



Shropshire Council
Legal and Democratic Services
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

Date: 30 June 2022

**Committee:
Pensions Board**

Date: Friday, 8 July 2022

Time: 10.00 am

**Venue: Wilfred Owen Room, Shirehall, Abbey Foregate, Shrewsbury,
Shropshire, SY2 6ND**

You are requested to attend the above meeting. The Agenda is attached

Members of the public will be able to access the live stream of the meeting by clicking on this link:

<https://shropshire.gov.uk/pensionsboardmeeting8jul22/>

If you wish to attend the meeting, please e-mail democracy@shropshire.gov.uk to check that a seat will be available for you.

Tim Collard
Assistant Director - Legal and Governance

Members of Pensions Board

Member Representatives

John Hall (Chairman)

Mike Morris

Dave Wright

Employer Representatives

Liz Furey

Clare Charlesworth-Jones

Helen Woodvine

Your Committee Officer is:

Michelle Dulson Committee Officer

Tel: 01743 257719 Email: michelle.dulson@shropshire.gov.uk

AGENDA

1 Election of Chairman

2 Apologies

To receive apologies for absence.

3 Declarations of Conflicts of Interest

Members are reminded that they should declare any interests which may lead to conflicts of interest in the subject area or any specific agenda item of this meeting. A conflict of interest is defined as a financial or other interest which is likely to prejudice a person's exercise of functions as a member of the Pension Board. It does not include a financial or other interest arising merely by virtue of that person being a member of the LGPS.

4 Minutes of the previous meeting (Pages 1 - 6)

The Minutes of the meeting held on 29 April 2022 are attached for confirmation.
Contact: Michelle Dulson (01743) 257719

5 Public Question Time

To receive any questions from the public, notice of which has been given in accordance with Procedure Rule 14. The deadline for this meeting is Monday 4 July 2022.

6 Administration and Regulatory Updates (Pages 7 - 24)

Report attached.
Contact: Debbie Sharp (01743) 252192

7 Pensions Committee Reports and Feedback

For Board Members to raise any questions following the recent Pensions Committee meeting.

Please click on the link below to access the reports considered by the Pensions Committee at its last meeting on 24 June 2022:

[Agenda for Pensions Committee on Friday, 24th June, 2022, 10.00 am — Shropshire Council](#)

8 Date of Next Meeting

The next meeting of the Pensions Board will be held at 10.00am on the 14 October 2022.

9 Exclusion of Press and Public

To RESOLVE that in accordance with the provision of Schedule 12A of the Local Government Act 1972, Section 5 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations and Paragraphs 3 of the Council's Access to Information Rules, the public and press be excluded during consideration of the following items.

10 Exempt Minutes (Exempted by Category 3) (Pages 25 - 28)

The Exempt Minutes of the meeting held on the 29 April 2022 are attached for confirmation.

Contact Michelle Dulson (01743) 257719

11 Pensions Committee Reports and Feedback (Exempted by Category 3)

For Board Members to raise any questions following the recent Pensions Committee meeting.

Please click on the link below to access the reports considered by the Pensions Committee at its last meeting on 24 June 2022.

[Agenda for Pensions Committee on Friday, 24th June, 2022, 10.00 am — Shropshire Council](#)

12 Governance Update (Exempted by Category 3) (Pages 29 - 52)

Report attached.

Contact: Rebecca Clough (01743) 254457

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Committee and Date

Pensions Board

8 July 2022

PENSIONS BOARD

Minutes of the meeting held on 29 April 2022

In the Shrewsbury Room, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

10.00am – 11.55am

Responsible Officer: Michelle Dulson

Email: michelle.dulson@shropshire.gov.uk Tel: 01743 257719

Present

Member Representatives

John Hall (Chairman)

Mike Morris

Dave Wright

Employer Representatives

Liz Furey (virtual)

Clare Charlesworth-Jones

Helen Woodvine

46 **Apologies**

No apologies were received.

47 **Declarations of Conflicts of Interest**

No conflicts of interest were declared.

48 **Minutes of the previous meeting**

RESOLVED:

That the Minutes of the meeting held on 28 January 2022 be approved and signed by the Chairman as a correct record.

49 **Public Question Time**

No public questions had been received.

50 **Administration and Regulatory Updates**

The Board received the report of the Pensions Administration Manager – copy attached to the signed Minutes which provided Members with the

latest administration and regulatory updates affecting the Local Government Pensions Scheme.

The Pensions Administration Manager drew attention to the letter from the Department of Levelling Up, Housing and Communities (attached at Appendix A of the report) which set out their recommendations on how administering authorities should take the McCloud remedy into account in the 2022 triennial valuation whereby the Fund's calculation for Member benefits would automatically include the assumptions referred to in the letter and would apply in the calculation of employer contribution rates by the Fund's actuary.

She also drew attention to further amendments to the Public Service Pensions and Judicial Officers Bill (set out in paragraph 7.3 of the Report) which gave relevant government departments the powers to address the discrimination identified in the McCloud judgment.

In response to a query about the worse-case scenario in relation to the assumptions that the administering authorities were being told to make, the Pensions Administration Manager informed the Board how the changes would affect benefits and the underpin and she explained how the aggregate was affected. When asked to quantify the impact on the scheme and its members, the Pensions Administration Manager explained that although it would affect very few people they needed to recalculate the benefits of everyone that had left the scheme since 2014.

In response to a query, the Pensions Administration Manager confirmed that very little had changed for the vast majority of employers.

Turning to the Pensions Dashboard, the Pensions Administration Manager explained that it was currently unclear how much work was involved but it would be significant and there was concern around the ability of the fund to meet the timescales due to other pressures such as recalculating benefits because of McCloud ruling.

In relation to the Single Code of Practice, the Pensions Administration Manager explained that the Pensions Regulator was expected to lay the code before Parliament later in the year and was expected to come into force in October 2022. The fund has been working on some of the areas that the Code will have increased emphasis on including scams, cyber controls, training and documentation.

RESOLVED:

That the contents of the report be noted.

51 **TPR's Single Code of Practice**

See update above.

52 **LGPS Central Chairs' meeting**

The Chairman updated the Board in relation to the LGPS Central Chair's meeting that took place on 28 March 2022. Issues discussed included:

- The Levelling Up White Paper which refers to a figure of 5% to be invested in 'local schemes'. It was confirmed that there was nothing for LGPS Central to do at present.
- Exposure to Russian investment was not an issue.
- Cost management issues – Officers were not aware of any issues.
- New members of staff employed to work on good governance.
- Meeting with Ministers in relation to the Scheme Advisory Board
- Performance of Prudential – It was confirmed that this had been an issue the previous year and that discussions had been held in terms of improving their performance.
- Pooling – the further consolidation of schemes.
- Communication between Pension Boards and LGPS Central was in general good. Suggested meetings should take place in LGPS Central Offices.
- Annual Pensions Board meeting for all LGPS Central Boards.

53 **Pensions Committee Reports and Feedback**

The public reports considered by the Pensions Committee at its meeting on 18 March 2022 had been received by the Board.

Agenda Item 11 - Pensions Administration Monitoring

A brief discussion ensued in relation to staffing and recruitment. It was confirmed that the administration team was now complete following recruitment, but recent vacancies had affected output. However, they were still in a good place because they didn't have a backlog to start with. They were ensuring that records were up to date in time for the valuation. In terms of staff training, new staff were sent on a three-day residential course alongside interactive and online training.

In response to a query about whether recruitment remained on the Risk Register, it was confirmed that there was a risk each time a member of staff was lost as it took a long time to recruit and there was not a readily available pool of recruitments. However this was a national issue.

The Pensions Administration Manager confirmed that a revised training policy had been introduced for Board/Committee members and staff and a training plan would be produced.

In terms of training for Board Members, attention was drawn to conferences in Gloucester, PLSA event held at Cotswold Water Park and the LGA conference. Any other conferences/training events would be brought to Members' attention.

54 Date of Next Meeting

The next meeting of the Pensions Board would be held on the 8 July 2022 at 10.00am.

55 Exclusion of Press and Public

RESOLVED:

That in accordance with the provisions of Schedule 12A of the Local Government Act 1972 and paragraph 10.2 of the Council's Access to Information Procedure Rules, the public and press be excluded during consideration of the following items as defined by the categories specified against them.

56 Exempt Minutes (Exempted by Category 3)

RESOLVED:

That the Exempt Minutes of the meeting held on 28 January 2022 be approved and signed by the Chairman as a correct record.

57 Cyber Security Update (Exempted by Category 3)

The Board received an update from Ian Churms, Infrastructure Security and Innovation Manager, Paul Day, Head of ICT and Barry Hanson, the Principal Auditor for IT in relation to a recent cyber incident.

RESOLVED: To note the contents of the update.

58 Pensions Committee Reports and Feedback (Exempted by Category 3)

The reports considered by the Pensions Committee at its meeting on 18 March 2022 had been received by the Board.

59 Governance Update (Exempted by Category 3)

The Board received the report of the Communications and Governance Team Leader – copy attached to the signed Exempt Minutes – which

provided an update on the Breaches of LGPS regulations recorded for the quarter ending 31 December 2021 affecting the Shropshire County Pension Fund. Updates on all other governance issues were also included within the report.

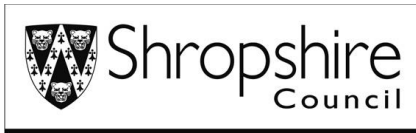
RESOLVED:

That the contents of the report be noted.

Signed (Chairman)

Date:

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<u>Committee and date</u> Pensions Board 8 July 2022 10.00am

<u>Item</u> <u>Public</u>

Administration and regulatory updates

Responsible Officer: Debbie Sharp
Email: Debbie.sharp@shropshire.gov.uk
Tel: (01743) 252192

1. Synopsis

- 1.1. The report provides Pension Board members with the latest administration and regulatory updates affecting the Local Government Pension Scheme (LGPS).

2. Executive Summary

- 2.1. Due to the fact that the Pensions Committee meeting has been held recently and to avoid duplication this report covers the administration and regulatory issues which have arisen since the administration report provided to Pensions Committee on the 24 June 2022.
- 2.2. Two national reports have recently been released which provide an overview of the Local Government Pension Scheme as a whole. The first is the Scheme Advisory Board's Scheme Annual Report 2020/21 for England and Wales and the second is a research report from the Pensions Lifetime and Savings Association (PLSA). Both provide Pension Board members with information on a wider perspective of issues within the LGPS.

3. Recommendations

- 3.1. Pension Board members are asked to note the contents of this report with or without comment.

REPORT

4. Risk Assessment and Opportunities Appraisal

4.1. Risk Management

By ensuring the guidance and legislation mentioned in this report is followed and adhered to, risks to the fund are minimised. A risk register is kept and updated in line with council corporate policy.

4.2. Human Rights Act Appraisal

The recommendations contained in this report are compatible with the Human Rights Act 1998.

4.3. Environmental Appraisal

There is no direct environmental, equalities or climate change consequence of this report.

5. Financial Implications

5.1. Currently there are no direct financial implications arising from this report.

6. Climate change appraisal

6.1. Energy and fuel consumption: No effect
Renewable energy generation: No effect
Carbon offsetting or mitigation: No effect
Climate Change adaptation: No effect

7. Administration and regulatory update

7.1. In addition to this report, the Pensions Board are advised to note the pensions administration reports submitted to the Pension Committee on 24 June 2022.

8. Cyber security

8.1. The Data Protection Act 2018, along with guidance from The Pensions Regulator, sets out rules that pension funds must follow to make sure they address any potential cyber security issues. Shropshire County Pension Fund takes data security very seriously and works closely with Shropshire Council's IT team and any companies providing pensions software to confirm that the systems holding personal data are protected. The latest update was provided to Pension Committee on 24 June 2022.

9. Communications

9.1. The fund monitors member take-up of its online area member self-service (MSS), known by members as 'My Pension Online'. The annual benefit statements for both active and deferred members are now available to view on 'My Pension Online' unless a member has requested a paper copy. As at May 2022 a total of 47% active members, 40% of deferred members and 44% of pensioners were registered to view their records on 'My Pension Online'. Officers are aware of a digital engagement group within the Local Government Association (LGA) Communications Working Group which is currently collating information on funds' experience of getting members to sign up to member self-service and is planning to share successful initiatives and examples of best practice.

10. Scheme Advisory Board (SAB) Annual Report 2021

10.1. The SAB has recently released the Annual Report for the Local Government Pension Schemes and provides a wider perspective on the LGPS in England and Wales. The report confirms that the LGPS is one of the largest defined benefit (DB) schemes in the world and is the

largest DB scheme in England and Wales, with 14,448 active employers, 6.2m members and assets of £342bn.

10.2. The aim of the Annual Report is to provide a single source of information about the status of the LGPS for its members, employers, and other stakeholders. This report aggregates information supplied in the 86 fund annual reports, as of 31st March 2021.

10.3. Key LGPS highlights for 2021 taken from the SAB Annual Report are:

- Total membership of the LGPS grew by 66,624 (1.08%) to 6.226 million members in 2021 from 6.160 million in 2020
- The total assets of the LGPS increased to £342bn (a change of 23.4%). These assets were invested in pooled investment vehicles (66.2%), public equities (13.4%) bonds (4.6%), direct property (2.3%), as well as other asset classes (8.7%)
- The Local Authority net return on investment over 2020/21 was 20.56%. This was reflective of the market conditions during the year and set against the UK equities return of 30%
- The scheme maintained a positive cash-flow position overall, including investment income
- Over 1.8 million pensioners were paid over the year
- COVID-19 significantly impacted life expectancy - with a drop of 0.9 years and 0.5 years for males and females respectively (2019 figures v 2020)
- Total management charges increased by £196m (+12.9%) from £1,517m. This was primarily driven by a £193m (14.9%) rise in investment management charges, while administration and oversight and governance costs remained broadly stable

10.4. As at the 31st March 2019, (the date of the last triennial fund valuation) the LGPS liabilities were estimated at £291bn indicating an overall funding level of 98%. During the intervening years since establishment, the Board actively developed proposals to tackle the funding deficit (£6bn in 2019, £37bn in 2016) to improve the sustainability of the LGPS and its future funding levels.

10.5. The full report can be found on the SAB's website:
<https://lgpsboard.org/index.php/scheme-annual-report>

11. Pensions and lifetime savings association (PLSA) research project

11.1. A research project – 'LGPS: Today's Challenges, Tomorrow's Opportunities' – has been carried out independently by the PLSA but with input from those who work within the LGPS. The project incorporates the views of 60+ LGPS funds, and addressed 4 key themes, with both issues and recommendations. A full report has been published and is available on the PLSA website. Due to its size, it has not been attached: <https://www.plsa.co.uk/Policy-and-Research/Document-library/The-Local-Government-Pension-Scheme-todays-challenges-tomorrows-opportunities>

- 11.2. A shorter executive summary has been made available for Pension Board members at **Appendix A**. The purpose of the report was to identify risks and opportunities and address them proactively. It also aims to suggest practical next steps to some of the challenges highlighted. It states:

'For more than a decade, the LGPS has undergone rapid change. Against a backdrop of the world financial crisis, austerity and pay freezes for local authorities, and – more recently – the global pandemic, the LGPS has had to contend with a rolling series of reforms including becoming a Career Average Revalued Earnings (CARE) Scheme for future accrual, transitioning to investment pooling, incoming responsible investment regulations and the impending implementation of the McCloud Judgment.'

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)

Pensions Committee Meeting 24 June 2022 Pensions Administration Report
Pensions Board Meeting 29 April 2022 Administration and Regulatory updates

Cabinet Member (Portfolio Holder)

N/A

Local Member

N/A

Appendices

Appendix A – PLSA Executive Summary report

**THE LOCAL GOVERNMENT PENSION SCHEME:
TODAY'S CHALLENGES, TOMORROW'S OPPORTUNITIES**

EXECUTIVE SUMMARY

JUNE 2022



THE LOCAL GOVERNMENT PENSION SCHEME: TODAY'S CHALLENGES, TOMORROW'S OPPORTUNITIES

EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

1. The Local Government Pension Scheme (LGPS) is the largest defined benefit (DB) pension scheme in the UK, and one of the biggest in the world. Recent figures show that it has 6.9 million members, over 17,000 employers, and assets totalling over £332 billion.¹
2. The LGPS is a statutory pension scheme delivering valuable benefits for people who provide public services, including many who perform roles of support and care in local communities, often for relatively low pay. The scheme offers high quality and efficient pension provision for local government employers but also for many other types of employers, which do not have direct ties to local authorities. At the time of publication, there are 86 funds in England and Wales (E&W), 11 funds in Scotland and one in Northern Ireland (NI).
3. The scheme has consistently demonstrated financial resilience and operational stability throughout regular periods of rapid change. It has successfully met numerous challenges over the decades with speed, accuracy and limited resources, and capitalised on its economies of scale and collaborative culture.
4. Latest valuation figures at time of publication show the LGPS to be in a strong financial position: the funding level in England and Wales at the 2019 triennial valuations was at 98%²; it was 102% for Scotland in 2017 (publication of the Scottish LGPS 2020 triennial valuations expected); and 112% for Northern Ireland in 2019.^{3,4}
5. From this position of financial security and operational success, the LGPS membership of the Pensions and Lifetime Savings Association (PLSA) requested an in-depth piece of independent research, to better understand the opportunities available to continue to evolve and future-proof the scheme from any possible headwinds. This research report sets out our findings, areas where existing good practice can be fortified and where action can be taken to address the ever-increasing regulatory and environmental challenges facing the scheme.

¹ These figures were correct as of May 2022. Please see:

(a) SAB Scheme Annual Report 2020. Available at: <https://lgpsboard.org/index.php/schemedata/scheme-annual-report>
(b) SLGPS Annual Report 2019-20. Available at: <http://scotlgpsab.webdigi.co.uk/docs/SABAnnualReport201920Final.pdf>
(c) NILGOSC Annual Report & Accounts 2020-21. Available at: <https://nilgosc.org.uk/wp-content/uploads/2021/11/NILGOSC-Annual-Report-2020-21.pdf>
(d) NILGOSC Annual Report & Accounts 2019-20. Available at: https://nilgosc.org.uk/wp-content/uploads/2020/12/new_7786653__annual_report_and_accounts_2019-20_webcompressed.pdf
(e) Audit Scotland SLGPS 2018-19. Available at: https://www.audit-scotland.gov.uk/uploads/docs/report/2019/nr_191217_local_government_finance_supp2.pdf

² (a) Figures are from LGPS Annual Report 2020 (based on individual LGPS funds' statutory annual reports and audited financial statements). Available at: <https://www.lgpsboard.org/index.php/schemedata/scheme-annual-report>
(b) Figures from latest England and Wales triennial valuations, completed in March 2022, are forthcoming but not publicly available as of May 2022.

³ These figures were correct as of May 2022. Please see:

(a) Aon (2019) Report on the 31 March 2019 Actuarial Evaluation. Available at: <https://nilgosc.org.uk/wp-content/uploads/2021/05/2019-Valuation-Report-for-LGPSNI.pdf>
(b) Clarke & Scanlon (2019) Local Government Pension Scheme Scotland. GAD. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/852463/191113Section13ReportMain.pdf
(c) SAB Scheme Annual Report 2020. Available at: <https://lgpsboard.org/index.php/schemedata/scheme-annual-report>

⁴ E&W LGPS figure is based on an aggregate of local actuarial valuations, taken from individual funds' statutory annual reports and audited financial statements. Scottish LGPS figure is based on an aggregate of actuarial valuations and other data supplied to the GAD by individual funds.



6. This research project has been carried out independently but informed by dialogue from those who work within the LGPS. This work is intended to provide PLSA members and those with an interest in the LGPS, additional information to aid and inform debate about its operation and purpose. It also aims to suggest practical next steps to some of the challenges highlighted.
7. This research also builds on some of the experiences senior LGPS officers have on a day-to-day basis, including with implementation of regulatory change. Additionally, the observations and recommendations from the England and Wales Scheme Advisory Board's (SAB's) Good Governance Project, as well as from its Tier 3 Employers report⁵, were found in aspects of this research as well, signalling evidence of a need to take action on various fronts.
8. The PLSA's membership was heavily engaged in this project from beginning to end. We conducted four in-depth workshops in July 2021 and had 98 respondents to the survey (issued in October 2021), with over 40 people offering to participate in additional qualitative work. The data collected is discussed under four themes: (1) The LGPS Regulatory and Operating Environment; (2) LGPS Employers; (3) LGPS and Scheme Members; and (4) Operational Sustainability – Systems and People.

⁵ Aon (2018) Tier 3 Employers in the LGPS. Available at: <https://lgpsboard.org/index.php/tier-3-employers>



THEME 1: THE LGPS REGULATORY AND OPERATING ENVIRONMENT

9. The LGPS operates within a government and regulatory landscape which is complex and the pace of regulatory change it has to react to and comply with has accelerated in the last few years. A wide range of bodies can bring different perspectives, which can of course have a positive impact on outcomes. However, the structure of the governance oversight of the LGPS results in it being hard to achieve a complete overview of its operation.
10. As different parts of the LGPS are required to report to a number of disparate bodies, each with their own distinct objectives, this obscures an overall view of the scheme, its purpose, operational requirements, and resource limitations.
11. Moreover, there is not one entity that has responsibility to consistently and visibly champion the LGPS at higher levels of government discussions and this can lead to the needs of the LGPS being de-prioritised, missed or misunderstood, on both pensions policy issues, as well as on macro policy issues that have knock-on effects for the LGPS – an example of this being education policy and the decision to integrate academies into the LGPS in England.
12. The complex and multiple layers of LGPS’s oversight sometimes also drives conflicting or ambiguous LGPS guidance, as well as an unclear hierarchy of authority between the various external governance bodies; this adds to the regulatory challenges. As a result, LGPS funds are taking increasingly individualised approaches based on local interpretations of guidance. This mode of operation is resource intensive and diminishes opportunities for synergies across funds. There is also a risk that interpretations of guidance or treatment of member benefits may be challenged, with wider consequences for the scheme.
13. The PLSA believes that deliberate and purposeful action should be taken to address the challenges resulting from these complex governance arrangements: (a) there should be a significant push to ensure the existing framework works in a more joined-up and coherent way and (b) there should be an examination of the benefits of a more centralised approach, that could involve new responsibilities for an existing body or creating a new body with greater powers. (Without a single entity, the LGPS’s needs will continue to be deprioritised in macro government discussions – outcomes that have tangible impacts to the day-to-day running of the LGPS, which will be explored in Theme 2: LGPS Employers.)
14. The PLSA also recommends developing a common standard on governance and a “levelling up” of practice, with a focus on the type and quality of outcomes administering authorities should aim to achieve. A blueprint for this form of standard can be found in the Financial Reporting Council (FRC)’s Stewardship Code.⁶ A common standard of this type would be additive and beneficial to the existing sharing of best practice and to the wide-spread collaboration already in place. The England and Wales SAB’s Good Governance Project has also produced recommendations on how to provide this common standard.⁷

⁶ FRC UK Stewardship Code. Available at: <https://www.frc.org.uk/investors/uk-stewardship-code>

⁷ SAB Secretariat (2021) Annex to Letter to Luke Hall MP. Available at: https://www.lgpsboard.org/images/Other/Annex_to_Good_Governance_letter_110221.pdf

TOPIC	OPPORTUNITIES	WHO SHOULD TAKE THIS FORWARD
<p>Theme 1: The LGPS Regulatory & Operating Environment</p>	<p>Recommendation 1: The PLSA recommends deliberate and purposeful action is taken to address the challenges of the complex and disparate nature of the governance and regulatory landscape in the following two ways:</p> <ul style="list-style-type: none"> (a) there should be a significant push to ensure the existing framework works in a more joined-up and coherent way; (b) there should be an examination of the benefits of a more centralised approach that could involve creating a new body or giving an existing body greater powers. <p>It will be important as well that the devolved administrations are a part of the above discussions and actions suggested, so that a consistent approach across the entirety of the UK can be taken where possible and appropriate.</p>	<p>England & Wales, Scottish and Northern Ireland Scheme Advisory Boards; The Pensions Regulator (TPR); FCA; DLUHC; Scottish Government; Northern Ireland’s DfC; Chartered Institute of Public Finance and Accountancy (CIPFA); Funds</p>
	<p>Recommendation 2: It may be beneficial for the Department for Levelling Up, Housing and Communities (DLUHC) to have more active outreach across the LGPS in England and Wales, across all fund sizes, perhaps even through the PLSA, so that more effort is put into ensuring that smaller funds’ views are taken into consideration in policy-making.</p>	<p>DLUHC, PLSA</p>
	<p>Recommendation 3: As there is currently no entity looking at the whole of the LGPS, drafting a strategic “regulatory map” would highlight to external stakeholders the complexities in which the LGPS operates. It would showcase the need for:</p> <ul style="list-style-type: none"> (a) a significant push to ensure the existing framework works in a more joined-up and coherent way; and (b) there should be an examination of the benefits of a more centralised approach that could involve creating a new body or giving an existing body greater powers. <p>This draft map from the PLSA would help Funds to clearly understand what applies to them, and would help ensure that the LGPS voice is represented and weighted accordingly in central government decisions that affect the sustainability of the LGPS and its day-to-day running directly.</p>	<p>PLSA, Funds</p>
	<p>Recommendation 4: It may be necessary to offer standardised and mandatory training courses, which could make use of CIPFA guidance and recommendations from the E&W SAB Good Governance project.⁸</p>	<p>Funds; England & Wales, Scottish and Northern Ireland Scheme Advisory Boards; TPR</p>

⁸ SAB Secretariat (2021), Letter to Luke Hall MP. Available here: https://www.lgpsboard.org/images/Other/Annex_to_Good_Governance_letter_110221.pdf



Recommendation 5: As funds are all at varying stages of development and progress on different operational and governance issues, the PLSA also recommends developing a common standard on governance and a “levelling up” of practice, with a focus on the type and quality of outcomes administering authorities should aim to achieve. A blueprint for this form of standard can be found in the FRC’s Stewardship Code.⁹ A common standard of this type would be additive and beneficial to the existing sharing of best practice and to the widespread collaboration already in place. The England and Wales SAB’s Good Governance Project has also produced recommendations on how to provide this common standard.¹⁰

DLUHC; Scottish Government; England & Wales, Scottish and Northern Ireland Scheme Advisory Boards; TPR

THEME 2: LGPS EMPLOYERS

15. Overall, the relationship between funds and employers is a very positive one. However, the consequences of public sector reforms since the 1980s – that encouraged the outsourcing of local authority services – combined with central government policy decisions over which the LGPS has very little influence, leave many LGPS funds to bridge large gaps in employers’ knowledge and understanding about their responsibilities to the scheme and to its savers.
16. Additionally, for some types of employers, the LGPS is increasingly unaffordable, raising questions over which employers should be part of the scheme. However, it is important to note that affordability for employers is less of an issue for the LGPS funds in Scotland or Northern Ireland, where there are a lower number of employer entrants; these funds are also typically better funded than their counterparts in England and Wales. There is also currently comparatively less demand from the charitable sector for admission to the LGPS in Scotland. In contrast, the LGPS funds in England have seen substantial growth in individual employers, as a consequence of the academisation of schools.
17. Issues around employer affordability are driven by both the terms of entry and the terms of exit. Ensuring employers understand their obligations to the Fund at the point of entry is very important. Contractual negotiations sometimes commence without the view of key bodies, including the LGPS fund, being fully considered. As a result, organisations can join unprepared to meet their scheme contribution rate and do not always have full awareness of the commitments and actions required to administer its obligations to members. Early engagement and clear communication of responsibilities to prospective employers before they join, as well as during their time in the scheme, including implications for outsourcing services, are paramount.

⁹ FRC UK Stewardship Code. Available here: <https://www.frc.org.uk/investors/uk-stewardship-code>

¹⁰ SAB Secretariat (2021), Letter to Luke Hall MP. Available here: https://www.lgpsboard.org/images/Other/Annex_to_Good_Governance_letter_110221.pdf

- 18. Funds have to react to a wide range of Government policy decisions that impact the LGPS. For instance, the creation of academy schools, while relevant only to England as LGPS employers, are an example of this; they have also been the biggest driver behind the tremendous growth in employers in England. Other, largely hidden complexities include the ability of local authority run schools to appoint their own payroll provider, which can reduce the timeliness and quality of data being submitted to LGPS funds.
- 19. It is important to note that while many LGPS funds are currently well-funded – many indeed in surplus on both their own and Government Actuary’s Department’s (GAD’s) funding measures – this does not guarantee that future employer affordability and sustainability issues will not arise.

TOPIC	OPPORTUNITIES	WHO SHOULD TAKE THIS FORWARD
<p>Theme 2: LGPS Employers</p>	<p>Recommendation 1: Given that the two most common reasons cited for not having the right staff to service relationships with employers is “not having enough staff” and “requirements are too complex”, a two-pronged approach to address this issue may be needed. The PLSA recommends the following:</p> <ul style="list-style-type: none"> (1) Review the PLSA’s Talent Management Guide 2018 and share best practices on talent management resourcing), and; (2) Where possible, review and implement the recommendations under Theme 1: The LGPS Regulatory and Operating Environment, to ensure that there is a single view to help make regulatory requirements less complex and easier to navigate, in a way that addresses the LGPS’s needs. 	<p>England & Wales, Scottish and Northern Ireland Scheme Advisory Boards; TPR; FCA; DLUHC; Scottish Government; Northern Ireland’s DfC; CIPFA; Funds</p>
	<p>Recommendation 2: The PLSA recommends that central government and devolved administrations actively involve local and administering authorities in policy decisions the scheme will be required to execute.</p>	<p>Funds; DLUHC; Scottish Government; Northern Ireland DfC; England & Wales, Scottish and Northern Ireland Scheme Advisory Boards</p>
	<p>Recommendation 3: The PLSA recommends a review of employer engagement best practice is commissioned. This will ensure that employers’ knowledge of their responsibilities (legal, administrative and funding) across the scheme are improved. This will also help improve awareness before employers officially join the scheme and also during their ongoing participation.</p>	<p>England & Wales, Scottish and Northern Ireland Scheme Advisory Boards; TPR; Funds; Employers (including HR departments)</p>



	<p>Recommendation 4: Funds should be proactive in providing information and assistance to existing and prospective employers. This should help to mitigate the potential for participating employers and outsourced providers failing to understand their responsibilities and risks.</p>	<p>England & Wales, Scottish and Northern Ireland Scheme Advisory Boards; TPR; Funds; Employers (including HR departments)</p>
	<p>Recommendation 5: We believe Funds should have something more aligned to TPR’s notifiable events framework or an information sharing protocol to trigger and facilitate appropriate dialogue in a timely manner, when appropriate.</p>	<p>England & Wales, Scottish and Northern Ireland Scheme Advisory Boards; TPR; Funds; Employers (including HR departments)</p>
	<p>Recommendation 6: The PLSA recommends commissioning additional work to explore and share best practice in both assessing employer risk early on and helping to manage both the risk and exit where appropriate (including through exit valuations), building on what is already available. Emphasis on consistency to approach and options whenever possible across the UK may be helpful to both funds and employers. It was reported to the PLSA that there is already much good practice and information, but which best practice guides to use is not always very clear. Any work in this area would need to ensure not to duplicate work that has already happened in this space, such as that done by E&W’s SAB.</p> <p>While employer affordability and exit challenges are not generally an issue in Scotland, it will be important to ensure that the Advisory Boards for Scotland and Northern Ireland are involved, to ensure best practice across the LGPS is captured.</p>	<p>England & Wales, Scottish and Northern Ireland Scheme Advisory Boards; PLSA</p>
	<p>Recommendation 7: The PLSA also recommends that the benefits of staying within the LGPS be actively and regularly explained to employers as well.</p>	<p>Funds, Employers (including HR departments)</p>
	<p>Recommendation 8: As there continues to be a debate about the type of employers which should participate over the long-term in the LGPS, the PLSA recommends that further work is commissioned to answer this question. We note ongoing work by DLUHC to consider changes for HE/FE sector.</p>	<p>Funds, England & Wales, Scottish and Northern Ireland Scheme Advisory Boards</p>

THEME 3: LGPS AND SCHEME MEMBERS

- 20. The approach to engagement with scheme members across Funds appears to be variable and inconsistent, however, our workshops and interviews captured a wider movement within the LGPS towards wanting to “prioritise savers”, including to protect savers from scams, the importance of reminding employers of their responsibilities to scheme members, and to provide greater support in communication of benefits and types of communication offered.
- 21. A significant proportion of the LGPS membership are lower paid workers who contribute to the provision of essential local community support and national public services. The scheme acts as a vital financial safety net for these workers – an objective which is sometimes lost in political and policy debates, with an assumption that all public sector workers, across all public sector pension schemes, will have adequate retirement income. However, data on membership profile is not yet collected in a systematic and consistent way to help maintain and grow an understanding of how best to support LGPS savers.

TOPIC	OPPORTUNITIES	WHO SHOULD TAKE THIS FORWARD
Theme 3: LGPS and Scheme Members	Recommendation 1: The PLSA recommends the LGPS engages further with the use of its Retirement Living Standards in its communications with its members, to help savers better understand what they should try to do now to have an adequate income in retirement.	Funds
	Recommendation 2: The PLSA recommends commissioning an independent piece of work to obtain a robust and granular understanding of the LGPS membership profiles, as a first step towards having a greater understanding of their needs, and for LGPS savers’ voices to be represented at a more macro level on regulatory, policy and political discussions relating to pensions. This may help to reveal what further official data may need to be collected from central and local government entities in England, Wales, Scotland and Northern Ireland.	PLSA; England & Wales, Scottish and Northern Ireland Scheme Advisory Boards; Funds
	Recommendation 3: The PLSA will seek to understand what communication tools Money and Pensions Service (MaPS) already employs with savers that could possibly be deployed for the needs of the LGPS. The PLSA should explore what role employee groups, such as trade unions, could play in helping savers understand pensions.	PLSA, MaPS, Funds



THEME 4: OPERATIONAL SUSTAINABILITY – SYSTEMS AND PEOPLE

22. The LGPS is not consistently well understood by those within administering authorities who do not work directly in the delivery of the LGPS. This can obstruct appropriate resource allocation and operational investment needed to fund strategic developments and operational requirements of the LGPS.
23. Investing in operational resilience – assessing resilience, risk/impact and drivers/mitigants – is key to enhanced long-term understanding of sustainability and is something the LGPS should as a whole commit to doing.
24. LGPS funds’ staff retention issues remain prevalent. Competition for talent remains fierce over pay – a situation made worse by effects of the pandemic on the job market. Given hybrid working is now the normal standard for most office jobs, many working in the LGPS outside of regional hubs or city centre locations can now also compete for roles that pay more than many administering authorities can typically offer.
25. Problems with retention and recruitment are exacerbated by increasing regulatory complexity. Project participants reported staff exiting in part because they did not want to be present for the McCloud Judgment implementation, leading to a wider insight into the lack of confidence by LGPS employees in the stabilisation of regulatory change, which is contributing to a retention and recruitment barrier, and thereby operational sustainability as well.
26. A nation-wide LGPS “rebrand”/campaign may be necessary to better articulate the benefits for existing and future LGPS employees. The LGPS may want to consider reforms which provide a standard framework which highlights the skills and knowledge requirements, the career progression available, and the positive, collegiate working environment captured by the research, all which could then be adapted at a more local level. This should in turn encourage more applicants to the LGPS at all levels, and to fill knowledge gaps within administering authorities on the important service LGPS pensions teams provide, which require skills that are often paid at higher wages in the private sector.

TOPIC	OPPORTUNITIES	WHO SHOULD TAKE THIS FORWARD
Theme 4: Operational Sustainability - Systems and People	Recommendation 1: The LGPS could ask IT suppliers for pensions administration to provide additional options and solutions to help funds to fulfil their wish to do more for, and to work more closely with, employers and scheme members. The push towards competition should encourage innovation. It will be important as well to continuously monitor whether existing systems can cope with the ever-changing and increasingly complex regulatory requirements of the LGPS.	Funds
	Recommendation 2: Given so many funds have reported increasing efforts to improve recruitment and retention in the last five years, the PLSA recommends a “best practice” case studies project be undertaken to share what has worked and what might not have worked as well.	Funds, PLSA

	<p>Recommendation 3: Some funds are having difficulty recruiting people with the “new skills” that are now required (i.e., digital skills, regulatory expertise, cyber security).</p> <p>The PLSA recommends that the LGPS explores establishing a central support network that could help with recruitment across the country.</p>	<p>Funds</p>
	<p>Recommendation 4: We recommend that the PLSA takes this finding – that staff are resigning due to concerns over regulatory complexities – to DLUHC, Scottish Government, Northern Ireland’s Department for Communities, TPR, and FCA to use in wider discussions about regulatory complexity and the negative impacts it has on funds, to ask them to consider more joined-up policy and regulatory work, and to streamline compliance issues where possible. It may be necessary to acquire new statistics on this to help make the case to decision-makers.</p>	<p>PLSA; Funds; DLUHC; Scottish Government; Northern Ireland DfC; TPR; FCA</p>
	<p>Recommendation 5: The PLSA recommends that some of the suggestions from its talent management guide be revisited, including, but not limited to the following:</p> <ul style="list-style-type: none"> • There may be a need to create comparable national roles and pay bands across the LGPS funds, so that funds are able to recruit more efficiently and appropriately for the skills gaps on their teams. • Reframing the language used to describe a career in pensions may help to attract a broader group of candidates. For instance, describing a job within an organisation that manages a multibillion-pound fund might be more appealing to a larger range of individuals for certain posts. Additionally, the scale of LGPS membership in terms of the variety of employers and the type of work they do across a range of sectors should be explicitly championed in all job descriptions, to showcase the tapestry of roles and skills that make up the LGPS. • There is limited comparability in roles between LGPS funds and the wider administering authority. As such, HR is often not fully aware of the specialised skills required to perform well within pension administration, finance, and investment roles. It may be worth exploring whether common job roles or common job descriptions across the LGPS funds might assist in pay challenges as they relate to recruitment and retention. <p>As many LGPS funds currently have difficulty competing on pay, it is crucial to emphasise the quality of pension provision and positive working environment they can offer. It is important to explain to potential applicants the flexibility, collegiate atmosphere and industry career pathways that are available to those who join LGPS funds.</p>	<p>England & Wales, Scottish and Northern Ireland Scheme Advisory Boards; LGA; WLGA; COSLA; Funds; Administering Authorities</p>



	<p>Recommendation 6: The LGPS could have a collective, UK-wide outreach campaign to help bridge knowledge gaps within administering authorities, to provide a greater understanding of the specialised pensions skills needed within funds. A comparison to equivalent roles in the private sector may be helpful. Please see Recommendation 5 in Theme 4: Operational Sustainability.</p>	<p>England & Wales, Scottish and Northern Ireland Scheme Advisory Boards; LGA; WLGA; COSLA; Funds; Administering Authorities; HR departments</p>
	<p>Recommendation 7: Investing in operational resilience – assessing resilience, risk/impact and drivers/mitigants – is key to enhanced long-term understanding of sustainability of the LGPS. The PLSA recommends that funds take this forward to establish and encourage best practice. Establishing a team that specifically looks at operational resilience, that would factor in incoming regulatory requirements such as implementing McCloud, or for projects such as Dashboards, could be one way to do this.</p>	<p>Funds; England & Wales, Scottish and Northern Ireland Scheme Advisory Boards</p>
	<p>Recommendation 8: As some funds have difficulties consistently securing necessary resources, a clearer articulation from Government of the requirements and a longer run-up to milestones would aid funds in their planning and development of business cases to secure the necessary resources at local level.</p>	<p>DLUHC; Scottish Government; NI DfC; DWP; HMT; HMRC; FCA; TPR</p>

CONCLUSIONS AND NEXT STEPS

- 28. The LGPS is the largest defined benefit (DB) pension scheme in the UK, and one of the biggest in the world. The long-term sustainability of the LGPS looks secure and opportunities to continue to grow and evolve the scheme to enhance its value to scheme members are plentiful. Sustaining its position of financial strength will be important, as is a willingness of various entities to work together to ensure that the LGPS’s needs are considered in all relevant regulatory developments, which was explored under **Theme 1: The LGPS Regulatory and Operating Environment**.
- 29. **Theme 4: Operational Sustainability** is also key to the overall long-term sustainability of the LGPS. The administrative burden is however rising due to increasing levels of regulation, and as such, talent management remains a top priority, to ensure that the LGPS continues to have enough of the right skills and personnel to navigate through its complicated regulatory environment.
- 30. Promoting the value and purpose of the LGPS can play an important role in recruiting and retaining talent. As explored in **Theme 3: Scheme Members**, the LGPS provides benefits to people across the UK who provide essential services to local communities. This articulation of “purpose” could also help strengthen relationships with employers, as explored in **Theme 2: LGPS Employers**.
- 31. The PLSA will work with its members and other bodies involved in supporting the delivery of the LGPS, to build on this programme of work to continue to help future-proofing the LGPS.

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