



Government
Actuary's
Department

Government Actuary's Department Annual Report 2013 - 2014

July 2014





OUR AIMS	OUR COMMITMENT	OUR VALUES
<p>1. For UK government and the devolved administrations to deliver and be seen to deliver:</p> <ul style="list-style-type: none"> > Top notch service and policy advice > A full range of actuarial analysis whenever appropriate for actuarial input to be provided > All the actuarial analysis on pensions as the 'shared service' supplier of actuarial analysis within government. <p>2. For other public sector (UK and overseas) to win as much actuarial analysis work as we can, subject to:</p> <ul style="list-style-type: none"> > Meeting the commitments to quality in all we do > Anything we do must be consistent with Government policy > Nothing we do must impair our ability to deliver our first aim <p>3. To have a sustainable long-term GAD in government</p>	<p>Our commitment to quality is to consider the six key aspects of the service we deliver. Our service and advice should be:</p> <ul style="list-style-type: none"> > correct > applicable > clear > on time > value for money > properly discussed at regular status briefings 	<p>In addition to the core values of the civil service (integrity, honesty, objectivity and impartiality), GAD has values of:</p> <ul style="list-style-type: none"> > Making client service our priority > Professionalism (civil service core values as above, as well as actuarial professionalism) > Treating people fairly and with respect > Being flexible, sharing and collaborative with clients; within and between teams; with peer group and above > Delivering a work/life balance to the extent consistent with our needs > Being forward looking and proactive > Pursuing a fulfilling and varied career > Public service ethos consistent with the ethos of our respective counterparts (i.e. clients and colleagues of equivalent pay/grade) in government departments generally

What is an actuary?

Rather than give a short six or seven word answer which would oversimplify and mislead, the following description provides a proper sense of what we do

'Where there is uncertainty, using mathematical and statistical methods, actuaries perform long-term financial modelling, analysis and certifications under a professional code and standards designed to give assurance on quality and consistency.'

In other words, it's a combination of genuine professionalism (with all that entails on education, annual learning and discipline schemes) directed at the handling of complex financial problems around sustainability and value.



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WELCOME



GAD in 2013-14

GAD has been extremely busy over the year. After much work with HM Treasury helping them determine the basis for the public service pension valuations, and much work gathering data, we have now finished three of the principal valuations with much progress on the rest. We have signed and issued reports on State pensions (the five yearly review projecting into the long-term, new factors for deferral) and pension scheme survivor benefits. We have been involved in big outsourcing and machinery of Government changes. We have been awarded the actuarial work for NHS Litigation Authority and provided support to HM Treasury on its Budget proposals on pensions.

GAD over the last six years

When I joined and we started together in 2008, I set three missions to deliver during our journey:

- > A successful GAD
- > A strong reputation for the GA, GAD and actuaries
- > GAD to work for Government (including devolved administrations and NDPBs) across the whole field of actuarial analysis.

During the last six years, fee income has doubled, we now meet all our financial targets set by Treasury, and we have achieved high employee engagement (67%) in the annual Civil Service surveys. Our client satisfaction reviews have improved each year and stand at a high 8.5 out of 10. I could go on but suffice to say that all key stakeholders seem to recognise our achievements on the first two elements of our mission.

In the last two years, we have correctly, but sadly, pulled out of international insurance regulation. This has enabled us in earnest to build up our capability in insurance, risk and modelling in the UK. Our tremendous progress on this front has been capped in the last two months by being asked to take on the actuarial work for the NHS Litigation Authority.



Message from the Government Actuary

And with increasing attention on assurance over general Departmental and NDPB models (as per the Macpherson Review) as well as our perceived ability to support policy analysis on other Government long-term costs, we are well positioned to deliver a full range of actuarial analysis across the range of Government, the NDPBs and the devolved administrations.

A key element of our philosophy has been to deliver quality (as perceived by clients) and this is absolutely essential. Without this, we would not have been able to take on Civil Service pensions (returned to GAD in 2012-13 after 10 years in the private sector). Nor could we have made the strong progress we have made, supported by and working with our clients and HM Treasury, in delivering our 2012 pension valuations for public service employers. After all, public service pensions and social security remains, and will remain, the lion's share of what we do.

Why does all this matter to you, our clients? My personal position on this, and I keep hearing from you, our clients, to confirm, is that a shared service supplier in Government is very desirable to you and to Government provided it delivers. And if we can keep hitting our targets, and keep further building diversity of work, we can have more control over our destiny to continue to meet your needs for many years into the future. In 2019, GAD will celebrate its centenary. I'm sure we all want this, and also many decades beyond.



What the Department needs for the next phase of its journey is a Government Actuary who has real hands-on experience of insurance and risk matters and who can add new impetus into the 'wide field of actuarial analysis' whilst having a strong pensions background to keep the lion's share of our work — pensions — continually delivering and improving.

So I am delighted that Martin Clarke will take over the reins later this summer — he has exactly the experience and expertise to fit.

Let me finish on a personal note. I have thoroughly enjoyed my six (and a bit) years. I've enjoyed working with all the dedicated staff here in GAD and with all our clients. What we've achieved has been achieved together and could not have been done without you. It's all of you who have made my stewardship of the GA role so enjoyable and so fulfilling. I thank you all.

TREVOR LLANWARNE CB

GOVERNMENT ACTUARY, July 2014



Our plan for 2011-14

What we wanted to achieve in 2011-2014

Financials	<ul style="list-style-type: none"> ➤ To meet all the control totals on which we are measured
Clients	<ul style="list-style-type: none"> ➤ To retain all our public sector clients delivering all that they request and need ➤ To have steadily increasing client satisfaction for each public sector client and major other clients to the extent not already at an excellent level under our six commitments on client service
Service Range	<ul style="list-style-type: none"> ➤ To have a reputation in UK government of adding real value on modelling, risk, long-term care and insurance with £1m+ income in 2013-14 ➤ To selectively pitch for other UK actuarial work on an opportunistic basis without target
People	<ul style="list-style-type: none"> ➤ To have a steadily increasing name for being seen as a great place to work in employee satisfaction ➤ Reinvigorate and develop training programme to get staff back onto career map
Technical	<ul style="list-style-type: none"> ➤ To provide all actuaries with up-to-date knowledge and support ➤ Not to take technical risks (except where justified on a robust and defensible basis)
Actuarial Operations	<ul style="list-style-type: none"> ➤ To ensure efficient delivery ➤ To ensure GAD staff feel they are in a fulfilling and rewarding career ➤ 70% utilisation rate across the actuarial teams
Risk	<ul style="list-style-type: none"> ➤ To minimise risk of failure



Our progress in 2013-14

What we achieved in 2013-2014

<ul style="list-style-type: none"> ➤ GAD met all the financial control totals required in 2013-14 (as we did throughout the 3-year plan). Detailed financial data is available in our published accounts. 	Financials
<ul style="list-style-type: none"> ➤ GAD retained all its public service pension scheme clients. Read the client work section to see what we delivered to our clients in 2013-14. ➤ GAD's Client Satisfaction Survey showed the fourth consecutive improvement in how our clients rate us since we started the survey in 2009. You can read the latest survey results published in November 2013 on our website. 	Clients
<ul style="list-style-type: none"> ➤ GAD exceeded this target. In 2013-14 we did £1.3m worth of work in this area for a client list that included the Pension Protection Fund, the Pensions Regulator, DECC, DFID, HMT, and HMRC ➤ The focus in 2013-14 has been on UK insurance opportunities. This culminated in GAD being awarded a contract by the NHS Litigation authority following a competitive tender. See the client work section for details. 	Service Range
<ul style="list-style-type: none"> ➤ GAD's engagement score increased 3% to 66% and GAD is amongst the top performers across the Civil Service ➤ We have updated the Learning and Development (L&D) Strategy and published revised guidance on accessing L&D in the era of Civil Service Learning. We have developed improved metrics on L&D, including training expenditure and actuarial exam pass rates, with the later benchmarked with the Institute and Faculty of Actuaries. We will continue to develop metrics and act on feedback to improve take up of L&D across GAD. 	People
<ul style="list-style-type: none"> ➤ Regular Knowledge Sharing sessions, Research Updates and Technical Bulletins. Worked with FRC on proposed standards and with Institute and Faculty of Actuaries on quality assurance. ➤ Lots of work on ensuring consistent technical approach in the valuations work including establishment of Technical Delivery Group 	Technical
<ul style="list-style-type: none"> ➤ Regular review by Chief Actuaries group of utilisation and resource needs/allocation. Centralised monitoring of resource use versus expected outputs for the 2012 valuations project ➤ Ongoing management / support / monitoring, drawing on 360 feedback and talent management planning, backed by high employee engagement results ➤ The aggregate utilisation rate across the actuarial teams in 2013-14 was 72%. It was higher (up to 85%) for those teams heavily involved in the public service pension schemes valuations. 	Actuarial Operations
<ul style="list-style-type: none"> ➤ GAD's log of failure risks was reviewed by the GAD Management Board each month to ensure completeness and appropriate risk ratings, with oversight from GAD's Audit and Risk Assurance Committee. There was a strong focus on risk management during the year in the management of the 2012 valuations project with a project risk register forming part of the monthly reporting to the Board. 	Risk



Public service pensions

GAD provides actuarial analysis to all the main public service pension schemes such as those for the civil service, armed forces, police, fire service, teachers and the National Health Service. All these unfunded schemes are being reformed, with new schemes required to be in place from April 2015.

Our main focus in this area of work in 2013-14 has been on undertaking actuarial valuations of the schemes, which are a key part of implementing the reforms. These actuarial valuations are used to:

- > set employer contribution rates
- > implement the employer cost cap mechanism

Delivering the numbers

Results from the valuations for the first schemes were delivered at the end of February 2014. This enabled the budgetary implications for the largest of these schemes to be factored into the announcements on public service pensions around Budget 2014. Valuations are required for the schemes listed below.

Schemes

Armed Forces Pension Scheme	Northern Ireland Local Government Pension Scheme
Firefighters' Pension Scheme (England)	Northern Ireland Teachers' Superannuation Scheme
Firefighters' Pension Scheme (Northern Ireland)	Police Pension Scheme (England and Wales)
Firefighters' Pension Scheme (Scotland)	Police Pension Scheme (Northern Ireland)
Firefighters' Pension Scheme (Wales)	Police Pension Scheme (Scotland)
Health and Social Care Pension Scheme	Principal Civil Service Pension Scheme (Great Britain) [†]
Judicial Pensions Scheme	Principal Civil Service Pension Scheme (Northern Ireland)
Local Government Pension Scheme (England and Wales)	Scottish Teachers' Superannuation Scheme
Local Government Pension Scheme (Scotland)	Teachers' Pension Scheme (England and Wales)
NHS Pension Scheme	United Kingdom Atomic Energy Authority
NHS Superannuation Scheme (Scotland)	

[†] *plus several by-analogy schemes*

Technical background

If you want to find out more about the technical background to the valuations and how GAD calculates the cost of public service pensions you can read this [paper](#), presented by GAD actuaries on 31 March 2014 to The International Congress of Actuaries.



Delivering quality

The significant long-term implications for public finances of the costs of the schemes mean that a very high level of detail and accuracy is required in the valuations work. GAD did much work during the year to ensure that the approach, assumptions and results for each scheme will be correct, comparable and consistent.

This involved liaison with HM Treasury and the schemes, as well as internal cross-team checks and peer review. GAD also contracted Hymans Robertson, an actuarial consultancy, to provide independent quality assurance of the valuations work.

Leaders on valuations work

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<p>Ian Boonin 020 7211 2973 ian.boonin@gad.gov.uk</p> <p><i>LGPS, Firefighters' schemes, Judges' scheme, Civil Service scheme in Northern Ireland and advice to the DFPNI</i></p>		<p>Sue Vivian 020 7211 2667 sue.vivian@gad.gov.uk</p> <p><i>NHS schemes</i></p>	
<p>Stephen Humphrey 020 7211 2646 stephen.humphrey@gad.gov.uk</p> <p><i>Advice to HMT</i></p>		<p>Matt Wood 020 7211 2694 matt.wood@gad.gov.uk</p> <p><i>Police schemes, Teachers' schemes</i></p>	

The scale of the job

24 pension schemes

Around 12 million scheme members and 5 million active members

About one-third of client work by GAD people in 2013-14 was spent on the valuations



Private pensions policy

GAD continues to advise the Department for Work and Pensions and other public sector organisations on a diverse range of private pensions policy issues.

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*Private pensions policy,
Coal pensions, Funded schemes*



The work of the private pensions policy team during 2013-14 included:

- > Assisting DWP with the statutory review of pension scheme survivor benefits published in June 2014, including estimating equalisation costs for private sector schemes
- > Advising DWP on the abolition of contracting out from 2016, the auto-enrolment quality tests for DB schemes and the valuation of some state benefit rights on divorce
- > Reviewing the operation of pension drawdown limits for HMRC

Other pensions work

- > Advising the Foreign and Commonwealth Office (FCO) on its pension arrangements for embassy staff in various countries (including a high-level risk review)
- > Advising the Civil Aviation Authority and Ofgem on regulated companies' pension costs
- > Valuing one of the coal pension schemes including reviewing the interests of various parties in the scheme

Staff transfers

The staff transfers team provides advice to government departments and other bodies on the application of the Fair Deal policy. This covers situations when public service staff are transferred to the private sector as a result of the outsourcing of services, or when public service staff are moved as part of a 'machinery of government' change.

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Outsourcing and pensions



In October 2013, HM Treasury published new guidance setting out a reformed Fair Deal policy. GAD's staff transfers team advised HM Treasury and the Department of Health on implementation aspects of the new policy.

Major projects for the team during the year included:

- > Advising Ministry of Justice on the pension aspects of the reorganisation of probation services
- > Advising DWP on pension aspects involved in the creation of a single fraud investigation service.

Budget 2014

The Government Actuary was one of a selection of people called on to assist HM Treasury on the planned proposals for pension changes as announced in Budget 2014.



Insurance, risk and modelling

GAD continues to refocus its insurance expertise on advising UK public sector clients following the completion of the withdrawal from providing services to overseas insurance regulators.

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Insurance, risk, modelling



Demand in this area has increased considerably; up almost 80% since 2012-13.

Key projects in this area in 2013-14 included:

- > Advising DECC on third party liability for nuclear power. A planned increase in statutory compensation requirements in the event of a nuclear incident has highlighted potential gaps in the commercial insurance market. GAD is bringing together its flexibility in tackling different issues, its knowledge of the commercial insurance market and its risk analysis frameworks to assist the Government with this problem.
- > Working with DFID on a number of their projects to help with the development of insurance in low and middle income countries. One such project is ARC (African Risk Capacity). ARC provides sovereign disaster risk protection for a number of African countries so that payments can be made to governments promptly when a drought is expected. GAD has reviewed the model used by ARC to test the financial robustness of the business plan and the level of risk.
- > Advising DEFRA on the proposed Flood Re scheme. Flood Re would be operated as a not-for-profit reinsurance scheme and would enable households in areas at a high risk of flooding to get insurance.

NHS Litigation Authority

GAD has recently been appointed as actuarial adviser to the NHS Litigation Authority (NHS LA) following a competitive tender. The NHS LA manages claims made against the NHS in England on behalf of its members, mostly for clinical negligence, but also for property, employers and public liability insurance.

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NHS LA, equivalent bodies in devolved administrations



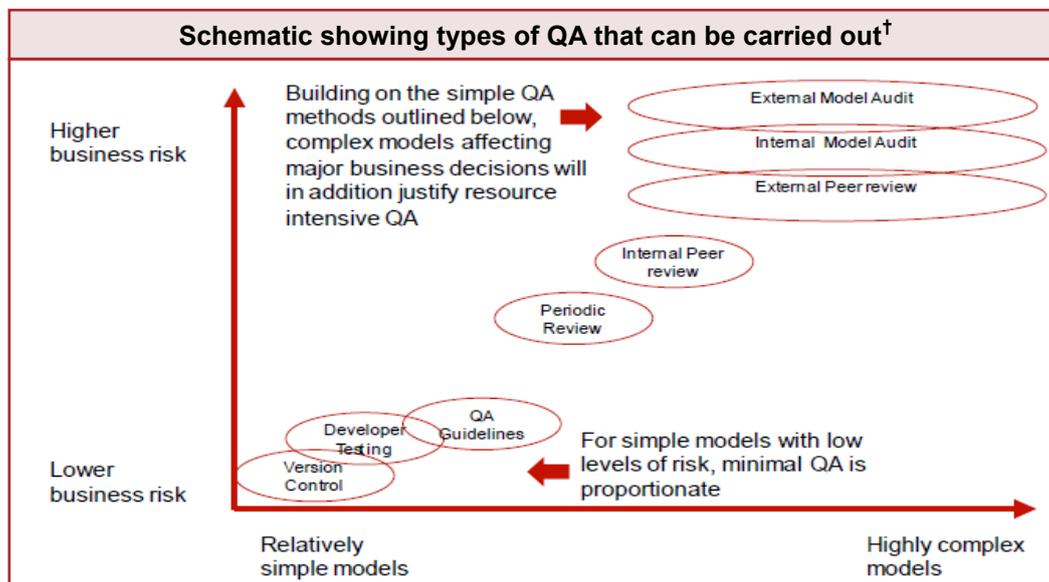
There are two main parts to the job GAD has been appointed to do:

- > To calculate the amount of money needed to pay claims made against members of the NHS LA. These claims provisions are currently just over £26bn and GAD will be responsible for calculating around 60% of this provision.
- > To calculate each member's annual contribution for the cover that the NHS LA provides. The NHS LA is keen to use these contributions to incentivise members to reduce risk for patients and staff.

Quality assurance of models

GAD continued to develop the range of modelling quality assurance (QA) services it offers to support Government's need to be confident that the results of modelling or analysis used in decision-making are sufficiently robust.

The Macpherson review examined these issues and emphasised the responsibility of departmental Accounting Officers for ensuring that an adequate governance framework and other measures are in place to achieve this. The diagram below highlights the various types of QA that will be needed to provide the required assurance depending on the complexity of the model and the level of risk involved.



Here are some recent examples of GAD's work in this area which demonstrate how we have helped departments with model QA:

- > Independent review of the annual actuarial valuations of the Pension Protection Fund
- > A review for the Department for Transport
- > Various other confidential projects including:
 - > Assurance on a range of aspects of a unique financial protection scheme
 - > Testing the functionality of a financial model before its release for public use and suggesting improvements, and
 - > Creation and implementation of a model risk framework for a government body

[†]Source: *Review of quality assurance of Government analytical models*, HM Treasury, March 2013



Social security

The social security team has produced the reports that the Government Actuary has a statutory responsibility to provide relating to the National Insurance Fund. The first was the [2014 Uprating report](#), published in early 2014. We have recently published the new [Quinquennial Review](#) (the long-term review of the National Insurance Fund) which was last issued in 2010.

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Social security and demography



The latest review shows a different picture reflecting the changes since the recession took effect as well as updates to state pensions and contracting-out. It is a comprehensive review, of interest to those in Government, academia and elsewhere concerned about long-term sustainability.

The social security team has also provided Government departments with support in a number of areas of social security reform, including reviewing how a person's state pension is increased on deferral and assisting in the development of the new additional voluntary Class 3A National Insurance Contribution arrangements.

In addition to working for the UK Government we also provide actuarial advice to a number of other countries and jurisdictions. These have included the Crown dependencies of Isle of Man, Jersey and Guernsey. We have provided actuarial services to the social security schemes in Gibraltar, Rwanda, Zambia and Saudi Arabia.

Demography and statistics

We have continued to supply demographic advice to the Office for National Statistics (ONS).

Premium Bonds

GAD has continued to work with National Savings & Investments on verification of the statistical randomness of the premium bond system ('ERNIE').

Our Onsite Actuary programme

In 2013 we started an initiative to have GAD actuaries working regularly at our clients' sites. Following positive feedback from the pilot clients we extended the programme across many of our major clients in 2013-14.

The objectives of the programme are to have GAD actuaries working regularly in the offices of many major government departments, available to give face to face support not only to existing clients but to others in the department, strengthening existing relationships and building new relationships and contacts. The arrangements are tailored to suit the client's needs and range from 'a day a week' to longer project-based secondments and ad hoc arrangements.

Around 15 departments and other clients now have an onsite actuary presence, including DCLG, DFID, DFT, HMRC, HM Treasury, Home Office, MoJ, ONS, PPF and SPPA.



Our people strategy

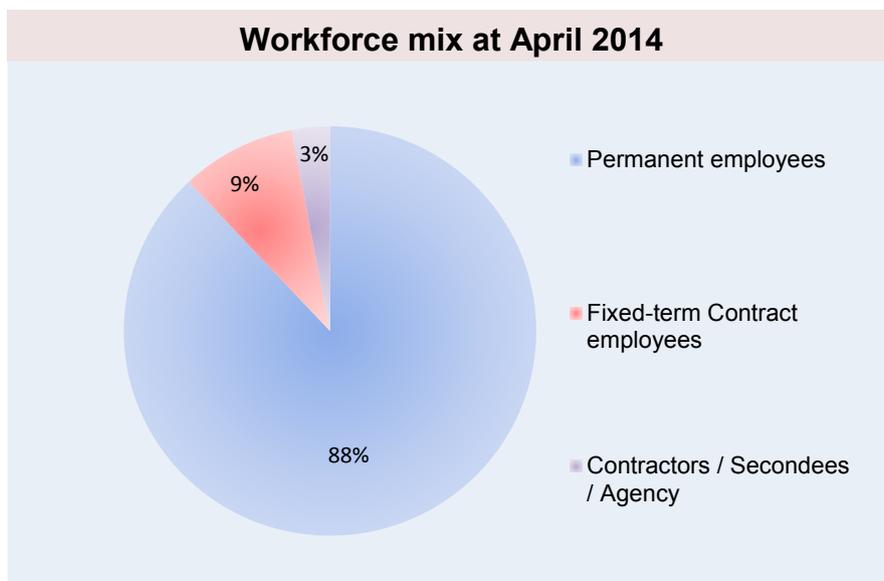
GAD's Strategic plan introduced in September 2011 formed the key drivers to enable the long term delivery of the Department's work and to enable high levels of staff engagement.

Staff development

Development of staff remained a strong focus in 2013-14. We promoted four staff to Senior Chief Actuary and one member of staff to Senior Consulting Actuary. We hired 9 trainee actuaries through our graduate trainee actuary recruitment programme and three trainees qualified in 2013-14, demonstrating our ability to help staff develop and gain professional recognition. In 2013-14 we spent an average of £1,252 per employee on Learning & Development.

Contingent workforce

To help deliver the significant increase in workload in 2013-14 in comparison to 2012-13, instead of hiring permanent staff we focused on bringing in transitional staff. This allowed GAD to achieve numerical and functional flexibility by hiring fixed term contract staff, agency workers and staff on secondment from a number of private sector firms. We took this approach because of the cyclical nature of scheme valuation work and its impact on revenue. Hiring transitional staff helps reduce the risk of GAD having to shed staff via expensive exit payments should revenue fall markedly.



These figures are from the Annual Report & Accounts 2013-14 which can be found at:

<https://www.gov.uk/government/publications/government-actuaries-department-annual-report-and-accounts-2013-to-2014>



Recruitment and turnover

Staff turnover remained low in 2013-14 with the majority of staff who left leaving at the end of a fixed term contract. Only 9 permanent employees left in 2013-14. This demonstrated GAD's ability to retain staff and highlights the value and importance of the GAD total reward package in a period of austerity.

Staff in post at 31 March

	2013	2014
Actuaries	66	68
Trainee Actuaries	46	55
Support Staff	33	30
Secondees / Agency	3	5
Total	148[†]	158

† 2013 number included 8 staff providing services to overseas insurance regulators who left on 31 March 2013 following GAD's withdrawal from that line of work

HR developments

Our staff engagement score as measured by the Civil Service Staff Survey was 66% in comparison to 63% in 2012-13. It compares favourably against the Civil Service average score of 58% which remains unchanged since 2012-13. Overall GAD ranked joint 12th out of 99 organisations in 2013.

Paul Vinall, HR Director
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Record demand for GAD's services, driven by the pension scheme valuations, resulted in the Department generating a net operating surplus of £3.5m in 2013-14. If accounting adjustments to provisions are excluded, the underlying surplus generated by our normal operations was £2.3m.

Income grew by 14% to £19m from £16.7m in 2012-13. The increase was largely due to the pension valuations with income from UK public sector clients growing by 29% from £12.5m to 16.2m. Rental income increased from £731k to £1.1m as a result of GAD signing up the Higher Education Funding Council as new tenants for the vacant second floor in Finlaison House.

Administrative Expenditure was £16.6m (£15.9m in 2012-13) of which staff costs is the main component. In addition to £12m of payroll costs for the permanent staff, we spent £545k on a number of staff through a variety of temporary arrangements to provide additional short term resource to meet the demand on valuation work.

Other expenditure included £2.4m on rent and other accommodation costs, £0.4m IT and telecoms, £0.2m recruitment, £0.3m depreciation, £0.2m staff expenses and £0.2m training. A full breakdown is given in GAD's Annual Report and Accounts 2013-14.

Having reached the half-way point of our 20 year lease in June 2013, we carried out some refurbishment works to Finlaison House. Capital investment of £473k was made on these works and on IT hardware and software, including replacing the majority of PCs which had reached their end of life.

Statement of Comprehensive Net Expenditure for the year ended 31 March 2014

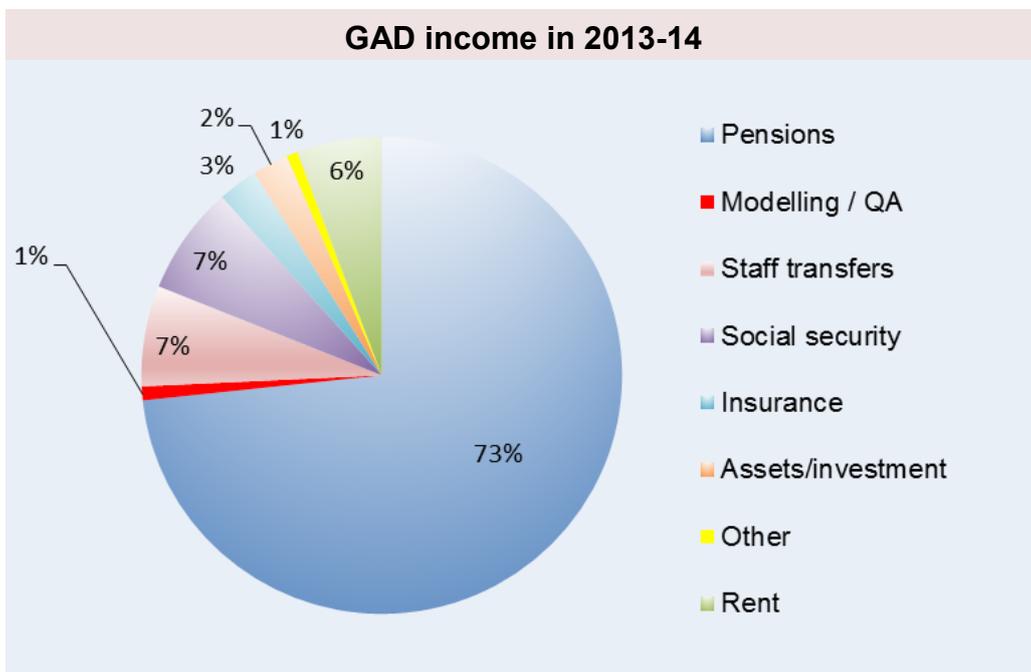
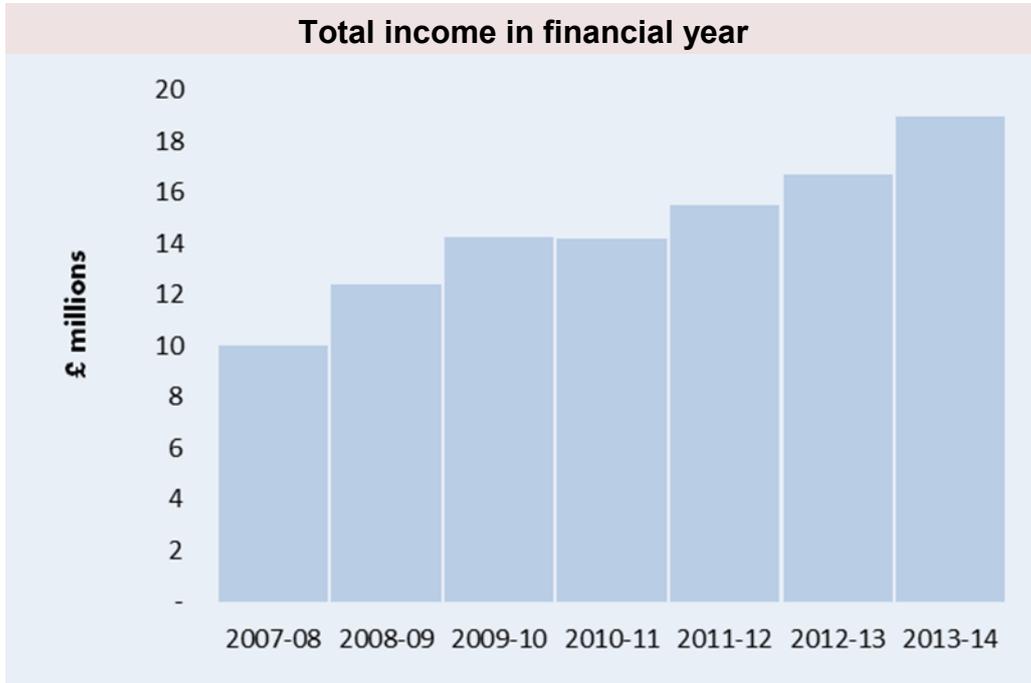
	2013-14	2012-13
	£'000	£'000
Administration costs		
Staff costs	12,018	12,101
Other costs	4,614	3,795
Operating income	(18,970)	(16,674)
Programme expenditure		
Staff costs	—	—
Other costs	(1,142)	(832)
Operating income	—	—
Net operating cost	(3,480)	(1,610)

These figures are from the Annual Report & Accounts 2013-14 which can be found at:

<https://www.gov.uk/government/publications/government-actuaries-department-annual-report-and-accounts-2013-to-2014>



Financial review



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Statement of Financial Position as at 31 March 2014

	2014	2013
	£'000	£'000
Non-current assets		
Property plant and equipment	1,270	976
Intangible assets	201	241
Total non-current assets	1,471	1,217
Current assets		
Work in progress	480	451
Trade and other receivables	5,007	3,877
Cash and cash equivalents	812	1,215
Total current assets	6,299	5,543
Total assets	7,770	6,760
Current liabilities		
Trade and other payables	(2,801)	(3,106)
Provisions (due within one year)	(177)	(265)
Non-current assets plus/less net current assets/liabilities	4,792	3,389
Non-current liabilities		
Trade and other payables	(974)	(1,080)
Provisions (due after one year)	(1,542)	(2,885)
Total non-current liabilities	(2,516)	(3,965)
Assets less liabilities	2,276	(576)
Taxpayers' equity		
General fund	2,051	(668)
Revaluation reserve	225	92
Total taxpayers' equity	2,276	(576)



Policy advice

- > Pensions
- > Demography
- > Social Security
- > Investment and Risk
- > Healthcare
- > Long-term care
- > Insurance

Public service pension schemes include:

- > Civil service
- > NHS
- > Teachers
- > Police/Fire
- > Local Government
- > Armed Forces
- > Parliamentary schemes of UK Government and devolved administrations
- > Coal Pensions
- > UK Atomic Energy Authority
- > Staff Transfers

Insurance, risk and modelling

- > Life and general insurance in the UK
- > Self-insurance financing and liabilities
- > Strategic risk consulting
- > Project risk consulting
- > Model development
- > Model quality assurance

International

- > Pensions
- > Social Security
- > Actuarial projects related to risk and finance, e.g. micro-finance

GOVERNMENT ACTUARY'S DEPARTMENT

ACTUARIAL ANALYSIS — FOR THE PUBLIC SECTOR — FROM THE PUBLIC SECTOR

ABOUT GAD

GAD provides actuarial analysis to the public sector from the public sector. Our aim is to be a highly valued principal provider of actuarial analysis and advice to all parts of the UK government, the devolved administrations and other relevant UK and overseas public bodies.

Executive contact details

Trevor Llanwarne	Government Actuary (<i>to 31 August 2014</i>)	020 7211 2620
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George Russell	Deputy Government Actuary and Actuarial Operations Director	020 7211 2666
Colin Wilson	Deputy Government Actuary and Technical Director	020 7211 2672
Kevin Down	Finance Director	020 7211 2709
Paul Vinall	Human Resources Director	020 7211 2610

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