown that this is not always the case.

I urge you to take these points seriously and ensure that the consultation process is transparent, inclusive, and genuinely responsive to employer feedback.

I look forward to receiving your feedback on my letter.

## Glasshoughton Infant Academy – Headteacher

I am writing as Head Teacher of Glasshoughton Infants Academy, part of Castleford Academy Trust, to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

To illustrate the scale of the impact, an 11.4% reduction in employer contributions to 6% would mean £48,000 per year could be redirected back to the education of Glasshougton Infants Academy pupils. This could enable us to employ the equivalent of 0.6 of an additional teacher. Such a change would make a huge difference to our academy.

Stability We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Great Heights Academy Trust – Chair of the Board of Trustees

Re: Funding Strategy Statement Consultation – Governance and Value for Money Concerns

As the Board of Trustees for Great Heights, we write from a governance perspective as stewards of public funds. We have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community. We are therefore concerned about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for Money and Use of Public Funds Our advisors have explained that financial conditions have changed substantially since the 2022 valuation, resulting in a much stronger funding position for WYPF. In this context, we would expect to see significant reductions in employer contribution rates over the next three years. We are concerned that, despite this improved picture, all levers within the FSS appear to have been pulled to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children we serve.

Request for Reduced Contributions Given the improved funding position, we respectfully request that the employer contribution rate be reduced to 6% for the next three years, up to the next valuation. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our schools.

Key Technical Concerns

* Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Governance and Consultation Process

We are also concerned about the consultation process itself. No sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS. We ask:

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

Conclusion Given our responsibilities as stewards of public funds, we urge WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions—specifically to 6%—reflecting the improved funding position, and that unnecessary prudence is not built into the strategy at the expense of value for money for schools and pupils.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

## Great Heights Academy Trust – Chief Financial and Operations Officer

Please find below my response to the Funding Strategy Statement (‘FSS’) consultation for the West Yorkshire Pension Fund (‘WYPF’). I welcome the opportunity to engage with you on this important matter. This consultation comes at a particularly significant time, given the new funding and investment landscape created by the substantial market changes since the last valuation.

I believe it is critical that the Fund carefully considers the views of employers as part of this process, to ensure that the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders.

As you are aware, over the last year Great Heights Academy Trust has been working collaboratively with other multi academy trusts, investing significant time and working with Isio to ensure we are an informed employer. This consultation is particularly significant to Great Heights and the staff and pupils within it, given the positive impact it could have on our pension contributions and, consequently, what this could mean for our schools.

We respectfully ask that you consider our response seriously and reflect on the points we have raised when making your final decisions for the valuation. We are also open to meeting with you to present our views in more detail, should you find this helpful.

Impact Statement

As a Trust with two secondary schools and seven primary schools, our West Yorkshire Pension Fund contributions make up a significant proportion of our overall budget. As we are dealing with public funds, I feel a strong duty to ensure that there is value for money from these contributions, just as we do with every other penny we spend. This is critical because it has a direct impact on the pupils in our schools—every penny we save can be redirected back into their education.

There is currently an SEN crisis, we are struggling to provide support staff for our most vulnerable learners. This is manifesting in underfunded schools, a dangerous situation. Schools are facing significant challenges in the aftermath of the pandemic, with more support required for neurodiverse pupils and pupils with mental health struggles. All of this requires resource in order to better support our pupils. I believe that education is vital not only for individual pupils but for the future of our society. Having the right money in our schools now has never been more critical and WYPF has the opportunity to benefit schools and society massively without damaging itself or its members access to a fantastic pension. In short dropping the contribution rate now is morally the right thing to do.

To illustrate the scale of impact, a 11% reduction in pension costs would mean £789,111 could be redirected directly back into the education of Great Height’s pupils per year. This would enable us to employ the equivalent of 37 full time support staff or 12 teachers or provide other much needed but expensive services such as additional mental health services to support our pupils. In short, such a change would make a huge difference in our schools.

Overview

I believe that the improved funding position of the West Yorkshire Pension Fund can support an immediate and significant reduction in pension contributions, without any increase in the level of risk that Great Heights and other employers pose to the Scheme. We are solid employers, having regular government income, we also have the DFE guarantee. We have high levels of accountability and scrutiny and do not pose any risk to the Fund.

In light of this, we request that you consider an approach that enables us to reduce our contributions to 6% for the next three years, as we do not wish to pay less than members. This would provide much-needed financial flexibility and allow us to redirect vital resources back into our schools.

As part of the Multi Academy Trust group, I would also like to reference the letter shared with the WYPF Advisory Panel meeting on 24th July, which sets out the collective views of the group. I hope that these perspectives will be given due consideration as you finalise the Funding Strategy Statement.

I am also aware that local authorities have expressed similar views regarding the importance of achieving value for money and the potential for reducing employer contributions. I note, in particular, the signatures of Becky McIntyre, Calderdale Council; Kevin Mulvaney, Kirklees Council and Victoria Bradshaw, Leeds City Council in the letter that was also shared with the WYPF Pensions Advisory Panel.

Key Points

Stability of Contributions

I understand that a key focus of WYPF is the stability of employer contributions, and that this has been reflected in the approach being proposed for the 2025 valuation. I also recognise that the proposed valuation assumptions and approach are more prudent than those used in the 2022 valuation, with the aim of keeping employer contributions at a similar level.

While I can appreciate the benefits of stability and the certainty it can bring to both WYPF and employers—and why this is relevant for the Scheme—stability is not my key priority at this valuation. Given the significant changes in market conditions since the last valuation and the extent of the funding improvements seen in the Scheme, I do not believe that the usual approach of maintaining stability is appropriate at this time.

I do not think we should continue to anchor to the current contribution rates purely to maintain short-term stability, especially if this results in overfunding the Scheme and requiring employers to pay more at a time when additional cash (which is public money) could be vital elsewhere. If contributions continue at a similar level and WYPF only offers a small reduction, I expect that similar discussions will arise at the next valuation, when contributions will again need to come down—an approach that does not provide true long-term stability.

Instead, I would prefer to see contributions re-set now to a level that reflects the true cost of providing benefits, without increasing prudence as is currently being proposed, and to arrive at a new, stable rate going forward. Given the underlying funding improvements in the Scheme, making this change and reducing contributions does not pose any more risk to the Scheme than the position agreed at the 2022 valuation, which was considered acceptable at that time.

Short Term Reduction

The financial market changes that created the funding improvements for the Scheme occurred towards the end of 2022. Whilst I acknowledge that a valuation only takes place every three years, if a valuation had happened sooner, we could have reduced our contributions earlier. As a result, Great Heights has effectively been overpaying into the Scheme since then.

Given this context, I believe the improved funding position should support a more significant reduction in contributions in the short term, allowing us to recoup these overpayments. This is an approach that I am aware has been adopted by other LGPS funds.

As an informed employer, I fully understand that what I am asking for may result in an increase in contributions in the future. However, I am comfortable that Great Heights can support a future increase if required and will budget appropriately. What we do not need is an overly prudent approach from the Fund, which would effectively reduce our effectiveness as an organisation whose sole aim is to provide the best possible outcomes for our pupils, simply to provide additional cushioning for the Fund.

Technical Questions and Concerns

I would also like to raise several technical questions regarding the proposed approach in the draft Funding Strategy Statement:

* You have proposed an increase in the Probability of Funding Success from the last valuation. Is this change being made purely to maintain employer contributions at a similar level? This increases the prudence of WYPF’s approach, and I do not believe additional prudence is needed now, given the improved funding position and the reduced risk of employers being unable to fund benefits.
* How has WYPF chosen the rate of 80%, and why is this considered the right rate when you were comfortable with 76% last time and have previously accepted 69%? The continued reference to the 105% buffer means any surplus below this threshold cannot be used to reduce our contributions. This buffer was introduced last time to reflect the specific circumstances of the 2022 valuation. It is not needed this time, and we should be able to use our full surplus to reduce contributions.
* As there is a surplus, running this off over, for example, six years would reduce our contributions further. Why is a 22-year period being suggested? The FSS notes that any changes to contributions are typically phased in over six years. We do not want this level of stabilisation and do not believe it is necessary given the significant improvements seen. We request that our revised contribution rate is payable immediately from April 2026.
* Is there a way of using the surplus in the Scheme to pre-fund the cost of redundancy payments? It would be extremely helpful to stabilise these costs rather than having to pay them as a one-off lump sum.

I would appreciate clear responses to these questions, as they are central to ensuring the consultation is robust, transparent, and genuinely responsive to employer needs.

Consultation Approach

I would like to raise several concerns regarding the consultation process for the Funding Strategy Statement. Firstly, no sensitivity analysis has been provided as part of the consultation, and there appears to have been an assumption about what employers want, without any real engagement to understand our actual views before setting the draft FSS.

To ensure this consultation is meaningful and not simply a pre-determined outcome, I would appreciate clarity on the following points:

* What is WYPF doing with employer responses to this consultation?
* Is there a plan to set up a working group to review the feedback?
* How will WYPF respond to each employer’s submission?
* How will employer responses be reflected in the final decision-making process?
* Does WYPF have sufficient time and resource to review all responses thoroughly before decisions are made?

I also wish to highlight that the timing of this consultation was not ideal for Multi Academy Trusts, as it took place over the summer holidays. Given that a large proportion of your employers are MATs, and this issue was pointed out in advance, I would ask that you reconsider the timing of future consultations to ensure all employers have a fair opportunity to engage. There is also an assumption that the consultation will automatically reach the right people within MATs, but our group’s experience has shown that this is not always the case.

I urge you to take these points seriously and ensure that the consultation process is transparent, inclusive, and genuinely responsive to employer feedback.

I look forward to receiving your feedback on my letter.

## The Greetland Academy – Executive Principal

I am writing as Executive Principal of Greetland Academy to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is achievable without having a negative impact on the fund or on our employees' pensions.

By reducing to 6%, this would mean a saving of £66,140. This would be equivalent to three full time support staff members or one teacher and resources that would be very beneficial to the school.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Halifax Academy (Impact Education MAT) – Headteacher

I am writing as Head Teacher of The Halifax Academy, a school within Impact Education Multi-Academy Trust to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

Should the consultation result in an employer contribution at this level, £184 000 would be released back into the school budget, having a significant impact on educational provision for our young people.

A reduction in employer contributions would have a decisive impact at The Halifax Academy, where a high proportion of our students are disadvantaged and vulnerable. We are establishing an Additional Resource Provision for pupils with autism, which depends on significant investment in specialist staffing, therapeutic support and curriculum adaptation. If savings from pension contributions are not released back into our budget, the inevitable outcome is that the children who most need support will suffer. It is a moral question as much as a financial one: whether surplus funds are held in reserve, or whether they are directed towards ensuring that every child, regardless of their background or needs, has a genuine chance to thrive. For our community, the choice is stark — either we invest in the most vulnerable now, or we accept that inequality will deepen.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Heritage Multi Academy Trust – Chair of the Board Finance Audit and Risk Committee

As the Chair of the Finance, Audit and Risk Committee of the Heritage Multi Academy Trust, I am writing to express our concern about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the current funding position of the West Yorkshire Pension Fund (WYPF).

As you know, we all have a duty to ensure that every pound spent delivers value for money for all our pupils, employees, and the wider community across our Trust. Our advisors have noted that financial conditions have improved significantly since the valuation completed in 2022, leading to a much stronger funding position for WYPF. Given this, we would anticipate substantial reductions in employer contribution rates over the next three years. However, we are concerned that despite this positive outlook, all mechanisms within the FSS seem to have been used to maintain the current high contribution rates, rather than allowing for a reduction that would directly benefit schools.

Request for reduced contributions

Given the improved funding position, we request that the employer contribution rate be reduced to 6% for the next three years, up to the next valuation. This reduction equates to a substantial saving for the schools in our Trust: just over £420k on our current budget forecast for 2025/26.

To be clear, we do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our schools.

Key technical concerns/questions and opportunities

Below are a number of points that would like to raise and require a response on:

1. Buffer: The continuation of the 105% buffer is unnecessary. It prevents the Trust from using its full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
2. Extended surplus run-off period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
3. Probability of funding success: The proposed increase in the Probability of Funding Success from previous valuations seems to introduce unnecessary caution. Is this adjustment primarily intended to keep employer contributions at a similar level? Why is an 80% now deemed appropriate, when 76% was acceptable previously and 69% in the past?
4. Phasing of contribution changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
5. Use of surplus for redundancy costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation process

We also have concerns with the consultation process itself. There is a lack of sensitivity analysis provided, and there appears to have been limited engagement with employers before setting the draft FSS. In addition, the timing of this consultation overlapped with summer holidays for Multi Academy Trusts, making participation and appropriate scrutiny difficult. We request better timing and communication for future consultations to reach all stakeholders.

In addition to the above questions for response, could you please clarify the following points from a Governance perspective:

* What is WYPF’s process for reviewing and responding to employer feedback on the consultation?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?

Summary

We urge the WYPF to reconsider its approach outlined in the draft FSS, specifically to implement a 6% employer contribution rate to reflect the improved funding position.

We look forward to your responses to the laid out.

## Heritage Multi Academy Trust – Chief Financial Officer

Please find below my response to the Funding Strategy Statement ('FSS') consultation for the West Yorkshire Pension Fund ('WYPF'). This comes at a particularly significant time, given the new funding and investment landscape created by the substantial market changes since the last valuation.

I believe it is essential that the Fund takes serious consideration of the views of employers as part of this process. The Funding strategy statement needs to remain in a healthy and appropriate position whilst still maintaining the needs and challenges faced by all stakeholders.

I understand that a key focus of WYPF is the stability of employer contributions, and that this has been reflected in the approach being proposed for the 2025 valuation. I also understand that the proposed valuation assumptions and approach are more prudent than those used in the 2022 valuation, with the aim of keeping employer contributions at a similar level.

While I appreciate the benefits of stability and the certainty it can bring to both WYPF. There have been significant changes in market conditions since the last valuation and the extent of the funding improvements seen in the Scheme, so therefore I do not believe that the usual approach of maintaining stability is appropriate at this time.

I would like to see contributions re-set now to a level that reflects the true cost of providing benefits and to arrive at a new, stable rate going forward. Given the underlying funding improvements in the Scheme, making this change and reducing contributions does not pose any more risk to the Scheme than the position agreed at the 2022 valuation, which was considered acceptable at that time.

Given this context, I believe the improved funding position should support a more significant reduction in contributions in the short term, allowing us to recoup these overpayments. This is an approach that I am aware has been adopted by other LGPS funds.

As an informed employer, I fully understand that what I am asking for may result in an increase in contributions in the future. However, I am comfortable that Heritage Multi Academy Trust will budget appropriately for an additional charge in the future. Having a cautious approach now would reduce our effectiveness as an organisation whose sole aim is to provide the best possible outcomes for our children, simply to provide additional cushioning for the Fund.

Impact Statement

As a Trust with one secondary school, three primary schools and two more primary schools soon to join, our West Yorkshire Pension Fund contributions make up a significant proportion of our overall budget, with £700K being spent across the Trust. The current employer contribution rate for the Trust is 15.1%, every 1% saved will lead to a saving of £46K, which can be redirected back into our children's education .

If the employer's contribution rate was brought down to 6%, which I believe is a possibility looking at the surplus balances in the fund over the last few years, then a saving of £422K would be achieved across our Trust. This would enable us to employ the equivalent of 20 extra teaching assistants or 17 teachers, which would make a huge difference in our schools.

Overview

I believe that the improved funding position of the WYPF can support an immediate and significant reduction in pension contributions, without any increase in the level of risk that the Trust and other employers pose to the Scheme. As employers, we have regular guaranteed government income.

In light of this, we request that you consider an approach that enables us to reduce our contributions to 6% for the next three years, as we do not wish to pay less than members. This would provide much-needed financial flexibility and allow us to redirect vital resources back into our schools.

I look forward to receiving your feedback on my letter.

## Holy Trinity C of E Academy Rothwell (Abbey MAT) – Headteacher

I am writing as Head Teacher within Abbey Multi Academy Trust to provide our response to the Funding Strategy Statement (FSS) consultation. Thank you for the opportunity to contribute; I wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members. Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees' pensions.

The financial position of Holy Trinity has been challenging over a number of years and this would support us in reducing costs so that we can better utilise those funds in meeting the complex needs of our pupils

A 1-year reduction in contributions would save my school f37,89S and 3 years would save fl 134,686. This amount of money would make a significant impact on our budget and our ability to meet the ever-growing needs of our cohorts.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.

With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?

The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF's process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?

The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that you extend the current consultation so that all employers within the West Yorkshire Pension Fund have time to respond and that all future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Immanuel College (BDAT) – Executive Business Manager

I am writing in response to the West Yorkshire Pension Fund’s Funding Strategy Statement Consultation which is significant to the Multi Academy Trust that our school is part of.

As an employer of over 200 members of staff, a lowering of the employer contribution rate would save thousands of pounds for our school budget and help to fund some of the areas where spending has necessarily been tightened and even reduced in recent years. These include, but are not limited to, areas such as staffing (including such posts as Learning Support Assistants to help students who would benefit from support in smaller groups), funding for more specialised resources in classrooms, support for staff and student wellbeing etc. The list is endless.

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation was carried out in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates due over the next 3 years

We understand that this improvement can mean there is an opportunity for WYPF to significantly reduce our contributions, maybe to zero for three years when we know they will be re-assessed, and we ask that the valuation approach allows this to happen.

It has been highlighted that in setting employer contribution rates, stability is the key focus for the WYPF. Given the cost pressures that academies are currently experiencing, however, money could be better spent elsewhere than building up additional surplus within the WYPF. As such, stability is not a priority at this point for us, although more information on what might happen if we pay nothing for three years would be very valuable

We understand that the WYPF is considering building in additional prudence to its funding strategy. Given the strong position the WYPF and its participating employers find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and it could be reduced to what it has been in the past. There does not need to be a funding buffer either. And the period over which surplus is used to reduce employer contributions should also be reduced.

## Immanuel College (BDAT) – Headteacher

I am writing in response to the West Yorkshire Pension Fund’s Funding Strategy Statement Consultation which is significant to the Multi Academy Trust that our school is part of.

As an employer of over 200 members of staff, a lowering of the employer contribution rate would save thousands of pounds for our school budget and help to fund some of the areas where spending has necessarily been tightened and even reduced in recent years. These include, but are not limited to, areas such as staffing (including such posts as Learning Support Assistants to help students who would benefit from support in smaller groups), funding for more specialised resources in classrooms, support for staff and student wellbeing etc. The list is endless.

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation was carried out in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates due over the next 3 years

We understand that this improvement can mean there is an opportunity for WYPF to significantly reduce our contributions, maybe to zero for three years when we know they will be re-assessed, and we ask that the valuation approach allows this to happen.

It has been highlighted that in setting employer contribution rates, stability is the key focus for the WYPF. Given the cost pressures that academies are currently experiencing, however, money could be better spent elsewhere than building up additional surplus within the WYPF. As such, stability is not a priority at this point for us, although more information on what might happen if we pay nothing for three years would be very valuable

We understand that the WYPF is considering building in additional prudence to its funding strategy. Given the strong position the WYPF and its participating employers find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and it could be reduced to what it has been in the past. There does not need to be a funding buffer either. And the period over which surplus is used to reduce employer contributions should also be reduced.

## Impact Education Multi Academy Trust – Chief Financial Officer

Please find below my response to the Funding Strategy Statement ('FSS') consultation for the West Yorkshire Pension Fund ('WYPF'). I welcome the opportunity to engage with you on this important matter. This consultation comes at a particularly significant time, given the new funding and investment landscape created by the substantial market changes since the last valuation.

I believe it is critical that the Fund carefully considers the views of employers as part of this process, to ensure that the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders.

As you are aware, over the last year Impact Education Multi Academy Trust (IEMAT) has been working collaboratively with other multi academy trusts, investing significant time and working with lsio to ensure we are an informed employer. This consultation is particularly significant to IEMAT and the staff and children within it, given the positive impact it could have on our pension contributions and, consequently, what this could mean for our schools.

We respectfully ask that you consider our response seriously and reflect on the points we have raised when making your final decisions for the valuation. We are also open to meeting with you to present our views in more detail, should you find this helpful.

Impact Statement

As a Trust with two secondary schools, six primary schools, an all-through school and an Alternative Provision schools, our West Yorkshire Pension Fund contributions make up a significant proportion of our overall budget. As we are dealing with public funds, I feel a strong duty to ensure that there is value for money from these contributions, just as we do with every other penny we spend. This is critical because it has a direct impact on the children in our schools-every penny we save can be redirected back into their education.

There is currently an SEN crisis in schools, and we are finding it increasingly difficult to identify resource to support our most vulnerable children. Post pandemic, there has been a tsunami of additional needs, and funding simply hasn't been available to respond to those needs. Having the right money in our schools now has never been more critical and WYPF has the opportunity to benefit schools and society massively without damaging itself or its members access to a fantastic pension. In short dropping the contribution rate now is morally the right thing to do.

To illustrate the scale of impact, a 11% reduction in pension costs would mean nearly £1 million could be redirected directly back into the education of IEMAT children per year. This would enable us to employ the equivalent of 40 extra teaching assistants or 16 teachers, and provide other much needed but expensive services such as additional mental health services to support our children. In short, such a change would make a huge difference in our schools.

Overview

I believe that the improved funding position of the West Yorkshire Pension Fund can support an immediate and significant reduction in pension contributions, without any increase in the level of risk that IEMAT and other employers pose to the Scheme. We are solid employers, having regular government income, we also have the DFE guarantee. We have high levels of accountability and scrutiny and do not pose any risk to the Fund.

In light of this, we request that you consider an approach that enables us to reduce our contributions to 6% for the next three years, as we do not wish to pay less than members. This would provide much needed financial flexibility and allow us to redirect vital resources back into our schools.

As part of the Multi Academy Trust group, I would also like to reference the letter shared with the WYPF Advisory Panel meeting on 24th July, which sets out the collective views of the group. I hope that these perspectives will be given due consideration as you finalise the Funding Strategy Statement.

I am also aware that local authorities have expressed similar views regarding the importance of achieving value for money and the potential for reducing employer contributions. I note, in particular, the signature of Steven Mair of Bradford Council, in the letter that was also shared with the WYPF Pensions Advisory Panel.

Key Points

Stability of Contributions

I understand that a key focus of WYPF is the stability of employer contributions, and that this has been reflected in the approach being proposed for the 2025 valuation. I also recognise that the proposed valuation assumptions and approach are more prudent than those used in the 2022 valuation, with the aim of keeping employer contributions at a similar level.

While I can appreciate the benefits of stability and the certainty it can bring to both WYPF and employers-and why this is relevant for the Scheme-stability is not my key priority at this valuation. Given the significant changes in market conditions since the last valuation and the extent of the funding improvements seen in the Scheme, I do not believe that the usual approach of maintaining stability is appropriate at this time.

I do not think we should continue to anchor to the current contribution rates purely to maintain shortterm stability, especially if this results in overfunding the Scheme and requiring employers to pay more at a time when additional cash (which is public money) could be vital elsewhere. If contributions continue at a similar level and WYPF only offers a small reduction, I expect that similar discussions will arise at the next valuation, when contributions will again need to come down-an approach that does not provide true long-term stability.

Instead, I would prefer to see contributions re-set now to a level that reflects the true cost of providing benefits, without increasing prudence as is currently being proposed, and to arrive at a new, stable rate going forward. Given the underlying funding improvements in the Scheme, making this change and reducing contributions does not pose any more risk to the Scheme than the position agreed at the 2022 valuation, which was considered acceptable at that time.

Short Term Reduction

The financial market changes that created the funding improvements for the Scheme occurred towards the end of 2022. Whilst I acknowledge that a valuation only takes place every three years, if a valuation had happened sooner, we could have reduced our contributions earlier. As a result, IEMAT has effectively been overpaying into the Scheme since then.

Given this context, I believe the improved funding position should support a more significant reduction in contributions in the short term, allowing us to recoup these overpayments. This is an approach that I am aware has been adopted by other LGPS funds.

As an informed employer, I fully understand that what I am asking for may result in an increase in contributions in the future. However, I am comfortable that IEMAT can support a future increase if required and will budget appropriately. What we do not need is an overly prudent approach from the Fund, which would effectively reduce our effectiveness as an organisation whose sole aim is to provide the best possible outcomes for our children, simply to provide additional cushioning for the Fund.

Technical Questions and Concerns

I would also like to raise several technical questions regarding the proposed approach in the draft Funding Strategy Statement:

You have proposed an increase in the Probability of Funding Success from the last valuation.

* Is this change being made purely to maintain employer contributions at a similar level?
* This increases the prudence of WYPF's approach, and I do not believe additional prudence is needed now, given the improved funding position and the reduced risk of employers being unable to fund benefits.
* How has WYPF chosen the rate of 80%, and why is this considered the right rate when you were comfortable with 76% last time and have previously accepted 69%?
* The continued reference to the 105% buffer means any surplus below this threshold cannot be used to reduce our contributions. This buffer was introduced last time to reflect the specific circumstances of the 2022 valuation. It is not needed this time, and we should be able to use our full surplus to reduce contributions.
* As there is a surplus, running this off over, for example, six years would reduce our contributions further. Why is a 22-year period being suggested?
* The FSS notes that any changes to contributions are typically phased in over six years. We do not want this level of stabilisation and do not believe it is necessary given the significant improvements seen. We request that our revised contribution rate is payable immediately from April 2026.
* Is there a way of using the surplus in the Scheme to pre-fund the cost of redundancy payments? It would be extremely helpful to stabilise these costs rather than having to pay them as a one-off lump sum.

I would appreciate clear responses to these questions, as they are central to ensuring the consultation

is robust, transparent, and genuinely responsive to employer needs.

Consultation Approach

I would like to raise several concerns regarding the consultation process for the Funding Strategy Statement. Firstly, no sensitivity analysis has been provided as part of the consultation, and there appears to have been an assumption about what employers want, without any real engagement to understand our actual views before setting the draft FSS.

There are only 14 working days between the consultation closing date and the fund advisory panel meeting. Presumably papers need to be released a week in advance giving only 9 working days to collate responses and to reflect on them and action any changes as a result.

To ensure this consultation is meaningful and not simply a pre-determined outcome, I would appreciate clarity on the following points:

* What is WYPF doing with employer responses to this consultation?
* Is there a plan to set up a working group to review the feedback?
* How will WYPF respond to each employer's submission?
* How will employer responses be reflected in the final decision-making process?
* Does WYPF have sufficient time and resource to review all responses thoroughly before decisions are made?
* Can you and will you extend the consultation to ensure employers views are heard

I also wish to highlight that the timing of this consultation was not ideal for Multi Academy Trusts, as it took place over the summer holidays. Given that a large proportion of your employers are MATs, and this issue was pointed out in advance, I would ask that you reconsider the timing of future consultations to ensure all employers have a fair opportunity to engage, I would also ask you to extend the period of consultation now to ensure it has been fair and transparent. There is also an assumption that the consultation will automatically reach the right people within MATs, but our group's experience has shown that this is not always the case.

I urge you to take these points seriously and ensure that the consultation process is transparent, inclusive, and genuinely responsive to employer feedback.

I look forward to receiving your feedback on my letter.

## Impact Education Multi Academy Trust – Chair of the Board of Trustees

As the Board of Trustees for Impact Education Multi Academy Trust, we write from a governance perspective as stewards of public funds. We have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community. We are therefore concerned about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for Money and Use of Public Funds

Our advisers have explained that financial conditions have changed substantially since the 2022 valuation, resulting in a much stronger funding position for WYPF. In this context, we would expect to see reductions in employer contribution rates over the next three years. We are concerned that, despite this improved picture, all levers within the FSS appear to have been pu lied to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children we serve.

Request for Reduced Contributions

You have received separately a response to your consultation from our CFO in which the case for a reduction in contributions to 6% has been made, reflecting the improved funding position. We would ask that you respond to the points in her letter which as a Board we support.

Governance and Consultation Process

We are concerned about the consultation process itself as there appears to have been limited engagement with employers before setting the draft FSS. The timing of the consultation has not been ideal for Multi Academy Trusts, as it has coincided with summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

Conclusion

Given our responsibilities as stewards of public funds, we urge WYPF to reconsider the approach taken in the draft FSS.

We look forward to your detailed response to the matters raised by our CFO, and to an ongoing transparent, robust consultation process.

## Incommunities – Executive Director of Finance

Thank you for inviting representations on the proposed changes to the Funding Strategy Statement (FSS) of the WYPF.

Incommunities firmly believes that the effective management of a pension scheme should be a collaborative effort between participating employers – who make and fund pension promises to their employees – and the scheme managers, who are responsible for delivering on those promises.

We are pleased to have been invited to contribute at this stage of the 31 March 2025 valuation process. We hope our input will help shape the valuation over the coming months and support the development of a fair and balanced employer contribution rate for Incommunities and other employers for the period April 2026 to March 2029.

Financial impact of proposed changes

We note that the consultation materials do not include any figures or sensitivities illustrating the financial impact of the proposed changes – either for Incommunities or for other fund employers. It is our understanding that consultations of this nature typically include a comparison of the status quo versus the proposed changes so that responses can be made from a fully informed position.

Probability of funding success

Employer contribution rates set from April 2026 will be heavily influenced by the discount rate applied under different funding targets for different types of employer. For scheduled body employers, the discount rate – and by extension, the employer contribution rate – will be determined using a ‘probability of funding success’ approach.

Due to a legal agreement executed during the three-year valuation cycle, Incommunities is treated on the “Secure Scheduled and Subsumption Body” funding target. Therefore, Incommunities has a direct interest in any proposed change to this funding target methodology and – in particular – the proposal to increase the probability of funding success from 76% to 80%.

While we recognise that the rationale behind this proposal is “to better meet the regulatory requirements of stable primary rates”, we would like to understand the impact of this proposed change – i.e. what the new employer contribution rate would be on both the 76% and 80% probabilities of funding success. Also, as presumably the fund felt that a 76% probability led to a reasonable funding target in the 2022 valuation, further rationale beyond the stability point would be welcome to understand why increasing the prudence in the funding target is a fair approach for employers three years’ later.

Phasing in of contribution rates

Again, we acknowledge the stability objective but feel that employers may not have an opportunity to feed into the decision to phase in contribution rate changes. We propose that some extra wording could be added so that a decision on phasing is made by the Administering Authority, but by having regard to representations from the employer.

## Inspire Partnership MAT – Chief Executive Officer

I am writing as CEO of Inspire Partnership Multi Academy Trust to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

As CEO and Accounting Officer responsible for the budgets of nine schools, it is my professional duty to ensure that every pound spent adds value to the education of our pupils. This involves evaluating expenditure and generating income where possible.

As over 50% of our school’s employees are members of WYPF, who I know value the pension fund as a benefit of their employment, I am acutely aware of the need to protect the financial interest of members and current and future retirees. However, this must be balanced with the current squeeze on school finances with ever increasing need, in particular the investment in the ever increasing numbers of pupils with SEN.

We are currently having to undertake staffing reductions to balance future years’ budgets, at a time when such reductions will have a negative impact on our ability to deliver the curriculum and support our most vulnerable pupils. A reduction of 11.7% in our employers contributions would equate to £480K. This would ensure that we can retain 2 teachers and 14 teaching assistants (the latter all WYPF members), who we are currently having to lose from our structures from next year in order to deliver balanced budgets. Such a reduction would help to protect our frontline services and improve the life chances of our pupils.

Stability We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resources to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Inspire Partnership MAT – Executive Headteachers

I am writing as Executive Headteacher of Inspire Partnership Multi Academy Trust to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

As Executive Headteacher responsible for the budgets of two schools, it is my professional duty to ensure that every pound spent adds value to the education of our pupils. This involves evaluating expenditure and generating income where possible.

As over 50% of my school’s employees are members of WYPF, who I know value the pension fund as a benefit of their employment, I am acutely aware of the need to protect the financial interest of members and current and future retirees. However, this must be balanced with the current squeeze on school finances with ever increasing need, in particular the investment in the ever increasing numbers of pupils with SEN.

We are currently having to undertake staffing reductions to balance future years’ budgets, at a time when such staffing reductions will have a negative impact on our ability to deliver the curriculum and support our most vulnerable pupils. A reduction of 11.7% in our employers contributions would equate to £87K across the schools that I lead. This would ensure that we can retain 3 teaching assistants who deliver education to our most vulnerable pupils, who we are currently having to lose from our structures in order to deliver balanced budgets. Such a reduction would help to protect our frontline services and improve the life chances of our pupils.

Stability We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resources to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Inspire Partnership MAT – Board of Trustees

Re: Funding Strategy Statement Consultation – Governance and Value for Money Concerns

As the Board of Trustees for Inspire Partnership Multi Academy Trust, we write from a governance perspective as stewards of public funds. We have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community. We are therefore concerned about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for Money and Use of Public Funds Our advisors have explained that financial conditions have changed substantially since the 2022 valuation, resulting in a much stronger funding position for WYPF. In this context, we would expect to see significant reductions in employer contribution rates over the next three years. We are concerned that, despite this improved picture, all levers within the FSS appear to have been pulled to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children we serve.

Request for Reduced Contributions Given the improved funding position, we respectfully request that the employer contribution rate be reduced to 6% for the next three years, up to the next valuation. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our schools.

Key Technical Concerns

* Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Governance and Consultation Process

We are also concerned about the consultation process itself. No sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS. We ask:

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?

The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

Conclusion Given our responsibilities as stewards of public funds, we urge WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions—specifically to 6%—reflecting the improved funding position, and that unnecessary prudence is not built into the strategy at the expense of value for money for schools and pupils.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

## Inspire Partnership MAT – Chief Operations Officer

I am writing as an employee of Inspire Partnership Multi Academy Trust and a member of WYPF because I care deeply about how our school’s money is spent and the impact this has on our pupils and colleagues. I am concerned about the high level of employer pension contributions being proposed, especially since I understand the West Yorkshire Pension Fund is in a much stronger financial position than it was at the last valuation.

Things have become much more difficult for our trust schools as budgets have become tighter. Every year, we are being asked to do more with less, and it is getting harder to provide the support and opportunities our children deserve. If employer pension contributions were reduced, it would make a real difference in our schools—freeing up money that could be used directly to support pupils, staff, and essential services.

As someone who has personally been a member of the WYPF for over 25 years and approaching retirement, I am acutely aware of the need to protect the financial interest of members and current and future retirees. However, this must be balanced with the current squeeze on school finances with ever increasing need, particularly investment in our SEN pupils.

I understand that financial conditions have improved a lot since 2022, and this means the Fund is much better funded. Because of this, I would expect to see a real reduction in the amount our school has to pay into the pension scheme over the next few years. I am worried that, instead, the Fund seems to be keeping contributions high when this money could be better spent supporting our pupils and staff.

I understand that the Fund wants to be careful and ensure stability, but right now, with all the cost pressures schools are facing, I believe it would be better to reduce contributions and use that money to help children and staff directly. I also understand that the Fund is considering being even more cautious than before, but I don’t believe this is necessary given the strong position that the Fund is now in.

I would like to see the Fund allow for a bigger reduction in contributions. I know this might mean contributions could go up again in the future if things change, but I am confident our Trust could manage that if needed.

Thank you for considering my views. I hope you will take this feedback seriously and make changes that will help schools like ours make the best use of public money.

## Inspire Partnership MAT – Chief Financial Officer

Please find below my response to the Funding Strategy Statement (‘FSS’) consultation for the West Yorkshire Pension Fund (‘WYPF’). I welcome the opportunity to engage with you on this important matter. This consultation comes at a particularly significant time, given the new funding and investment landscape created by the substantial market changes since the last valuation.

I believe it is critical that the Fund carefully considers the views of employers as part of this process, to ensure that the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders.

As you are aware, over the last year Inspire Partnership Multi Academy Trust has been working collaboratively with other multi academy trusts, investing significant time and working with Isio to ensure we are an informed employer. This consultation is particularly significant to Inspire Partnership Multi Academy Trust and the staff and children within it, given the positive impact it could have on our pension contributions and, consequently, what this could mean for our schools.

We respectfully ask that you consider our response seriously and reflect on the points we have raised when making your final decisions for the valuation. We are also open to meeting with you to present our views in more detail, should you find this helpful.

As CFO of the Trust, it is my professional duty to ensure that every pound spent adds value to the education of our pupils. This involves evaluating expenditure and generating income where possible.

As someone who has personally been a member of the WYPF for over 30 years and fast approaching retirement, I am acutely aware of the need to protect the financial interest of members and current and future retirees. However, this must be balanced with the current squeeze on school finances with ever increasing need, particularly investment in our SEN pupils.

We are currently having to undertake large scale staffing reductions to balance future year’s budgets, at a time when such staffing reductions will have a negative impact on our ability to deliver the curriculum and support our most vulnerable pupils. A reduction of 10% in our employers contributions would equate to £480K. This would ensure that we can retain 2 teachers and 14 teaching assistants (the latter all WYPF members), who we are currently having to lose from our structures from next September in order to deliver balanced budgets. Such a reduction would help to protect our frontline services and improve the life chances of our pupils.

Overview

I believe that the improved funding position of the West Yorkshire Pension Fund can support an immediate and significant reduction in pension contributions, without any increase in the level of risk that Inspire Partnership and other employers pose to the Scheme. We are solid employers, having regular government income, we also have the DFE guarantee. We have high levels of accountability and scrutiny and do not pose any risk to the Fund.

In light of this, we request that you consider an approach that enables us to reduce our contributions to 6% for the next three years, as we do not wish to pay less than members. This would provide much-needed financial flexibility and allow us to redirect vital resources back into our schools.

As part of the Multi Academy Trust group, I would also like to reference the letter shared with the WYPF Advisory Panel meeting on 24th July, which sets out the collective views of the group. I hope that these perspectives will be given due consideration as you finalise the Funding Strategy Statement.

I am also aware that local authorities have expressed similar views regarding the importance of achieving value for money and the potential for reducing employer contributions. I note, in particular, the signature of Steven Mair of Bradford Council, in the letter that was also shared with the WYPF Pensions Advisory Panel.

Key Points

Stability of Contributions

I understand that a key focus of WYPF is the stability of employer contributions, and that this has been reflected in the approach being proposed for the 2025 valuation.

I also recognise that the proposed valuation assumptions and approach are more prudent than those used in the 2022 valuation, with the aim of keeping employer contributions at a similar level.

While I can appreciate the benefits of stability and the certainty it can bring to both WYPF and employers—and why this is relevant for the Scheme—stability is not my key priority at this valuation. Given the significant changes in market conditions since the last valuation and the extent of the funding improvements seen in the Scheme, I do not believe that the usual approach of maintaining stability is appropriate at this time.

I do not think we should continue to anchor to the current contribution rates purely to maintain short-term stability, especially if this results in overfunding the Scheme and requiring employers to pay more at a time when additional cash (which is public money) could be vital elsewhere. If contributions continue at a similar level and WYPF only offers a small reduction, I expect that similar discussions will arise at the next valuation, when contributions will again need to come down—an approach that does not provide true long-term stability.

Instead, I would prefer to see contributions re-set now to a level that reflects the true cost of providing benefits, without increasing prudence as is currently being proposed, and to arrive at a new, stable rate going forward. Given the underlying funding improvements in the Scheme, making this change and reducing contributions does not pose any more risk to the Scheme than the position agreed at the 2022 valuation, which was considered acceptable at that time.

Short Term Reduction

The financial market changes that created the funding improvements for the Scheme occurred towards the end of 2022. Whilst I acknowledge that a valuation only takes place every three years, if a valuation had happened sooner, we could have reduced our contributions earlier. As a result, Inspire Partnership Multi Academy Trust has effectively been overpaying into the Scheme since then.

Given this context, I believe the improved funding position should support a more significant reduction in contributions in the short term, allowing us to recoup these overpayments. This is an approach that I am aware has been adopted by other LGPS funds.

As an informed employer, I fully understand that what I am asking for may result in an increase in contributions in the future. However, I am comfortable that Inspire Partnership Multi Academy Trust can support a future increase if required and will budget appropriately. What we do not need is an overly prudent approach from the Fund, which would effectively reduce our effectiveness as an organisation whose sole aim is to provide the best possible outcomes for our children, simply to provide additional cushioning for the Fund.

Technical Questions and Concerns

I would also like to raise several technical questions regarding the proposed approach in the draft Funding Strategy Statement:

* You have proposed an increase in the Probability of Funding Success from the last valuation.
* Is this change being made purely to maintain employer contributions at a similar level?
* This increases the prudence of WYPF’s approach, and I do not believe additional prudence is needed now, given the improved funding position and the reduced risk of employers being unable to fund benefits.
* How has WYPF chosen the rate of 80%, and why is this considered the right rate when you were comfortable with 76% last time and have previously accepted 69%?
* The continued reference to the 105% buffer means any surplus below this threshold cannot be used to reduce our contributions. This buffer was introduced last time to reflect the specific circumstances of the 2022 valuation. It is not needed this time, and we should be able to use our full surplus to reduce contributions.
* As there is a surplus, running this off over, for example, six years would reduce our contributions further. Why is a 22-year period being suggested?
* The FSS notes that any changes to contributions are typically phased in over six years. We do not want this level of stabilisation and do not believe it is necessary given the significant improvements seen. We request that our revised contribution rate is payable immediately from April 2026.
* Is there a way of using the surplus in the Scheme to pre-fund the cost of redundancy payments? It would be extremely helpful to stabilise these costs rather than having to pay them as a one-off lump sum.
* I would appreciate clear responses to these questions, as they are central to ensuring the consultation is robust, transparent, and genuinely responsive to employer needs.

Consultation Approach

I would like to raise several concerns regarding the consultation process for the Funding Strategy Statement.

Firstly, no sensitivity analysis has been provided as part of the consultation, and there appears to have been an assumption about what employers want, without any real engagement to understand our actual views before setting the draft FSS.

To ensure this consultation is meaningful and not simply a pre-determined outcome, I would appreciate clarity on the following points:

* What is WYPF doing with employer responses to this consultation?
* Is there a plan to set up a working group to review the feedback?
* ow will WYPF respond to each employer’s submission?
* How will employer responses be reflected in the final decision-making process?
* Does WYPF have sufficient time and resources to review all responses thoroughly before decisions are made?

I also wish to highlight that the timing of this consultation was not ideal for Multi Academy Trusts, as it took place over the summer holidays. Given that a large proportion of your employers are MATs, and this issue was pointed out in advance, I would ask that you reconsider the timing of future consultations to ensure all employers have a fair opportunity to engage. There is also an assumption that the consultation will automatically reach the right people within MATs, but our group’s experience has shown that this is not always the case.

I urge you to take these points seriously and ensure that the consultation process is transparent, inclusive, and genuinely responsive to employer feedback.

I look forward to receiving your feedback on my letter.

## Isio - response on behalf of MATs

Please find below the response on behalf of the 26 employers in the Multi Academy Trust group to the Funding Strategy Statement (‘FSS’) consultation for the West Yorkshire Pension Fund (‘WYPF’). The following messages and attached appendices represent the collective position of the group. We welcome the opportunity to engage with WYPF for the 2025 valuation at an important time given the new funding and investment landscape created by the significant market changes since the last valuation.

The group represented by this letter includes 311 schools across West Yorkshire, teaching over 170,000 students. The financial situation for all schools is extremely challenging with many having to reduce front line teaching staff in order to maintain a viable financial position.

The contributions paid to the WYPF are a significant part of school budgets. A reduction in contributions as part of the 2025 valuation will enable budgets to be more balanced and limit further restructuring.

To be clear the priority for this employer group is for the pension costs to be value for money and NOT to maintain a stable but higher than is necessary contribution rate. In our view there is a very significant surplus that creates plenty of room for the Actuary, the Administering Authority and the WYPF Advisory Panel to reduce contributions and still adopt a prudent overall approach to the scheme valuation.

Introduction

As you are aware from our ongoing communications, ahead of preparing this response we’ve invested significant time and costs working as a group with our pension advisers, Isio. Considering the investment we have made in becoming informed employers, and the significance of the pension costs in terms of what we could achieve if they were reduced significantly, we believe WYPF has a public duty to consider our response and views very carefully and that they should influence your final decisions in this process. We have not engaged in the valuation process previously and recognise in our journey so far with this valuation that our voices as employers providing public services in West Yorkshire is important in this significant process.

Whilst the consultation covers the FSS in full, our key area of focus is the 2025 valuation and the implications for employer contributions and so we have focused our response on these areas of the statement. We have not considered wider areas such as the investment strategy here but would be keen to be part of these conversations and add our voice to those of other employers.

Overview

Multi Academy Trusts are facing financial pressures and so the level of pension contributions agreed at this valuation will directly impact our schools, staff and students. Enabling a significant reduction in pension contributions through the 2025 valuation would allow us to proceed with investments into the Academies which we would not be able to do otherwise.

We expect that there will be a large surplus disclosed at this valuation which could be available to reduce the contributions paid by employers. We believe some of the surplus should be used in this way. This surplus should support an immediate reduction in employer contributions at the 2025 valuation, without any increase in the level of risk we pose to the Scheme. We request that WYPF reconsiders the proposed valuation approach to arrive at a funding strategy that will enable us to reduce our contributions to 6% for the next three years to the next valuation, as we don’t wish to pay less than members. As a combined group we pay over £30m in pension contributions. Dropping these to 6% would save our schools over £20m. This is equivalent to funding over 350 additional teachers, or over 700 additional teaching assistants each year.

Over the long term we want contributions rates to be set for long-term sustainability, not focused on short-term stability as we cover below. We set out our original request as part of the joint letter dated 11th July shared for the WYPF Advisory Panel meeting on 24th July which is included as an appendix to further support our response. The West Yorkshire Local Authorities wrote on 9th June seeking similar outcomes and we have also attached this in the appendix.

A significant reduction in contributions would unlock vital resources for our schools. We want to ensure the benefits for our employees are secured whilst also working with you to take accountability for public money, ensuring we are making public money work as hard as we do for our schools, staff and students.

Further details of our response to the consultation are set out below.

We have also included a section on requesting further information and clarification on the consultation process. We asked WYPF to provide some additional information to support our consultation response, information that should have been readily available and was requested in a timely way. It has not been forthcoming. In particular, we note that the consultation information shared does not provide any details on the detailed assumptions used to calculate the discount rate assumption and the proposed changes. This is a surprising omission and without it the proposal cannot be easily interpreted and the impact fully understood even by our actuarial advisers. We don’t believe this is acceptable and this information should be provided to employers to support them through the consultation. We are disappointed that we have not received this information and so have not been able to incorporate into our response.

1) Stability of contributions

The draft FSS states “a key priority for the Administering Authority is to bring stability to employers’ total contributions”. We can see this has been the main driver behind the proposed valuation assumptions and approach. The WYPF are proposing to be more prudent in their approach in this valuation to maintain employer contributions at a similar level to past rates. The recent Advisory Panel meeting was run on the assumption that stability was important for all employers and it was not evident that a question on this was being asked of employers. Value for Money and good use of public money are important to us and not stability of short-term contributions at this time.

A reset of stability

We acknowledge the benefits of stability and the level of certainty it provides helping employers plan and budget their contributions. All other things being equal, we agree stability is relevant. However, the market has shifted so much since the last valuation that the usual approach to stability isn’t right here. If contributions are kept at a similar level, this means overpaying to the Scheme and it is extremely likely that our contributions will need to go down in the future. This only provides short-term stability but long-term instability and isn’t sustainable. We don’t want short-term stability at the cost of overfunding now when we feel strongly that we have vital ways we can use the additional cash to improve our schools, the education of our pupils and our local communities by providing employment.

Given the market changes mentioned above the 2025 valuation provides the opportunity to reset the approach. We ask WYPF to consider the correct underlying costs of providing benefits from the Scheme. We have been over-paying and have paid more than the benefits cost for this current year, based on the current market conditions. Rather than adjusting the assumptions to maintain short-term stability of contributions, there needs to be an acknowledgement of what the correct rates should be. Based on this we ask you to consider what is the right new stable contribution rate. A rate that is more balanced in terms of the likelihood of it going up versus the likelihood of it coming down.

Requirements of stability

Whilst the Scheme regulations require the actuary to consider the desirability of stability when setting the valuation approach, we believe the employer’s views should play their part. And the role of the WYPF Advisory Panel is to consider these views too and stability should be considered in the wider context. We note in particular the regulations only refer to stability of the primary rate, rather than stability of total contributions as you reference in the FSS priority noted above. We would also highlight that the stability requirement within the regulations forms part of a wider clause which requires other factors to be taken into account. One of these refers specifically to “long-term cost efficiency” supporting the points we make above.

Impact on employer risk

As informed employers we appreciate there is always a risk that contributions may need to increase in the future. We also accept that paying lower contributions now means there is a greater chance of contributions needing to increase in the future as we are not continuing to build up an even larger cushion of surplus in the Scheme.

We acknowledge this and we note from the FSS that WYPF believes employers would be able to support this if needed as you state “The Administering Authority believes that its funding strategy will ensure the solvency of the Fund because employers collectively have the financial capacity to increase employer contributions should future circumstances require, in order to continue to target a funding level of 100%”

However, we believe that even if we do significantly reduce our contributions now, given the improved funding position of the Scheme, the risk of them needing to go up again in the future is still lower than it was at the last valuation. That was a level of risk that WYPF have previously been comfortable with.

Please can WYPF share details of the financial modelling they have done on the downside risk for the 2025 valuation proposal compared to the 2022 valuation which we believe will support this point. For example, have you compared:

* At the 2022 valuation, the likelihood of our rates increasing by 5% at the 2025 valuation compared (ignoring the stabilisation mechanisms)
* At the 2025 valuation, if you implement the FSS as drafted, the likelihood of the resulting contributions increasing by 5% at the 2028 valuation? (again, ignoring the stabilisation mechanisms)

Quantifying this risk will help us and all employers. Our advisors believe this risk is considerably lower and prefer, for reasons of efficiency, Aon provide this analysis. We ask WYPF to provide additional modelling and use this to review their approach to stability and consider the right underlying costs of the Scheme, rather than taking an approach derived to maintain contributions at the same level in the short-term that doesn’t reflect the current financial conditions.

2) Funding strategy for the next 3 years

In addition to the points above relating to the longer-term stability and funding for employers, given the extent of improvement in the underlying funding position of the Scheme for the 2025 valuation we believe this could support a further temporary reduction which could make a big difference to employers like us.

Favourable market conditions have existed since late 2022, and have actually continued to improve since the March 2025 valuation date showing an even better position now in October 2025. If a valuation had happened sooner our contributions would have been reduced sooner, meaning we have been overpaying the last few years. In light of this and the resulting funding improvements we think the position of the Scheme can support us paying 6% contributions (as we don’t wish to pay less than members) for the next three years to recoup some of these overpayments. This is similar to the approach taken by Strathclyde Pension Fund as part of the 2023 valuation.

It is acknowledged that this level of reduction may need to be temporary, and will be reviewed at the next valuation. In the long term we want to contributions to align with a new stable rate in line with the principals mentioned above.

3) Academies Group

The decision to be part of the Academies Group and whether it is right for each Trust is one that may change over time. We don’t believe the decision to leave the Academies Group should be irrevocable and ask for more flexibility here.

4) Consultation approach

Given the importance and the impact of the areas raised in the FSS we are keen to make sure the consultation is meaningful. Please can you provide some clarity on the approach that will be taken to the employer responses you receive during the consultation:

* How does WYPF intend to review the consultation responses? We understand a working group is being formed for this please can you provide the details of this group and how it will operate.
* How will you respond to each employer’s response and work with employers to ensure their views are being heard?
* WYPF’s approach to calculating the liabilities for the valuation is not transparent and is not something that can be easily replicated or understood by employers or their actuarial advisers. In particular, no information has been provided on the assumptions underlying the discount rate approach. Under public law a consultation needs to provide sufficient information for intelligent consideration. Without these assumptions the discount rate
* assumptions and the impact on employers cannot be sufficiently understood. We ask that more detail is provided around this approach to support employers understanding the proposals and the impact of the assumptions proposed. We have reflected this in the information section below.
* The advice paper shared by Aon for the WYPF Advisory Panel meeting includes some helpful information that should have been shared more widely as part of the consultation. For example, pages 12 and 13 of this report includes some sensitivities that show a potential movement in the employer contributions of around 5% reflecting the changes in the valuation approach which has not been shared with employers in the consultation material. Please explain why this was not made readily available to employers to support the consultation process?
* Please can you poll the employers to ask them what their view of stability is? We suggest this might be to ask what is more important to them: the absolute amount of contributions for the next three years, or stability for the next 6 years? We are happy to help frame this question. You would then have evidence as to why you might (or might not) change your approach to stability, in the same was as we can see the Royal Borough of Kensington & Chelsea council have done.
* Please can you confirm the decision-making process for finalising the valuation approach. We note there is a short timeframe between the end of consultation and the committee meeting in October where the responses will be discussed. And we note the Pensions Board minutes anticipate a conclusion in November. Are you comfortable WYPF has sufficient time and resource to be able to consider and reflect on all of the responses ahead of making decisions to ensure this is a meaningful consultation?
* Is WYPF comfortable employers have received the information on the consultation, and this has been sufficiently communicated to employers for their engagement? We note there was limited signposting to the consultation in the lead up to the launch.

5) Further information

Please can you provide more information on the following questions to help us understand the position the WYPF has proposed. We have already requested elements of this information directly from WYPF in advance of sending this response but have not yet received a response:

* Details of the expected return for the WYPF assets, both overall and split by asset class, at both the 2022 and 2025 valuation dates and Aon’s Capital Market assumptions. (We note the Aon paper states this is an overall rate of 7.35% p.a. for 2025). We would have expected these assumptions to be provided as part of the consultation to support employer understanding and transparency in line with the actuarial standards.
* Details of the demographic assumptions proposed, including details of the mortality assumptions in detail
* The Probability of Funding Success for the 2013 and 2016 valuations noting it was 69% in 2019 and 76% in 2022 and proposed to increase to 80% at the 2025 valuation and an explanation for the reason for the increases in recent years.
* Please provide details of the calculated contribution rate if the Probability of Funding Succes was 69% for the 2025 valuation, all other assumptions remaining as proposed.
* Details of the risk modelling WYPF has done to support the proposed valuation assumptions. In particular has the WYPF considered how likely the contributions are to increase in the future at this valuation for different agreed contributions, and how this compares to the position for the 2022 valuation.

We expect WYPF to take full consideration of the points we have raised in this response when making their decision and provide feedback on the points we’ve raised and answers to our questions. We would welcome the opportunity to discuss this response further and to present our views as part of the deliberations.

We have included in the appendix further technical details of our view on each of the proposed valuation assumptions which should also be considered as part of our consultation response.

Abbey Multi Academy Trust

Accord Multi Academy Trust

Batley Multi Academy Trust

Beckfoot Trust

Bradford Diocesan Academies Trust

Castleford Academy Trust

Cockburn Multi Academy Trust

Dixons Academies Trust

Exceed Academies Trust

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Red Kite Learning Trust

Share Multi Academy Trust

South Pennine Academies

The Gorse Academies Trust

Together Learning Trust

Trinity Multi Academy Trust

Wellspring Academy Trust

## Kirklees Council – Cabinet Member for Finance and Regeneration and Cllr Turner

Kirklees Council Response to WYPF Funding Strategy Statement Consultation – September 2025

Kirklees Council welcomes the opportunity to respond to the consultation on the proposed updates to the Funding Strategy Statement (FSS). We appreciate the work undertaken by WYPF and its advisors in preparing for the 2025 actuarial valuation. However, we would like to raise several points for further reflection and consideration by Members of the Advisory Panel:

1. Pressures on Local Authority Budgets

Local authorities continue to face unprecedented financial pressures. Rising demand for statutory services, constrained funding settlements, and inflationary cost increases have placed significant strain on council budgets.

We feel in this context, employer pension contribution rates must be carefully balanced to ensure affordability and sustainability for employers as well as ensuring long term stability of the Fund.

2. Surplus Growth Despite Adverse Conditions

We note that WYPF has experienced a significant increase in funding surpluses since the last valuation, despite a challenging macroeconomic environment marked by geopolitical instability, high inflation, and market volatility.

At the 2019 valuation, the Fund reported a surplus of £0.7 billion with a funding level of 102%. This increased to £1.1 billion and 108.5% at the 2022 valuation. Based on the papers presented to the Advisory Panel in July 2025 (p11 of AoN report), there was an indicative funding position of 117.5% and an indicative increase in surplus to c£2.9bn, reflecting continued strong performance of the Fund.

These figures demonstrate the Fund’s resilience and suggest that previous assumptions —while prudent—may have been overly cautious. We feel there is scope to revisit the level of prudence applied in the current strategy and this would appear to afford the opportunity to reduce employers’ contributions.

3. Justification for the 80% Funding Success Assumption

The proposed increase in the probability of funding success from 76% to 80% warrants further scrutiny. Historical assumptions of 76% (2022) and 69% (2019) have both resulted in rising surpluses. We request that WYPF provide clear evidence and rationale for this proposed change to 80%, including modelling outcomes and sensitivity analysis, to demonstrate that the increased threshold is necessary and proportionate. We feel it would be appropriate for Members of the Panel to be provided with the analysis and the impact on employer contribution rates as part of their deliberations.

4. Discount Rate Adjustment

Whilst we recognise the proposed discount rate of 4.0% will help to derisk the pension fund in the future, it does represent a material shift from the current 4.5%. We ask WYPF to share the underlying evidence and market assumptions that support this change, particularly in light of recent economic trends, the Fund’s actual performance and the fact that UK gilt yields exceed the discount rate assumptions.

5. Sustainable Contribution Reductions

Given the improved funding position and the financial pressures faced by councils, Kirklees Council requests that Members of the WYPF advisory panel consider sustainable reductions in employer contribution rates.

Whilst any employer contribution reductions are of course welcome, our preference is not for phased reductions, which are referenced in the Funding Strategy statement, as these somewhat delay the effects of much-needed budget relief. We’d prefer an immediate reduction (from April 2026) which covers the three years to the next review period. Kirklees Council contributes over £42m to the WYPF and we estimate savings of over £2m pa for every 1% point reduction in the overall employer rate.

We do of course recognise the responsibility of the Fund’s trustees to ensure the long-term viability of the Fund, and we accept that any reduction in contributions that the Members may agree must not undermine its solvency. We also acknowledge that under Regulation 64 of the LGPS Regulations 2013, further changes to employer contributions may be required during the three-year valuation period.

Nonetheless, we believe the current surplus position provides a strong basis for immediate recalibration of employer contributions to deliver savings and help support local authorities in maintaining essential services.

We thank WYPF for its continued stewardship of the Fund and look forward to further dialogue on these matters.

## Lady Royd Primary School (BDAT) – Headteacher

I am writing as Headteacher of Lady Royd Primary School regarding the West Yorkshire Pension Fund’s (WYPF) Funding Strategy Statement (FSS) consultation. As a school, we are acutely aware of the impact that employer pension contributions have on our ability to deliver the best possible education for our pupils.

The upcoming 2025 actuarial valuation presents an opportunity to review employer contribution rates. We understand from our advisors that the financial position of the WYPF has improved significantly since the last valuation in 2022. This improvement should be reflected in a meaningful reduction in employer contributions.

* For Lady Royd Primary, a reduction in employer contributions could save the school approximately £25,000 per year. This is a substantial sum for a primary school and would have a direct and positive impact on our community. With these savings, we could:
* Avoid the need for any staff restructure, maintaining continuity and morale.
* Support the employment of additional teaching assistants, providing more support for our most vulnerable children, particularly at a time when SEND need is at an all-time high but funding to provide teaching support for those with Special Educational Needs and Disabilities is chronically low.

Invest further in our school buildings and facilities, ensuring a safe, accessible, inclusive and inspiring environment.

* Enhance enrichment opportunities for our pupils, including extracurricular activities and learning experiences.

We recognise the importance of stability for the Fund, but at a time when schools are facing unprecedented financial pressures, it is vital that resources are directed to where they are needed most – supporting children’s education. Surpluses within the Fund should not be prioritised over the immediate needs of schools.

We therefore urge the WYPF to adopt a flexible approach to the valuation, allowing for the lowest possible employer contributions over the next three years, with a review at the next valuation. We also question the need for additional prudence or funding buffers, given the current strong position of the Fund.

Thank you for considering the views of Lady Royd Primary School. We hope that the final strategy will enable us to continue investing in our pupils, staff, and facilities.

## Lee Mount Academy (Impact Academy) – Headtecher

I am writing as Head Teacher of Lee Mount Academy, a school within Impact Education Multi-Academy Trust to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

Should the consultation result in an employer contribution at this level, £47,000 would be released back into the school budget, having a significant impact on educational provision for our young people.

This saving would support staff retention and protect jobs whilst ensuring the quality provision at the academy can be maintained. This sum of money would equate to an additional teacher or for two support staff. This would allow us to support disadvantaged and vulnerable children in the Lee Mount and Ovenden area of Calderdale, improving their life chances and success in the future through improved academic outcomes along with rich life experiences.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Leeds City Council – Assistant Chief Executive

Thank you for the opportunity to provide our response as part of the consultation on the Funding Strategy Statement for the West Yorkshire Pension Fund (“WYPF”) which closes on the 3rd October. At Leeds we understand the difficult decisions which are required to be made to ensure the WYPF is sustainable and resilient for the future while balancing the requirements of the Local Authority Contributions. This comes at a time when many Local Authorities are struggling to balance their budgets and therefore your consideration of our ask would be appreciated. Leeds City Council would like to thank you and your team for all your hard work in managing the pension fund so effectively.

Leeds City Council has responded as part of the joint consultation response by the West Yorkshire Authorities and we are also responding individually with our key members taking a keen interest. WE would like the points raised in the joint response to be considered which we are very supportive of and would ask that the following are also key points:

1. Changes in contribution rates has the most significant impact on Local Authority revenue budgets and, therefore, potential savings (where they are possible due to improvements in scheme funding) these should be considered alongside the desirability of stability in contribution rates rather than as a secondary consideration. This is key to the long term and the ability of Local Authorities to continue to make contributions to the Pension Fund which are not at the detriment to those live members of the fund.

2. When the Pension Fund is deliberating the level of contributions a Local Authority needs to make we would ask the Pension Fund to consider the impact of these contributions on the local tax payers of Leeds who are experiencing cuts in services to fund contributions to the Pension Fund which is currently in a surplus position. By increasing the level of prudence assumed by the WYPF this has a real impact on the resources the Council has to deliver services.

3. The WYPF has been in a surplus position for a number of years and has been steadily increasing with a forecast surplus position of £2.3bn on 31st Dec 2024, £1.407bn in 2022, £866m in 2019. We now feel the time is right that the WYPF should consider reducing Employers Contribution Rates to a level which enables the Pension Fund to have surplus assets over Liabilities at a level around 105%. This could be achieved either through reducing the Primary Rate by reducing the level of prudence as detailed in the WY joint response or through the Secondary Rate as an adjustment to the primary rate.

4. Leeds City Council currently contributes £76m per annum in Pension Fund Contributions and therefore a reduction of 4% would enable vital services to be protected. A reduction in contribution rates from the 1st April 2026 would be preferable for Leeds City Council.

Thank you for your consideration of our response.

## Leeds City Council – Leader and Deputy Leader of the Council

Thank you for the opportunity to provide our responses as part of the consultation on the Funding Strategy Statement for the West Yorkshire Pension Fund (“WYPF”) which closes on the 3rd October. As Leader and Deputy Leader of Leeds City Council we feel it is imperative that we respond to such a key consultation.

I would firstly like to recognise the hard work you and your team do in securing the pension fund assets for our officers and the performance you have achieved through the diverse investments you have made.

I am aware of the response provide by the West Yorkshire Authorities on all our behalfs and I would ask that you consider the detail of this response. I would however like to make the following points.

As you detail in the funding strategy the main purpose is to ensure:

* A clear and transparent funding strategy, specific to the Fund, to meet employer’s pension liabilities going forward.
* Aims to meet the regulatory requirement in relation to the desirability of maintaining as nearly constant a primary contribution rate as possible.
* The regulatory requirement to set contributions so as to ensure the solvency and long term cost efficiency of the Fund are met.
* A prudent longer-term view of funding the Fund’s liabilities.

A key point to the aim and objective of the FSS details “the requirement to secure…the long-term cost efficiency of the scheme”

The WYPF states their priority continues to be stability. However, given that the actuary must have regard to both points (amongst others) and is detailed above as a clear aim and objective of the FSS, it follows that equal weight should be given to ensuring the long-term cost efficiency of the scheme, which must acknowledge the affordability of the scheme for participating employers.

Changes in contribution rates has the most significant impact on Local Authority revenue budgets and, therefore, potential savings (where they are possible due to improvements in scheme funding) should be considered alongside the desirability of stability in contribution rates rather than as a secondary consideration. This is key to the long term affordability of Local Authorities to continue to make contributions to the Pension Fund which are not at the detriment to those live members of the fund.

When the Pension Fund is deliberating the level of contributions a Local Authority needs to make we would ask the Pension Fund to consider the impact of these contributions on the local tax payers of Leeds who are experiencing cuts in services to fund contributions to the Pension Fund which is currently in a surplus position. By increasing the level of prudence assumed by the WYPF has a real impact on the resources the Council has to deliver services.

The WYPF has been in a surplus position for a number of years and has been steadily increasing with a forecast surplus position of £2.3bn on 31st Dec 2024, £1.407bn in 2022, £866m in 2019. We now feel the time is right that the WYPF should consider reducing Employers Contribution Rates to a level which enables the Pension Fund to have surplus assets over Liabilities at a level around 105%.

Leeds City Council currently contributes £76m per annum in Pension Fund Contributions and therefore a reduction of 4% would enable vital services to be protected while still making substantial contributions to the WYPF. A reduction in contribution rates from the 1st April 2026 would be preferable for Leeds City Council.

Thank you for your consideration of our response.

## Leeds Trinity University - Director of Finance & Strategic Planning

Please find below the Leeds Trinity University (LTU) response to the Funding Strategy Statement (‘FSS’) consultation for the West Yorkshire Pension Fund (‘WYPF’). Leeds Trinity University (“the University”) welcomes the opportunity to respond to the consultation on the FSS. We are fully committed to the long-term sustainability of the WYPF and recognise the need for prudence, long-term stability, and intergenerational fairness in the management of the Fund. At the same time, as an Admitted Body within the Fund, we welcome the time to engage with WYPF for the 2025 valuation to agree the right outcome for the University and WYPF. This is an important valuation following the new funding and investment landscape created by the significant market changes since the last valuation. We look forward to continuing our discussions with you.

Introduction

As part of preparing this response we’ve worked with our pension advisers,ISIO, supporting us to understand the proposed FSS and what it means for us. Considering the investment we’ve made in becoming informed employers, and the significance of our LGPS pension costs to us at this current time, we ask that WYPF considers our response and views very carefully and that they should inform your final decisions in this process.

We appreciate some advisors may be working with more than one organisation in the WYPF and so their responses may reflect on similar points that we have outlined here. However, this should not mean that our responses are combined with theirs or less weight is put on similar responses. This response should be treated as a complete and standalone response and considered on its own merit.

Overview

At the University we value being a part of the LGPS and know our employees who are or have been members value the scheme. We are committed to ensuring that benefit provision is continued for our employees and to achieving the right balance of costs and risk to support us being a long-term employer in the LGPS.

Market conditions have improved significantly since the last valuation. This is reflected in the most recent balance sheet position we’ve received for reporting at 31 July 2025. This showed for the University:

• Fair value of assets: £78.15m

• Present value of funded defined benefit obligations: £54.49m

• Funding surplus: £23.66m (before recognition restrictions)

This represents a surplus in excess of £20m which, under current accounting rules, is not recognised on LTU’s balance sheet due to the surplus restrictions applied. This surplus restriction is because we do not have the legal right to set contributions or a return of surplus, but this does not mean that we should not be able to benefit from the surplus.

We acknowledge that the Fund must preserve sufficient assets to cover liabilities and maintain long-term stability. However, we believe the improved funding position means there are now sufficient assets to be able to support a significant, immediate reduction in employer contributions at the 2025 valuation, without any increase in the level of risk we pose to the Fund.

However, the proposed approach is underpinned by one key priority of stability of contributions in the short-term. In our view this will, with high probability lead to increased surplus and gradual reductions over the long term. This creates long-term instability. We don’t want short-term stability with the continued overfunding it brings when we are clear that we can use the additional cash to improve and strengthen our university. We ask WYPF to urgently reconsider the valuation approach to facilitate immediate, larger reductions in contributions.

A reduction in contributions would unlock vital resources for our university. As you will know, Universities are currently facing significant short-term challenges in the sector. Our university, like many, is facing ongoing liquidity challenges and is actively managing significant cashflow pressures. Whilst we are confident that we can withstand these short-term challenges, our level of pension contributions are significant and are increasing the amount of borrowing we need. A reduction in contributions will help us reduce the cost of borrowing as we work through a refinancing exercise. It will also support us in making investments into the University’s core academic mission to improve the student experience, improve and retain jobs for our employees (who are members of the LGPS) and support the local community. As a not-for-profit organisation the values of these investments will accumulate and contribute to an even stronger covenant in years to come.

We are aware of the government’s focus on UK pension schemes supporting UK economic growth, including through local investments. In our view, allowing cash for direct investments in employers, meets this objective and should be seen as a very positive use of the LGPS’s strong funding position.

We would like to work with you to agree a contribution approach that is right for us and you. We appreciate that the FSS is drafted in a way that allows flexibility in approach in a number of areas, and we ask that this flexibility is maintained to support us having these discussions and then put them into practice.

However, we also consider that the FSS has far too much built in prudence, designed to meet the stability objective. We would request that this prudence is re-considered from an independent and fresh perspective. We have set out further details on our views of the proposed FSS below.

We have also included a section on requesting further information and clarification on the consultation process. In particular, we note that the consultation information shared does not provide any details on the detailed assumptions used to calculate the discount rate assumption and the proposed changes. This is a surprising omission and without it the proposal cannot be easily interpreted and the impact fully understood even by our actuarial advisers. We don’t believe this is acceptable and this information should be provided to employers to support them through the consultation.

1) Stability of contributions

The draft FSS states “a key priority for the Administering Authority is to bring stability to employers’ total contributions”. We can see this has been the main driver behind the proposed valuation assumptions and approach. The FSS is proposing to be more prudent in the approach at this valuation to maintain employer contributions at a similar level to past rates.

We also understand the last Advisory Panel meeting was run on the assumption that stability was important for all employers and it was not evident that a question on this was being asked of employers. It was also not clear from the discussions that the same regulation that includes the need for stability (albeit to primary contribution rates) also requires the long-term cost efficiency of the scheme to be considered.

Short term stability is not the most important consideration for us at this valuation. We consider that excessive prudence can lead to long-term cost inefficiency, if a wider view is taken on the benefits for employers of having more available resources.

A reset of stability

We acknowledge the benefits of stability and the level of certainty it provides with helping employers plan and budget their contributions. All other things being equal, we agree short-term stability is valuable. However, the market has shifted so much since the last valuation that the usual approach to stability is not appropriate. Continuing to pay contributions at a slightly lower level will mean overpaying to the Fund making further future reductions at successive valuations very probable.

This provides short-term stability with long-term instability and therefore arguably is not sustainable. We don’t want short-term stability with the overfunding it brings when we are clear that we can use the additional cash to improve and strengthen our University, including helping with our short-term section financial challenges and improving the experience for our students and our local communities.

Given the market changes the 2025 valuation provides the opportunity to reset the approach. Rather than adjusting the assumptions to maintain short-term stability of contributions, there needs to be an acknowledgement of what is the correct cost of providing the benefits. We ask WYPF to consider what is the right “new stable” contribution rate that provides sustainability and is much more balanced in terms of the likelihood of it going up versus the likelihood of it coming down.

Requirements of stability

The Scheme regulations require the actuary to consider the desirability of stability when setting the valuation approach. However, the regulations only refer to stability of the primary rate, rather than stability of total contributions as referenced in the FSS priority noted above. The stability requirement within the regulations also forms part of a wider clause which requires other factors to be considered. One of these refers specifically to “long-term cost efficiency” supporting the points above.

We therefore ask WYPF to reconsider the requirements for stability and ensure that you have also taken into account long-term cost efficiency. We believe the employer’s views should also play their part here.

Impact on employer risk

As informed employers we appreciate there is always a risk that contributions may need to increase in the future, and it goes without saying that paying lower contributions now means there is a greater chance of contributions needing to increase as we are not continuing to build up an even larger cushion of surplus in the Fund.

We are comfortable we would be able to plan for and support an increase in contributions if this was required in the future and was needed for the Fund. The FSS also notes WYPF are comfortable employers can support an increase if needed, stating “The Administering Authority believes that its funding strategy will ensure the solvency of the Fund because employers collectively have the financial capacity to increase employer contributions should future circumstances require, in order to continue to target a funding level of 100%”.

We believe that even if we do significantly reduce our contributions now, given the improved funding position of the Fund, the risk of them needing to go up again in the future is still lower than it was at the last valuation. A level of risk WYPF were previously comfortable with.

Please can WYPF share details of the financial modelling they have done on the downside risk for the 2025 valuation proposal compared to the 2022 valuation which we believe will support this point. For example, have you compared

- At the 2022 valuation, the likelihood our rates would need to increase by 5% at the point we got to the 2025 valuation (ignoring the stabilisation mechanisms)

- At the 2025 valuation, if you implement the FSS as drafted, the likelihood of the resulting contributions increasing by 5% at the 2028 valuation (again ignoring the stabilisation mechanisms)

Quantifying this risk will help us and all employers understand the position. Our advisors believe this risk is considerably lower following the 2025 valuation showing the scope to reduce contributions without increasing risk.

We ask WYPF to review their approach to stability and consider the right underlying costs of the scheme, rather than taking an approach derived to maintain contributions at the same level in the short-term. This is not the right approach given the current position and future outlook. Maintaining stability of employer contributions WILL very likely increase the existing surplus and at a level that is already £20m+ it is not acceptable that the WYPF should retain more than it needs.

2) Probability of Funding Success

The draft FSS shows an increase in the Probability of Funding Success. For Secure Scheduled Bodies this moves from 76% at the last valuation to 80% this valuation. There is no clear justification for why this parameter is 80% and there hasn’t been a justification at previous valuations.

For “Intermediate – Medium risk” employers like the University, it is proposed to change from 83% last time to 87% this time. This increases the level of prudence being taken and increases the level of employer contribution needed compared to adopting the same approach as the last valuation. This takes our assumption very close to the extremely prudent basis that is being used as the exit basis.

We understand the key reason for this change is to meet the priority of stable contribution rates. There is no other reason for higher prudence at this valuation.

The Probability of Success was also increased at the last valuation in 2022 (for Secure Scheduled bodies this went from 69% that had been used previously). Again, we understand the only reason for this change at the time was to offset the improvements in the funding position of the Fund maintaining stability.

Continuously increasing the prudence in this assumption as a way of maintaining stability will result in an overly prudent approach that leads to overfunding of the Fund. The resulting discount rate for this valuation of 4.5% for Secure Scheduled Bodies is significantly below the government bond yield at that date, which is around 5.25% at a similar duration to the Fund (this is the case even if when considering net rates, with the inflation assumption adjusted to reflect a market-based approach). This appears to contradict the view you include within the investment strategy section of the FSS which states “The Administering Authority invests a substantial proportion of the Fund in assets which are expected to offer higher long-term rates of return than government bonds and cash”.

We therefore don’t agree with the proposed increase in the probability of Funding Success and ask WYPF to reconsider this proposal. Given WYPF has been comfortable with 76%, and before that lower, in the past please could you share the analysis that has been undertaken to support your view that 80% and 87% are appropriate.

In addition, given the changes we’ve seen in market conditions since the last valuation, the funding position of our participation measured on a low-risk gilts-based approach has improved significantly and this is now in surplus. Considering this we believe the level of risk we, and all employers, represent to the Fund is greatly reduced. As such, employer covenant and the approach to employer categorisation feels less relevant to the valuation discussions this time. Something you have demonstrated by grouping medium and higher risk employers together.

Given the very low covenant risk, our assumptions should be set in line with the Secure Scheduled Body assumptions for this valuation and so shouldn’t be higher than the 80% probability proposed for them, albeit as noted above we would also challenge this as overly prudent.

For the avoidance of doubt, we don’t consider that the exit valuation is the basis on which our risk can be measured. The low-risk basis is broadly in line with available insurance pricing which is a step the LGPS could take if it was concerned about protecting the current covenant position.

3) Removal of surplus

We note the use of surplus above 105% was introduced in 2022 to reflect the very specific circumstances at the time where the assets of the Fund had fallen in value after the valuation date. This is not the case here, with market conditions having improved since the valuation date. Combined with the improved position of the Fund overall since the last valuation we don’t believe this adjustment is needed for the 2025 valuation. It should be possible to use at least the full surplus to reduce employer contributions. We note the wording included in the draft FSS provides WYPF the flexibility to remove this requirement when setting the contributions.

Furthermore, it follows from the approach taken last time that the 105% factor could be varied to be less than 100% to reflect the post valuation date (positive) experience.

4) Intermediate employers

As an intermediate employer we appreciate we are part of a small group of employers within WYPF and we would like to work with you to agree the best approach that works for us and you. We want to make sure we have the right balance of costs and risk for our LGPS participation and that we are working with you to ensure our money, as a not-for-profit organisation, is being allocated in the best way to secure our members benefits, whilst also improving our organisation and the local community. A key ask we have for the proposed FSS is that it provides sufficiently flexibility for the WYPF to work with us in this way.

Favourable market conditions have existed since late 2022 and have continued to improve since the March 2025 valuation date showing an even better position now in September 2025. If a valuation had happened sooner our contributions would have been reduced sooner, meaning we have been overpaying the last few years. Considering this and the resulting funding improvements we think the WYPF could also support an even further short-term reduction in our contributions for the next three years to support our short-term challenges. We acknowledge this could be temporary and would be reviewed again at the next valuation. We are aware of similar approaches being taken by other funds.

We note there are a number of key areas within the valuation approach that enables flexibility, and we ask that this is maintained to support these discussions.

- Recovery plan period

We note from the consultation website the typical approach is to apply a recovery period of 22 years which, combined with the level of prudence reflected in other areas of the valuation proposal, is exceptionally prudent. This represents more than 7 future valuation cycles. We also note a recovery period of 22 years would be the same as that adopted at the last valuation. The FSS notes the intention for the recovery plan to be gradually reduced where there is a deficit in the Fund and so we would question why that isn’t the same here when there is a surplus. However, we note the FSS allows flexibility for this to be considered on a case-for-case basis which we would ask for here, not just in writing, but also in practice

- Phasing in of contributions

Again, the FSS notes that typically contributions are phased in over six years. However, the wording gives scope for this to be different for different employers. Given the extent of the market changes we have seen we don’t believe phasing in of contributions is appropriate here and we believe could support moving to the revised contributions immediately. We look forward to discussing the options here with you.

5) Wider elements of the FSS

- Exit basis

The revised FSS does not propose any change to the exit basis being adopted. This was changed in 2024 as the approach being applied at that time was resulting in an overly prudent approach. Whilst this doesn’t influence the valuation discussions, we want to acknowledge that in our view these changes were not sufficient. The current exit basis approach continues to result in an overly prudent basis that will overfund the Fund, overcharging exiting employers to the benefit of the remaining employers. We believe a gilts-based approach remains the most appropriate method for the exit valuation and WYPF should revert to a gilts-based approach.

- Derisking options available

The revised FSS doesn’t provide practical de-risking options for employers. Many employers are now likely to find themselves in a position where they have a surplus on the ongoing valuation basis and on a low-risk basis. We believe employers should be able to use this to reduce contributions, in the ways we have outlined in the points above. Alternatively, some employers may appreciate the ability to use this to reduce the level of risk for their participation.

At the current time there aren’t any alternative investment strategy options, something we are starting to see offered more within LGPS funds. Partial exit is also something which could facilitate de-risking which, although we note is now referenced in the FSS, isn’t the helpful option it could otherwise be because of the very poor value exit valuation terms. We would be keen to be part of these conversations and support the Fund with finding the approaches which provide good outcomes for all employers.

- Additional contributions

The FSS states that employers will have to pay additional contributions to the Fund when granting additional member benefits such as retirement before normal retirement age on unreduced benefits. However, considering the surplus, it should be possible to fund these differently to help manage this cost for employers. For example, employers could reasonably be given the option to use surplus to meet the cost of redundancy strains to avoid having to pay them as a one-off extra payment.

Further information

Please can you provide more information on the following questions to help us understand the position the WYPF has proposed:

- Details of the expected return for the WYPF assets, both overall and split by asset class, at both the 2022 and 2025 valuation dates and Aon’s Capital Market assumptions. (We note the Aon paper online states this is an overall rate of 7.35% p.a. for 2025). We would have expected these assumptions to be provided as part of the consultation to support employer understanding and transparency in line with the actuarial standards.

- Details of the demographic assumptions proposed, including details of the mortality assumptions in detail

- The Probability of Funding Success for the 2013 and 2016 valuations noting it was 69% in 2019 and 76% in 2022 and proposed to increase to 80% at the 2025 valuation and an explanation for the reason for the increases in recent years.

- Details of the calculated contribution rate if the Probability of Funding Succes was 69% for the 2025 valuation, all other assumptions remaining as proposed.

- Details of the risk modelling WYPF has done to support the proposed valuation assumptions. In particular, has WYPF considered how likely the contributions are to increase in the future at this valuation for different agreed contributions, and how this compares to the position for the 2022 valuation?

Consultation approach

Given the importance and the potential significant impact of the areas raised in the FSS we are keen to make sure the consultation is meaningful. Please can you provide some clarity on the approach that will be taken to the employer responses you receive during the consultation.

- How does WYPF intend to review the consultation responses? We understand a working group is being formed for this please can you provide the details of this group and how it will operate.

- How will you respond to each employer’s response and work with employers to ensure their views are being heard?

- WYPF’s approach to calculating the liabilities for the valuation is not transparent and is not something that can be easily replicated by employers or their actuarial advisers. No information has been provided on the assumptions underlying the discount rate approach. Under public law a consultation needs to provide sufficient information for intelligent consideration. Without these assumptions the discount rate assumptions and the impact on employers cannot be sufficiently understood. We ask that more detail is provided around this approach to support employers understanding the proposals and the impact of the assumptions proposed. We have reflected this in the information section above.

- Please can you poll the employers to ask them what their view of stability is? This would need to be an informed poll which considers the very high probability of contributions gradually falling over a long period if short-term stability is imposed. We are happy to help frame these questions. You would then have evidence as to why you might (or might not) change your approach to stability, in the same way as we can see the Royal Borough of Kensington & Chelsea council have done.

- Please can you confirm the decision-making process for finalising the valuation approach. We note there is a short timeframe between the end of consultation and the committee meeting in October where the responses will be discussed. And we note the Pensions Board minutes anticipate a conclusion in November. Please can you demonstrate that WYPF has sufficient time and resource to be able to consider and reflect on all of the responses ahead of making decisions to ensure this is a meaningful consultation?

- Is WYPF comfortable that all employers have received the information on the consultation, and this has been sufficiently communicated to employers for their engagement? We note there was limited signposting to the consultation in the lead up to the launch

We expect WYPF to take full consideration of the points we have raised in this response when making their decision and provide feedback on the points we’ve raised and answers to our questions. We would welcome the opportunity to discuss this response further and to present our views as part of the deliberations. This is a critical phase for the University and we would hope that WYPF would take a considered and collaborative approach, reflecting and responding to the needs of our University and it’s employees – your scheme members.

## Leodis Academies Trust – CEO Principal

I am writing as CEO Principal of Leodis Academies Trust to provide our response to the West Yorkshire Pensions Fund (WYPF) Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we would expect to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions We understand that these improvements create an opportunity for the WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our children and schools. This would provide much-needed financial flexibility and allow us to redirect vital resources back into our schools.

This is the right thing to do given the current funding situation. Reducing the contribution rate for employers is absolutely achievable without having a negative impact on the fund or on our employees’ pensions.

Stability We recognise that stability is a key focus for the WYPF when setting employer contribution rates. Given the cost pressures that academies are currently experiencing, we believe that money could be better and more fairly spent supporting our children and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases, if a future valuation necessitates this, and will be able to meet our contributions in full.

Prudence We understand that the WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, this is not justified and would act as a blocker to allowing lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened. We, therefore, request that prudence is released.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is no longer needed.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is the WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Leodis Academies Trust – Chief Finance and Operations Manager

Please find below my response to the Funding Strategy Statement (FSS) consultation for the West Yorkshire Pension Fund (WYPF). I welcome the opportunity to engage with you on this important matter. This consultation comes at a particularly significant time, given the new funding and investment landscape created by the substantial market changes since the last valuation.

I believe it is critical that the WYPF carefully considers the views of employers as part of this process, to ensure that the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders.

Over the last year, Leodis Academies Trust has been working collaboratively with other Trusts and with Isio, to ensure we are an informed employer. This consultation is particularly significant to the sector and for the staff and children within Leodis Academies Trust, given the positive financial impact it could have on our pension contributions and, consequently, what this could mean for our schools.

We respectfully ask that you consider our response seriously and reflect on the points we have raised when making your final decisions for the valuation. As a group of Trusts, we are also open to meeting with you to present the collective view in more detail, should you find this helpful.

Impact Statement

As a Trust with one large secondary school with Sixth Form and four primary schools, our West Yorkshire Pension Fund contributions make up a significant proportion of our overall budget. In my role as CFOO, I have a strong duty to ensure that there is value for money for the use of public funds used for these contributions. This is critical because it has a direct impact on the children in our schools and community with any savings being redirected back into their education, often covering the increasing gap in funding we face.

An example of this is the national underfunding of SEND. In Leeds we are struggling to provide enough specialist or resourced provision places for our most vulnerable learners resulting in many being given an unsuitable place. There is often a lag in appropriate funding also due to prioritisation changes being made by the Local Authority and sadly, this is resulting in many children receiving no funding for a number of years. Their needs still have to be met, despite the absence of money and schools are having to make up that shortfall.

Schools are fundamentally different places since COVID and are facing growing challenges. Children have been significantly impacted, as have families. All of this requires increased resource to better support our children. I believe that education is vital not only for individual children but for the future of our society. Having the right money in our schools now has never been more critical and the WYPF has the opportunity to benefit schools and society massively without damaging itself or its members access to a fantastic pension. In short, dropping the contribution rate now is morally the right thing to do.

Overview

I believe that the improved funding position of the WYPF can support an immediate and significant reduction in pension contributions, without any increase in the level of risk that Leodis Academies Trust and other employers pose to the scheme. We have regular government income, and we also have the DFE guarantee. We have high levels of accountability and scrutiny and do not pose any risk to the Fund. As such are a low-risk employer/sector.

In light of this, we request that you consider an approach that enables us to reduce our contributions to 6% for the next three years. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our children and schools.

This would provide much-needed financial flexibility and allow us to redirect vital resources back into our schools.

As part of the Multi Academy Trust group, I would also like to reference the letter shared with the WYPF Advisory Panel meeting on 24th July, which sets out the collective views of the group. I hope that these perspectives will be given due consideration as you finalise the Funding Strategy Statement.

I am also aware that local authorities have expressed similar views regarding the importance of achieving value for money and the potential for reducing employer contributions.

Key Points

Stability of Contributions

I understand that a key focus of WYPF is the stability of employer contributions, and that this has been reflected in the approach being proposed for the 2025 valuation. I also recognise that the proposed valuation assumptions go further, and the approach is more prudent than those used in the 2022 valuation, with the aim of keeping employer contributions at a similar level.

While I can appreciate the benefits of stability and the certainty it can bring to both the WYPF and employers—and why this is relevant for the scheme—stability does not need to be the key priority at this valuation. Given the significant changes in market conditions since the last valuation and the extent of the funding improvements seen in the scheme, I do not believe that the usual approach of maintaining stability in terms of contribution is either necessary or appropriate at this time.

I do not think we should continue to anchor to the current contribution rates purely to maintain short-term stability in contribution, especially if this results in overfunding the scheme and requiring employers to pay more at a time when additional cash (which is public money) is vital to be spent elsewhere. If contributions continue at a similar level and the WYPF only offers a small reduction, I expect that similar discussions will arise at the next valuation, when contributions will again need to come down—an approach that does not provide true long-term stability.

Instead, I would prefer to see contributions re-set now to a level that reflects the true cost of providing benefits, without increasing prudence as is currently being proposed, and to arrive at a new, stable rate going forward. Given the underlying funding improvements in the scheme, making this change and reducing contributions does not pose any more risk to the scheme than the position agreed at the 2022 valuation, which was considered acceptable at that time.

Short Term Reduction

The financial market changes that created the funding improvements for the Scheme occurred towards the end of 2022. Whilst I acknowledge that a valuation only takes place every three years, if a valuation had happened sooner, we could have reduced our contributions earlier. As a result, Leodis Academies Trust has effectively been overpaying into the scheme since then.

Given this context, I believe the improved funding position should support a more significant reduction in contributions in the short term, allowing us to recoup these overpayments. This is an approach that I am aware has been adopted by other LGPS funds and needs to be the case with the WYPF.

As an informed employer, I fully understand that what I am asking for may result in an increase in contributions in the future. I am comfortable that Leodis Academies Trust could support a future increase if required as we would have to budget appropriately. What we do not need is an overly prudent approach from the WYPF now, simply to provide additional cushioning for the Fund, which would effectively reduce our effectiveness as an organisation whose sole aim is to provide the best possible outcomes for our children.

Technical Questions and Concerns

I would also like to raise several technical questions regarding the proposed approach in the draft Funding Strategy Statement:

* You have proposed an increase in the Probability of Funding Success from the last valuation.
  + Is this change being made purely to maintain employer contributions at a similar level?
  + This increases the prudence of WYPF’s approach, and I do not believe additional prudence is needed now, given the improved funding position and the reduced risk of employers being unable to fund benefits.
  + How has WYPF chosen the rate of 80%, and why is this considered the right rate when you were comfortable with 76% last time and have previously accepted 69%?
* The continued reference to the 105% buffer means any surplus below this threshold cannot be used to reduce our contributions. This buffer was introduced last time to reflect the specific circumstances of the 2022 valuation. It is not needed this time, and we should be able to use our full surplus to reduce contributions.
* As there is a surplus, running this off over, for example, six years would reduce our contributions further. Why is a 22-year period being suggested?
* The FSS notes that any changes to contributions are typically phased in over six years. We do not want this level of stabilisation and do not believe it is necessary given the significant improvements seen. We request that our revised contribution rate is payable immediately from April 2026.
* Is there a way of using the surplus in the scheme to pre-fund the cost of redundancy payments? It would be extremely helpful to stabilise these costs rather than having to pay them as a one-off lump sum.

I would appreciate clear responses to these questions, as they are central to ensuring the consultation is robust, transparent, and genuinely responsive to employer needs.

Consultation Approach

I would like to raise several concerns regarding the consultation process for the Funding Strategy Statement. Firstly, no sensitivity analysis has been provided as part of the consultation, and there appears to have been an assumption about what employers want, without any real engagement to understand our actual views before setting the draft FSS.

To ensure this consultation is meaningful and not simply a pre-determined outcome, I would appreciate clarity on the following points:

* What is WYPF doing with employer responses to this consultation?
* Is there a plan to set up a working group to review the feedback?
* How will WYPF respond to each employer’s submission?
* How will employer responses be reflected in the final decision-making process?
* Does WYPF have sufficient time and resource to review all responses thoroughly before decisions are made?

I also wish to highlight that the timing of this consultation was not ideal for Multi Academy Trusts, as it took place over the summer holidays. Given that a large proportion of your employers are MATs, and this issue was pointed out in advance, I would ask that you reconsider the timing of future consultations to ensure all employers have a fair opportunity to engage. There is also an assumption that the consultation will automatically reach the right people within MATs, but our group’s experience has shown that this is not always the case.

I urge you to take these points seriously and ensure that the consultation process is transparent, inclusive, and genuinely responsive to employer feedback.

I look forward to receiving your feedback on my letter.

## Leodis Academies Trust – Chair of the Trust Board

Concerns

As the Board of Trustees for Leodis Academies Trust, we write as stewards of public funds from a governance perspective. We have a duty to ensure all monies deliver value for money for our pupils, staff, and the wider community. We are therefore concerned about the proposed high levels of employer contribution rates in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for Money and Use of Public Funds

Our advisors have explained that since the 2022 valuation the financial conditions have changed substantially, resulting in a much stronger funding position for the WYPF. As such, we would expect to see significant reductions in employer contribution rates over the next three years. We are concerned that, despite this improved picture, the FSS appears to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children and communities we serve.

Request for Reduced Contributions

Given the improved funding position, we respectfully request that the employer contribution rate be reduced to 6% for the next three years, up to the next valuation. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our children and schools.

Key Technical Concerns

* Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to be unnecessarily prudent. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not currently needed.
* Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested? This is unnecessarily long.
* Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised lower contribution rates be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Governance and Consultation Process

We are also concerned about the consultation process itself. There appears to have been limited engagement with employers before setting the draft FSS. In addition, no sensitivity analysis has been provided, and we ask:

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

Conclusion

Given our responsibilities as stewards of public funds, we urge WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions—specifically to 6%— to reflect the improved funding position, and that being unnecessarily prudent, is not built into this strategy at the expense of value for money for schools and children.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

## Leodis Academies Trust – Principals of Blackgates, East Ardsley, Hill Top, Westerton and Woodkirk academies

I am writing as Principal of Blackgates Primary Academy, a member of Leodis Academies Trust to provide our response to the West Yorkshire Pensions Fund (WYPF) Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we would expect to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions We understand that these improvements create an opportunity for the WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our children and schools.

This is the right thing to do given the current funding situation. Reducing the contribution rate for employers is absolutely achievable without having a negative impact on the fund or on our employees’ pensions.

Stability We recognise that stability is a key focus for the WYPF when setting employer contribution rates. Given the cost pressures that academies are currently experiencing, we believe that money could be better and more fairly spent supporting our children and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases, if a future valuation necessitates this, and will be able to meet our contributions in full.

Prudence We understand that the WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, this is not justified and would act as a blocker to allowing lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened. We, therefore, request that prudence is released.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is no longer needed.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is the WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Lightcliffe Academy (Abbey MAT) – Headteacher

I am writing as Head Teacher within Abbey Multi Academy Trust to provide my response to the Funding Strategy Statement (FSS) consultation. Thank you for the opportunity to contribute; I wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members. Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees’ pensions.

Lightcliffe Academy has a falling roll and its financial sustainability is, therefore, under threat. In real terms, this means that providing an effective and impactful education to our young people is a significant challenge. A one-year reduction at 6% would provide our academy with additional funds amounting to £118,569, while a three-year reduction at 6% would have a transformative impact, providing additional funding totalling £355,708. This, as I am sure you can see, would enable me to recruit quality teachers so that our pupils benefit from an excellent education.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.

With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?

The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?

The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that you extend the current consultation so that all employers within the West Yorkshire Pension Fund have time to respond and that all future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Lightcliffe CE Primary School (Abbey MAT) – Co-Headteacher

I am writing as a Co-Head Teacher within Abbey Multi Academy Trust to provide our response to the Funding Strategy Statement (FSS) consultation. Thank you for the opportunity to contribute; I wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members. Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees' pensions.

Financial projections demonstrate that the school would benefit from an additional £60,345 per annum, amounting to £181,046 over a three-year term. This funding would directly support our strategic aim to meet the increasing needs of pupils requiring additional support, particularly those identified as vulnerable or with special educational needs and disabilities (SEND).

As pupil needs evolve, we are committed to ensuring t hat every child receives the right support to thrive. This funding would enable us to:

* Recruit and retain skilled Learning Support Assistants, providing consistent, high-quality support across classrooms.
* Deliver targeted interventions, including speech and language therapy, emotional wellbeing programmes, and academic catch-up support.
* Invest in staff training and development, equipping our team with the tools and expertise to respond effectively to complex needs.
* Enhance inclusive learning environments, through sensory resources, adaptive technologies, and safe spaces for regulation and reflection.
* Strengthen multi-agency collaboration, ensuring joined-up support for families and pupils with complex needs.

We firmly believe that early, sustained, and well-resourced support leads to improved outcomes, not only for individual pupils but for the wider school community. This funding would be a vital enabler in our mission to provide equitable, inclusive education where all children can flourish.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer

contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a sim ilar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.

With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?

The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF's process for reviewing and respond ing to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?

The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that you extend the current consultation so that all employers within the West Yorkshire Pension Fund have time to respond and that all future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to t hese questions and urge WYPF to ensure the

consultation is robust, transparent, and genuinely responsive to employer needs.

## Lilycroft Primary School – Headtecher

As the Headteacher of Lilycroft Primary School, I write from governance and operational perspectives as stewards of public funds. We have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community. We are therefore concerned about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for Money and Use of Public Funds

Our advisors have explained that financial conditions have changed substantially since the 2022 valuation, resulting in a much stronger funding position for WYPF. In this context, we would expect to see significant reductions in employer contribution rates over the next three years. We are concerned that, despite this improved picture, all levers within the FSS appear to have been pulled to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children we serve.

Request for Reduced Contributions

Given the improved funding position, we respectfully request that the employer contribution rate be reduced to 6% for the next three years, up to the next valuation. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our schools.

Key Technical Concerns

* Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Governance and Consultation Process

We are also concerned about the consultation process itself. No sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS. We ask:

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

Conclusion

Given our responsibilities as stewards of public funds, we urge WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions—specifically to 6%—reflecting the improved funding position, and that unnecessary prudence is not built into the strategy at the expense of value for money for schools and pupils.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

## Lindley Junior School – Chair of the Local Governing Body

I write 0n behalf of the Local Governing Body of Lindley Junior School. I am writing to express our concern about the high level of employer contributions rates being proposed in the draft Funding Strategy Statement (FSS).

As the financial conditions have changed since the 2022 valuation, now being much stronger, we would have thought that reductions in employer contributions would be appropriate and this would help schools in their underfunded position enabling us to provide a better education for our pupils. We would specifically ask that the employer contribution rate be reduced to 6% for the next three years.

I list below concerns given by our advisors:

* Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

As we are responsible for public funds I would ask the WYPF to reconsider the draft proposals and make a significant reduction in employer contributions.

I would welcome a response.

## Linthwaite Clough Primary School – Chair of Governors and Headteacher

As the Chair of Governors and Head Teacher for Linthwaite Clough Primary School, we are committed to ensuring that public funds are used efficiently to benefit our pupils, staff, and communities. We therefore wish to raise concerns about the approach taken in the draft Funding Strategy Statement (FSS).

Despite the significantly improved financial position of WYPF since the last valuation, the draft FSS maintains employer contribution rates at unnecessarily high levels. In our view, this does not represent value for money and diverts resources away from education.

We respectfully request that employer contributions be reduced to 6% for at least the next three years, reflecting the stronger funding position and ensuring a fairer balance between prudence and affordability.

We are informed by the CFO of the Trust that a 11% reduction to our contribution rate would see a reduction of £40k each year for the next 3 years which would be directly invested back into the classroom. This could allow us to employ additional staff to support the learning of our children or invest the additional funds in resources and/or the school environment. Each £26k reduction would allow the school to employ a teaching assistant which is desperately needed to meet increasing need within the school.

We therefore challenge elements of the strategy which appear overly cautious, including:

* The increased Probability of Funding Success.
* Continued use of the 105% buffer.
* A 22-year surplus run-off period.
* Phasing of contribution changes rather than immediate implementation.

Revising these elements would make available cash to the school to enable school leaders to meet the needs of its pupils, staff and wider community.

In addition, we are concerned about the consultation process. Engagement with employers has been limited, as we understand from the CFO of Together Learning Trust MAT no sensitivity analysis has been provided, and the timing of the consultation has made it difficult for Multi Academy Trusts to participate fully and has not allowed time to consult with schools.

We ask for greater transparency in how employer feedback will be reviewed and reflected in the final FSS.

We ask that the consultation period is extended to enable employers to respond fully and for the WYPF to review in depth the views of the employers.

In conclusion, we urge WYPF to adopt a more balanced valuation approach that reduces contributions, avoids unnecessary prudence, and delivers better value for money for schools and pupils.

## Manston St James CE Primary Academy (Abbey MAT) – Headteacher

I am writing as Head Teacher within Abbey Multi Academy Trust to provide our response to the Funding Strategy Statement (FSS) consultation. Thank you for the opportunity to contribute; I wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members. Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees’ pensions.

At Manston St James Academy, securing this reduction would have a significant impact on the opportunities we can provide for our pupils. With our budget already limited, an additional £52,551 each year — and £157,654 over three years — would make a huge difference. These funds could be redirected into supporting teaching, improving learning resources, and providing wider enrichment opportunities. This would allow us to enhance the quality of education, offer additional support for children who need it most, and invest in creating the best possible environment for all our pupils to thrive.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.

With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?

The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?

The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that you extend the current consultation so that all employers within the West Yorkshire Pension Fund have time to respond and that all future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Margaret McMillan Primary – Headteacher

As the Headteacher of Margaret McMillan Primary, I write from governance and operational perspectives as stewards of public funds. We have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community. We are therefore concerned about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for Money and Use of Public Funds

Our advisors have explained that financial conditions have changed substantially since the 2022 valuation, resulting in a much stronger funding position for WYPF. In this context, we would expect to see significant reductions in employer contribution rates over the next three years. We are concerned that, despite this improved picture, all levers within the FSS appear to have been pulled to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children we serve.

Request for Reduced Contributions

Given the improved funding position, we respectfully request that the employer contribution rate be reduced to 6% for the next three years, up to the next valuation. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our schools.

Key Technical Concerns

* Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Governance and Consultation Process

We are also concerned about the consultation process itself. No sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS. We ask:

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

Conclusion

Given our responsibilities as stewards of public funds, we urge WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions—specifically to 6%—reflecting the improved funding position, and that unnecessary prudence is not built into the strategy at the expense of value for money for schools and pupils.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

Marsden Junior School (Great Heights Academy Trust) – Head of School

I am writing as head of school of Marsden Junior School to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is achievable without having a negative impact on the fund or on our employees' pensions.

By reducing to 6%, this would mean a saving of £22,903. This would be equivalent to one full time support staff members and resources that would be very beneficial to the school. Marsden’s SEND pupils is 36.69% which is above national average (18.20%), additional support and resources would directly help support these students.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Mellors Catering – Chief Executive

I am writing on behalf of The Beckfoot Trust to provide our response to the Funding Strategy Statement (FSS) consultation. We appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, it is expected that there will be significant improvements in funding levels and large reductions in employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to reduce pension contribution values significantly. We respectfully request that the valuation approach allow this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay more than our members.

Reducing the contribution rate for employers is the right approach given the current funding situation. It is achievable without having a negative impact on the fund or on our employees’ pensions.

Impact on Our Organisation

A reduction in employer contributions would have a meaningful impact on our organisation, freeing up resources that could be redirected to essential services and support for our staff and beneficiaries. In the current climate, where budgets are increasingly stretched, every pound saved on pension contributions can be used to maintain and improve the services we provide, such as investing in social value activities to benefit our customers and broader communities, as well as creating additional employment opportunities in the region.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that employers are currently experiencing, we believe that money could be better spent supporting our staff and the communities we serve, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as an organisation we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Meltham Moor Primary School (Together Learning Trust) – Chair of Governors

As the Chair of Governors and Head Teacher for Meltham Moor Primary School, we are committed to ensuring that public funds are used efficiently to benefit our pupils, staff, and communities. We therefore wish to raise concerns about the approach taken in the draft Funding Strategy Statement (FSS).

Despite the significantly improved financial position of WYPF since the last valuation, the draft FSS maintains employer contribution rates at unnecessarily high levels. In our view, this does not represent value for money and diverts resources away from education.

We respectfully request that employer contributions be reduced to 6% for at least the next three years, reflecting the stronger funding position and ensuring a fairer balance between prudence and affordability.

We are informed by the CFO of the Trust that a 11% reduction to our contribution rate would see a reduction of £30k each year for the next 3 years which would be directly invested back into the classroom. This could allow us to employ additional staff to support the learning of our children or invest the additional funds in resources and/or the school environment. Each £26k reduction would allow the school to employ a teaching assistant which is desperately needed to meet increasing need within the school.

* We therefore challenge elements of the strategy which appear overly cautious, including:
* The increased Probability of Funding Success.
* Continued use of the 105% buffer.
* A 22-year surplus run-off period.
* Phasing of contribution changes rather than immediate implementation.

Revising these elements would make available cash to the school to enable school leaders to meet the needs of its pupils, staff and wider community.

In addition, we are concerned about the consultation process. Engagement with employers has been limited, as we understand from the CFO of Together Learning Trust MAT no sensitivity analysis has been provided, and the timing of the consultation has made it difficult for Multi Academy Trusts to participate fully and has not allowed time to consult with schools.

We ask for greater transparency in how employer feedback will be reviewed and reflected in the final FSS.

We ask that the consultation period is extended to enable employers to respond fully and for the WYPF to review in depth the views of the employers.

In conclusion, we urge WYPF to adopt a more balanced valuation approach that reduces contributions, avoids unnecessary prudence, and delivers better value for money for schools and pupils.

## The Mirfield Free Grammar (Great Heights Academy Trust) – Principal

I am writing as Principal of The Mirfield Free Grammar to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is achievable without having a negative impact on the fund or on our employees' pensions.

By reducing to 6%, this would mean a saving of £222,750. Mirfield Free Grammar entered a deficit budget of -£658K, this saving would help with offsetting some of this deficit.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?

The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## New College Doncaster – Principal

I am writing as Principal of New College Doncaster, I am pleased to submit a response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and would like to highlight several key points and questions for your consideration.

Changes in the pensions landscape

Our advisors have outlined how changes in financial conditions have enhanced the funding status of WYPF since the 2022 actuarial valuation. As a result, I expect improvements in funding levels to be possible and substantial reductions in employer contribution rates over the coming three years.

Request for Reduced Contributions

I recognise that these improvements present an opportunity for WYPF to significantly reduce our contributions. I kindly request that the valuation approach supports this objective, enabling us to reduce our contributions by 5 percentage points for the next three years, up to the subsequent valuation, ensuring we do not pay less than the members.

Reducing the employer contribution rate is appropriate given the current funding position and can be accomplished without adversely affecting the fund or the pension outcomes for our employees.

Stability

I acknowledge that stability is an important consideration for WYPF when determining employer contribution rates. However, given the current cost pressures faced by colleges, we believe that resources could be more effectively allocated toward supporting our students and staff rather than accumulating additional surplus within the WYPF. Therefore, stability is not our primary focus at this time. I am confident in our ability, as part of New Collaborative Learning Trust, to budget for potential future increases and to meet our contribution obligations as they become due.

Prudence

I acknowledge that WYPF is contemplating increased prudence within its funding strategy. Given the robust financial position of WYPF and its participating employers, I believe that additional prudence may not be warranted at this time. I respectfully request that any prudence be adjusted to facilitate the setting of lower employer contribution rates. Specifically, the Probability of Funding Success should remain at its current level or potentially be reduced to prior levels. There is no need to include an additional funding buffer, and the period over which surplus is utilised to decrease employer contributions could be shortened accordingly.

Key Technical Concerns

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We note that a sensitivity analysis has not been provided, and there appears to have been limited engagement with employers prior to the development of the draft FSS.

* Could you please outline WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will feedback be incorporated into the final decision?
* Is there adequate time and resources allocated to review all feedback before finalising decisions?
* The timing of this consultation coinciding with the summer holidays posed challenges for Multi Academy Trusts. We kindly request that future consultations are scheduled more appropriately and communicated effectively to ensure all relevant stakeholders are adequately engaged.

We would appreciate clear responses to these questions and encourage WYPF to ensure that the consultation process remains thorough, transparent, and genuinely responsive to employer needs.

## Netherton Infant & Nursery School (Together Learning Trust) – Chair of Governors and Headteacher

As the Chair of Governors and Head Teacher for Netherton Infant and Nursery School, we are committed to ensuring that public funds are used efficiently to benefit our pupils, staff, and communities. We therefore wish to raise concerns about the approach taken in the draft Funding Strategy Statement (FSS).

Despite the significantly improved financial position of WYPF since the last valuation, the draft FSS maintains employer contribution rates at unnecessarily high levels. In our view, this does not represent value for money and diverts resources away from education.

We respectfully request that employer contributions be reduced to 6% for at least the next three years, reflecting the stronger funding position and ensuring a fairer balance between prudence and affordability.

We are informed by the CFO of the Trust that a 11% reduction to our contribution rate would see a reduction of £40k each year for the next 3 years which would be directly invested back into the classroom. This could allow us to employ additional staff to support the learning of our children or invest the additional funds in resources and/or the school environment. Each £26k reduction would allow the school to employ a teaching assistant which is desperately needed to meet increasing need within the school.

* We therefore challenge elements of the strategy which appear overly cautious, including:
* The increased Probability of Funding Success.
* Continued use of the 105% buffer.
* A 22-year surplus run-off period.

Phasing of contribution changes rather than immediate implementation.

Revising these elements would make available cash to the school to enable school leaders to meet the needs of its pupils, staff and wider community.

In addition, we are concerned about the consultation process. Engagement with employers has been limited, as we understand from the CFO of Together Learning Trust MAT no sensitivity analysis has been provided, and the timing of the consultation has made it difficult for Multi Academy Trusts to participate fully and has not allowed time to consult with schools.

We ask for greater transparency in how employer feedback will be reviewed and reflected in the final FSS.

We ask that the consultation period is extended to enable employers to respond fully and for the WYPF to review in depth the views of the employers.

In conclusion, we urge WYPF to adopt a more balanced valuation approach that reduces contributions, avoids unnecessary prudence, and delivers better value for money for schools and pupils.

## New Collaborative Learning Trust – Board of Trustees

As the Board of Trustees for New Collaborative Learning Trust, we are committed to upholding the highest standards of governance as custodians of public funds. Our responsibility is to ensure that expenditure maximises value for money for pupils, staff, and the wider community. Accordingly, we have concerns regarding the proposed employer contribution rates outlined in the draft Funding Strategy Statement (FSS), particularly in light of the substantially improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for Money and Use of Public Funds

Our advisors have indicated that recent changes in financial conditions have resulted in a notably stronger funding position for WYPF. Based on this development, we would expect to see a corresponding significant reduction in employer contribution rates over the forthcoming three years. We are concerned that, despite this enhanced financial standing, all mechanisms within the FSS appear to support maintaining contribution rates at their current high levels, rather than adjusting them downward to reflect the improved situation for the benefit of schools and the students they serve.

Request for Reduced Contributions

In light of the improved funding status, we respectfully request that employer contribution rates be substantially reduced for the next three years, aligned with the period until the next valuation. We do not advocate for contributions below those of scheme members, but we believe that a sizable reduction is justified and essential to ensure optimal use of public funds in support of our colleges and schools.

Key Technical Concerns

* Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations seems to introduce additional conservatism. Is this adjustment primarily aimed at maintaining contribution levels? Why is an 80% probability now deemed appropriate when previous valuations accepted 76% and 69%?
* 105% Buffer: The continued application of the 105% surplus buffer limits the scheme’s ability to reduce contributions through surplus utilisation. This buffer was specific to the 2022 valuation circumstances and is likely no longer necessary.
* Surplus Run-Off Period: Given the current surplus, shortening the surplus run-off period (e.g., to six years) could further reduce contribution requirements. Why is a 22-year period being recommended?
* Phasing of Contribution Changes: The FSS proposes a six-year phasing of contribution changes. Given the significant funding improvements, we question the necessity of such a gradual approach and suggest implementing revised rates immediately from April 2026.
* Use of Surplus for Redundancy Costs: Could the scheme surplus be allocated to pre-fund redundancy costs? This approach might help in stabilising these expenses rather than incurring large one-off payments.

Governance and Consultation Process

We also have concerns regarding the consultation process. No sensitivity analyses have been provided, and engagement with employers prior to drafting the FSS appears limited. Accordingly, we request clarity on:

* WYPF’s process for reviewing and responding to employer feedback
* Whether a working group will be established to consider responses
* How feedback will influence the final decision
* Whether there is adequate time and resources allocated for comprehensive review of all responses before finalisation

Furthermore, the timing of this consultation coincided with the summer holiday period, posing challenges for Multi Academy Trusts and other stakeholders. We urge that future consultations are scheduled more appropriately and communicated effectively to ensure broad participation.

Conclusion

As stewards of public funds, we strongly encourage WYPF to revisit the approach outlined in the draft FSS. We recommend that valuation assumptions be adjusted to reflect the improved funding position, allowing for meaningful reduction in employer contributions. It is essential that the strategy avoids unnecessary conservatism that could compromise value for money for educational providers and their pupils.

We look forward to your detailed response to these points and to a transparent, thorough consultation process.

## New Collaborative Learning Trust – Chief Finance Officer

Please find below my response to the Funding Strategy Statement (‘FSS’) consultation for the West Yorkshire Pension Fund (‘WYPF’). I appreciate the opportunity to engage on this important matter. This consultation is particularly timely given the significant changes in the financial markets since the previous review.

I believe it is critical that the Fund carefully considers the views of employers as part of this process, to ensure that the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders.

Over the past year, New Collaborative Learning Trust has collaborated closely with other multi-academy trusts, to develop a comprehensive understanding of the current funding situation. This consultation is of great importance to the Trust, our staff, and our students, as the outcome of this strategy review could impact our contribution rates and, consequently, the financial planning of our Trust and colleges.

Impact Statement

As a Trust based in West Yorkshire, our West Yorkshire Pension Fund contributions make up a significant proportion of our overall budget. As a multi-academy Trust, we are required to properly consider value for money and due diligence and so must consider our employer pension contributions as part of this. This is critical because it has a direct impact on the students in our colleges—every penny we save can be redirected back into their education.

To illustrate the scale of impact, a 5% reduction in WYPF pension costs would mean £680,000 could be redirected directly back into the education of NCLT students per year.

Overview

I believe that the improved funding position of the West Yorkshire Pension Fund can support an immediate and significant reduction in pension contributions, without any increase in the level of risk to the Scheme. As an employer, we have regular government income, the DfE LGPS Guarantee, high levels of accountability and scrutiny and so do not pose any risk to the Fund.

In light of this, I request that you consider an approach that enables us to reduce our contributions by 5% for the next three years, ensuring we do not pay less than any of our members.

As part of the Multi Academy Trust group, I would also like to reference the letter shared with the WYPF Advisory Panel meeting on 24th July, which sets out the collective views of the group.

Key Points

Stability of Contributions

I understand that a key focus of WYPF is the stability of employer contributions, and that this has been reflected in the approach being proposed for the 2025 valuation. However, I also recognise that the proposed valuation assumptions and approach are more prudent than those used in the 2022 valuation in order to facilitate that stability. There has to be a moderated approach such that stability does not override all other factors e.g. changes in market conditions.

Anchoring on current contribution rates purely to maintain short-term stability, may not be appropriate if this results in overfunding the Scheme. If contributions continue at a similar level and WYPF only offers a small reduction, a similar situation will arise at the next valuation, which undermines long-term stability.

I recommend resetting contributions to a level that accurately reflects the true cost of providing benefits, without incorporating additional prudence as currently proposed. This approach should establish a new, stable rate moving forward. Given the improvements in the Scheme’s funding position, implementing this adjustment and reducing contributions would not introduce any additional risk beyond what was previously agreed upon in the 2022 valuation, which was deemed acceptable at the time.

Technical Questions and Concerns

I would also like to raise several technical questions regarding the proposed approach in the draft Funding Strategy Statement:

* You have proposed an increase in the Probability of Funding Success from the last valuation.
* Is this change being made purely to maintain employer contributions at a similar level?
* This increases the prudence of WYPF’s approach, and I do not believe additional prudence is needed now, given the improved funding position and the reduced risk of employers being unable to fund benefits.
* How has WYPF chosen the rate of 80%, and why is this considered the right rate when you were comfortable with 76% last time and have previously accepted 69%?
* The continued reference to the 105% buffer means any surplus below this threshold cannot be used to reduce our contributions. This buffer was introduced last time to reflect the specific circumstances of the 2022 valuation. It is not needed this time, and we should be able to use our full surplus to reduce contributions.
* As there is a surplus, running this off over, for example, six years would reduce our contributions further. Why is a 22-year period being suggested?
* The FSS notes that any changes to contributions are typically phased in over six years. I request that our revised contribution rate is payable immediately from April 2026.
* Is there a way of using the surplus in the Scheme to pre-fund the cost of redundancy payments? It would be extremely helpful to stabilise these costs rather than having to pay them as a one-off lump sum.

I would appreciate clear responses to these questions, as they are central to ensuring the consultation is robust, transparent, and genuinely responsive to employer needs.

Consultation Approach

I would like to raise several concerns regarding the consultation process for the Funding Strategy Statement. Firstly, no sensitivity analysis has been provided as part of the consultation, this would better inform those consulted.

To ensure this consultation is meaningful please can you provide clarity on the following points:

* What is WYPF doing with employer responses to this consultation?
* Is there a plan to set up a working group to review the feedback?
* How will WYPF respond to each employer’s submission?
* How will employer responses be reflected in the final decision-making process?
* Does WYPF have sufficient time and resource to review all responses thoroughly before decisions are made?

I respectfully encourage you to consider these points carefully and to ensure that the consultation process is conducted transparently, inclusively, and in a manner that thoughtfully addresses employer feedback. I look forward to your response.

## New College Bradford – Principal

I am writing as Principal of New College Bradford; I am pleased to submit a response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and would like to highlight several key points and questions for your consideration.

Changes in the pensions landscape

Our advisors have outlined how changes in financial conditions have enhanced the funding status of WYPF since the 2022 actuarial valuation. As a result, I expect improvements in funding levels to be possible and substantial reductions in employer contribution rates over the coming three years.

Request for Reduced Contributions

I recognise that these improvements present an opportunity for WYPF to significantly reduce our contributions. I kindly request that the valuation approach supports this objective, enabling us to reduce our contributions by 5 percentage points for the next three years, up to the subsequent valuation, ensuring we do not pay less than the members.

Reducing the employer contribution rate is appropriate given the current funding position and can be accomplished without adversely affecting the fund or the pension outcomes for our employees.

Stability

I acknowledge that stability is an important consideration for WYPF when determining employer contribution rates. However, given the current cost pressures faced by colleges, we believe that resources could be more effectively allocated toward supporting our students and staff rather than accumulating additional surplus within the WYPF. Therefore, stability is not our primary focus at this time. I am confident in our ability, as part of New Collaborative Learning Trust, to budget for potential future increases and to meet our contribution obligations as they become due.

Prudence

I acknowledge that WYPF is contemplating increased prudence within its funding strategy. Given the robust financial position of WYPF and its participating employers, I believe that additional prudence may not be warranted at this time. I respectfully request that any prudence be adjusted to facilitate the setting of lower employer contribution rates. Specifically, the Probability of Funding Success should remain at its current level or potentially be reduced to prior levels. There is no need to include an additional funding buffer, and the period over which surplus is utilised to decrease employer contributions could be shortened accordingly.

Key Technical Concerns

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We note that a sensitivity analysis has not been provided, and there appears to have been limited engagement with employers prior to the development of the draft FSS.

* Could you please outline WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will feedback be incorporated into the final decision?
* Is there adequate time and resources allocated to review all feedback before finalising decisions?
* The timing of this consultation coinciding with the summer holidays posed challenges for Multi Academy Trusts. We kindly request that future consultations are scheduled more appropriately and communicated effectively to ensure all relevant stakeholders are adequately engaged.

We would appreciate clear responses to these questions and encourage WYPF to ensure that the consultation process remains thorough, transparent, and genuinely responsive to employer needs.

## New College Pontefract – Principal

I am writing as Principal of New College Pontefract, I am pleased to submit a response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and would like to highlight several key points and questions for your consideration.

Changes in the pensions landscape

Our advisors have outlined how changes in financial conditions have enhanced the funding status of WYPF since the 2022 actuarial valuation. As a result, I expect improvements in funding levels to be possible and substantial reductions in employer contribution rates over the coming three years.

Request for Reduced Contributions I recognise that these improvements present an opportunity for WYPF to significantly reduce our contributions. I kindly request that the valuation approach supports this objective, enabling us to reduce our contributions by 5 percentage points for the next three years, up to the subsequent valuation, ensuring we do not pay less than the members.

Reducing the employer contribution rate is appropriate given the current funding position and can be accomplished without adversely affecting the fund or the pension outcomes for our employees.

Stability

I acknowledge that stability is an important consideration for WYPF when determining employer contribution rates. However, given the current cost pressures faced by colleges, we believe that resources could be more effectively allocated toward supporting our students and staff rather than accumulating additional surplus within the WYPF. Therefore, stability is not our primary focus at this time. I am confident in our ability, as part of New Collaborative Learning Trust, to budget for potential future increases and to meet our contribution obligations as they become due.

Prudence

I acknowledge that WYPF is contemplating increased prudence within its funding strategy. Given the robust financial position of WYPF and its participating employers, I believe that additional prudence may not be warranted at this time. I respectfully request that any prudence be adjusted to facilitate the setting of lower employer contribution rates. Specifically, the Probability of Funding Success should remain at its current level or potentially be reduced to prior levels. There is no need to include an additional funding buffer, and the period over which surplus is utilised to decrease employer contributions could be shortened accordingly.

Key Technical Concerns

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We note that a sensitivity analysis has not been provided, and there appears to have been limited engagement with employers prior to the development of the draft FSS.

* Could you please outline WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will feedback be incorporated into the final decision?
* Is there adequate time and resources allocated to review all feedback before finalising decisions?
* The timing of this consultation coinciding with the summer holidays posed challenges for Multi Academy Trusts. We kindly request that future consultations are scheduled more appropriately and communicated effectively to ensure all relevant stakeholders are adequately engaged.

We would appreciate clear responses to these questions and encourage WYPF to ensure that the consultation process remains thorough, transparent, and genuinely responsive to employer needs.

## Newsome Academy (Impact Education MAT) – Headteacher

I am writing as Head Teacher of Newsome Academy, a school within Impact Education Multi-Academy Trust to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

Should the consultation result in an employer contribution at this level, £188k would be released back into the school budget, having a significant impact on educational provision for our young people.

This important funding would go directly to curriculum provision including our additional resourced provision that houses students with life limiting conditions. This finance would ensure the appropriate seating is in place for all learners – something which is sadly not the case currently. This money would also ensure that students have access to ICT something which is also currently not the case. Above all, this money would also contribute towards life-changing cultural capital experiences which our disadvantaged students would never normally experience.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% bu􀆯er prevents us from using our full surplus to reduce contributions. This bu􀆯er was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this o􀆯 over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-o􀆯 lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Newsome Junior Academy (Impact Education MAT) – Headteacher

I am writing as Head Teacher of Newsome Junior Academy, a school within Impact Education Multi-Academy Trust to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

Should the consultation result in an employer contribution at this level, £36,000 would be released back into the school budget, having a significant impact on educational provision for our young people.

With this additional sum we could afford to appoint a member of staff to support our most vulnerable children in school to achieve their full potential or to support those children who have significant gaps in learning. Our budget is stretched, and our staffing capacity has been greatly reduced over the last 5 years.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed.

For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Northern Education Trust - Deputy Chief Financial Officer

Please find below our response to the Funding Strategy Statement (‘FSS’) consultation for the West Yorkshire Pension Fund (‘WYPF’). I welcome the opportunity to engage with you on this important matter.

This consultation comes at a particularly significant time, given the new funding and investment landscape created by the substantial market changes since the last valuation.

I believe it is critical that the Fund carefully considers the views of employers as part of this process, to ensure that the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders. Now more than ever, academies and schools are being asked to find savings and stretch budgets beyond their current funding capacity, which makes this consultation all the more relevant.

As you are aware, over the last year a number of trusts have been working together, investing significant time and working with Isio to ensure we are an informed employer. This consultation is particularly significant to Northern Education Trust and the staff and children within it, given the positive impact it could have on our pension contributions and, consequently, what this could mean for our academies.

We respectfully ask that you consider our response seriously and reflect on the points we have raised when making your final decisions for the valuation. We are also open to meeting with you to present our views in more detail, should you find this helpful.

Overview

Northern Education Trust has three primary academies as part of the West Yorkshire Pension Fund. Particularly in primary academies where every penny is a prisoner, our contributions make up a significant proportion of our overall budget. As we are dealing with public funds, I feel a strong duty to ensure that there is value for money from these contributions, just as we do with every other penny we spend. This is critical because it has a direct impact on the children in our academies—every penny we save can be redirected back into their education.

The WYPF has the opportunity to benefit academies and schools with no detrimental impact on itself or its members’ access to a fantastic pension. In short, a reduction in the contribution rate is now the right thing to do.

I believe that the improved funding position of the West Yorkshire Pension Fund can support an immediate and significant reduction in pension contributions, without any increase in the level of risk that employers pose to the Scheme. We are solid employers, having regular government income, we also have the DFE guarantee. We have high levels of accountability and scrutiny and do not pose any risk to the Fund. In light of this, we request that you consider an approach that enables us to reduce our contributions to 6% for the next three years, as we do not wish to pay less than members. This would provide much-needed financial flexibility and allow us to redirect vital resources back into our academies.

As part of the Multi Academy Trust group, I would also like to reference the letter shared with the WYPF

Advisory Panel meeting on 24th July, which sets out the collective views of the group. I hope that these perspectives will be given due consideration as you finalise the Funding Strategy Statement.

I am also aware that local authorities have expressed similar views regarding the importance of achieving value for money and the potential for reducing employer contributions. I note, in particular, the signature of Steven Mair of Bradford Council, in the letter that was also shared with the WYPF Pensions Advisory Panel.

Key Points

Stability of Contributions

I understand that a key focus of WYPF is the stability of employer contributions, and that this has been reflected in the approach being proposed for the 2025 valuation. I also recognise that the proposed valuation assumptions and approach are more prudent than those used in the 2022 valuation, with the aim of keeping employer contributions at a similar level. While I can appreciate the benefits of stability and the certainty it can bring to both WYPF and employers—and why this is relevant for the Scheme—stability is not my key priority at this valuation. Given the significant changes in market conditions since the last valuation and the extent of the funding improvements seen in the Scheme, I do not believe that the usual approach of maintaining stability is appropriate at this time.

I do not think our trust should continue to anchor to the current contribution rates purely to maintain short-term stability, especially if this results in overfunding the scheme and requiring employers to pay more at a time when additional cash (which is public money) could be vital elsewhere. If contributions continue at a similar level and WYPF only offers a small reduction, I expect that similar discussions will arise at the next valuation, when contributions will again need to come down—an approach that does not provide true long-term stability.

Instead, I would prefer to see contributions re-set now to a level that reflects the true cost of providing benefits, without increasing prudence as is currently being proposed, and to arrive at a new, stable rate going forward. Given the underlying funding improvements in the Scheme, making this change and reducing contributions does not pose any more risk to the Scheme than the position agreed at the 2022 valuation, which was considered acceptable at that time.

Short Term Reduction

The financial market changes that created the funding improvements for the Scheme occurred towards the end of 2022. Whilst I acknowledge that a valuation only takes place every three years, if a valuation had happened sooner, we could have reduced our contributions earlier. As a result, Northern Education Trust has effectively been overpaying into the Scheme since then.

Given this context, I believe the improved funding position should support a more significant reduction in contributions in the short term, allowing us to recoup these overpayments. This is an approach that I am aware has been adopted by other LGPS funds.

As an informed employer, I fully understand that what I am asking for may result in an increase in contributions in the future. However, I am comfortable that Northern Education Trust can support a future increase if required and will budget appropriately. What we do not need is an overly prudent approach from the Fund, which would effectively reduce our effectiveness as an organisation whose sole aim is to provide the best possible outcomes for our children, simply to provide additional cushioning for the Fund.

Consultation Approach

I would like to raise several concerns regarding the consultation process for the Funding Strategy Statement. Firstly, no sensitivity analysis has been provided as part of the consultation, and there appears to have been an assumption about what employers want, without any real engagement to understand our actual views before setting the draft FSS.

To ensure this consultation is meaningful and not simply a pre-determined outcome, I would appreciate clarity on the following points:

* What is WYPF doing with employer responses to this consultation?
* Is there a plan to set up a working group to review the feedback?
* How will WYPF respond to each employer’s submission?
* How will employer responses be reflected in the final decision-making process?
* Does WYPF have sufficient time and resource to review all responses thoroughly before decisions are made?

I also wish to highlight that the timing of this consultation was not ideal for Multi Academy Trusts, as it took place over the summer holidays. Given that a large proportion of your employers are MATs, and this issue was pointed out in advance, I would ask that you reconsider the timing of future consultations to ensure all employers have a fair opportunity to engage. There is also an assumption that the consultation will automatically reach the right people within MATs, but our group’s experience has shown that this is not always the case.

I urge you to take these points seriously and ensure that the consultation process is transparent, inclusive, and genuinely responsive to employer feedback.

I look forward to receiving your feedback on my letter.

## Notre Dame Catholic Sixth Form College – Director of Finance and Operations

Thank you for the opportunity to respond to the Funding Strategy Statement (FSS) consultation for the West Yorkshire Pension Fund (WYPF). Notre Dame Catholic Sixth Form College welcomes the chance to engage at this pivotal time, given the significant changes in the funding and investment environment since the last valuation.

Over the past year, we have invested considerable time and college funds working alongside ISIO and other local Multi Academy Trusts to ensure we are an informed employer. This consultation is therefore of great importance to us due to the potential positive impact on employer pension contributions and, by extension, on the resources available to support our students.

Request for Contribution Reduction

We believe that WYPF’s improved funding position can support a significant and immediate reduction in employer contributions without increasing risk to the scheme.

We are formally requesting that our employer contribution rate be reduced from 16.5% to 6% for the next three years. This level aligns with the principle of not contributing less than members themselves.

While we recognise that this rate may be temporary and will require review at the next valuation, we are fully prepared to accommodate any necessary increase thereafter to settle at a longer-term stable rate. As a public body, we are duty-bound to ensure value for money in all areas including pension contributions. Continuing to pay above the true cost of providing benefits would represent an inefficient use of public funds at a time when every pound must directly support our 16–18-year-old learners.

We note with interest that Victoria Bradshaw, Assistant Chief Executive (Finance) at Leeds City Council, has expressed similar views regarding affordability and proportionality.

On Stability Versus Fairness

We understand that stability of employer contributions is a key objective of WYPF, and we acknowledge the benefits this brings to both the Fund and employers. However, given the material improvement in market conditions and the scheme’s funding position since the 2022 valuation, we do not believe that prioritising short-term stability over fairness is appropriate on this occasion.

* The proposed valuation assumptions appear more prudent than those used in 2022, seemingly with the effect of maintaining employer contributions at current levels.
* We do not believe that additional prudence is necessary when funding levels have improved and the risk of employer default has reduced.
* Continuing to anchor contribution rates to past assumptions will lead to overfunding, diverting public funds unnecessarily from education.

If only a modest reduction is applied now, we fully expect similar debates at the next valuation, meaning that deferring change today will not enhance long-term stability.

On the Use of Surplus and Valuation Assumptions

We would welcome clarification on several points within the proposed FSS:

1. Probability of Funding Success – What is the rationale for increasing this to 80% when 76% was deemed sufficient in 2022, and 69% in previous valuations? Is this change solely to maintain contribution levels rather than reflect actual risk?
2. 105% Buffer – This buffer was introduced to reflect the unique conditions of the 2022 valuation. Those conditions no longer apply. We believe employers should be able to utilise their full surplus to reduce contributions.
3. Surplus Run-Off Period – Why is a 22-year run-off period being suggested when a 6-year period would allow for more meaningful contribution reductions?
4. Phasing of Contribution Changes – The FSS indicates that changes are typically phased over six years. In our view, phasing is not necessary in this valuation cycle. We request that any revised contribution rate applies in full from April 2026.
5. Use of Surplus for Pre-Funding Redundancy Costs – Could the Scheme allow employers to pre-fund redundancy liabilities using surplus? This would provide cost stability and avoid significant one-off lump sum payments.

Consultation Process

Finally, we wish to emphasise that this consultation must be approached with meaningful engagement. Could you please confirm:

* How you intend to respond to employer submissions, and
* Whether WYPF has sufficient time and capacity to thoroughly consider responses before final decisions are made?

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We hope you will give full consideration to our position. A fair recalibration of contributions at this valuation would allow Notre Dame Catholic Sixth Form College to reinvest vital funds into student provision—without increasing risk to WYPF.

We look forward to your response.

## Northern Star Academies Trust – Chief Executive Officer

I am writing as Chief Executive Officer of Northern Star Academies Trust (“NSAT”) to provide my response to the Funding Strategy Statement (“FSS”) consultation for the West Yorkshire Pension Fund (“WYPF”). I welcome the opportunity to engage with you on this important matter. This consultation comes at a particularly significant time, given the new funding and investment landscape created by substantial market changes since the last valuation. As a result I am expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

I believe it is critical that the Fund carefully considers the views of employers as part of this process, to ensure that the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders.

Northern Star Academies Trust (“NSAT”) has been working collaboratively with other multi academy trusts and engaged with advisors to ensure we are a well informed employer. This consultation is particularly significant to NSAT and the staff and children within it, given the positive impact it could have on our pension contributions and, consequently, what this could mean for our schools and the challenges we face.

We respectfully ask that you consider our response seriously and reflect on the points we have raised when making your final decisions for the valuation.

Overview

I believe that the improved funding position of the WYPF creates an opportunity for you to significantly reduce our contributions. I respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions. This would provide much-needed financial flexibility at a critical time and allow us to redirect vital resources back into our schools.

As part of the Multi Academy Trust group, I would also like to reference the letter shared with the WYPF Advisory Panel meeting on 24th July, which sets out the collective views of the group. I hope that these perspectives will be given due consideration as you finalise the FSS.

Impact Statement

Our Trust includes eight primary schools where associate staff contribute to WYPF within some of the most deprived communities in West Yorkshire. In these communities education is the key route to improving the life chances of young people. WYPF contributions make up 4% of the eight West Yorkshire primary schools’ overall budget. As we are dealing with public funds, I feel a strong duty to ensure that there is value for money from these contributions, just as I do with every other penny we spend. This is critical because it has a direct impact on the children in our schools. Every penny we save will enhance the education of the pupils within our schools and improve their life chances. At the moment with funding levels at such a low level that we are having to reduce staffing levels to balance the budget despite children facing significant challenges in the aftermath of the pandemic and our schools experiencing unprecedented levels of Special Education Needs the financial challenges are immense.

The significant challenges we are facing require resources if we are to meet the evolving needs of our schools and communities. As a trust we strive to deliver early education to the highest level, provide learning that is inclusive and liberating and equip children and young people with the knowledge, skills, dispositions and qualifications to provide a meaningful contribution to lead our country into a brighter, fairer and more sustainable future. With the current national and global challenges never has it been more important to invest in our children and young people. This requires adequate funding in our schools and WYPF has the opportunity to support and benefit our schools and society massively without damaging itself or its members access to an excellent pension. Dropping the contribution rate now is the right thing to do to support the young people in West Yorkshire who are the future of our country.

To illustrate the scale of impact, a 11% reduction in pension costs would mean £581k could be redirected directly back into the education of NSAT children each year. This would enable us to employ the equivalent of 22.8 extra teaching assistants or 9 teachers, and provide other much needed services to support our children. In short, such a change would make a huge difference in our schools.

Key Points

Stability of Contributions

I recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, I believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. I am confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

I understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, I do not feel this is justified. Instead, I request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Technical Questions and Concerns

I would also like to raise several technical questions regarding the proposed approach in the draft FSS:

* You have proposed an increase in the Probability of Funding Success from the last valuation. Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* As there is a surplus, running this off over, for example, six years would reduce our contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, I do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way of using the surplus in the Scheme to pre-fund the cost of redundancy payments? It would be extremely helpful to stabilise these costs rather than having to pay them as a one-off lump sum.

I would appreciate clear responses to these questions, as they are central to ensuring the consultation is robust, transparent, and genuinely responsive to employer needs.

Consultation Approach

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

I respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Northern Star Academies Trust – Chair of the Board of Trustees

As the Board of Trustees for Northern Star Academies Trust, we write to express our concerns from a governance perspective regarding the proposed employer contribution rates in the draft Funding Strategy Statement (“FSS”). Given our responsibility to ensure prudent use of public funds we have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community. We are therefore concerned about the high levels of employer contribution rates being proposed in the FSS, especially given the significantly improved funding position of the West Yorkshire Pension Fund (“WYPF”) since the last actuarial valuation.

Value for Money and Use of Public Funds

Our advisors have explained that since the 2022 valuation the funding position of the WYPF has improved considerably, resulting in a much stronger funding position for WYPF. In this context, we would expect to see significant reductions in employer contribution rates over the next three years. We are concerned that, despite this improved picture, all levers within the FSS appear to have been pulled to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children we serve. This is especially pertinent given we serve some of the most deprived pupils in the country in inner city Bradford and Keighley.

Request for Reduced Contributions

Given the improved funding position, we respectfully request that the employer contribution rate be reduced to 6% for the next three years, up to the next valuation. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of the children in our schools.

Key Technical Concerns

* Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Governance and Consultation Process

We are also concerned about the consultation process itself. No sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS. We are seeking clarity on:

* What is WYPF’s procedure for reviewing and addressing employer feedback?
* Will a dedicated working group be formed to evaluate responses?
* How will stakeholder input be incorporated into the final strategy?
* Is there adequate time and resources allocated to thoroughly assess all feedback before finalising decisions?
* The timing of this consultation—during the summer holidays—was not conducive for Multi Academy Trusts. We urge future consultations to be scheduled more appropriately and communicated effectively to ensure inclusive participation.

Conclusion

In our role as custodians of public funds, we strongly encourage WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions—specifically to 6%—reflecting the improved funding position, and that unnecessary prudence is not built into the strategy at the expense of value for money for schools and pupils.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

## Northern Star Academies Trust – Chief Finance Officer

Please find below my response to the Funding Strategy Statement (“FSS”) consultation for the West Yorkshire Pension Fund (“WYPF”). I welcome the opportunity to engage with you on this important matter. This consultation comes at a particularly significant time, given the new funding and investment landscape created by the substantial market changes since the last valuation.

I believe it is critical that the Fund carefully considers the views of employers as part of this process, to ensure that the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders.

Northern Star Academies Trust (“NSAT”) has been working collaboratively with other multi academy trusts and engaged with advisors to ensure we are a well-informed employer. This consultation is particularly significant to NSAT and the staff and children within it, given the positive impact it could have on our pension contributions and, consequently, what this could mean for our schools.

We respectfully ask that you consider our response seriously and reflect on the points we have raised when making your final decisions for the valuation.

Impact Statement

Our Trust includes eight primary schools within West Yorkshire where associate staff contribute to WYPF. West Yorkshire Pension Fund contributions make up 4% of our West Yorkshire primary schools ‘overall budget. As we are dealing with public funds, I feel a strong duty to ensure that there is value for money from these contributions, just as we do with every other penny we spend. This is critical because it has a direct impact on the children in our schools—every penny we save will enhance the education of the pupils within our schools. This is especially critical at the moment when funding levels are at such a low level that we are having to reduce staffing levels to balance the budget despite children facing significant challenges in the aftermath of the pandemic and our schools experiencing unprecedented levels of Special Education Needs.

The significant challenges we are facing require resources if we are to meet the evolving needs of our schools and communities. I believe that education is key to to our future as individuals, as communities and as a country. Education enables our children and young people to interpret the world around them and acquire the knowledge and skills to shape it for the better. Having the right money in our schools now has never been more critical and WYPF has the opportunity to benefit schools and society massively without damaging itself or its members access to an excellent pension. Dropping the contribution rate now is the right thing to do to support the young people in West Yorkshire who are the future of our country.

To illustrate the scale of impact, a 11% reduction in pension costs would mean £581k could be redirected directly back into the education of NSAT children each year. This would enable us to employ the equivalent of 22.8 extra teaching assistants or 9 teachers and provide other much needed services to support our children. In short, such a change would make a huge difference in our schools.

Overview

I believe that the improved funding position of the WYPF can support an immediate and significant reduction in pension contributions, without any increase in the level of risk that NSAT and other employers pose to the Scheme. We are solid employers, with regular government income, we also have the DFE guarantee. We have high levels of accountability and scrutiny and do not pose any risk to the Fund.

In light of this, we request that you consider an approach that enables us to reduce our contributions to 6% for the next three years, as we do not wish to pay less than members. This would provide much-needed financial flexibility and allow us to redirect vital resources back into our schools.

As part of the Multi Academy Trust group, I would also like to reference the letter shared with the WYPF Advisory Panel meeting on 24th July, which sets out the collective views of the group. I hope that these perspectives will be given due consideration as you finalise the Funding Strategy Statement.

I am also aware that local authorities have expressed similar views regarding the importance of achieving value for money and the potential for reducing employer contributions. I note, in particular, the signature of Steven Mair of Bradford Council, in the letter that was also shared with the WYPF Pensions Advisory Panel.

Key Points

Stability of Contributions

I understand that a key focus of WYPF is the stability of employer contributions, and that this has been reflected in the approach being proposed for the 2025 valuation. I also recognise that the proposed valuation assumptions and approach are more prudent than those used in the 2022 valuation, with the aim of keeping employer contributions at a similar level.

While I can appreciate the benefits of stability and the certainty it can bring to both WYPF and employers—and why this is relevant for the Scheme—stability is not my key priority at this valuation. Given the significant changes in market conditions since the last valuation and the extent of the funding improvements seen in the Scheme, I do not believe that the usual approach of maintaining stability is appropriate at this time.

I do not think we should continue to anchor to the current contribution rates purely to maintain short-term stability, especially if this results in overfunding the Scheme and requiring employers to pay more at a time when additional cash (which is public money) could be vital elsewhere. If contributions continue at a similar level and WYPF only offers a small reduction, I expect that similar discussions will arise at the next valuation, when contributions will again need to come down—an approach that does not provide true long-term stability.

Instead, I would prefer to see contributions re-set now to a level that reflects the true cost of providing benefits, without increasing prudence as is currently being proposed, and to arrive at a new, stable rate going forward. Given the underlying funding improvements in the Scheme, making this change and reducing contributions does not pose any more risk to the Scheme than the position agreed at the 2022 valuation, which was considered acceptable at that time.

Short Term Reduction

The financial market changes that created the funding improvements for the Scheme occurred towards the end of 2022. Whilst I acknowledge that a valuation only takes place every three years, if a valuation had happened sooner, we could have reduced our contributions earlier. As a result, NSAT has effectively been overpaying into the Scheme since then.

Given this context, I believe the improved funding position should support a more significant reduction in contributions in the short term, allowing us to recoup these overpayments. This is an approach that I am aware has been adopted by other LGPS funds.

As an informed employer, we fully understand that what we are asking for may result in an increase in contributions in the future. However, we are comfortable that NSAT can support a future increase if required and will budget appropriately. What we do not need is an overly prudent approach from the Fund, which would effectively reduce our effectiveness as an organisation whose sole aim is to provide the best possible outcomes for our children, simply to provide additional cushioning for the Fund.

Technical Questions and Concerns

I would also like to raise several technical questions regarding the proposed approach in the draft FSS:

* You have proposed an increase in the Probability of Funding Success from the last valuation. Is this change being made purely to maintain employer contributions at a similar level?
* This increases the prudence of WYPF’s approach, and I do not believe additional prudence is needed now, given the improved funding position and the reduced risk of employers being unable to fund benefits.
* How has WYPF chosen the rate of 80%, and why is this considered the right rate when you were comfortable with 76% last time and have previously accepted 69%?
* The continued reference to the 105% buffer means any surplus below this threshold cannot be used to reduce our contributions. This buffer was introduced last time to reflect the specific circumstances of the 2022 valuation. It is not needed this time, and we should be able to use our full surplus to reduce contributions.
* As there is a surplus, running this off over, for example, six years would reduce our contributions further. Why is a 22-year period being suggested?
* The FSS notes that any changes to contributions are typically phased in over six years. We do not want this level of stabilisation and do not believe it is necessary given the significant improvements seen. We request that our revised contribution rate is payable immediately from April 2026.
* Is there a way of using the surplus in the Scheme to pre-fund the cost of redundancy payments? It would be extremely helpful to stabilise these costs rather than having to pay them as a one-off lump sum.

I would appreciate clear responses to these questions, as they are central to ensuring the consultation is robust, transparent, and genuinely responsive to employer needs.

Consultation Approach

I would like to raise several concerns regarding the consultation process for the FSS.

Firstly, no sensitivity analysis has been provided as part of the consultation, and there appears to have been an assumption about what employers want, without any real engagement to understand our actual views before setting the draft FSS.

* There are only 14 working days between the consultation closing date and the fund advisory panel meeting. Presumably papers need to be released a week in advance giving only 9 working days to collate responses and to reflect on them and action any changes as a result.
* To ensure this consultation is meaningful and not simply a pre-determined outcome, I would appreciate clarity on the following points:
* What is WYPF doing with employer responses to this consultation?
* Is there a plan to set up a working group to review the feedback?
* How will WYPF respond to each employer’s submission?
* How will employer responses be reflected in the final decision-making process?
* Does WYPF have sufficient time and resource to review all responses thoroughly before decisions are made?
* Can you and will you extend the consultation to ensure employers views are heard?

I also wish to highlight that the timing of this consultation was not ideal for Multi Academy Trusts (“MATs”), as it took place over the summer holidays. Given that a large proportion of your employers are MATs, and this issue was pointed out in advance, I would ask that you reconsider the timing of future consultations to ensure all employers have a fair opportunity to engage, I would also ask you to extend the period of consultation now to ensure it has been fair and transparent. There is also an assumption that the consultation will automatically reach the right people within MATs, but our group’s experience has shown that this is not always the case.

I urge WYPF to adopt a more responsive and transparent approach in finalising the FSS. A reduction in employer contributions to 6% is both justified and necessary, given the improved funding position. We look forward to your considered response and to a constructive dialogue moving forward.

## Oxenhope C of E Primary School (BDAT) - Local Governing Board

Response from the Governing Board of Oxenhope CE Primary School to the West Yorkshire Pension Fund (WYPF) Funding Strategy Statement (FSS) Consultation 2025

1. Context and financial position

* Oxenhope CE Primary School is a participating employer within the Local Government Pension Scheme.
* The Governing Board is responsible for the financial oversight and strategic direction of the school and is deeply concerned about the financial pressures currently faced by the education sector, including rising costs and declining pupil numbers.
* We welcome the opportunity to respond to the FSS consultation, which will significantly impact our financial planning for the 2026–2029 period.

2. Request for reduced contribution rates

* We acknowledge the improvement in the financial health of the WYPF since the 2022 actuarial valuation, which is understood to have been driven by positive market conditions.
* We therefore respectfully request that the WYPF actuary recommends a significant reduction in employer contribution rates for the upcoming triennial period.
* Considering the exceptional financial pressures faced by schools, we specifically ask that you explore the feasibility of implementing a zero-rated employer contribution for the three-year period, with the understanding that this would be reviewed at the next valuation.

3. Impact on educational provision

* High employer contribution rates directly impact our budget, forcing us to make difficult decisions that affect staffing levels and, consequently, the quality of education and support for our pupils.
* A reduction in contributions would provide vital financial relief, enabling us to retain key members of our support team and protect the learning and wellbeing of our most vulnerable students.

4. Concerns regarding prudence and surplus funds

* While we recognise the WYPF's focus on stability, we do not believe that adding further prudence to the funding strategy is justified at this time, given the fund's strong position.
* We argue that any surplus funds currently being accumulated could be more effectively utilised by participating employers, such as schools, who are operating under severe financial constraints.
* We ask the WYPF to release any additional planned prudence to enable lower employer contribution rates.

5. Request for further information

* To fully understand the potential implications of our proposal, we would be grateful for more information on the potential impact and ramifications of a nil contribution for three years.

6. Conclusion

* We urge the WYPF to consider our position carefully. A significant reduction in employer contribution rates would provide essential financial breathing room for schools during a period of immense pressure, safeguarding the quality of education for our pupils while the fund remains in a robust financial position.

## Oxenhope C of E Primary School (BDAT) – Headteacher

As a participating employer within the Local Government Pension Scheme (LGPS), we are writing to provide our response to the Funding Strategy Statement (FSS) consultation, which will influence our employer contribution rates for the period of 1st April 2026 to 31st March 2029. This is a significant consultation for us, especially given the current financial climate experienced by all schools and multi-academy trusts (MATs).

Since the last actuarial valuation in 2022, there have been significant improvements in the pensions landscape. We understand from our advisors that market conditions have led to a marked improvement in the funding position of the WYPF. Consequently, we hope to see a substantial reduction in employer contribution rates over the next three years.

Our request is for the WYPF to allow a significant reduction in our contributions, perhaps even to zero for the upcoming three-year period, with the understanding that they will be reassessed after that time. This is in recognition of the improved funding position and the severe cost pressures currently faced by schools. I cannot stress enough how much of a difference this would make to our whole school community. With the impact of reduced pupil numbers and rising staff costs we are constantly being forced to lose valuable members of our support team which impacts heavily, not only on staff morale, but on the learning and wellbeing of our pupils. If our contributions were reduced to zero over this 3 year period it would significantly impact on the likelihood of us being able to retain key members of staff. This would impact on the most vulnerable pupils and their families.

We understand that the WYPF's primary focus in setting employer contribution rates is stability. However, given the current financial constraints on academies, we believe that funds could be better spent elsewhere rather than building up additional surplus within the WYPF. We would be very grateful for more information on the potential implications of paying a nil contribution for three years.

Finally, we are concerned to learn that the WYPF is considering building additional prudence into its funding strategy. We feel that given the strong position of the fund and its participating employers, this is not justified. We request that this prudence is released to enable lower employer contribution rates. We trust that you will consider our comments as you finalise the FSS for the 2025 actuarial valuation.

## Oxenhope C of E Primary School (BDAT) – Executive Academy Business Leader

Thank you for the opportunity to respond to the WYPF Funding Strategy consultation.

I work as Academy Business Leader for two primary schools, Oxenhope CE Primary School and Cullingworth Village Primary School. I have already sent a joint response, along with our Headteacher at Cullingworth Primary School but I am also sending this response on behalf of Oxenhope CE Primary School as I am well aware of how critical this issue is to our school. I am aware our headteacher at Oxenhope, Alice Jones, has also already sent in a response.

The school has been in a deficit position for a number of years and has just emerged from that. However, budget forecasts indicate the potential need to resort to drastic reductions in the number of support staff hours over the next three years in order to retain a balanced budget position by the end of this period. We have already implemented significant cutbacks, including a staffing restructure, in order to get to a balanced position. If we have to lose more support staff hours it will have a profound impact on the sustainability of our ability to meet the needs of our pupils.

A considerable reduction to our pension contribution costs could be the turning point in enabling us to retain a valuable member of our support team. This is likely to have a cascading impact, not only on our pupils, but also on staff morale and the perception of parents and the school community. This has the potential to lead to a drop in confident and pupil numbers which would have a further drastic impact on the budget and long-term financial sustainability.

I therefore urge WYPF to consider a funding approach that acknowledges the current robust financial health of the pension scheme and enables a significant reduction in employer contribution rates. Such a move would have a transformative impact on our school budgets and signal a strong commitment to supporting education during a time of immense financial strain.

Schools are facing unprecedented challenges. Rising costs and shrinking budgets are forcing difficult decisions that directly affect pupils. A reduction in pension contributions would be the clinching factor to free up funds that could be reinvested in vital classroom support for our most vulnerable pupils.

I’m certain this would be the case for so many schools and pupils across the district. Support staff are essential to inclusive education, yet, the current crisis in SEND provision, exacerbated by funding cuts, means many children are not receiving the support they need. Lower contributions would free up funds to retain essential staff, ensuring that every child, regardless of their needs, has access to the support they deserve.

While we understand the importance of safeguarding the long-term stability of the pension fund, we believe that the current surplus offers a rare opportunity to ease financial pressures without compromising future security. Over-cautious funding strategies risk undermining the very institutions the scheme is designed to support.

With a national surplus exceeding £100 billion, there is a clear opportunity to make a meaningful difference. We strongly support a substantial reduction in employer contribution rates and urge WYPF to adopt a strategy that reflects both the strength of the fund and the urgent needs of schools. For our Trust, this would mean an annual saving of approximately £1.6 million. For individual schools, such as Oxenhope, it could mean avoiding staff restructures and retaining desperately needed support staff hours.

Thank you very much for considering our views. I can’t stress enough what a difference it could make if these views are taken into account.

## Oyster Park Primary Academy – Headteacher

I am writing as Head Teacher of Oyster Park Primary Academy, part of Castleford Academy Trust, to provide our response to the Funding Strategy Statement (FSS) consultation . I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

To illustrate the scale of the impact, an 11.4% reduction in employer contributions to 6% would mean £90,000 per year could be redirected back to the education of Oyster Park Academy pupils. This could enable us to employ the equivalent of more than 1 additional teacher. Such a change would make a huge difference to our academy.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF's process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached .

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Priestley Academy Trust – Chief Finance Officer

I welcome the opportunity to engage with you on this important matter. This consultation comes at a particularly significant time, given the new funding and investment landscape created by the substantial market changes since the last valuation.

I believe it is critical that the Fund carefully considers the views of employers as part of this process, to ensure that the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders.

Impact Statement

As a Trust with six primary schools, our employer contributions to the WYPF will amount to more than £0.5M this year, constituting a significant proportion of our overall budget. As a public sector organisation, we have an obligation to ensure we extract the best value for money from all of our expenditure and we seek to invest as much of our financial resources as possible directly into the educational experience of our children.

There is currently an SEN crisis, and in Bradford in particular, we are struggling to provide enough places for our most vulnerable learners. This is manifesting in overly crowded and underfunded schools. Trusts need to be able to subsidise increasingly specialist levels of provision to support the most vulnerable children to ensure they – and all our children – have access to the resources needed to gain the best educational experience possible. The triennial review of WYPF presents an opportunity to provide a significant financial benefit to schools and society without adversely affecting the viability of the scheme or the benefits accruing to its members. Reducing the employer contribution rate would enable schools to redirect funds directly into the educational experience of all our children, benefiting them and in the longer term, wider society. There is a moral imperative on WYPF to facilitate this by reducing the contribution rate now.

To illustrate the scale of impact, a reduction in pension costs from our current rate of 16.4% to 6.4% would mean £358k could be redirected directly back into the education of The Priestley Academy Trust children every year. This would enable us to employ the equivalent of 14 extra teaching assistants or 7 teachers and provide other much needed but expensive services such as additional mental health services to support our children. In short, such a change would make a huge difference in our schools and to our children.

Overview

I believe that the improved funding position of the West Yorkshire Pension Fund can support an immediate and significant reduction in pension contributions, without any increase in the level of risk that The Priestley Academy Trust and other employers pose to the Scheme. We are financially secure employers, having regular government income, we also have the DFE guarantee. We have high levels of accountability and scrutiny and do not pose any risk to the Fund.

In light of this, we request that you consider an approach that enables us to reduce our contributions to 6% for the next three years. This would provide much-needed financial flexibility and allow us to redirect vital resources back into our schools.

I am also aware that local authorities have expressed similar views regarding the importance of achieving value for money and the potential for reducing employer contributions. I note, in particular, the signature of Steven Mair of Bradford Council, in the letter that was also shared with the WYPF Pensions Advisory Panel.

Key Points

Stability of Contributions

I understand that a key focus of WYPF is the stability of employer contributions, and that this has been reflected in the approach being proposed for the 2025 valuation. I also recognise that the proposed valuation assumptions and approach are more prudent than those used in the 2022 valuation, with the aim of keeping employer contributions at a similar level.

While I can appreciate the benefits of stability and the certainty it can bring to both WYPF and employers, and why this is relevant for the Scheme, I question why stability is the overarching priority for this valuation. Given the significant changes in market conditions since the last valuation and the extent of the funding improvements seen in the Scheme, I do not believe that the usual approach of maintaining stability is appropriate at this time.

I do not think we should continue to anchor to the current contribution rates purely to maintain short-term stability, especially if this results in overfunding the Scheme and requiring employers to pay more at a time when additional cash (which is public money) could be vital elsewhere. If contributions continue at a similar level and WYPF only offers a small reduction, I expect that similar discussions will arise at the next valuation, when contributions will again need to come down—an approach that does not provide true long-term stability.

Instead, I would prefer to see contributions re-set now to a level that reflects the true cost of providing benefits, without increasing prudence as is currently being proposed, and to arrive at a new, stable rate going forward. Given the underlying funding improvements in the Scheme, making this change and reducing contributions does not pose any more risk to the Scheme than the position agreed at the 2022 valuation, which was considered acceptable at that time.

Short Term Reduction

The financial market changes that created the funding improvements for the Scheme occurred towards the end of 2022. Whilst I acknowledge that a valuation only takes place every three years, if a valuation had happened sooner, we could have reduced our contributions earlier. As a result, The Priestley Academy Trust has effectively been overpaying into the Scheme since then.

Given this context, I believe the improved funding position should support a more significant reduction in contributions in the short term, allowing us to recoup these overpayments. This is an approach that I am aware has been adopted by other LGPS funds.

As an informed employer, I fully understand that what I am asking for may result in an increase in contributions in the future. However, I am comfortable that my Trust can support a future increase if required and will budget appropriately. What we do not need is an overly prudent approach from the Fund, which would effectively reduce our effectiveness as an organisation whose sole aim is to provide the best possible outcomes for our children, simply to provide additional cushioning for the Fund.

Consultation Approach

I would like to raise several concerns regarding the consultation process for the Funding Strategy Statement. Firstly, no sensitivity analysis has been provided as part of the consultation, and there appears to have been an assumption about what employers want, without any real engagement to understand our actual views before setting the draft FSS.

To ensure this consultation is meaningful and not simply a pre-determined outcome, I would appreciate clarity on the following points:

* What is WYPF doing with employer responses to this consultation?
* Is there a plan to set up a working group to review the feedback?
* How will WYPF respond to each employer’s submission?
* How will employer responses be reflected in the final decision-making process?
* Does WYPF have sufficient time and resource to review all responses thoroughly before decisions are made?

I also wish to highlight that the timing of this consultation was not ideal for Multi Academy Trusts, as it took place over the summer holidays. Given that a large proportion of your employers are MATs, and this issue was pointed out in advance, I would ask that you reconsider the timing of future consultations to ensure all employers have a fair opportunity to engage. There is also an assumption that the consultation will automatically reach the right people within MATs, but our group’s experience has shown that this is not always the case.

I urge you to take these points seriously and ensure that the consultation process is transparent, inclusive, and genuinely responsive to employer feedback.

I look forward to receiving your feedback on my letter.

## Priestley Academy Trust – Chief Executive

As the CEO for Priestley Academy Trust, I write from governance and operational perspectives as stewards of public funds. We have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community. We are therefore concerned about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for Money and Use of Public Funds

Our advisors have explained that financial conditions have changed substantially since the 2022 valuation, resulting in a much stronger funding position for WYPF. In this context, we would expect to see significant reductions in employer contribution rates over the next three years. We are concerned that, despite this improved picture, all levers within the FSS appear to have been pulled to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children we serve.

Request for Reduced Contributions

Given the improved funding position, we respectfully request that the employer contribution rate be reduced to 6% for the next three years, up to the next valuation. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our schools.

Key Technical Concerns

* Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Governance and Consultation Process

We are also concerned about the consultation process itself. No sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS. We ask:

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

Conclusion

Given our responsibilities as stewards of public funds, we urge WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions—specifically to 6%—reflecting the improved funding position, and that unnecessary prudence is not built into the strategy at the expense of value for money for schools and pupils.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

## Raynville Academy (Great Heights Academy Trust) – Head of School

I am writing as head of school of Raynville Academy to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is achievable without having a negative impact on the fund or on our employees' pensions.

By reducing to 6%, this would mean a saving of £67,778. This would be equivalent to three full time support staff members or 1 teacher and resources that would be very beneficial to the school. Raynville's SEND pupils is 21.83% which is above national average (18.20%), additional support and resources would directly help support these students.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Red Kite Learning Trust – Chief Executive Officer

I am writing as Chief Executive Officer of Red Kite Learning Trust to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees' pensions.

Impact Statement

As a Trust with two secondary schools, five primary schools and one all through school in Leeds, our West Yorkshire Pension Fund contributions make up a significant proportion of our overall budget. As we are dealing with public funds, I feel a strong duty to ensure that there is value for money from these contributions, just as we do with every other penny we spend. This is critical because it has a direct impact on the children in our schools - every penny we save can be redirected back into their education.

There is currently an SEN crisis, and in Leeds in particular, we are struggling to provide enough places for our most vulnerable learners. The planned change to move to Educational Health Care Plans (EHCPs) from Block funding has led to a significant delay in processing and approving plans. This is manifesting in overly crowded and underfunded schools, a dangerous situation. Schools are facing significant challenges in the aftermath of the pandemic, they are a fundamentally different place, children are fundamentally different as are families. All of this requires resource in order to better support our children. I believe that education is vital not only for individual children but for the future of our society. Having the right money in our schools now has never been more critical and WYPF has the opportunity to benefit schools and society massively without damaging itself or its members access to a fantastic pension. In short dropping the contribution rate now is morally the right thing to do.

To illustrate the scale of impact, an 11% reduction in pension costs would mean £1.0 million annually could be redirected directly back into the education of Red Kite Learning Trust children per year. This would enable us to employ the equivalent of 28 extra teaching assistants or 13 teachers and provide other much needed but expensive services such as additional mental health services to support our children. In short, such a change would make a huge difference in our schools.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?

The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions . This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now. With a surplus in the Scheme, running this off over a shorter period (eg, six years) would reduce contributions further. Why is a 22-year period being suggested?

The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.

Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF's process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

On behalf of:-

* Austhorpe Primary School
* Colton Primary School
* Crawshaw Academy
* Meadowfield Primary School
* Templenewsam Halton Primary School
* Temple Learning Academy
* Temple Moor High School
* Whitkirk Primary School

## Red Kite Learning Trust – Chair of the Board of Trustees

As the Board of Trustees for Red Kite Learning Trust, we write from a governance perspective as stewards of public funds. We have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community. We are therefore concerned about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for Money and Use of Public Funds

Our advisors have explained that financial conditions have changed substantially since the 2022 valuation, resulting in a much stronger funding position for WYPF. In this context, we would expect to see significant reductions in employer contribution rates over the next three years. We are concerned that, despite this improved picture, all levers within the FSS appear to have been pulled to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children we serve.

Request for Reduced Contributions

Given the improved funding position, we respectfully request that the employer contribution rate be reduced to 6% for the next three years, up to the next valuation. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our schools. As a Trust with two secondary schools, five primary schools and one all through school in Leeds, our West Yorkshire Pension Fund contributions make up a significant proportion of our overall budget. To illustrate the scale of impact, an 11% reduction in pension costs would mean £1.0 million annually could be redirected directly back into the education of Red Kite Learning Trust children per year. This would enable us to employ the equivalent of 28 extra teaching assistants or 13 teachers and provide other much needed but expensive services such as additional mental health services to support our children. In short, such a change would make a huge difference in our schools.

Key Technical Concerns

* Probability of Funding Success:
  + The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
  + 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (eg, six years} would reduce contributions further. Why is a 22-year period being suggested?
* Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Governance and Consultation Process

We are also concerned about the consultation process itself. No sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS. We ask:-

* What is WYPF's process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

Conclusion

Given our responsibilities as stewards of public funds, we urge WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions - specifically to 6% - reflecting the improved funding position, and that unnecessary prudence is not built into the strategy at the expense of value for money for schools and pupils.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

## Red Kite Learning Trust – Chief Finance Officer

Please find below my response to the Funding Strategy Statement ('FSS') consultation for the West Yorkshire Pension Fund {'WYPF'). I welcome the opportunity to engage with you on this important matter. This consultation comes at a particularly significant time, given the new funding and investment landscape created by the substantial market changes since the last valuation.

I believe it is critical that the Fund carefully considers the views of employers as part of this process, to ensure that the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders.

As you are aware, over the last year Red Kite Learning Trust has been working collaboratively with other multi academy trusts, investing significant time and working with lsio to ensure we are an informed employer. This consultation is particularly significant to Red Kite Learning Trust and the staff and children within it, given the positive impact it could have on our pension contributions and, consequently, what this could mean for our schools.

We respectfully ask that you consider our response seriously and reflect on the points we have raised when making your final decisions for the valuation. We are also open to meeting with you to present our views in more detail, should you find this helpful. We would appreciate if the consultation period could be extended to allow for a meaningful discussion.

Impact Statement

As a Trust with two secondary schools, five primary schools and one all through school in Leeds, our West Yorkshire Pension Fund contributions make up a significant proportion of our overall budget. As we are dealing with public funds, I feel a strong duty to ensure that there is value for money from these contributions, just as we do with every other penny we spend. This is critical because it has a direct impact on the children in our schools - every penny we save can be redirected back into their education.

There is currently an SEN crisis, and in Leeds in particular, we are struggling to provide enough places for our most vulnerable learners. The planned change to move to Educational Health Care Plans (EHCP's) from Block funding has led to a significant delay in processing and approving plans. This is manifesting in overly crowded and underfunded schools, a dangerous situation. Schools are facing significant challenges in the aftermath of the pandemic, they are a fundamentally different place, children are fundamentally different as are families. All of this requires resource in order to better support our children. I believe that education is vital not only for individual children but for the future of our society. Having the right money in our schools now has never been more critical and WYPF has the opportunity to benefit schools and society massively without damaging itself or its members access to a fantastic pension. In short dropping the contribution rate now is morally the right thing to do.

To illustrate the scale of impact, an 11% reduction in pension costs would mean £1.0 million annually could be redirected directly back into the education of Red Kite Learning Trust children per year. This would enable us to employ the equivalent of 28 extra teaching assistants or 13 teachers and provide other much needed but expensive services such as additional mental health services to support our children. In short, such a change would make a huge difference in our schools.

Overview

I believe that the improved funding position of the West Yorkshire Pension Fund can support an immediate and significant reduction in pension contributions, without any increase in the level of risk that Red Kite Learning Trust and other employers pose to the Scheme. We are solid employers, having regular government income, we also have the DFE guarantee. We have high levels of accountability and scrutiny and do not pose any risk to the Fund.

In light of this, we request that you consider an approach that enables us to reduce our contributions to 6% for the next three years, as we do not wish to pay less than members. This would provide much-needed financial flexibility and allow us to redirect vital resources back into our schools.

As part of the Multi Academy Trust group, I would also like to reference the letter shared with the WYPF Advisory Panel meeting on 24th July, which sets out the collective views of the group. I hope that these perspectives will be given due consideration as you finalise the Funding Strategy Statement.

I am also aware that local authorities have expressed similar views regarding the importance of achieving value for money and the potential for reducing employer contributions. I note, in particular, the signature of Steven Mair of Bradford Council, in the letter that was also shared with the WYPF Pensions Advisory Panel.

Key Points

Stability of Contributions

I understand that a key focus of WYPF is the stability of employer contributions, and that this has been reflected in the approach being proposed for the 2025 valuation. I also recognise that the proposed valuation assumptions and approach are more prudent than those used in the 2022 valuation, with the aim of keeping employer contributions at a similar level.

While I can appreciate the benefits of stability and the certainty it can bring to both WYPF and employers -and why this is relevant for the Scheme - stability is not my key priority at this valuation. Given the significant changes in market conditions since the last valuation and the extent of the funding improvements seen in the Scheme, I do not believe that the usual approach of maintaining stability is appropriate at this time.

I do not think we should continue to anchor to the current contribution rates purely to maintain short-term stability, especially if this results in overfunding the Scheme and requiring employers to pay more at a time when additional cash (which is public money) could be vital elsewhere. If contributions continue at a similar level and WYPF only offers a small reduction, I expect that similar discussions will arise at the next valuation, when contributions will again need to come down - an approach that does not provide true long-term stability.

Instead, I would prefer to see contributions re-set now to a level that reflects the true cost of providing benefits, without increasing prudence as is currently being proposed, and to arrive at a new, stable rate going forward. Given the underlying funding improvements in the Scheme, making this change and reducing contributions does not pose any more risk to the Scheme than the position agreed at the 2022 valuation, which was considered acceptable at that time.

Short Term Reduction

The financial market changes that created the funding improvements for the Scheme occurred towards the end of 2022. Whilst I acknowledge that a valuation only takes place every three years, if a valuation had happened sooner, we could have reduced our contributions earlier. As a result, Red Kite Learning Trust has effectively been overpaying into the Scheme since then.

Given this context, I believe the improved funding position should support a more significant reduction in contributions in the short term, allowing us to recoup these overpayments. This is an approach that I am aware has been adopted by other LGPS funds.

As an informed employer, I fully understand that what I am asking for may result in an increase in contributions in the future. However, I am comfortable that Red Kite Learning Trust can support a future increase if required and will budget appropriately. What we do not need is an overly prudent approach from the Fund, which would effectively reduce our effectiveness as an organisation whose sole aim is to provide the best possible outcomes for our children, simply to provide additional cushioning for the Fund.

Technical Questions and Concerns

I would also like to raise several technical questions regarding the proposed approach in the draft Funding Strategy Statement:-

* You have proposed an increase in the Probability of Funding Success from the last valuation.
* Is this change being made purely to maintain employer contributions at a similar level?
* This increases the prudence of WYPF's approach, and I do not believe additional prudence is needed now, given the improved funding position and the reduced risk of employers being unable to fund benefits.
* How has WYPF chosen the rate of 80%, and why is this considered the right rate when you were comfortable with 76% last time and have previously accepted 69%?
* The continued reference to the 105% buffer means any surplus below this threshold cannot be used to reduce our contributions. This buffer was introduced last time to reflect the specific circumstances of the 2022 valuation. It is not needed this time, and we should be able to use our full surplus to reduce contributions.
* As there is a surplus, running this off over, for example, six years would reduce our contributions further.  
  Why is a 22-year period being suggested?
* The FSS notes that any changes to contributions are typically phased in over six years. We do not want this level of stabilisation and do not believe it is necessary given the significant improvements seen. We request that our revised contribution rate is payable immediately from April 2026.
* Is there a way of using the surplus in the Scheme to pre-fund the cost of redundancy payments? It would be extremely helpful to stabilise these costs rather than having to pay them as a one-off lump sum.

I would appreciate clear responses to these questions, as they are central to ensuring the consultation is robust, transparent, and genuinely responsive to employer needs.

Consultation Approach

I would like to raise several concerns regarding the consultation process for the Funding Strategy Statement. Firstly, no sensitivity analysis has been provided as part of the consultation, and there appears to have been an assumption about what employers want, without any real engagement to understand our actual views before setting the draft FSS.

To ensure this consultation is meaningful and not simply a pre-determined outcome, I would appreciate clarity on the following points:-

* What is WYPF doing with employer responses to this consultation?
* Is there a plan to set up a working group to review the feedback?
* How will WYPF respond to each employer's submission?
* How will employer responses be reflected in the final decision-making process?
* Does WYPF have sufficient time and resource to review all responses thoroughly before decisions are made?

I also wish to highlight that the timing of this consultation was not ideal for Multi Academy Trusts, as it took place over the summer holidays. Given that a large proportion of your employers are MATs, and this issue was pointed out in advance, I would ask that you reconsider the timing of future consultations to ensure all employers have a fair opportunity to engage. There is also an assumption that the consultation will automatically reach the right people within MATs, but our group's experience has shown that this is not always the case.

I urge you to take these points seriously and ensure that the consultation process is transparent, inclusive, and genuinely responsive to employer feedback.

I look forward to receiving your feedback on my letter.

## Scout Road Academy (Together Learning Trust) – Co Chairs of the Local Governing Committee

As the Chair of Governors and Head Teacher for Scout Road Academy, we are committed to ensuring that public funds are used efficiently to benefit our pupils, staff, and communities. We therefore wish to raise concerns about the approach taken in the draft Funding Strategy Statement (FSS).

Despite the significantly improved financial position of WYPF since the last valuation, the draft FSS maintains employer contribution rates at unnecessarily high levels. In our view, this does not represent value for money and diverts resources away from education.

We respectfully request that employer contributions be reduced to 6% for at least the next three years, reflecting the stronger funding position and ensuring a fairer balance between prudence and affordability.

We are informed by the CFO of the Trust that a 11% reduction to our contribution rate would see a reduction of £20k each year for the next 3 years which would be directly invested back into the classroom. This could allow us to employ additional staff to support the learning of our children or invest the additional funds in resources and/or the school environment. Each £26k reduction would allow the school to employ a teaching assistant which is desperately needed to meet increasing need within the school.

* We therefore challenge elements of the strategy which appear overly cautious, including:
* The increased Probability of Funding Success.
* Continued use of the 105% buffer.
* A 22-year surplus run-off period.
* Phasing of contribution changes rather than immediate implementation.

Revising these elements would make available cash to the school to enable school leaders to meet the needs of its pupils, staff and wider community.

In addition, we are concerned about the consultation process. Engagement with employers has been limited, as we understand from the CFO of Together Learning Trust MAT no sensitivity analysis has been provided, and the timing of the consultation has made it difficult for Multi Academy Trusts to participate fully and has not allowed time to consult with schools.

We ask for greater transparency in how employer feedback will be reviewed and reflected in the final FSS.

We ask that the consultation period is extended to enable employers to respond fully and for the WYPF to review in depth the views of the employers.

In conclusion, we urge WYPF to adopt a more balanced valuation approach that reduces contributions, avoids unnecessary prudence, and delivers better value for money for schools and pupils.

## Share MAT – Chief Executive and Operations Officer

Please find below SHARE Multi Academy Trust’s response to the Funding Strategy Statement (FSS) consultation for the West Yorkshire Pension Fund (WYPF). We welcome the opportunity to engage at such a pivotal time, given the evolving funding and investment landscape following the significant market changes since the last valuation.

As a Trust, we have invested considerable time and resources working with Isio and other WYPF employers to become an informed and proactive participant in the Fund.

This consultation is of great importance to us, as the outcome could have a meaningful impact on our pension contributions and, by extension, the resources available to support our schools and communities.

We ask that our response be given serious consideration and that the points raised are reflected in your final decisions for the 2025 valuation. We would also welcome the opportunity to meet and present our views in more detail if helpful.

Overview of Our Position

SHARE Multi Academy Trust, like many others, is facing significant financial pressures. Rising costs and constrained funding are placing strain on our ability to maintain staffing levels and deliver high-quality education. A reduction in pension contributions would provide much-needed relief and allow us to redirect public funds to frontline services.

In schools with a high proportion of teaching assistants and SEND staff, LGPS contributions represent a substantial share of total costs. We believe the improved funding position of WYPF justifies a significant and immediate reduction in employer contributions, without increasing the risk we pose to the Scheme.

We therefore request that WYPF consider an approach that enables us to reduce our contributions to 6% for the next three years, aligning with member contributions and ensuring fairness.

To illustrate the impact:

* For every 1% reduction in employer contributions, the Trust would save approximately £87,000, equivalent to funding three Educational Support Assistants.
* A 5% reduction would generate a £435,000 annual saving, which could fund 16 Educational Support Assistants across our schools.
* This would enable us to potentially avoid staffing cuts, helping to protect educational delivery and potentially avoid further restructures.

At a time when school budgets are under increasing pressure and real-terms funding is declining, it is critical that we ensure value for money in all areas of expenditure.

As a publicly funded organisation, we are held to high standards of financial accountability. The Academy Trust Handbook, issued by the Department for Education (DfE), places a clear emphasis on achieving value for money, requiring Trusts to demonstrate that resources are used efficiently and effectively to support educational outcomes. Our annual external audit includes a review of value for money, and given the significant sums paid into the pension scheme, it is only right that we scrutinise whether these contributions remain proportionate and justified.

In light of the current surplus within the Scheme, we believe a reduction in employer contributions is not only reasonable but necessary to meet our obligations under DfE guidance and to ensure public funds are being used appropriately.

As part of a wider Multi Academy Trust group, we also refer you to the letter submitted to the WYPF Advisory Panel on 24th July, which outlines the collective views of participating employers. We note that local authorities have expressed similar concerns, and we support the sentiments expressed in the letter signed by councillors and other stakeholders.

Stability of Contributions

We understand that WYPF places a high value on contribution stability, and this is reflected in the more prudent assumptions proposed for the 2025 valuation. While we recognise the benefits of stability, it is not our priority at this valuation.

Given the substantial improvements in funding since the last valuation, we believe that anchoring to current contribution rates for the sake of short-term stability would result in unnecessary overfunding. This would divert public funds away from essential services at a time when they are most needed.

We would prefer to re-set contributions now to reflect the true cost of providing benefits, rather than maintain artificially high rates. This would establish a new, sustainable baseline and avoid repeated discussions at future valuations.

Short-Term Reduction Request

The market changes that improved the Fund’s position occurred in late 2022. Had a valuation been conducted sooner, we could have adjusted contributions earlier. As a result, we have effectively been overpaying into the Scheme.

We believe this overpayment justifies a significant reduction in contributions and have been advised this could be done safely to as little as 6% for the next three years. We understand this may need to be reviewed at the next valuation and understand the need to adjust if the long-term stable rate exceeds 6%. As a responsible employer, we are confident in our ability to budget for future increases if required.

Consultation Process and Transparency

We would appreciate clarity on how employer responses will be used in the decision-making process. Specifically:

* How will WYPF review and respond to employer feedback?
* Will a working group be established to consider responses?
* How will the consultation influence final decisions?
* Does WYPF have sufficient time and resource to meaningfully engage with responses before decisions are finalised?

We hope this consultation is a genuine opportunity for engagement and not a predetermined outcome.

Comments on the Proposed Valuation Approach

We have several questions regarding the proposed valuation methodology:

* Probability of Funding Success: Why has this increased to 80% from 76% in 2022 and 69% in earlier valuations? Is this change solely to maintain current contribution levels? We believe this added prudence is unnecessary given the improved funding position.
* 105% Buffer: This buffer was introduced in 2022 under specific circumstances. We do not believe it is needed now and request that the full surplus be used to reduce contributions.
* Surplus Run-Off Period: Why is a 22-year period being proposed? A shorter period (e.g. 6 years) would allow for greater contribution reductions now.
* Phasing of Contribution Changes: The FSS suggests phasing changes over six years. We do not support this and request that revised contribution rates be implemented in full from April 2026.
* Use of Surplus for Redundancy Costs: Is there a mechanism to use surplus to pre-fund redundancy costs? This would help us manage these costs more effectively and avoid one-off payments.

Conclusion

We appreciate the opportunity to contribute to this consultation and urge WYPF to consider our response carefully. The decisions made now will have a lasting impact on our ability to deliver value for money and support our staff and pupils.

We remain open to further dialogue and would welcome the chance to discuss our views in more detail.

This response is submitted on behalf of SHARE Multi Academy Trust and reflects the collective position of the Trust’s leadership team.

## Shipley CE Primary School (BDAT) – SENCO and scheme member

I am responding to this consultation as an employee of Bradford Diocesan Academy Trust (BDAT) to the FSS consultation, and that I believe it is significant to our MAT.

I think lower employer contributions are an important opportunity to have a positive effect on the education of the children we serve and the wellbeing of staff, whilst not affecting the overall purpose of the pension fund. 4 key detailed points are made below. However, I would underline how the additional funding available to schools, because of the proposed change, would reduce the need for further cuts to education, in a time of exceptionally difficult budgets which are already having a negative impact on the life chances of the children we work with.

Key points

* Changes in the pensions landscape – our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation was carried out in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates due over the next 3 years
* Request – we understand that this improvement can mean there is an opportunity for WYPF to significantly reduce our contributions – and we ask that the valuation approach allows this to happen – maybe to zero for three years when we know they will be re-assessed
* Stability – it has been highlighted that in setting employer contribution rates, stability is the key focus for the WYPF. However, given the cost pressures that academies are currently experiencing, money could be better spent elsewhere than building up additional surplus within the WYPF. As such, stability is not a priority at this point for us, although more information on what might happen if we pay nothing for three years would be very valuable
* Prudence – we understand that the WYPF is considering building in additional prudence to its funding strategy. Given the strong position the WYPF and its participating employers find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and it could be reduced to what it has been in the past. There does not need to be a funding buffer either. And the period over which surplus is used to reduce employer contributions should also be reduced)

Thank you for taking the time to consider my response.

## Shipley CE Primary School (BDAT) – Interim Executive Headteacher

I am responding to this consultation as an employee of Bradford Diocesan Academy Trust (BDAT) to the FSS consultation, and that I believe it is significant to our MAT.

I think lower employer contributions are an important opportunity to have a positive effect on the education of the children we serve and the wellbeing of staff, whilst not affecting the overall purpose of the pension fund. 4 key detailed points are made below. However, I would underline how the additional funding available to schools, because of the proposed change, would reduce the need for further cuts to education, in a time of exceptionally difficult budgets which are already having a negative impact on the life chances of the children we work with.

Key points

* Changes in the pensions landscape – our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation was carried out in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates due over the next 3 years
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Thank you for taking the time to consider my response.

## Shipley CE Primary School (BDAT) – Executive Business Manager

I am an Executive Business Manager within the BDAT Trust. I wish to respond to the FSS consultation, the outcome of which will have a significant impact on my schools and the Trust as a whole. It is well documented that school finances are in a dire situation, and as I sit here and struggle to balance budgets, I feel strongly that this is an opportunity to reduce costs with no lasting impact for employees’ pensions. Our advisors assure us that contributions could be reduced dramatically while the fund remains 100% funded.

In summary:

• Changes in the pensions landscape – our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation was carried out in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates due over the next 3 years

• Request – we understand that this improvement can mean there is an opportunity for WYPF to significantly reduce our contributions – and we ask that the valuation approach allows this to happen – maybe to zero for three years when we know they will be re-assessed

• Stability – it has been highlighted that in setting employer contribution rates, stability is the key focus for the WYPF. However, given the cost pressures that academies are currently experiencing, money could be better spent elsewhere than building up additional surplus within the WYPF. As such, stability is not a priority at this point for us, although more information on what might happen if we pay nothing for three years would be very valuable

## St John’s CE Primary School (BDAT) – School Business Leader

I would like the following points to be taken into consideration regarding the consultation please:

Financial conditions have strengthened significantly since the 2022 actuarial valuation, leading to a much-improved funding level for WYPF. This opens the door to substantial reductions in employer contribution rates over the next three years .In light of these improvements, we ask that the valuation approach allows for a meaningful reduction in contributions—potentially to zero for a three-year period—recognising that rates will be reassessed thereafter. While stability is typically a priority for WYPF, current financial pressures on academies mean that surplus contributions are less appropriate. We believe funds could be better directed toward immediate educational needs. We do not support the introduction of further prudence in the funding strategy. The current strong financial position of WYPF and its employers justifies a more flexible approach, including reducing the Probability of Funding Success and shortening the surplus amortisation period.

Redirecting these savings back into our school would have a transformative impact. With reduced pension contributions, we could reinvest in areas that directly enhance pupil experience and outcomes. This includes:

More Educational Trips & Experiences Schools could fund more excursions to museums, theatres, outdoor centres, and historical sites—bringing learning to life and expanding students' horizons beyond the classroom.

Improved Staffing & Support Savings could be used to hire additional teaching staff, learning support assistants, or pastoral care workers—ensuring students receive more personalised attention and emotional support.

Enhanced Wellbeing & Mental Health Services Schools could invest in counselling, mindfulness programmes, and wellbeing initiatives that help students feel safe, supported, and ready to learn.

Broader Enrichment Opportunities From sports teams and music lessons to coding clubs and drama productions, these activities build confidence, creativity, and teamwork—especially vital for students who may not access them outside school.

Better Learning Environments Funds could improve classroom resources, technology, and facilities—creating spaces where students feel inspired and equipped to succeed.

Support for Vulnerable Pupils Additional funding could be directed toward pupils with SEND, those from disadvantaged backgrounds, or those facing barriers to learning—helping close the attainment gap.

In short, every pound saved from pension contributions is a pound that could be spent directly on enriching students’ lives, boosting their wellbeing, and improving their educational outcomes. It’s not just a financial decision—it’s an investment in their future.

## St John’s CE Primary School (BDAT) – Headteacher

I am writing to submit the following points for consideration in relation to the ongoing consultation on the pension valuation.

Since the 2022 actuarial valuation, financial conditions have improved markedly, resulting in a significantly stronger funding position for the West Yorkshire Pension Fund (WYPF). This enhanced financial outlook presents a timely opportunity to reduce employer contribution rates over the next three years. In light of these developments, we respectfully request that the valuation methodology accommodate a meaningful reduction in contributions—potentially to zero for a three-year period—with the understanding that rates will be reviewed thereafter.

While WYPF has traditionally prioritised stability, the current financial pressures facing academies make surplus contributions increasingly difficult to justify. We believe that resources would be more effectively deployed in addressing immediate educational priorities. Accordingly, we do not support the introduction of additional prudence within the funding strategy. Given the robust financial health of WYPF and its participating employers, we advocate for a more flexible approach—specifically, a reduction in the Probability of Funding Success and a shorter surplus amortisation period.

The potential savings from reduced pension contributions could have a transformative impact on our school community. Reinvesting these funds would allow us to enhance the educational experience and wellbeing of our pupils in the following ways:

* Expanded Educational Opportunities Increased funding for trips to museums, theatres, outdoor centres, and historical sites would enrich learning and broaden students’ horizons.
* Strengthened Staffing and Support Additional resources could be used to recruit more teaching staff, learning support assistants, and pastoral care workers—ensuring tailored academic and emotional support for every child.
* Improved Mental Health and Wellbeing Services Investment in counselling, mindfulness programmes, and wellbeing initiatives would foster a safe and supportive learning environment.
* Greater Access to Enrichment Activities Enhanced provision for sports, music, coding, and drama would nurture creativity, confidence, and collaboration—particularly for pupils with limited access outside school.
* Upgraded Learning Environments Improved classroom resources, technology, and facilities would create inspiring spaces that promote engagement and achievement.
* Targeted Support for Vulnerable Pupils Additional funding could be directed toward pupils with special educational needs and disabilities (SEND), those from disadvantaged backgrounds, and others facing barriers to learning—helping to close the attainment gap.

In summary, every pound saved through reduced pension contributions is a pound that could be directly invested in our pupils’ development, wellbeing, and future success. This is not merely a financial consideration—it is a strategic investment in the next generation.

## St Phillip’s Primary Academy (BDAT) – Headteacher

I write to you on behalf of our inner-city primary school and our academy trust, with regard to the Funding Strategy consultation about the LPGS employer contributions.

As an employer in a one of the highest deprivation postcodes in the country, the outcome of this consultation has high stakes for our pupils in their formative years and for our support staff, many of whom live within the community we serve.

As the 2025 valuation will not change employee contributions, or the setting of the level of benefits, then the impact will only be on our pupils and staff, and be entirely negative.

We understand that the landscape for pensions has changed and we know from our advisors that the funding levels have significantly improved, so the key place we need to be focussing on is the internal costs pressures on running our school and maintaining our staffing levels.

In this community, we take children who come to us at 3 years of age with English as a second language and yet send out children at the national average or higher by the time they leave us for secondary school.

We manage this via intensive support in the classroom, one to one and small groups. The trade-off for the last few years has been at the cost of other roles/duties in school which are now shared out between us.

A drop in the employer contributions would make the intensive pupil support more sustainable, positively impact staff, pupils, families and finances. There will be no negative impact on the WYPF, as I understand it, if the valuation approach could go to zero for 3 years before being re-assessed.

The outcome for us be great, the impact across our whole trust and Bradford communities would be huge.

Maybe there is more information available that models the stability factor, if:

* we pay nothing for 3 years or lower employer contributions are agreed
* Probability of Funding Success reverts back to a lower rate, without a funding buffer
* The surplus addressing periods be reduced

I hope you are able to look favourably on the predicaments for schools in the current climate and use this opportunity to support us without negatively affecting the WYPF remit for members and employers.

## St Phillip’s Primary Academy (BDAT) – School Business Manager

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As an employer in a one of the highest deprivation postcodes in the country, the outcome of this consultation has high stakes for our pupils in their formative years and for our support staff, many of whom live within the community we serve.

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In this community, we take children who come to us at 3 years of age with English as a second language and yet send out children at the national average or higher by the time they leave us for secondary school.

We manage this via intensive support in the classroom, one to one and small groups. The trade-off for the last few years has been at the cost of other roles/duties in school which are now shared out between us.

A drop in the employer contributions would make the intensive pupil support more sustainable, positively impact staff, pupils, families and finances. There will be no negative impact on the WYPF, as I understand it, if the valuation approach could go to zero for 3 years before being re-assessed.

The outcome for us be great, the impact across our whole trust and Bradford communities would be huge.

Maybe there is more information available that models the stability factor, if:

* we pay nothing for 3 years or lower employer contributions are agreed
* Probability of Funding Success reverts back to a lower rate, without a funding buffer
* The surplus addressing periods be reduced

I hope you are able to look favourably on the predicaments for schools in the current climate and use this opportunity to support us without negatively affecting the WYPF remit for members and employers.

## The Brooksbank School (Together Learning Trust) - Chair of the Local Governing Committee and Head of School

As the Chair of Governors and Head Teacher for The Brooksbank School, we are committed to ensuring that public funds are used efficiently to benefit our pupils, staff, and communities. We therefore wish to raise concerns about the approach taken in the draft Funding Strategy Statement (FSS).

Despite the significantly improved financial position of WYPF since the last valuation, the draft FSS maintains employer contribution rates at unnecessarily high levels. In our view, this does not represent value for money and diverts resources away from education.

We respectfully request that employer contributions be reduced to 6% for at least the next three years, reflecting the stronger funding position and ensuring a fairer balance between prudence and affordability.

We are informed by the CFO of the Trust that a 11% reduction to our contribution rate would see a reduction of £280k each year for the next 3 years which would be directly invested back into the classroom. This could allow us to employ additional staff to support the learning of our children or invest the additional funds in resources and/or the school environment. Each £26k reduction would allow the school to employ a teaching assistant which is desperately needed to meet increasing need within the school.

We therefore challenge elements of the strategy which appear overly cautious, including:

* The increased Probability of Funding Success.
* Continued use of the 105% buffer.
* A 22-year surplus run-off period.
* Phasing of contribution changes rather than immediate implementation.

Revising these elements would make available cash to the school to enable school leaders to meet the needs of its pupils, staff and wider community.

In addition, we are concerned about the consultation process. Engagement with employers has been limited, as we understand from the CFO of Together Learning Trust MAT no sensitivity analysis has been provided, and the timing of the consultation has made it difficult for Multi Academy Trusts to participate fully and has not allowed time to consult with schools.

We ask for greater transparency in how employer feedback will be reviewed and reflected in the final FSS.

We ask that the consultation period is extended to enable employers to respond fully and for the WYPF to review in depth the views of the employers.

In conclusion, we urge WYPF to adopt a more balanced valuation approach that reduces contributions, avoids unnecessary prudence, and delivers better value for money for schools and pupils.

## Three Lane Ends Academy, (Castleford Academy Trust) – Headteacher

I am writing as Head Teacher of Three Lane Ends Academy, part of Castleford Academy Trust, to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

To illustrate the scale of the impact, an 11.4% reduction in employer contributions to 6% would mean £79,000 per year could be redirected back to the education of Three Lane Ends Academy pupils. This could enable us to employ the equivalent of 1 additional teacher. Such a change would make a huge difference to our academy.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Together Housing – Group Director of People

Thank you for inviting submissions to the consultation on updates to the Funding Strategy Statement (FSS). We welcome the Fund’s commitment to transparency and engagement, as set out in the latest guidance from the Scheme Advisory Board (SAB) and the Department for Levelling Up, Housing and Communities (DLUHC) for the 2025 valuation cycle.

This response is submitted on behalf of Together Housing Association (Pennine) (650) and Together Housing Association (Greenvale) (651).

1. Our Position on Defined Benefit (DB) Pensions

We are committed to keeping our DB pension arrangements open and available to both new and existing employees. To achieve this, it is essential that these arrangements remain affordable for the business, both in terms of FRS106 accounting treatment and cash contributions.

2. Contribution Rates and Surplus Management

Our current contribution rates for 2025/26 are 20.1% for (651) and 19.4% for (650). We ask that the Fund carefully considers the current funding position and prevailing market conditions when setting employer contribution rates for the next three years. Given the significant improvements in funding levels reported across the LGPS sector, we believe it is appropriate for any surplus to be reflected in reduced employer contributions, supporting the long-term sustainability of our DB offer.

We would also welcome the setting of a fixed contribution rate for the three years of this valuation cycle, to provide certainty for business planning.

3. Employer Status and Consistency Across Funds

We currently participate in DB pension arrangements with two other LGPS funds. Through this round of LGPS consultations, one of the other funds has confirmed it is prepared to view us (as a Housing Association) in the same light as its category A members, which aligns with WYPF’s scheduled and subsumed bodies for the purposes of discounted rates. We ask WYPF to consider this approach, recognising our employer status and supporting consistency across funds, as recommended in the latest guidance.

4. Risk Management and Partnership

We remain committed to prudent risk management and value our long-term partnership with WYPF in delivering secure retirement outcomes for our employees. As mentioned above we have had notification of changes to our status and project contribution rates from one of our other LGPS DB providers and this was done through a meeting with ourselves and other social housing providers. There will also be an opportunity to meet with them on an individual basis prior to the completion of the triennial valuation and I would hope that there will be a similar opportunity afforded to our organisation by yourselves before the completion of the WYPF valuation and the setting of the contribution rates applicable from 1st April 2026.

If you would like any further clarity on the points that we have submitted or if there is an opportunity to meet with WYPF and the actuaries, please do not hesitate to contact me.

## Together Learning Trust - Chair of the Board of Trustees, Co Vice Chairs and Chief Executive Officer

As Chairs and Co Vice Chairs of the Board of Trustees for Together Learning Trust and CEO of Together Learning Trust we write from a governance and leadership perspective as stewards of public funds. We have a duty to ensure that every pound spent delivers value for money for our pupils, staff, and the wider community. We are therefore concerned about the high levels of employer contribution rates being proposed in the draft Funding Strategy Statement (FSS), especially given the significantly improved funding position of the West Yorkshire Pension Fund (WYPF) since the last actuarial valuation.

Value for Money and Use of Public Funds Our advisors have explained that financial conditions have changed substantially since the 2022 valuation, resulting in a much stronger funding position for WYPF. In this context, we would expect to see significant reductions in employer contribution rates over at least the next three years. We are concerned that, despite this improved picture, all levers within the FSS appear to have been pulled to maintain contribution rates at their current high levels, rather than allowing for a reduction that would benefit schools and the children we serve.

We are informed by our CFO that a 10% reduction to our contribution rate would see a reduction of £1 million each year for the next 3 years which would be directly invested back into the classroom. This could allow us to employ additional staff to support the learning of our children or invest the additional funds in resources and/or the school environment. £1 million would equate to approximately 38 teaching supports assistants, a vital resource to deal with the increased pressures of SEN and vulnerable children within schools nationally.

Request for Reduced Contributions Given the improved funding position, we respectfully request that the employer contribution rate be reduced to 6% for at least the next three years. We do not wish to pay less than members, but believe this reduction is both justified and necessary to ensure public funds are used as effectively as possible for the benefit of our schools.

The reduction would reflect the stronger funding position and give a fairer balance between prudence and affordability.

Key Technical Concerns

* Probability of Funding Success: The proposed increase in the Probability of Funding Success from previous valuations appears to add unnecessary prudence. Is this change being made primarily to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* 105% Buffer: The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* Surplus Run-Off Period: With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested? When schools are underfunded now.
* Phasing of Contribution Changes: The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs: Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Governance and Consultation Process We are also concerned about the consultation process itself. No sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS. We ask:

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders such as Trustees and Governors are reached and consulted with.

We ask that the consultation period is extended to enable employers to respond fully after consulting with Trustees and Governors and leaders of the Trust and schools and to enable WYPF to review in depth the views of the employers.

Conclusion Given our responsibilities as stewards of public funds, we urge WYPF to reconsider the approach taken in the draft FSS. We ask that the valuation approach allows for a significant reduction in employer contributions—specifically to 6%—reflecting the improved funding position, and that unnecessary prudence is not built into the strategy at the expense of value for money for schools and pupils.

We look forward to your detailed response to these points and to a transparent, robust consultation process.

## Together Learning Trust – Chief Finance Officer

Thank you for the opportunity to engage with the Funding Strategy Statement (‘FSS’) consultation for the West Yorkshire Pension Fund (‘WYPF’).

I have been working collaboratively with other multi academy trusts, and our pension advisers, ISIO to understand the more technical aspects of the valuation process. I believe it is crucial that the Fund carefully considers the views of employers as part of this process, ensuring the FSS remains reflective of employer perspectives. My response to the consultation will echo the responses of my colleagues’ as we have been working together and receiving the same advice.

I respectfully ask that the points that are put forward are considered carefully as part of the consultation process. The pensionable rates that are decided will have a real impact on a range of stakeholders within our Trust and the wider community and economy.

Impact Statement

As a Trust of nine schools across two local authorities, our WYPF contributions make up a significant proportion of our overall budgets. Our budgets are predominantly public funds therefore it is our duty to ensure value for money across all areas of expenditure. Any efficiencies that we can make within our budgets will be redirected directly back into our students’ education.

Academies and schools are facing a range of financial challenges due to increased special educational needs (SEN), inflation, unfunded pay awards and increasing repairs and maintenance costs for older school buildings. With limited increases to our annual funding allocations and increasing funding pressures, driving efficiencies in our budgets and questioning every aspect of spending has never been more important. The MAT working group has been advised that WYPF can reduce our employer contributions, without damaging the fund or reducing employee benefits. This would release funds in our budgets that would greatly benefit our students.

A 10% reduction to our contribution rate would see a reduction of £1 million each year for the next 3 years which would be directly invested back into the classroom. This could allow us to employ additional staff to support the learning of our children or invest the additional funds in resources and/or the school environment.

In summary, a reduction to our employer pension contribution rate will have a huge impact on our schools and the wider community.

Overview

Having taken professional advice, I believe that the funding position of the West Yorkshire Pension Fund can support an immediate and significant reduction in employer pension contributions, without compromising the ability to meet future liabilities. Multi Academy Trusts are consistent and safe employers, receiving regular government income, our pension liabilities are also underwritten by the DfE guarantee.

Considering this, MATs in the Collective are requesting that you (WYPF) consider an approach which enables us as Employers to reduce our contributions to 6% for the next three years, (we do not wish to pay less than members). As the CFO for the Together Learning Trust I fully support this approach which would provide much-needed financial relief and allow us to redirect vital resources back into our classrooms.

As part of the Multi Academy Trust group (The Collective), I would also like to reference the letter shared with the WYPF Advisory Panel meeting on 24th July, which sets out the collective views of the group. I hope that these perspectives will be given due consideration as you finalise the Funding Strategy Statement.

I am also aware that local authorities have expressed similar views regarding the importance of achieving value for money and the potential for reducing employer contributions.

Key Points for Consideration:

Stability of Contributions

I acknowledge that a central objective of WYPF is the maintenance of stable employer contribution rates, and that this objective underpins the approach proposed for the 2025 valuation. I also recognise that the proposed valuation assumptions and methodology are more prudent than those adopted in 2022, with the intention of sustaining contributions at their current levels.

However, whilst I appreciate the benefits that stability and predictability can bring to both WYPF and its participating employers, I do not regard stability as the primary consideration for this valuation. Considering the significant changes in market conditions since the previous valuation and the material improvement in the Scheme’s funding position, I believe that the continuation of a stability-driven approach is not appropriate.

Anchoring contribution rates to their current level purely for short-term stability risks overfunding the Scheme and imposing unnecessary costs on employers at a time when public resources could be deployed more effectively elsewhere. Should contributions remain broadly unchanged with only minimal reductions, it is highly likely that these same discussions will arise at the next valuation to seek further reductions in the contribution rate for the following three years, such an approach would undermine the very long-term stability it seeks to protect.

I therefore advocate a recalibration of contribution rates at this valuation to a level that more accurately reflects the true cost of providing benefits, without the additional prudence currently proposed. Establishing such a rate now would provide a fair and sustainable basis for the future.

Short Term Reduction

The funding improvements experienced by the Scheme stem from financial market changes that took place towards the end of 2022. While I recognise that formal valuations occur on a three-year cycle, had a valuation been undertaken sooner than the normal 3 yearly cycle, employer contributions could have been reduced at an earlier stage. Consequently, Together Learning Trust has, in effect, been making excess contributions since that time.

In this context, I consider that the improved funding position provides a clear and reasonable basis for a more substantial reduction in contributions in the short term, thereby allowing employers to recover, at least in part, these historic overpayments. I note that comparable approaches have been adopted by other LGPS funds, demonstrating both feasibility and precedent.

As an informed employer, I fully appreciate that such an adjustment may necessitate higher contributions at a future valuation. However, Together Learning Trust is prepared to plan and budget for this eventuality. What is not acceptable is an unnecessarily prudent approach from the Fund that undermines our capacity to fulfil our core purpose - delivering the best possible outcomes for our children - merely to provide additional, and arguably unwarranted, cushioning for the Scheme.

Technical Questions and Concerns

I wish to raise several technical questions and concerns regarding the proposed approach set out in the draft Funding Strategy Statement (FSS):

* Increase in Probability of Funding Success. You are proposing to increase the Probability of Funding Success from the last valuation. Is this change being introduced primarily to maintain employer contributions at their current level? This adjustment increases the overall prudence of WYPF’s approach. Given the markedly improved funding position and the reduced risk of employers being unable to meet benefit costs, I do not believe additional prudence is justified at this time.
* Choice of 80% Threshold. How has WYPF determined that 80% is the appropriate rate? You were comfortable with 76% at the previous valuation and have, in earlier years, accepted a level of 69%. On what basis is 80% now considered the correct figure?
* 105% Buffer. The continued reference to the 105% buffer effectively prevents any surplus below this threshold from being used to reduce contributions. This buffer was introduced to reflect the particular circumstances of the 2022 valuation. Those circumstances no longer apply, and employers should now be able to utilise their full surplus to reduce contributions.
* Surplus Run-Off Period. With a surplus in place, running this off over a shorter period—such as six years—would deliver a more meaningful reduction in contributions. Why, therefore, is a 22-year period being proposed? I would therefore ask for this to be reduced.
* Phasing of Contribution Changes. The FSS notes that changes to contributions are typically phased in over six years. In the current context of significant funding improvements, we do not consider this level of stabilisation necessary and request that our revised contribution rate be implemented immediately from April 2026.
* Use of Surplus for Redundancy Costs. Is there scope to use the Scheme’s surplus to pre-fund the cost of redundancy payments? This would provide much-needed stability in these costs rather than requiring one-off lump-sum payments.

I would welcome clear, evidence-based responses to each of these questions to be published. Addressing them fully is essential to ensuring that the consultation process is robust, transparent and genuinely responsive to employers’ needs.

Consultation Approach

I wish to express several concerns regarding the consultation process for the draft Funding Strategy Statement (FSS). No sensitivity analysis has been provided as part of the consultation, and the draft FSS appears to have been prepared on the basis of assumptions about employers’ preferences without any substantive engagement to ascertain our actual views beforehand. This significantly limits the ability of employers to provide informed and constructive feedback.

To ensure that this consultation is meaningful and not perceived as a predetermined outcome, I would be grateful for clarity on the following points:

* Use of Employer Responses: How will WYPF utilise the feedback received from employers through this consultation?
* Review Mechanism: Is there an intention to establish a working group to review and evaluate the feedback submitted?
* Response to Submissions: How will WYPF respond to individual employer submissions?
* Influence on Final Decisions: How will employer responses be reflected in the final decision-making process?
* Capacity and Resourcing: Does WYPF have sufficient time and resource to review all responses thoroughly before finalising decisions?

I would also like to take the opportunity to highlight that the timing of this consultation has not been ideal for Multi-Academy Trusts, falling over the summer holiday period. Given that MATs make up a large proportion of WYPF’s employer base — and that this issue was flagged in advance — I would kindly request that WYPF extend the deadline of the current consultation period. Extending the consultation period will improve fairness and support Academy employers to submit well-informed responses.

Additionally, I would urge WYPF to reconsider the timing of future consultations to ensure that all employers have a fair and practical opportunity to engage.

As part of the consultative process, I would urge you to consider the points that are being made in this response. Taking the views of employers is imperative to a transparent and inclusive consultation process.

I look forward to receiving your feedback on the concerns laid out in this letter.

## Trinity MAT – Chief Finance Officer

Please find below my response to the Funding Strategy Statement (‘FSS’) consultation for the West Yorkshire Pension Fund (‘WYPF’). I welcome the opportunity to engage with you on this important matter.

This consultation comes at a particularly significant time, given the new funding and investment landscape created by the substantial market changes since the last valuation.

I believe it is critical that the Fund carefully considers the views of employers as part of this process, to ensure that the FSS remains robust, fair, and reflective of the needs and challenges faced by all stakeholders.

As you are aware, over the last year Trinity MAT has been working collaboratively with other multi academy trusts, investing significant time and working with Isio to ensure we are an informed employer. This consultation is particularly significant to Trinity MAT and the staff and children within it, given the positive impact it could have on our pension contributions and, consequently, what this could mean for our schools.

We respectfully ask that you consider our response seriously and reflect on the points we have raised when making your final decisions for the valuation. We are also open to meeting with you to present our views in more detail, should you find this helpful.

Impact Statement

As a Trust with six secondary schools, four primary schools and a post-16 academy, our West Yorkshire Pension Fund contributions make up a significant proportion of our overall budget. As we are dealing with public funds, I feel a strong duty to ensure that there is value for money from these contributions, just as we do with every other penny we spend. This is critical because it has a direct impact on the children in our schools—every penny we save can be redirected back into their education.

There is currently an SEN crisis, and in West Yorkshire in particular, we are struggling to provide enough places for our most vulnerable learners. This is manifesting in overly crowded and underfunded schools, a dangerous situation. Schools are facing significant challenges in the aftermath of the pandemic, they are a fundamentally different place, children are fundamentally different as are families. All of this requires resource in order to better support our children. I believe that education is vital not only for individual children but for the future of our society. Having the right money in our schools now has never been more critical and WYPF has the opportunity to benefit schools and society massively without damaging itself or its members access to a fantastic pension. In short dropping the contribution rate now is morally the right thing to do.

To illustrate the scale of impact, a 11% reduction in pension costs would mean £750k could be redirected directly back into the education of Trinity trust children per year. This would enable us to employ the equivalent of 15 extra teaching assistants or 9 teachers, and provide other much needed but expensive services such as additional mental health services to support our children. In short, such a change would make a huge difference in our schools.

Overview

I believe that the improved funding position of the West Yorkshire Pension Fund can support an immediate and significant reduction in pension contributions, without any increase in the level of risk that Trinity MAT and other employers pose to the Scheme. We are solid employers, having regular government income, we also have the DfE guarantee. We have high levels of accountability and scrutiny and do not pose any risk to the Fund.

In light of this, we request that you consider an approach that enables us to reduce our contributions to 6% for the next three years, as we do not wish to pay less than members. This would provide much needed financial flexibility and allow us to redirect vital resources back into our schools.

As part of the Multi Academy Trust group, I would also like to reference the letter shared with the WYPF Advisory Panel meeting on 24th July, which sets out the collective views of the group. I hope that these

perspectives will be given due consideration as you finalise the Funding Strategy Statement.

I am also aware that local authorities have expressed similar views regarding the importance of achieving value for money and the potential for reducing employer contributions. I note, in particular, the signature of Steven Mair of Bradford Council, in the letter that was also shared with the WYPF Pensions Advisory Panel.

Key Points

Stability of Contributions

I understand that a key focus of WYPF is the stability of employer contributions, and that this has been reflected in the approach being proposed for the 2025 valuation. I also recognise that the proposed valuation assumptions and approach are more prudent than those used in the 2022 valuation, with the aim of keeping employer contributions at a similar level.

While I can appreciate the benefits of stability and the certainty it can bring to both WYPF and employers — and why this is relevant for the Scheme—stability is not my key priority at this valuation. Given the significant changes in market conditions since the last valuation and the extent of the funding improvements seen in the Scheme, I do not believe that the usual approach of maintaining stability is appropriate at this time.

I do not think we should continue to anchor to the current contribution rates purely to maintain short-term stability, especially if this results in overfunding the Scheme and requiring employers to pay more at a time when additional cash (which is public money) could be vital elsewhere. If contributions continue at a similar level and WYPF only offers a small reduction, I expect that similar discussions will arise at the next valuation, when contributions will again need to come down—an approach that does not provide true longterm stability.

Instead, I would prefer to see contributions re-set now to a level that reflects the true cost of providing benefits, without increasing prudence as is currently being proposed, and to arrive at a new, stable rate going forward. Given the underlying funding improvements in the Scheme, making this change and reducing contributions does not pose any more risk to the Scheme than the position agreed at the 2022 valuation, which was considered acceptable at that time.

Short Term Reduction

The financial market changes that created the funding improvements for the Scheme occurred towards the end of 2022. Whilst I acknowledge that a valuation only takes place every three years, if a valuation had happened sooner, we could have reduced our contributions earlier. As a result, Trinity MAT has effectively been overpaying into the Scheme since then.

Given this context, I believe the improved funding position should support a more significant reduction in contributions in the short term, allowing us to recoup these overpayments. This is an approach that I am aware has been adopted by other LGPS funds.

As an informed employer, I fully understand that what I am asking for may result in an increase in contributions in the future. However, I am comfortable that Trinity MAT can support a future increase if required and will budget appropriately. What we do not need is an overly prudent approach from the Fund, which would effectively reduce our effectiveness as an organisation whose sole aim is to provide the best possible outcomes for our children, simply to provide additional cushioning for the Fund.

Technical Questions and Concerns

I would also like to raise several technical questions regarding the proposed approach in the draft Funding Strategy Statement:

* You have proposed an increase in the Probability of Funding Success from the last valuation.
  + Is this change being made purely to maintain employer contributions at a similar level?
  + This increases the prudence of WYPF’s approach, and I do not believe additional prudence is needed now, given the improved funding position and the reduced risk of employers being unable to fund benefits.
  + How has WYPF chosen the rate of 80%, and why is this considered the right rate when you were comfortable with 76% last time and have previously accepted 69%?
* The continued reference to the 105% buffer means any surplus below this threshold cannot be used to reduce our contributions. This buffer was introduced last time to reflect the specific circumstances of the 2022 valuation. It is not needed this time, and we should be able to use our full surplus to reduce contributions.
* As there is a surplus, running this off over, for example, six years would reduce our contributions further. Why is a 22-year period being suggested?
* The FSS notes that any changes to contributions are typically phased in over six years. We do not want this level of stabilisation and do not believe it is necessary given the significant improvements seen. We request that our revised contribution rate is payable immediately from April 2026.
* Is there a way of using the surplus in the Scheme to pre-fund the cost of redundancy payments? It would be extremely helpful to stabilise these costs rather than having to pay them as a one-off lump sum.

I would appreciate clear responses to these questions, as they are central to ensuring the consultation is robust, transparent, and genuinely responsive to employer needs.

Consultation Approach

I would like to raise several concerns regarding the consultation process for the Funding Strategy Statement. Firstly, no sensitivity analysis has been provided as part of the consultation, and there appears to have been an assumption about what employers want, without any real engagement to understand our actual views before setting the draft FSS.

To ensure this consultation is meaningful and not simply a pre-determined outcome, I would appreciate clarity on the following points:

* What is WYPF doing with employer responses to this consultation?
* Is there a plan to set up a working group to review the feedback?
* How will WYPF respond to each employer’s submission?
* How will employer responses be reflected in the final decision-making process?
* Does WYPF have sufficient time and resource to review all responses thoroughly before decisions are made?

I also wish to highlight that the timing of this consultation was not ideal for Multi Academy Trusts, as it took place over the summer holidays. Given that a large proportion of your employers are MATs, and this issue was pointed out in advance, I would ask that you reconsider the timing of future consultations to ensure all employers have a fair opportunity to engage. There is also an assumption that the consultation will automatically reach the right people within MATs, but our group’s experience has shown that this is not always the case.

I urge you to take these points seriously and ensure that the consultation process is transparent, inclusive, and genuinely responsive to employer feedback.

I look forward to receiving your feedback on my letter.

## Unison - National Officer for Capital Stewardship

I write having seen a "private and confidential" letter dated 11 July to you from the consultancy lsio, on behalf of a number of Academy Trusts which are employer members in the West Yorkshire Pension Fund. It asserts that they "value the opportunity to participate in the LGPS". It is of course a legal requirement that they do so. They are scheduled, not admitted bodies.

We encourage you to give the letter you have received appropriate weight, given the small proportion of membership accounted for by the employers in question. We think it worthwhile to set out our own views on the issues raised, given that over 20,000 UNISON members are also active scheme members, and many more are deferred or retired members, many working for academy schools. We hope this will be given appropriate weight in your considerations also.

The consultation process

While recognising the importance of the review of employer contributions, the Fund has many other issues to deal with and its predominant focus must always be the effective administration of pensions and service to members. We would support proportionate engagement with stakeholders and a consultation which does not absorb management resource required for the primary purpose. We do not agree that there needs to be an extended period of consultation; there are significant advantages to all employers in concluding this well before budget processes for 2026/7 are seriously underway.

The substance: appropriate levels of contribution

We believe that employer contributions to the scheme need to be sufficient, and not excessive. We hope that this can involve a reduction of employer contributions in 2026/7 and the following two years, and that any such reductions can be applied to participating employers of all kinds.

The scheme actuary is best placed to judge what contribution levels should be recommended to your Committee. These should be the subject of consultation, not negotiation, with employers and other stakeholders. Individual employers should work with the Fund to ensure the rate they pay reflects their funding position and accurately reflects the employer's risk to the local fund. In making recommendations on funding levels, we would expect the scheme actuary to be mindful of the desirability of a smoothed profile of employer contribution, as required in guidance. A contribution holiday would be the exact opposite of what guidance and prudence requires.

Misleading use of examples from elsewhere

The lsio letter refers to Kensington and Chelsea and Strathclyde as examples of where employer contributions have been reduced. These are exceptional and anomalous, and do not support the case the letter makes. It is the more than 90 other schemes rather then these two which represent trends in the sector.

1. In Kensington and Chelsea, the superintending Council Committee decided, against the advice of the actuary, to reduce to zero for one year the contributions paid by Council employers. This did not include academies, who continue to pay unreduced contributions. We have complained to the regulator and asked them to intervene, on the basis that the contribution is not in accordance with the actuarial certificate. The Government has said that this was an abusive use of the legislation relied upon and that it intends to close the loophole.

2. In Strathclyde, the scheme was 145% funded at last valuation compared to WYPF's 108%. Exceptional and time-limited funding pressures for Glasgow City Council were identified which would have required damaging spending cuts, including the closure of most libraries. The actuary, given the funding level, approved a lower level of employer contribution for two years. Stakeholders broadly supported this.

Assessment of the likely durability of a surplus

Asset and liability valuations fluctuate. The existence of a healthy surplus at valuation date does not suggest that this can be relied upon forever. According to lsio's own calculations, WYPF was 67% funded in 2022, and 128% in 2025. From our perspective, prudence is required at times both of surplus and deficit.

Appropriate attribution of any surplus and of service costs for members

The proper employer contribution from an employer with weak employer covenant should be higher than for one whose covenant is strong. Scheme employers with many years of contribution have contributed more towards any actuarial surplus than recent joiners and it would be appropriate for this to be reflected in "surplus return", through adjustment of contributions. It may also be appropriate to recognise the higher servicing costs for members in small employers in setting employer contributions.

Please feel free to share this letter with whomsoever you think might be interested. We would ask that you share it with any who were given access to lsio's "private and confidential" input. We do not understand why the lsio letter was marked "private and confidential" and deplore efforts to exercise influence outside proper scrutiny. We will be releasing this letter to our members so they know what we are doing on their behalf. It is the product of consultation among our members who are involved in scheme governance. We would also expect that all representations, including the "private and confidential" letter and this letter, will be published when you make final decisions on this matter.

On the broader subject of how a consultation should be managed, we would see that it would be inappropriate for any particular stakeholders to have particular access and do not see why any would need to involve third parties without direct involvement in the scheme. We would be happy to attend any public consultation meeting, which we would see as the appropriate mechanism for providing transparency and accountability.

## University of Huddersfield – Director of Finance

Please find below our response to the Funding Strategy Statement (FSS’) consultation for the West Yorkshire Pension Fund (‘WYPF’). We welcome the opportunity to engage with WYPF for the 2025 valuation given the significance of this valuation following the new funding and investment landscape created by the significant market changes since the last valuation. We’ve separately been in touch to introduce ourselves and look forward to finding an opportunity to discuss this with you.

Introduction

As part of preparing this response we’ve worked with our pension advisers, Isio, supporting us to understand the proposed FSS and what it means for us. Considering the investment we’ve made in becoming informed employers, and the materiality of our LGPS pension contributions, we ask that WYPF consider our response and views very carefully and that they should inform your final decisions in this process.

We appreciate some advisors may be working with more than one organization in the WYPF and so their responses may reflect similar points that we have outlined here. However, this should not mean that our responses are combined with theirs or less weight is put on similar responses. This response should be treated as a complete and standalone response and considered on its own merit.

Overview

At the University we value being a part of the LGPS and know our employees who are or have been members value the scheme. We are committed to ensuring that benefit provision is continued for our employees.

We believe the improved funding position of WYPF means there is now sufficient assets to be able to support an immediate and significant reduction in employer contributions at the 2025 valuation, without any increase in the level of risk we pose to the Fund.

However, the proposed approach is underpinned by one key priority of stability of contributions in the short-term. In our view this will, with high probability, lead to increased surplus and gradual reductions in contributions over the long term. This creates long-term instability. We don’t want short-term stability and the continued overfunding that comes with it now when we are confident that more available resources will strengthen our University for the benefit of all of its stakeholders, including WYPF.

A significant reduction in contributions will support us in making investments directly into the University to improve the student experience, supporting the local community through removing barriers to learning and protecting and improving jobs for our employees. As a not-for-profit organisation the value of these investments will accumulate and contribute to an even stronger covenant in years to come.

We are aware of the government’s focus on UK pension schemes supporting UK economic growth, including through local investments. In our view, allowing cash for direct investments in employers, meets this objective and should be seen as a very positive use of the LGPS’s strong funding position.

We therefore request that WYPF reconsiders the proposed valuation approach to arrive at a funding strategy that will provide long-term stability and will facilitate immediate, larger reductions in contributions which will have a significant impact on our organisation. We have benchmarked our contributions against the rate that would be calculated using a very low-risk, long-dated gilt yield discount rate, utilising any surplus over a long period and we think the Fund should also be using this as the basis for checking that it is not being too prudent.

We would like to work with you to agree a contribution approach that is right for us and you. We appreciate that the FSS is drafted in a way that allows flexibility in approach in several areas, and we ask that this flexibility is maintained to support us having these discussions and then put into practice.

However, we also consider that the FSS has far too much built in prudence, designed to meet the stability objective. We would request that this prudence is re-considered from an independent and fresh perspective.

We have set out further details on our views of the proposed FSS below.

We have also included a section requesting further information and clarification on the consultation process. In particular, we note that the consultation information shared does not provide any details on the detailed assumptions used to calculate the discount rate assumption and the proposed changes. This is a surprising omission and without it the proposal cannot be easily interpreted and the impact fully understood even by our actuarial advisers. We don’t believe this is acceptable and this information should be provided to employers to support them through the consultation.

1) Stability of contributions

The draft FSS states “a key priority for the Administering Authority is to bring stability to employers’ total contributions”. We can see this has been the main driver behind the proposed valuation assumptions and approach. The FSS is proposing to be more prudent in the approach at this valuation to maintain employer contributions at a similar level to past rates.

We also understand that the last Advisory Panel meeting was run on the assumption that stability was important for all employers and it was not evident that a question about this was being asked of employers. It was also not clear from the discussions that the same regulation that includes the need for stability (albeit to primary contribution rates) also requires the long-term cost efficiency of the scheme to be considered.

Short term stability is not the most important consideration for us at this valuation. We consider that excessive prudence can lead to long-term cost inefficiency, if a wider view is taken on the benefits for employers of having more available resources.

A reset of stability

We acknowledge the benefits of stability and the level of certainty it provides to help employers plan and budget their contributions. All other things being equal, we agree short-term stability is valuable. However, the market has shifted so much since the last valuation that the usual approach to stability is not appropriate. Continuing to pay contributions at a slightly lower level will mean overpaying into the Fund making further future reductions at successive valuations very probable.

This provides short-term stability with long-term instability and therefore arguably is not sustainable. We don’t want short-term stability with the continued overfunding it creates when we are clear that we have vital uses for the additional cash to improve our University, the experience for our students and our local communities by providing accessible education, employment and protecting jobs.

Given the market changes the 2025 valuation provides the opportunity to reset the approach. Rather than adjusting the assumptions to maintain short-term stability of contributions, there needs to be an acknowledgement of what is the correct cost of providing the benefits. We ask WYPF to consider what is the right “new stable” contribution rate that provides sustainability and is much more balanced in terms of the likelihood of it going up versus the likelihood of it coming down.

Requirements of stability

The Scheme regulations require the actuary to consider the desirability of stability when setting the valuation approach. However, the regulations only refer to stability of the primary rate, rather than stability of total contributions as referenced in the FSS priority noted above. The stability requirement within the regulations also forms part of a wider clause which requires other factors to be considered. One of these refers specifically to “long-term cost efficiency” supporting the points above.

We therefore ask WYPF to reconsider the requirements for stability and ensure that you have also taken into account long-term cost efficiency. We believe the employer’s views should also play their part here.

Impact on employer risk

As informed employers we appreciate there is always a risk that contributions may need to increase in the future, and it goes without saying that paying lower contributions now means there is a greater chance of contributions needing to increase as we are not continuing to build up an even larger cushion of surplus in the Fund.

We are satisfied we would be able to significantly reduce contributions and the plan for and support a future increase in contributions if this was required and was needed for the Fund. The FSS also notes WYPF are comfortable employers can support an increase if needed, stating “The Administering Authority believes that its funding strategy will ensure the solvency of the Fund because employers collectively have the financial capacity to increase employer contributions should future circumstances require, in order to continue to target a funding level of 100%”

We believe that even if we do significantly reduce our contributions now, given the improved funding position of the Fund, the risk of them needing to go up again in the future is still lower than it was at the last valuation. A level of risk WYPF were previously comfortable with.

Please can WYPF share details of the financial modelling they have done on the downside risk for the 2025 valuation proposal compared to the 2022 valuation which we believe will support this point. For example, have you compared:

* At the 2022 valuation, the likelihood our rates would need to increase by 5% at the point we got to the 2025 valuation (ignoring stabilisation mechanisms).
* At the 2025 valuation, if you implement the FSS as drafted, the likelihood of the resulting contributions increasing by 5% at the 2028 valuation (also ignoring stabilisation mechanisms).

Quantifying this risk will help us and all employers understand the position. Our advisors believe this risk is considerably lower following the 2025 valuation showing the scope to reduce contributions without reducing risk.

We ask WYPF to review their approach to stability and consider the right underlying costs of the scheme, rather than taking an approach derived to maintain contributions at the same level in the short-term.

2) Probability of Funding Success

The draft FSS shows an increase in the Probability of Funding Success. For Secure Scheduled Bodies this moves from 76% at the last valuation to 80% this valuation. There is no clear justification for why this parameter is 80% and there hasn’t been a justification at previous valuations.

For “Intermediate - Lower risk” employers like the University, it is proposed to change from 80% last time to 84% this time. This increases the level of prudence being taken and increases the level of employer contribution needed compared to adopting the same approach as the last valuation.

We understand the key reason for this change is to meet the priority of stable contribution rates. There is no other stated reason for higher prudence at this valuation.

The Probability of Success was also increased at the last valuation in 2022 (for Secure Scheduled bodies this went from 69% that had been used previously). Again, we understand the only reason for this change at the time was to offset the improvements in the funding position of the Fund to maintain stability.

Continuously increasing the prudence in this assumption as a way of maintaining stability will result in an overly prudent approach that leads to overfunding of the Fund. The resulting discount rate for this valuation of 4.5% for Secure Scheduled Bodies is significantly below the government bond yield at that date, which is around 5.25% at a similar duration to the Fund (this is the case even if when considering net rates, with the inflation assumption adjusted to reflect a market-based approach). This appears to contradict the view you include within the investment strategy section of the FSS which states “The Administering Authority invests a substantial proportion of the Fund in assets which are expected to offer higher long-term rates of return than government bonds and cash”.

We therefore don’t agree with the proposed increase in the probability of Funding Success and ask WYPF to reconsider this proposal. Given WYPF has been comfortable with 76%, and before that lower, in the past please could you share the analysis that has been undertaken to support your view that 80% and 84% are appropriate.

In addition, given the changes we’ve seen in market conditions since the last valuation, the funding position of our participation measured on a low-risk gilts-based approach has improved significantly and this is now in surplus. In light of this we believe the level of risk we, and all employers, represent to the Fund is greatly reduced. As such, employer covenant and the approach to employer categorisation feels less relevant to the valuation discussions this time. Something you have demonstrated by grouping medium and higher risk employers together.

Given the very low covenant risk, our assumptions should be set in line with the Secure Scheduled Body assumptions for this valuation. We note that “Intermediate lower-risk employers” like us were already adopting a Probability of Funding Success of 80% at the last valuation, which is in line with what is being proposed for Secure Scheduled bodies this time. We therefore don’t agree that this group needs their Probability of Funding Success increased any further than we had at the last valuation, and as noted above, we already view this as overly prudent.

For the avoidance of doubt, we don’t consider that the exit valuation is the basis on which our risk can be measured. The low-risk basis is broadly in line with available insurance pricing which is a step the LGPS could take if it was concerned about protecting the current covenant position.

3) Removal of surplus

We note the use of surplus above 105% was introduced in 2022 to reflect the very specific circumstances at the time where the assets of the Fund had fallen in value after the valuation date. This is not the case here, with market conditions having improved since the valuation date. Combined with the improved position of the Fund overall since the last valuation we don’t believe this adjustment is needed for the 2025 valuation. It should be possible to use at least the full surplus to reduce employer contributions. We note the wording included in the draft FSS provides WYPF the flexibility to remove this requirement when setting the contributions.

Furthermore, it follows from the approach taken last time that the 105% factor could be varied to be less than 100% to reflect the post valuation date (positive) experience.

4) Intermediate employers

As an intermediate employer we appreciate we are part of a small group of employers within WYPF and we would like to work with you to agree the best approach that works for us and you. We want to make sure we have the right balance of costs and risk for our LGPS participation and that we are working with you to ensure our money, as a not-for-profit organisation, is being allocated in the best way to secure our members benefits, whilst also improving our organisation and the local community. A key ask we have for the proposed FSS is that it provides sufficient flexibility for the WYPF to work with us in this way.

We note there are a number of key areas within the valuation approach that enables flexibility, and we ask that this is maintained to support these discussions.

Recovery plan period

We note from the consultation website the typical approach is to apply a recovery period of 22 years which, combined with the level of prudence reflected in other areas of the valuation proposal, is exceptionally prudent. This represents more than seven future valuation cycles. We also note a recovery period of 22 years would be the same as that adopted at the last valuation.

The FSS notes the intention for the recovery plan to be gradually reduced where there is a deficit in the Fund and so we would question why that isn’t the same here when there is a surplus. However, we note the FSS allows flexibility for this to be considered on a case-for-case basis which we would ask for here, not just in writing, but also in practice.

Phasing in of contributions

Again, the FSS notes that typically contributions are phased in over six years. However, the wording gives scope for this to be different for different employers. Given the extent of the market changes we have seen we don’t believe phasing in of contributions in appropriate here and we believe could support moving to the revised contributions immediately. We look forward to discussing the options here with you.

5) Wider elements of the FSS

Exit basis

The revised FSS does not propose any change to the exit basis being adopted. This was changed in 2024 as the approach being applied at that time was resulting in an overly prudent approach. Whilst this doesn’t influence the valuation discussions, we want to acknowledge that in our view these changes were not sufficient. The current exit basis approach continues to result in an overly prudent basis that will overfund the Fund, overcharging exiting employers to the benefit of the remaining employers. We believe a gilts-based approach remains the most appropriate method for the exit valuation and WYPF should revert to a gilts-based approach.

Derisking options available

The revised FSS doesn’t provide practical de-risking options for employers. Many employers are now likely to find themselves in a position where they have a surplus on the ongoing valuation basis and on a low-risk basis. We believe employers should be able to use this to reduce contributions, in the ways we have outlined in the points above. Alternatively, some employers may appreciate the ability to use this to reduce the level of risk for their participation.

At the current time there are not any alternative investment strategy options, something we are starting to see offered more within LGPS funds. Partial exit is also something which could facilitate de-risking which, although we note is now referenced in the FSS, is not the helpful option it could otherwise be because of the extremely poor value exit valuation terms. We would be keen to be part of these conversations and support the Fund with finding the approaches which provide good outcomes for all employers.

Additional contributions

The FSS states that employers will have to pay additional contributions to the Fund when granting additional member benefits such as retirement before normal retirement age on unreduced benefits. However, considering the surplus, it should be possible to fund these differently to help manage this cost for employers. For example, employers could reasonably be given the option to use surplus to meet the cost of redundancy strains to avoid having to pay them as a one-off extra payments.

Further information

Please can you provide more information on the following questions to help us understand the position the WYPF has proposed:

* Details of the expected return for the WYPF assets, both overall and split by asset class, at both the 2022 and 2025 valuation dates and Aon’s Capital Market assumptions. (We note the Aon paper online states this is an overall rate of 7.35% p.a. for 2025.) We would have expected these assumptions to be provided as part of the consultation to support employer understanding and transparency in line with the actuarial standards.
* Details of the demographic assumptions proposed, including details of the mortality assumptions in detail.
* The Probability of Funding Success for the 2013 and 2016 valuations, noting it was 69% in 2019 and 76% in 2022 and proposed to increase to 80% at the 2025 valuation and an explanation for the reason for the increases in recent years.
* Details of the calculated contribution rate if the Probability of Funding Succes was 69% for the 2025 valuation, all other assumptions remaining as proposed.
* Details of the risk modelling WYPF has done to support the proposed valuation assumptions. In particular, has WYPF considered how likely the contributions are to increase in the future at this valuation for different agreed contributions, and how this compares to the position for the 2022 valuation?

Consultation approach

Given the importance and the impact of the areas raised in the FSS we are keen to make sure the consultation is meaningful. Please can you provide some clarity on the approach that will be taken to the employer responses you receive during the consultation.

* How does WYPF intend to review the consultation responses? We understand a working group is being formed for this please can you provide the details of this group and how it will operate.
* How will you respond to each employer’s response and work with employers to ensure their views are being heard?
* WYPF’s approach to calculating the liabilities for the valuation is not transparent and is not something that can be easily replicated by employers or their actuarial advisers. In particular, no information has been provided on the assumptions underlying the discount rate approach. Under public law a consultation needs to provide sufficient information for intelligent consideration. Without these assumptions the discount rate assumptions and the impact on employers cannot be sufficiently understood. We ask that more detail is provided around this approach to support employers understanding the proposals and the impact of the assumptions proposed. We have reflected this in the information section above.
* Please can you poll the employers to ask them what their view of stability is? This would need to be an informed poll which takes into account the very high probability of contributions gradually falling over a long period if short-term stability is imposed. We are happy to help frame these questions. You would then have evidence as to why you might (or might not) change your approach to stability, in the same way as we can see the Royal Borough of Kensington & Chelsea council have done.
* Please can you confirm the decision-making process for finalising the valuation approach. We note there is a short timeframe between the end of consultation and the committee meeting in October where the responses will be discussed. And we note the Pensions Board minutes anticipate a conclusion in November. Please will you demonstrate that WYPF has sufficient time and resources to be able to consider and reflect on all of the responses ahead of making decisions to ensure this is a meaningful consultation?
* Is WYPF comfortable that all employers have received the information on the consultation, and this has been sufficiently communicated to employers for their engagement? We note there was limited signposting to the consultation in the lead up to the launch.

We expect WYPF to take full consideration of the points we have raised in this response when making their decision and provide feedback on the points we’ve raised and answers to our questions. We would welcome the opportunity to discuss this response further and to present our views as part of the deliberations.

## West Yorkshire Police – Chief Finance Officer

Thank you for the opportunity to contribute to the consultation on the Funding Strategy Statement (FSS) for the West Yorkshire Pension Fund (“WYPF”). West Yorkshire Police appreciates the important work being undertaken to safeguard the Fund’s assets and to ensure its long-term sustainability.

We have been fortunate to be involved in several conversations with Local Authority Directors of Finance within West Yorkshire and we have used the basis of their response, which we whole heartedly agree with as a basis for our response as you will see. I hope that in future years we can increase the engagement between West Yorkshire Police and the West Yorkshire Pension Fund given the significant number of staff we have within the Pension Fund and the significant value of our employer contributions to the scheme.

West Yorkshire Police would like to submit the following response.

1.0 Aims and Objectives of the FSS

The main purpose of the FSS is to document the processes by which the Administering Authority:

* Establishes a clear and transparent funding strategy, specific to the Fund, to meet employer’s pension liabilities going forward.
* Aims to meet the regulatory requirement in relation to the desirability of maintaining as nearly constant a primary contribution rate as possible.
* Ensures the regulatory requirement to set contributions so as to ensure the solvency and long term cost efficiency of the Fund are met.
* Takes a prudent longer-term view of funding the Fund’s liabilities.

1.1 Response:

A key objective of the FSS is to ensure the long-term cost efficiency of the scheme. While the WYPF rightly prioritise stability, it is important to recognise that the actuary must have regard to both stability and cost efficiency, as outlined in the FSS. Therefore, equal consideration should be given to the affordability of the scheme for participating employers.

Changes in contribution rates have a significant impact on West Yorkshire Police’s revenue budget. Where improvements in scheme funding allows for potential savings, these should be actively considered alongside the goal of maintaining stable contribution rates, not treated as a secondary concern.

2.0 Management of employer liabilities and stability of employer contributions

The Administering Authority seeks to ensure that all employers’ liabilities are managed effectively. In a funding context, this is achieved by:

* seeking regular actuarial advice
* ensuring that employers are properly informed and consulted
* regular monitoring of the funding position and the outlook for employers' contributions
* appropriate identification of employer liabilities and notional assets

The Administering Authority aims to manage employers' liabilities effectively through regular review of contributions at triennial Actuarial Valuations and additional contributions for early retirement. At such reviews, a key priority for the Administering Authority is to bring stability to employers’ total contributions through gradual increases (or decreases) phased in over a number of years, subject to the Administering Authority not taking undue risks, and at reasonable cost to the taxpayers and employers.

2.1 Response:

This is a key aspect of the consultation which employers are well placed to advise on the affordability of contribution rates and their impact on taxpayers. Any gradual increase or decrease in contribution rates should be carefully managed to avoid negatively affecting the delivery of policing services provided to the public. The Pension Fund should avoid increasing solely to build surplus at the expense of policing service provision.

3.0 Funding Target

The FSS states that the funding Target should be set at

“Employers’ contributions will be set to ensure that 100% of the Liabilities can be met over the long term using appropriate actuarial assumptions. The Administering Authority believes that its funding strategy will ensure the solvency of the Fund because employers collectively have the financial capacity to increase employer contributions should future circumstances require, in order to continue to target a funding level of 100% (where the assets are equal to the Liabilities)”.

3.1 Response:

The WYPF has been in surplus for numerous years and has been steadily increasing with forecast surplus of £2.3bn on 31st Dec 2024, £1.407bn in 2022, £866m in 2019. When the probability of Funding success of the Investment Strategy being at 76% in 2022, 69% in 2019 and 2016.

Question 1. What is the rationale behind the assumption that WYPF’s long-term asset returns are expected to be lower than he yields on UK government gilts?

Probability of success – the current probability of success set at 76% appears somewhat arbitrary, particularly given that it was 69% in both 2013 and 2016 valuations. We understand the increase to 76% was introduced primarily to maintain stability in contributions rates. However, it is unclear why a higher level of certainty is now required, given that a 3-in-4 chance of success already represents a reasonable level of prudence.

In our view, a probability rate of 80% is overly cautious. We recommend that independent benchmarking be undertaken to assess the appropriateness of this assumption and to understand its sensitivity within the funding strategy, especially as it is arguably one of the most material assumptions in the actuarial valuations. West Yorkshire Police therefore proposes that the probability of funding success remains at 76%.

Question 2. If the probability of funding success were reduced to the previous level of 69%, what would be the impact on West Yorkshire Police’s contribution rate?

4.0 Risk based funding target

The Fund uses a risk-based funding strategy to calculate the Liabilities, where the Actuarial Valuation is carried out on the basis of the assessed likelihood of meeting the funding objectives. In practice, three key decisions are required for the risk-based approach:

* what the solvency target should be (the funding objective - where the Administering Authority wants the Fund to get to),
* the trajectory period (how quickly the Administering Authority wants the Fund to get there), and
* the probability of funding success (how likely the Administering Authority wants it to be now that the Fund will achieve the solvency target by the end of the trajectory period). These three decisions, supported by risk modelling carried out by the Fund Actuary, define the discount rate (investment return assumption) to be adopted and, by extension, the appropriate employer contributions payable. Together they measure the riskiness of the funding strategy. Information about the assumptions used in the calculation of the Liabilities are set out in the section “Main actuarial assumptions”.

4.1 Response:

As outlined above, the probability of funding success is closely linked to the WYPF confidence in its investment strategy projected performance over the next 20 years. In the 2022 valuation, a funding success of 76% was agreed, which produced an expected discount rate of 4.5% at the time. This level of prudence proved to be appropriate, as the funds surplus increased from 108% to 114%, despite significant volatility in financial markets driven by:

1. The ongoing war in Ukraine
2. Increased geopolitical tension
3. Climate Emergency concerns
4. Elections in the UK, US and Germany
5. The refugee crisis
6. Higher inflation in the UK
7. And or the level of surplus of that above 100%

Given this context, West Yorkshire Police believes that maintaining the current probability of success at 76% strikes a reasonable balance between prudence and affordability. Increasing this threshold further may unnecessarily constrain participating employers and public services.

West Yorkshire Police contributes significantly to the fund, £25.1m in 2025/26, on top of the contributions made by employees.

A small decrease in the contribution rate would still result in a significant contribution from West Yorkshire Police, and in any case, contribution rates would still be reviewed following the 2028 Actuarial Valuation.

Changes in contribution rates have a significant impact on our revenue budget. Even a small percentage point adjustment, such as 2%, 3% or 4%, can translate into several millions of pounds of reduction in the cost. This directly affects the financial burden on taxpayers and should be carefully considered within the funding strategy.

5.0 Financial assumptions:

Pension and pay increase assumption The Scheme provides increases in line with increases in the Consumer Prices Index on the majority of pensions paid. The pension increase assumption is generally set by reference to the Fund Actuary’s best estimate of Consumer Prices Index inflation over the long term. The pay increase assumption can then be derived from the CPI assumption, with the pay increase assumption being set as CPI plus 1.25% at the 2025 Actuarial Valuation. At the 2025 valuation the CPI assumption is 2.1% p.a. and the pay increase assumption is 3.35% p.a. Allowance may also be made for any short-term inflationary pressures where this is considered appropriate and prudent.

Response:

West Yorkshire Police agrees with the Pension and Pay Increase assumptions.

Discount rate: The discount rate, or future investment return assumption, depends on the funding target used. The funding target used is determined by the type of employer in the Fund, the way any exit valuations will WYPF Draft FSS August 2025 Page 8 of 38 be carried out, and the employer risk/covenant. This is achieved by using different principles to derive the funding targets for different employers in the Fund. The relevant funding targets at the 2025 Actuarial Valuation, the three key decisions made in each case and the corresponding discount rates are as follows:

Funding Target/Solvency Target/Trajectory Period/Probability of Funding Success Secure Scheduled and Subsumption Body 100% funded using a discount rate of 4.00% and a CPI assumption of 2.00%, 20 years, 80% Discount Rate (p.a.)

5.1 Response:

As stated above West Yorkshire Police does not agree that the discount rate should be reduced from 4.5% to 4% due to the Probability of the Funding Success being increase to 80% from 76%.

West Yorkshire Police recommends that the following key assumptions be maintained as part of the Funding Statement Strategy:

* A discount rate of 4.5%
* A CPI assumption of 2% over 20 years
* A probability of funding success of 76%

These assumptions strike a balanced approach between prudence and affordability and have previously supported strong funding outcomes without placing undie pressure on participating employers.

6.0 Demographic assumptions:

6.1 Response: No comments

7.0 Asset shares notionally allocation:

7.1 Response: No comments

8.0 Link to Investment Strategy Statement

Funding and investment strategy are closely linked. Investment strategy is set by the Administering Authority, after taking investment advice.

The 2025 triennial valuation is based on the following high-level strategic asset allocation:

Main asset classes Strategic allocation (used for 2025 valuation)

UK Equities 18.0%

US Equities 18.0%

Japanese Equities 18.0%

Emerging Markets Equities 6.0%

UK Corporate Bonds 5.5%

Global Private Equity 5.0%

Infrastructure 5.0%

UK Property 5.0%

UK Index Linked Gilts 5.0%

UK Fixed Interest Gilts 5.0%

Hedge Funds 2.5%

Multi Asset Credit 2.5%

Global Government Bonds 2.5%

Cash 2.0%

8.1 Response:

Given that Aon’s valuation methodology is based on a set of assumptions that may be considered arbitrary, West Yorkshire Police recommends that these assumptions be independently benchmarked prior to being set (rather than afterwards by the Government Actuary’s Department (GAD)). This will help to ensure appropriateness for all participating employers.

The Capital Market Assumptions (CMAs) used by Aon have not been made available, but the significantly prudent discount rates proposed suggest that Aon have taken an overly prudent view in determining their CMAs. In particular, the expected return at 2022 should be provided so that it can be compared with that proposed as at 2025. As part of the independent benchmarking mentioned above, further analysis / comparison of the appropriateness of the CMAs should be carried out before any decisions are made on the level of contribution rates set for West Yorkshire Police.

Question3. What is the rationale for assuming that WYPF’s long-term asset returns are expected to return less than UK government gilt yields?

9.0 Phasing in of contribution rates

Consistent with a desire to keep employer contribution rates as stable as possible, the Administering Authority will consider, at each Actuarial Valuation, whether new contribution rates should be payable immediately, or reached by a series of steps over future years (this could be an increase or decrease in employer contribution rates). The Administering Authority will discuss with the Fund Actuary the risks inherent in such an approach, and will examine the financial impact and risks associated with each employer. The Administering Authority’s policy is that contribution changes will generally be phased in over six equal annual steps. Further steps, less steps, or unequal steps may be permitted at the Administering Authority's discretion.

9.1 Response:

It is West Yorkshire Police’s view that as annual budgets are considered each year when the Council Tax is set, any increase or decrease would be included within the budget provision at that time. It is therefore not an issue for West Yorkshire Police if the contribution rates were lower in one year and then had to increase. West Yorkshire Police is very experienced in managing significant changes in resource requirements. We therefore feel that it should be the contributing employers who should be managing the increase / decrease in contribution rates not the Pension Fund Administrating Authority on their behalf.

It is also our view that the secondary rate should be reduced to enable the surplus of the Pension Fund Assets over liabilities to be 105% as soon as possible. The preference would be for one consistent reduction to be made from 1 April 2026. If there is an interim requirement to increase contribution rates West Yorkshire Police would be supportive of this under Regulation 64.

Summary of Main Points.

1. West Yorkshire Police, and contributing employers, are best placed to advise on the affordability of contribution rates and the impact on taxpayers. The gradual increase or decrease of contribution rates should not be at the detriment of services provided to the public. The Pension Fund should not be increasing prudence to further increase the surplus of the fund at the detriment of public services. (see Paragraph 2.1).
2. West Yorkshire Police would ask that probability of funding success remains at 76%. (Paragraph 3.1 and 4.1)
3. The “Probability of funding success” is linked to the WYPF confidence in the investment strategy and how the fund will perform over the next 20 years. A funding success of 76% was agreed in the 2022 valuation which produced an expected discount rate of 4.5% at the time. This proved to be a sufficient level of prudence with the fund surplus increasing during this time. Therefore, the West Yorkshire Police does not see the rational for increasing the prudence of the funding success to 80% and a discount rate of 4%. (Paragraph 5.1).
4. Independent benchmarking should be undertaken to validate Aon’s valuation basis and assumptions, it should be independently benchmarked prior to being set. (Paragraph 8.1)
5. We recommend that the secondary rate be reduced to enable the surplus of the Pension Fund Assets over liabilities to be 105% as soon as possible. Therefore, we request that a consistent reduction in contribution rates be applied from 1 April 2026. Should an interim requirement to increase contribution rates we would be supportive of this under Regulation 64. (Paragraph 9.1).

Thank you for taking the time to consider our response. We appreciate the opportunity to contribute to this important consultation.

## Warley Road Academy (Impact Education MAT) – Headteacher

I am writing as Head Teacher of Warley Road Academy, a school within Impact Education Multi-Academy Trust to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions

We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is absolutely achievable without having a negative impact on the fund or on our employees pensions.

Should the consultation result in an employer contribution at this level, £103,000 would be released back into the school budget, having a significant impact on educational provision for our young people. This sum of money would equate to an additional teacher along with 2 specialist support staff. This would allow us to support disadvantaged and vulnerable children in the Park Ward area of Calderdale, improving their life chances and success in the future through improved academic outcomes along with rich life experiences.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence

We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## Wellspring Academy Trust - Chief Finance Officer

Please find below my response to the Funding Strategy Statement Consultation for the West Yorkshire Pension Fund. As an Academy Trust we welcome the opportunity to engage with yourselves, particularly given the position of the fund since the last valuation.

Wellspring Academy Trust has been working with a consortium of other Academy Trusts and a consultant organisation (Isio) in order to ensure that we better understand the position of the pension fund and are able to engage meaningfully. This consultation is of particular importance given the positive impact any reduction in contribution rate could have across our schools at a time where schools are facing a number of significant financial challenges.

Wellspring has 4 primary schools, 1 secondary school and 4 special schools in the WYPF, with the special schools employing proportionately more support staff in the pension scheme. The pension fund contributions account for a material proportion of these school budgets, and hence securing value for money in this area is incredibly important, enabling scarce resources to be deployed on front line services for children.

Ensuring that the contribution rate is reduced to reflect the overall financial health of the fund would have a material positive benefit in terms of monies being available to address ongoing financial challenges in our schools.

We believe the improved funding position of the fund can support a significant reduction in pension contributions. In light of this, we request that you consider an approach that reduces contributions to 6% for the next three years.

A reduction to 6% would unlock £1.1 million across the 9 schools we operate in the fund, that could be used to support delivering improved outcomes for the children in those settings.

As part of the Multi-Academy Trust Group, I would also like you to consider the letter shared with the WYPF Advisory Panel meeting on the 24th July 2025, which sets out the collective view of the group.

I note that a number of local authorities are similarly seeking to ensure value for money and the opportunity for reducing employer contributions.

I look forward to the outcome of the Advisory Panel meeting on the 23 October 2025, and hopefully a material reduction in the contribution rate.

## West Vale Academy (Great Heights Academy Trust) – Head of School

I am writing as head of school of Westvale Academy to provide our response to the Funding Strategy Statement (FSS) consultation. I appreciate the opportunity to contribute and wish to highlight several key points and questions for your consideration.

Changes in the Pensions Landscape Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates over the next three years.

Request for Reduced Contributions We understand that these improvements create an opportunity for WYPF to significantly reduce our contributions. We respectfully ask that the valuation approach allows this to happen, enabling us to reduce our contributions to 6% for the next three years, up to the next valuation, as we do not wish to pay less than members.

Reducing the contribution rate for employers is the right thing to do given the current funding situation and is achievable without having a negative impact on the fund or on our employees' pensions.

By reducing to 6%, this would mean a saving of £32,046. This would be equivalent to two full time support staff members or one part time teacher and resources that would be very beneficial to the school. West Vales’s SEND pupils is 43.42% which is above national average (18.20%), additional support and resources would directly help support these students.

Stability

We recognise that stability is a key focus for WYPF when setting employer contribution rates. However, given the cost pressures that academies are currently experiencing, we believe that money could be better spent supporting our pupils and staff, rather than building up additional surplus within the WYPF. As such, stability is not a priority for us at this point. We are confident that as a Trust we can budget for potential future increases and will be able to meet our contributions as they fall due.

Prudence We understand that WYPF is considering building in additional prudence to its funding strategy. Given the strong position that WYPF and its participating employers now find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and could even be reduced to previous levels. There does not need to be a funding buffer, and the period over which surplus is used to reduce employer contributions should also be shortened.

Key Technical Points and Questions

* The proposed increase in the Probability of Funding Success: Is this change being made purely to maintain employer contributions at a similar level? Why is 80% now considered appropriate, when 76% was acceptable last time and 69% in the past?
* The continued use of the 105% buffer prevents us from using our full surplus to reduce contributions. This buffer was introduced for the specific circumstances of the 2022 valuation and is not needed now.
* With a surplus in the Scheme, running this off over a shorter period (e.g., six years) would reduce contributions further. Why is a 22-year period being suggested?
* The FSS proposes phasing in contribution changes over six years. Given the significant improvements in funding, we do not believe this is necessary and request that revised contribution rates be implemented immediately from April 2026.
* Is there a way to use Scheme surplus to pre-fund redundancy payments? This would help us stabilise these costs rather than paying them as one-off lump sums.

Consultation Process

We are concerned that no sensitivity analysis has been provided, and there appears to have been limited engagement with employers before setting the draft FSS.

* What is WYPF’s process for reviewing and responding to employer feedback?
* Will a working group be established to review responses?
* How will responses be reflected in the final decision?
* Is there sufficient time and resource to review all feedback before decisions are made?
* The timing of this consultation was not ideal for Multi Academy Trusts, as it coincided with the summer holidays. We ask that future consultations are better timed and more effectively communicated to ensure all relevant stakeholders are reached.

We respectfully request clear responses to these questions and urge WYPF to ensure the consultation is robust, transparent, and genuinely responsive to employer needs.

## West Yorkshire Local Authorities - Leeds City Council, Calderdale Council, Wakefield Council Kirklees Council

Thank you for the opportunity to provide our responses as part of the consultation on the Funding Strategy Statement for the West Yorkshire Pension Fund (“WYPF”) which closes on the 3rd October. The West Yorkshire Authorities would like to thank the pension fund for the work you are undertaking to safeguard the assets of the fund and ensuring the fund is sustainable for the future. The West Yorkshire Local Authorities listed above would like to submit the following response.

1.0 Aims and Objectives of the FSS

The main purpose of the FSS is to document the processes by which the Administering Authority:

* Establishes a clear and transparent funding strategy, specific to the Fund, to meet employer’s pension liabilities going forward.
* Aims to meet the regulatory requirement in relation to the desirability of maintaining as nearly constant a primary contribution rate as possible.
* Ensures the regulatory requirement to set contributions so as to ensure the solvency and long term cost efficiency of the Fund are met.
* Takes a prudent longer-term view of funding the Fund’s liabilities.

1.1 Response:

A key point to the aim and objective of the FSS details “the requirement to secure…the long-term cost efficiency of the scheme”

The WYPF states their priority continues to be stability. However, given that the actuary must have regard to both points (amongst others) and is detailed above as a clear aim and objective of the FSS, it follows that equal weight should be given to ensuring the long-term cost efficiency of the scheme, which must acknowledge the affordability of the scheme for participating employers

Changes in contribution rates have the most significant impact on Local Authority revenue budgets and, therefore, potential savings (where they are possible due to improvements in scheme funding) should be considered alongside the desirability of stability in contribution rates rather than as a secondary consideration.

2.0 Management of employer liabilities and stability of employer contributions

The Administering Authority seeks to ensure that all employers’ liabilities are managed effectively. In a funding context, this is achieved by:

* seeking regular actuarial advice
* ensuring that employers are properly informed and consulted
* regular monitoring of the funding position and the outlook for employers' contributions
* appropriate identification of employer liabilities and notional assets

The Administering Authority aims to manage employers' liabilities effectively through regular review of contributions at triennial Actuarial Valuations and additional contributions for early retirement. At such reviews, a key priority for the Administering Authority is to bring stability to employers’ total contributions through gradual increases (or decreases) phased in over a number of years, subject to the Administering Authority not taking undue risks, and at reasonable cost to the taxpayers and employers.

2.1 Response: This is a key element of the consultation which Local Authorities are best placed to advise on the affordability of contribution rates and the impact on taxpayers. The gradual increase or decrease of contribution rates should not be at the detriment of services provided to the public. The Pension Fund should not be increasing prudence to further increase the surplus of the fund at the detriment of public services.

3.0 Funding Target

The FSS states that the funding Target should be set at

“Employers’ contributions will be set to ensure that 100% of the Liabilities can be met over the long term using appropriate actuarial assumptions. The Administering Authority believes that its funding strategy will ensure the solvency of the Fund because employers collectively have the financial capacity to increase employer contributions should future circumstances require, in order to continue to target a funding level of 100% (where the assets are equal to the Liabilities)”.

3.1 Response:

The WYPF has been in surplus for numerous years and has been steadily increasing with forecast surplus of £2.3bn on 31st Dec 2024, £1.407bn in 2022, £866m in 2019. When the probability of Funding success of the Investment Strategy being at 76% in 2022, 69% in 2019 and 2016.

Qu. 1. What is the rationale for assuming that WYPF’s long-term asset returns are expected to return less than UK government gilt yields?

* Probability of success – the current probability of success of 76% is arbitrary (noting it was 69% in 2013 and 2016) and we understand it was increased to keep contributions stable previously. It is unclear why more certainty is required than a 3 in 4 chance of success. A probability rate of 80% in the West Yorkshire Authorities view is too prudent and independent benchmarking should be carried out to understand its appropriateness and the sensitivity of this element to the funding strategy (as it is perhaps the most material assumption used in the actuarial valuation). The WY Local Authorities would ask that probability of funding success remains at 76%.

Qu. 2. If this was reduced to the previous probability rate of 69% what would do to the contribution rates made by Local Authorities?

4.0 Risk based funding target

The Fund uses a risk-based funding strategy to calculate the Liabilities, where the Actuarial Valuation is carried out on the basis of the assessed likelihood of meeting the funding objectives. In practice, three key decisions are required for the risk-based approach:

* what the solvency target should be (the funding objective - where the Administering Authority wants the Fund to get to),
* the trajectory period (how quickly the Administering Authority wants the Fund to get there), and
* the probability of funding success (how likely the Administering Authority wants it to be now that the Fund will achieve the solvency target by the end of the trajectory period). These three decisions, supported by risk modelling carried out by the Fund Actuary, define the discount rate (investment return assumption) to be adopted and, by extension, the appropriate employer contributions payable. Together they measure the riskiness of the funding strategy. Information about the assumptions used in the calculation of the Liabilities are set out in the section “Main actuarial assumptions”.

4.1 Response:

As detailed in the response above and the “Probability of funding success” is linked to the WYPF confidence in the investment strategy and how the fund will perform over the next 20 years. A funding success of 76% was agreed in the 2022 valuation which produced an expected discount rate of 4.5% at the time. This proved to be a sufficient level of prudence with the fund surplus increasing from 108% to 114% despite the turmoil in the financial markets due to the following:

1. Ongoing war in Ukraine
2. Increased geopolitical tension
3. Climate Emergency concerns
4. Elections in the UK, US and Germany
5. Refugee crisis
6. Higher inflation in the UK
7. And or the level of surplus of that above 100%

Our view, as the WY Directors of Finance (WYDOF), is that we would ask that the Probability of funding success remains at 76%. If this was reduced to the previous probability rate of 69% what would do to the contribution rates made by Local Authorities?

Each of the five Council’s contributes significantly to the fund, with the amount the Local Authorities contribute into the fund each year, on top of the contributions made by employees, amounting to the following:

1. Leeds City Council £76m
2. Bradford City Council £45.7m
3. Calderdale Council £17.98m
4. Wakefield Council £26.2m
5. Kirklees Council £43.8m

A small decrease in the contribution rate would still mean significant contributions from each Council and in any case, contribution rates would be reviewed following the 2028 Actuarial Valuation. It should also be noted that changes in contribution rates have the most significant impact on Local Authority revenue budgets, even a small change in the percentage points ie 2%, 3% or 4% can mean several £millions of reduction in the cost to each authorities contribution rates and therefore taxpayers.

5.0 Financial assumptions:

Pension and pay increase assumption The Scheme provides increases in line with increases in the Consumer Prices Index on the majority of pensions paid. The pension increase assumption is generally set by reference to the Fund Actuary’s best estimate of Consumer Prices Index inflation over the long term. The pay increase assumption can then be derived from the CPI assumption, with the pay increase assumption being set as CPI plus 1.25% at the 2025 Actuarial Valuation. At the 2025 valuation the CPI assumption is 2.1% p.a. and the pay increase assumption is 3.35% p.a. Allowance may also be made for any short-term inflationary pressures where this is considered appropriate and prudent.

Response: The WY Local Authorities agree with the Pension and Pay Increase assumptions.

Discount rate: The discount rate, or future investment return assumption, depends on the funding target used. The funding target used is determined by the type of employer in the Fund, the way any exit valuations will WYPF Draft FSS August 2025 Page 8 of 38 be carried out, and the employer risk/covenant. This is achieved by using different principles to derive the funding targets for different employers in the Fund. The relevant funding targets at the 2025 Actuarial Valuation, the three key decisions made in each case and the corresponding discount rates are as follows:

Funding Target / Solvency Target / Trajectory Period / Probability of Funding Success Secure Scheduled and Subsumption Body 100% funded using a discount rate of 4.00% and a CPI assumption of 2.00% , 20 years, 80% Discount Rate (p.a.)

5.1 Response: As stated above the WY Local Authorities do not agree that the discount rate should be reduced from 4.5% to 4% due to the Probability of the Funding Success being increase to 80% from 76%.

The West Yorkshire Authorities would ask that the discount rate is maintained at 4.5%, CPI 2% over 20 years 76% probability of success.

6.0 Demographic assumptions:

6.1 Response: No comments

7.0 Asset shares notionally allocation:

7.1 Response: No comments

8.0 Link to Investment Strategy Statement

Funding and investment strategy are closely linked. Investment strategy is set by the Administering Authority, after taking investment advice.

The 2025 triennial valuation is based on the following high-level strategic asset allocation:

Main asset classes Strategic allocation (used for 2025 valuation)

UK Equities 18.0%

US Equities 18.0%

Japanese Equities 18.0%

Emerging Markets Equities 6.0%

UK Corporate Bonds 5.5%

Global Private Equity 5.0%

Infrastructure 5.0%

UK Property 5.0%

UK Index Linked Gilts 5.0%

UK Fixed Interest Gilts 5.0%

Hedge Funds 2.5%

Multi Asset Credit 2.5%

Global Government Bonds 2.5%

Cash 2.0%

8.1 Response:

Independent benchmarking – given that Aon’s valuation basis is a construct which adopts arbitrary assumptions, it should be independently benchmarked prior to being set (rather than afterwards by the Government Actuary’s Department (GAD)) to ensure its appropriateness for the WYPF and its participating employers

Capital Market Assumptions (CMAs) – these have not been made available by Aon, but the significantly prudent discount rates proposed suggest that Aon have taken an overly prudent view in determining their CMAs. In particular, the expected return at 2022 should be provided so that it can be compared with that proposed as at 2025. As part of the independent benchmarking mentioned above, further analysis / comparison of the appropriateness of the CMAs should be carried out before a decision on the level of contribution rates to be set for Local Authorities.

Qu.3. What is the rationale for assuming that WYPF’s long-term asset returns are expected to return less than UK government gilt yields?

9.0 Phasing in of contribution rates - Consistent with a desire to keep employer contribution rates as stable as possible, the Administering Authority will consider, at each Actuarial Valuation, whether new contribution rates should be payable immediately, or reached by a series of steps over future years (this could be an increase or decrease in employer contribution rates). The Administering Authority will discuss with the Fund Actuary the risks inherent in such an approach, and will examine the financial impact and risks associated with each employer. The Administering Authority’s policy is that contribution changes will generally be phased in over six equal annual steps. Further steps, less steps, or unequal steps may be permitted at the Administering Authority's discretion.

9.1 Response: The Local Authorities view is that annual budgets are considered each year when the Council Tax is set and therefore any increase or decrease would be included within the budget provision at this time. It is therefore not an issue for Local Authorities if the contribution rates were lower in one year and then had to increase. Local Authorities are very experienced in managing significant changes in resource requirements. The WY Local Authorities therefore feel that it should be the contributing employers who should be managing the increase / decrease in contribution rates not the Pension Fund Administrating Authority on their behalf.

It is the WY Local Authorities view that the secondary rate should be reduced to enable the surplus of the Pension Fund Assets over liabilities to be 105% as soon as possible. The preference would be for one consistent reduction to be made from 1st April 2025. If there is an interim requirement to increase contribution rates Local Authorities would be supportive of this under Regulation 64.

Summary of Main Points.

1. Local Authorities are best placed to advise on the affordability of contribution rates and the impact on taxpayers. The gradual increase or decrease of contribution rates should not be at the detriment of services provided to the public. The Pension Fund should not be increasing prudence to further increase the surplus of the fund at the detriment of public services. (see Paragraph 2.1).
2. The WY Local Authorities would ask that probability of funding success remains at 76%. (Paragraph 3.1 and 4.1)
3. The “Probability of funding success” is linked to the WYPF confidence in the investment strategy and how the fund will perform over the next 20 years. A funding success of 76% was agreed in the 2022 valuation which produced an expected discount rate of 4.5% at the time. This proved to be a sufficient level of prudence with the fund surplus increasing during this time. Therefore the West Yorkshire Local Authorities do not see the rational for increasing the prudence of the funding success to 80% and a discount rate of 4%. (Paragraph 5.1).
4. Independent benchmarking should be undertaken to validate Aon’s valuation basis and assumptions, it should be independently benchmarked prior to being set. (Paragraph 8.1)
5. It is the WY Local Authorities view that the secondary rate should be reduced to enable the surplus of the Pension Fund Assets over liabilities to be 105% as soon as possible. Therefore please can contribution rates be reduced by one consistent reduction on 1st April 2026. If there is an interim requirement to increase contribution rates Local Authorities would be supportive of this under Regulation 64. (Paragraph 9.1)

Thank you for your consideration of our response.

## Westminster C of E Primary Academy (BDAT) - Executive Business Leader

I am writing as an employer, in response to the FSS consultation.

We are requesting that our employer contribution rates are lowered in light of significant market improvements affecting pension schemes since the last valuation in 2022.

The financial impact of lower employer pension contributions for our school and our Trust is significant. The impact on children, their wellbeing, and their learning from the additional finances that we could have in our budget as a result of lower contributions is also extremely significant.

We have been managing a reduced PAN from 90 down to 60 over the last seven years. As a result of reduced pupil numbers, we are managing a significantly reduced budget. With a much smaller staff structure, we still manage the issues we face in our school community. With high deprivation, high mobility, increasing levels of SEND need and high levels of safeguarding concerns, every pound in our budget is vital to ensure we can provide the best possible education and outcomes for our children. They deserve the best.

We serve an area of extremely high socio-economic deprivation, where experience of, and aspiration to, education success has been historically and significantly low – IMD & LSOA data confirms the children live in an area that is identified as being in the most deprived 5% of the country and has become more deprived since 2015. Our constituency, Bradford East, has the highest rate of unemployment in Bradford, the lowest life expectancy and highest infant mortality rates. Crime figures show that we are in the 2% most affected areas in the country. 14% classed as obese on entry into Reception and 30% of Y6 children are classed as obese. Both these figures are higher than the national and Bradford averages and are despite our priority on physical activity in PE and healthy eating in DT.

This unplanned mass mobility of children who are new to the country, community and school now makes up a large proportion of the school. Over the last 2 years, not including normal Nursery/Reception admissions, we have welcomed 125 new children into school (around 25% of NOR) and 68 children have moved on to other schools or moved to another country.

Significant numbers of our new children are asylum seekers and refugees and experienced severe trauma on their journey to our country, community and school. We know a number of our children have 3 or more ACEs through our Safeguarding and Inclusion work and recognise that there will be many more where we have not had notification or provide intervention.

Our local community was even more adversely affected by the COVID pandemic due to its existing difficulties and is still recovering from the impact. Our community outreach work is growing; we support around 100 families in many ways including debt counselling; food bank supporting at least 30 families per week (this has doubled since 2021-22); access to benefits advisor; supporting families fleeing domestic violence; providing clothing and essential household items; support for applying to secondary schools and basic language & number skills training for parents and carers all in addition to the ongoing academic communication.

Key Points

Our advisors have explained how financial conditions have changed and improved the funding of WYPF significantly since the last actuarial valuation was carried out in 2022. As a result, we are expecting to see significant improvements in funding levels and large reductions to employer contribution rates due over the next 3 years

We understand that this improvement can mean there is an opportunity for WYPF to significantly reduce our contributions – and we ask that the valuation approach allows this to happen – maybe to zero for three years when we know they will be re-assessed.

It has been highlighted that in setting employer contribution rates, stability is the key focus for the WYPF. However, given the cost pressures that academies are currently experiencing, money could be better spent elsewhere than building up additional surplus within the WYPF. As such, stability is not a priority at this point for us, although more information on what might happen if we pay nothing for three years would be very valuable

We understand that the WYPF is considering building in additional prudence to its funding strategy. Given the strong position the WYPF and its participating employers find themselves in, we do not feel this is justified. Instead, we request that prudence is released to allow lower employer contribution rates to be agreed. For example, the Probability of Funding Success should not be increased, and it could be reduced to what it has been in the past. There does not need to be a funding buffer either. And the period over which surplus is used to reduce employer contributions should also be reduced.

We urge you to significantly reducing our employer contributions.