

## **Lancashire County Council**

### **Lancashire Local Pension Board**

**Tuesday, 30th April, 2019 at 2.00 pm in Room CHG:05 - A Floor, County Hall, Preston.**

#### **Agenda**

##### **Part I (Open to Press and Public)**

<b>No.</b>	<b>Item</b>	
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|------------|--|-----------------|
| <b>1.</b>  | <b>Apologies</b>   |                 |
| <b>2.</b>  | <b>Disclosure of Pecuniary and Non-Pecuniary Interests</b>   |                 |
| <b>3.</b>  | <b>Minutes of the Meeting held on 29th January 2019</b><br>To be confirmed, and signed by the Chair. | (Pages 1 - 8)   |
| <b>4.</b>  | <b>Constitution, Membership and Terms of Reference of the Board</b>                                  | (Pages 9 - 10)  |
| <b>5.</b>  | <b>Annual Report 2018/19</b>   | (Pages 11 - 18) |
| <b>6.</b>  | <b>Chairs report on the Lancashire Local Pension Board Appraisal.</b>                                | (Pages 19 - 24) |
| <b>7.</b>  | <b>Lancashire Local Pension Board Workplan</b>   | (Pages 25 - 28) |
| <b>8.</b>  | <b>Regulatory Update</b>   | (Pages 29 - 44) |
| <b>9.</b>  | <b>Update on Part I presented to the Pension Fund Committee</b>                                      | (Pages 45 - 46) |
| <b>10.</b> | <b>Feedback from members of the Board on pension related training, conferences and events.</b>       | (Pages 47 - 48) |
| <b>11.</b> | <b>Report of the Advisory Group on implementation of the Service Improvement Plan</b>                | (Pages 49 - 52) |
| <b>12.</b> | <b>Urgent Business</b>   |                 |

An item of urgent business may only be considered under this heading where, by reason of special circumstances to be recorded in the minutes, the Chair of the meeting is of the opinion that the item should be considered at the meeting as a matter of urgency. Wherever possible, the Chief Executive should be given advance warning of any Member's intention to raise a matter under this heading.

**13. Date of Next Meeting**

The next scheduled meeting of the Board will be held at 2pm on the 9<sup>th</sup> July 2019 in Room CHG: 04 at County Hall, Preston.

**14. Exclusion of Press and Public**

The Board is asked to consider whether, under Section 100A(4) of the Local Government Act, 1972, it considers that the public should be excluded from the meeting during consideration of the following items of business on the grounds that there would be a likely disclosure of exempt information as defined in the appropriate paragraph of Part I of Schedule 12A to the Local Government Act, 1972, as indicated against the heading to the item.

**Part II (Not Open to Press and Public)**

**15. Update on Part II reports presented to the Pension Fund Committee** (Pages 53 - 54)

**16. Monitoring of KPIs for administration, complaints, governance and investments**

An update on the report presented to the last Pension Fund Committee (referred to in the previous item) will be given at the meeting.

**17. Update on LPP Transformation Plan**

An update on the report presented to the last Pension Fund Committee (referred to in item 15 above) will be given at the meeting.

**18. Breaches reported to Pension Fund Committee since the last meeting**

Oral Report

L Sales  
Director of Corporate Services

County Hall  
Preston.

# Agenda Item 3

## Lancashire Local Pension Board

Minutes of the Meeting held on Tuesday, 29th January, 2019 at 2.00 pm in Committee Room 'D' - The Henry Bolingbroke Room at County Hall, Preston.

### Present:

#### Chair

William Bourne

#### Board Members

County Councillor Christian Wakeford, Employer representative - LCC  
Tony Pounder, Employer representative - LCC  
Steve Thompson, Employer representative - Unitary, City, Boroughs, Police and Fire  
Kathryn Haigh, Scheme Member representative  
Yvonne Moulton, Scheme Member representative  
Keith Wallbank, Scheme Member representative

#### Officers

Abbi Leech, Head of Fund, LCPF, Lancashire County Council.  
Colin Smith, Technical Adviser Pensions, LCPF, Lancashire County Council.  
Mukhtar Master, Governance & Risk Officer, LCPF, Lancashire County Council.  
Mike Neville, Senior Democratic Services Officer, Lancashire County Council.  
Rachel Blundell, Deputy Director of Member Operations, Local Pension Partnership  
Abbi Leech, Head of Fund, LCPF, Lancashire County Council.  
Colin Smith, Technical Adviser Pensions, LCPF, Lancashire County Council.  
Mukhtar Master, Governance & Risk Officer, LCPF, Lancashire County Council.  
Mike Neville, Senior Democratic Services Officer, Lancashire County Council.  
Rachel Blundell, Deputy Director of Member Operations, Local Pension Partnership.

### 1. Apologies

Apologies for absence were received from Mr C Gibson and Mr R Harvey.

### 2. Disclosure of Pecuniary and Non-Pecuniary Interests

The Chair disclosed a pecuniary interest in relation to item 19 on the agenda and stated he would leave the meeting during the discussion of that item. No additional disclosures of interest were made in relation to items on the agenda.

### 3. Minutes of the last meeting

The Chair referred to the discussion regarding the CIPFA Guide for Local Pension Boards and Mr Neville confirmed that a copy of the Guidance was available for members of the Board to view via the secure Pensions Library.

It was noted that in accordance with the decision at the last meeting the Deputy Director Member Operations from the Local Pension Partnership would attend the meeting later to discuss the pension administration service.

**Resolved:** That the Minutes of the meeting held on the 16<sup>th</sup> October 2018 are confirmed as an accurate record and signed by the Chair.

#### **4. Regulatory Update**

Mr Smith, Technical Adviser Pensions for the LCPF, updated the Board on the following pension regulatory matters.

- The Local Government Pension Scheme (LGPS) (Miscellaneous Amendment) Regulations 2018 [SI 2018/1366]
- Actuarial factors
- Cost Cap update
- Quadrennial valuations
- Pensions Increase
- Fair Deal – Strengthening pension protection – Consultation

The Chair informed the Board that at the recent LGPS Governance Conference it had been announced that the next local Fund valuation would be in 2023. With regard to the Fair Deal consultation it was suggested that members of the Board send any comments on the proposed amendments to Mr Smith who would draft a response which could be shared with Board Members before submission.

#### **Resolved:**

1. That the regulatory updates set out in the report and given at the meeting are noted.
2. That individual members of the Board send any comments they may have in relation to the introduction of Fair Deal proposals into the Local Government Pension Scheme to Mr Smith before the 15<sup>th</sup> March 2019 so that they can be collated into a single response on behalf of the Board. The draft response to be shared with all members of the Board before being submitted ahead of the 4<sup>th</sup> April 2019 deadline.
3. That the Early Retirement fact sheet published on the Your Pension Service website be updated to reflect current guidance.

#### **5. Lancashire County Pension Fund – Data Quality report**

The Head of Fund presented a report which summarised the findings of the Scheme Actuary following a review of the quality of the membership data for the Fund.

In considering the report the Board noted that given the prudent approach undertaken by the Actuary it was likely that the real figures in relation to liability impact would be lower than those set out in the report. The Board also acknowledged that whilst the report identified some areas that required attention no

major concerns regarding the quality of the membership data for the Fund had been identified. It was noted that the full report would be shared with the Local Pensions Partnership with a view to addressing any issues as part of the normal scheduled processes associated with the 2019 valuation.

**Resolved:** That the findings of the review by the Scheme Actuary on the quality of membership data held by the Fund, as set out in the report presented, is noted.

## **6. Statutory Guidance on Asset Pooling - consultation.**

The Head of Fund informed the Board that the Ministry of Housing, Communities and Local Government had invited views on the draft statutory guidance in relation to asset pooling as set out in the Appendix to the report.

When discussing the draft the Board noted the requirement to establish a 'pool governance body' to oversee operation of pooled funds and ensure that the democratic link to pool members was maintained. The Board also recognised the acknowledgement of the key role of Pension Boards in assisting authorities to secure compliance with legislation and ensure effective/efficient governance and administration of the LGPS. The Head of Fund reported that she was a member of a cross pool group of officers and would also discuss the implications of the draft guidance for Lancashire with colleagues in due course.

### **Resolved:**

1. That individual members of the Board send any comments they may have on the draft statutory guidance on asset pooling to the Head of Fund by the 1<sup>st</sup> March 2019 so that she can collate views into a single response on behalf of the Lancashire County Pension Fund for submission before the 28<sup>th</sup> March 2019 deadline.
2. That the contents of the Lancashire County Pension Fund response referred to in 1 above be shared with the Local Pensions Partnership and the London Pensions Fund Authority before it is submitted.

## **7. LCPF Compliance with The Pension Regulator Requirements**

The Risk and Governance Officer informed the Board that since the review last year there had been a number of improvements in data quality and confirmed that overall compliance with Code of Practice No 14 was good, with updates within sub-sections such as 'knowledge and understanding required by board members', 'internal controls', 'maintaining contributions' and 'reporting breaches of the law' all indicating that overall levels of compliance had improved.

**Resolved:** That the detailed Compliance Statement in relation to the Pension Regulator Code of Practice No 14, as set out in the Appendix to the report presented, is noted.

## **8. Lancashire Local Pension Board Workplan 2019/20**

During consideration of the draft 2019/20 Work Plan the Board discussed the most appropriate frequency for reporting with regard to breaches and it was suggested that an update on breaches relating to contributions should be presented every 6 months and for data at every meeting. With regard to the annual update on the Local Pension Partnership Transformation Plan it was acknowledged that more regular updates would be appropriate in order that the Board can effectively monitor progress.

### **Resolved:**

1. That the Board receive an update regarding contributions breaches on a 6 monthly basis and at every meeting in relation to data.
2. That an update on the Local Pension Partnership Transformation Plan be presented to each meeting of the Board.
3. That, subject to the amendments specified at 1 and 2 above, the 2019/20 Work Plan for the Lancashire Local Pension Board, as set out in the Appendix to the report presented, is approved.

## **9. Feedback from members of the Board on pension related training, conferences and events.**

The Chair informed the Board that he had attended the recent LGPS Governance Conference and highlighted the following:

- Representatives from each of the four Actuaries on the panel had put forward one suggestion each on how to make the valuation process less complex and to mitigate the unexpected consequences of the cost cap exercise. The Government Actuary Department representative (in the audience) agreed to take them away and consider.
- The Local Government Pension Scheme was due to be given a new template for the measurement of costs and the intention was to establish a similar template for all Pension Funds.
- The Pension Regulator and Pensions Ombudsman had signed an agreement to facilitate closer working in the future.
- Speakers had referred to lessons to be learnt from recent cases involving other Funds, including a death payment where the most recent guidance had not been followed and a scam regarding a transfer statement.

Mr Neville informed the meeting that since the agenda had been circulated there had been an additional Workshop on the 23rd January 2019 in relation to Responsible Investment attended by Y Moulton, K Haig and K Wallbank which had been well received.

**Resolved:** That the feedback on conferences and events attended by Board members as set out above is noted.

#### **10. Part I reports presented to the previous Pension Fund Committee**

The Head of Fund updated the Board on discussions at the Pension Fund Committee held on the 30<sup>th</sup> November 2018 and decisions taken.

The Board discussed the Lancashire County Pension Fund Strategic Plan which had previously been circulated to members in accordance with the decision of the Committee. It was also noted that the revised Responsible Investment Policy had been approved by the Committee.

It was suggested that in future all Board members should receive a copy of any newsletters circulated to members of the Fund so that they were aware of communications.

#### **Resolved:**

1. That the updates regarding reports considered by the Pension Fund Committee held on the 30<sup>th</sup> November 2018 and decisions taken are noted.
2. That the Head of Fund arrange for all Board members to be included in the circulation list for future newsletters from the Your Pension Service in order the communications with the Fund membership can be monitored.

#### **11. Urgent Business**

No items of urgent business were raised under this heading.

#### **12. Programme of meetings 2019/20**

The Board considered a report on the proposed programme of meetings for 2019/20 and agreed that future meetings should continue to be held in Meeting Rooms at County Hall rather than in Committee Room 'D' – The Henry Bolingbroke Room as proposed. It was also noted that the intention was to arrange the 2020 appraisals of the Board around the meeting scheduled for the 14<sup>th</sup> January 2020.

**Resolved:** That the 2019/20 programme of meetings for the Lancashire Local Pension Board, as set out below, is approved, with all meetings to be held at 2.00pm in one of the ground floor meeting rooms at County Hall, Preston.

Tuesday 9th July 2019  
Tuesday 15th October 2019  
Tuesday 14th January 2020  
Tuesday 21st April 2020

### **13. Date of Next Meeting**

It was noted that the next scheduled meeting of the Board would be held at 2.00pm on the 30<sup>th</sup> April 2019 in Meeting Room CHG: 05 at County Hall, Preston.

### **14. Exclusion of Press and Public**

**Resolved:** That the press and public be excluded from the meeting during consideration of the following items of business on the grounds that there would be a likely disclosure of exempt information as defined in the appropriate paragraphs of Part 1 of Schedule 12A to the Local Government Act, 1972, as indicated on each item. It is considered that in all the circumstances the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

### **15. Pension Administration Update**

(Exempt information as defined in Paragraph 3 of Part 1 of Schedule 12 A of the Local Government Act 1972. It was considered that in all the circumstances of the case the public interests in maintaining the exemption outweighed the public interest in disclosing the information).

The Deputy Director of Member Operations from the Local Pension Partnership joined the meeting to discuss current performance of the pension administration service.

It was reported that following the problems experienced in April last year call handling by the Contact Centre had improved with call waiting times reduced. A number of changes were also planned to the pension administration service as outlined in the draft Service Improvement Plan, which included improved communication with members/employers and the introduction of feedback surveys to gauge users experiences of the service.

The Board discussed a range of planned improvements which were intended to both assist with the stabilisation of the service over the coming year and develop future service provision and it was suggested that a small Advisory Group be established to act as a 'sounding board' for the Director and provide knowledge/experience of the service from a user's perspective.

The Chair thanked the Director for her attendance and contributions to the discussion. The Director then left the meeting.

#### **Resolved:**

1. That the Board thank the Deputy Director of Member Operations from the Local Pension Partnership for her update on the pension administration service.
2. That the Board establish an Advisory Group comprising Mr S Thompson and Ms Y Moulton (accompanied by Colin Smith – Technical Adviser Pensions) to



work with the Director on implementation of the Service Improvement Plan and report back to the Board on the 30<sup>th</sup> April 2019.

## **16. Part II reports presented to the previous Pension Fund Committee**

(Exempt information as defined in Paragraph 3 of Part 1 of Schedule 12 A of the Local Government Act 1972. It was considered that in all the circumstances of the case the public interests in maintaining the exemption outweighed the public interest in disclosing the information).

The Head of Fund updated the Board on discussions at the Pension Fund Committee on the 30<sup>th</sup> November 2018 and decisions taken, including the following.

- Representatives from the Local Pension Partnership had been challenged in relation to concerns about the performance of the pension administration service and regular updates would continue to be presented to the Committee.
- The Investment Panel had been requested to explore with the Local Pension Partnership the proposed work plan to reach the target asset allocation for real estate and report back to a future meeting of the Committee.
- The Committee continued to receive detailed information in relation to individual investment portfolios that would inform the development of a Dashboard for future reporting.

**Resolved:** That the updates regarding reports considered by the Pension Fund Committee on the 30<sup>th</sup> November 2018 under Part II of the agenda and the decisions taken are noted.

## **17. PwC report on the outcomes of the LPP partnership**

(Exempt information as defined in Paragraph 3 of Part 1 of Schedule 12 A of the Local Government Act 1972. It was considered that in all the circumstances of the case the public interests in maintaining the exemption outweighed the public interest in disclosing the information).

The Head of Fund presented a report on the findings of an independent review of the Local Pensions Partnership (LPP) which concluded that whilst some performance had deviated from the initial projected feasibility forecast, in the majority of areas shareholders had either been made aware of deviations in advance and/or the explanations for such deviations were considered reasonable and had been substantiated.

In considering the report the Board acknowledged that LPP would examine activity by other pools in order to identify examples of best practice and would work with the Head of Fund to implement a balanced scorecard exercise over the next 3 years to inform future performance monitoring.

**Resolved:**

1. That the findings of the independent review and the responses from the Local Pensions Partnership, as set out in the report presented, are noted.
2. That the introduction of a balanced score card exercise over the next 3 years is welcomed and that the Board be kept informed of developments with a view to up to 3 Board members being directly involved in the exercise.

#### **18. Breaches reported to Pension Fund Committee since the last meeting**

The Board noted the discussion earlier in the meeting in relation to the 2019/20 Work Plan and the decision that in future a report on contributions related breaches would be presented every 6 months and an update with regard to data breaches at every meeting.

Having declared a pecuniary interest in the next item of business Mr Bourne left the meeting.

#### **19. Appointment of Chair**

As the current Chair was excluded from the meeting having declared a pecuniary interest in the next item of business the Board discussed the appointment of a Chair for the remainder of the meeting.

**Resolved:** That Mr S Thompson be appointed as Chair of the Board for the remainder of this meeting.

#### **20. Chairman of the Lancashire Local Pension Board**

(Exempt information as defined in Paragraphs 1, 2 and 3 of Part 1 of Schedule 12 A of the Local Government Act 1972. It was considered that in all the circumstances of the case the public interests in maintaining the exemption outweighed the public interest in disclosing the information).

The Board discussed the proposed reappointment of the Chair for an initial 2 years with an option to extend for a further 2 years and noted that a report on the matter would be presented to the Pension Fund Committee on the 1<sup>st</sup> February 2019.

**Resolved:** That the unanimous support of the Board for the reappointment of Mr W Bourne as independent Chair of the Lancashire Local Pension Board be reported to the Pension Fund Committee on the 1<sup>st</sup> February 2019.

L Sales  
Director of Corporate Services

County Hall  
Preston

## Lancashire Local Pension Board

Meeting to be held on Tuesday, 9 July 2019

Electoral Division affected: None;
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### **Update on the Constitution, Membership and Terms of Reference of the Board.**

Contact for further information: Mike Neville, 01772 533431, Legal and Democratic Services [mike.neville@lancashire.gov.uk](mailto:mike.neville@lancashire.gov.uk)

#### **Executive Summary.**

An update on the constitution, membership and Terms of Reference of the Lancashire Local Pension Board.

#### **Recommendations.**

1. That the decision of the full county council on the 28<sup>th</sup> February 2019 to appoint Mr William Bourne as the independent Chair of the Lancashire Local Pension Board with effect from 1 April 2019 for an initial 2 years with an option for an extension for a further 2 years, is noted.
2. That the Constitution, Membership and Terms of Reference of the Pension Board, as set out in the report, be noted.

#### **Background and Advice**

##### **1. Reappointment of the Independent Chair of the Board.**

At the last meeting members of the Board gave their unanimous support for a proposal to reappoint Mr W Bourne as the independent Chair of the Lancashire Local Pension Board for an initial 2 years with an option to extend for a further 2 years.

The proposal was subsequently reported to the Pension Fund Committee on the 1<sup>st</sup> February 2019 which agreed to recommend the appointment to the full county council for approval. Details were then presented to the full council on the 28<sup>th</sup> February 2019 where it was agreed to approve the reappointment of Mr Bourne as the independent Chair of the Lancashire Local Pension Board with effect from the 1st April 2019 for an initial 2 years with an option for an extension for a further 2 years, as set out in the report.

##### **2. Constitution, Membership and Terms of Reference.**

The Lancashire Local Pension Board is comprised of 9 members on the basis of an independent Chair and 4 representatives each for employers and scheme members.

The current membership of the Board is as follows:

<b>Name</b>	<b>Role</b>
William Bourne	Independent Chair
County Councillor Christian Wakeford	Employer representative (LCC)
Tony Pounder	Employer representative (LCC)
Steve Thompson	Employer representative (Unitary, City, Borough Councils and Police/Fire)
Carl Gibson	Employer representative (Other Employers)
Kathryn Haigh	Scheme member representative
Yvonne Moulton	Scheme member representative
Robert Harvey	Scheme member representative
Keith Wallbank	Scheme member representative

A copy of the current [Terms of Reference](#) for the Board is available to view at Article 7 (Other Committees of the County Council) of the county councils Constitution.

As stated in the [Work Plan](#) presented to the Board in January 2019 it is intended, as a matter of good governance, to review the Terms of Reference later this year and bring a report with any proposed amendments to the meeting in January 2020

### **Consultations**

N/A

### **Implications:**

This item has the following implications, as indicated:

### **Risk management**

In accordance with section 5(4) (c) 6 of the Public Service Pensions Act 2013 the Pension Board is required to include employer representatives and member representatives in equal numbers, thus ensuring that it can undertake its role in assisting the Administering Authority with the governance and administration of the Lancashire County Pension Fund.

### **Local Government (Access to Information) Act 1985**

#### **List of Background Papers**

Paper	Date	Contact/Tel
N/A		

Reason for inclusion in Part II, if appropriate

N/A

## Lancashire Local Pension Board

Meeting to be held on Tuesday, 30 April 2019

Electoral Division affected: None;
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### Local Pension Board - Annual Report 2018/19

(Appendix 'A' refers)

Contact for further information: Mike Neville (01772) 534261, Senior Democratic Services Officer, [mike.neville@lancashire.gov.uk](mailto:mike.neville@lancashire.gov.uk)

#### Executive Summary

The Terms of Reference for the Board includes the requirement for the Board to produce an annual report on its activities for consideration by the Pension Fund Committee as Administering Authority for the Lancashire County Pension Fund. A copy of the draft Annual Report is attached at Appendix 'A'.

#### Recommendation

The Board is asked to consider and approve the draft Annual Report for 2018/19 as set out at Appendix 'A' for presentation to the Pension Fund Committee on the 21<sup>st</sup> June 2019.

#### Background and Advice

The Terms of Reference for the Lancashire Local Pension Board include the requirement that the Board "shall on an annual basis produce a report on both the nature and effect of its activities for consideration by the Administering Authority".

A draft of the Annual Report for 2018/19 is attached at Appendix 'A' and includes the following.

- A summary of the Boards activity during the year;
- The attendance of Board members at meetings;
- Training and development events which Board members have attended during the year together with completed online modules;
- Details of the costs incurred in the operation of the Board

Subject to the Board's approval, the Annual Report will be presented by the Chair to the Pension Fund Committee on 21<sup>st</sup> June 2019 for consideration and, if approved, will be incorporated into the Lancashire County Pension Fund's Annual Report.

**Consultations**

N/A

**Implications:**

This item has the following implications, as indicated:

**Risk management**

There are no significant risks associated with the proposals set out in this report.

**Local Government (Access to Information) Act 1985****List of Background Papers**

Paper	Date	Contact/Tel
Attendance Sheets for meetings of the Lancashire Local Pension Board	July 2018 April 2019	Mike Neville OCE (01772) 533431
The Training Record for members of the Lancashire Local Pension Board	1 <sup>st</sup> May 2018 to 30 <sup>th</sup> April 2018	Mike Neville OCE (01772) 533431

Reason for inclusion in Part II, if appropriate

N/A

## **Lancashire Local Pension Board – Annual Report 2018/19**

The Lancashire County Pension Fund's Local Pension Board (LPB) has now been up and running for nearly four years. As a reminder to readers, our legal duty is to assist the Pension Fund Committee (PFC). Because LPB members explicitly represent either employers or members, we also have a representative role in the Fund's governance structure.

When they were set up in 2015, LPBs were new bodies and it has taken time to establish how we should fulfil our duties without duplicating the PFC's role. There is a wide variation in the effectiveness of LPBs across the country and the national Scheme Advisory Board will be conducting a survey into the operation of LPBs in 2019. Your LPB is seen as one of the leading models and I shall be contributing a response in order to spread what I regard as good practice.

We create an annual Work Plan to ensure that we are methodical in our activities. The core of our work is to review the reports and compliance assurances which support the Fund's activities and comment on them to the PFC. If we believe something requires particular attention, we may make a formal recommendation to them which requires a response. However, we are always aware that our role is to assist the PFC and a good relationship between the two bodies is absolutely essential.

In this report, I will start by reminding readers of the mechanics of the LPB; cover the training we undertake; and finally comment on our activities in the past twelve months, noting where we expect to focus our efforts in the next year.

### **Membership of the Pension Board**

The LPB has nine members, four Employer representatives, four Scheme Member representatives and I act as the Independent Chair. Members serve an eight year term, except for the Chair who serves four. Apart from the Chair, none are remunerated other than for expenses incurred in attending meetings or training.

During the year we welcomed Keith Wallbank, who was appointed to fill a vacant Scheme Member representative place and I have been reappointed by the County Council to serve as Chair for up to a further four years.

The LPB meets four times a year and we additionally create informal groups if we feel they are needed. Members attend training events both in Preston and elsewhere. In my capacity as Chair I am also invited to attend PFC meetings, to

present reports and advise the Committee on the work of the Board. I have attended three out of the of the four Committees held over the past year.

### **Attendance of Board members at meetings of the Pension Board**

Details of individual members' attendance at Board meetings (between 1<sup>st</sup> May 2018 and 30<sup>th</sup> April 2019), together with changes to the membership of the Board, are set out below.

<b>Name</b>	<b>Representing</b>	<b>3<sup>rd</sup> July 2018</b>	<b>16<sup>th</sup> October 2018</b>	<b>29<sup>th</sup> January 2019</b>	<b>30<sup>th</sup> April 2019</b>
W Bourne	Chair	✓	✓	✓	
T Pounder	Employer rep - LCC	apologies	✓	✓	
County Councillor C Wakeford	Employer rep - LCC	✓	✓	✓	
S Thompson	Employer – Unitary, City, Borough, Police & Fire	✓	✓	✓	
C Gibson	Employer rep - Others	apologies	✓	apologies	
K Haigh	Scheme Member rep	✓	✓	✓	
R Harvey	Scheme Member rep	✓	✓	apologies	
Y Moulton	Scheme Member rep	apologies	✓	✓	
K Wallbank	Scheme Member rep	N/A	✓	✓	
<b>Change to the membership of the Board</b>					
K Wallbank appointed in October 2018 to fill a scheme member representative vacancy which arose in June 2018					

### **Training**

The Board has a small internal budget, which is used primarily for Members' attendance at training events or conferences. During the year £10,474.66 was spent running the Board and training.

The LPB is under a legal obligation to maintain its levels of knowledge and understanding through regular training. We conduct a gap analysis of training needs once a year as part of our own annual appraisal, which becomes an agenda item at our next meeting and have all committed to completing the online training modules from The Pension Regulator's Public Service toolkit

Members are actively encouraged to join internal training sessions held jointly with the members of the Pension Fund Committee. During the year, internal training



workshops were held on a number of topics including cyber resilience, infrastructure, property, the triennial fund valuation and responsible investment. Members are also notified of and encouraged to attend external training conferences/event to extend their knowledge and meet LPB members from other funds.

The table below shows the number of training events individual Board members attended during the period 1<sup>st</sup> May 2018 to 30<sup>th</sup> April 2019) together with completed online modules from The Pension Regulators Public Service Toolkit.

<b>Name</b>	<b>Internal events</b>	<b>External events</b>	<b>Online Modules</b>
W Bourne	0	2	7
County Councillor C Wakeford	0	0	0
T Pounder	2	1	0
S Thompson	1	1	0
C Gibson	0	1	0
K Haigh	6	1	3
R Harvey	4	0	0
Y Mout	3	2	7
K Wallbank	4	0	0
D Owen	1	0	0

Further information about the Board, including minutes and public papers, can be viewed on the [Your Pension Service website](#).

### **Activities during the year**

A year ago I expected the focus to be largely on the LPB's core scrutinising role. In particular I said we would monitor improvements expected from the Administration Transformation Plan, as well as the governance processes over LPP (Local Pensions Partnership, the entity created with the London Pension Fund Authority to perform the Fund's investment and administration activities). The Fund's ability to fulfil its fiduciary duty and thereby pay pensions in full and on time depends critically on LPP providing an effective service to it.

In practice, we have spent more time than we had envisaged on the changes to the administration service. The LPB was fully supportive of the concept behind the plan but did, in 2017, recommend a risk assessment ahead of its implementation date. With hindsight, had this been done and acted on it might have prevented many of the problems the service encountered in the first half of this year.

We have consequently been actively involved in engaging LPP, both through recommendations to the PFC and on occasion directly, to ensure that client service quality is given priority. We have also been carefully monitoring the recovery of

service levels since the implementation of the Administration Plan. At our January 2019 meeting, we set up an informal Advisory Group together with LPP and Officers to assist by providing feedback from the employers' and members' perspectives. We are aware that there is more work to be done to improve the client experience but at the same time remain firmly behind LPP's ambition to use the combination of the two administration services as an opportunity to change things for the better.

I noted last year an external review of LPP's effectiveness, which had been commissioned after two years' operation to provide third-party assurance that it is indeed cost-effective for both funds. The report by PwC was duly delivered but was perhaps too early in LPP's life to provide a definitive answer to the question. The LPB will remain vigilant on this front because LPP's role is so important to the smooth running of the Fund.

With the next valuation due as of 31<sup>st</sup> March 2019, communication and engagement will remain at the forefront of our work in the next year. Valuations almost always involve changes to employer contributions and effective communication to manage expectations is essential.

I comment next on some of our more routine scrutinising work. At every meeting, we look at any breaches of the regulations and at the Key Performance Indicators in detail. One of our objectives for next year is to review the KPIs to ensure they properly reflect the experience of Fund members. This will help us in our aim of assisting the PFC in monitoring LPP's performance effectively.

During the year we also reviewed and commented on a wide range of documents. These included statutory documents such as the Administration, Investment and Governance Strategy statements, as well as policies such as that on Responsible Investment and climate change. We also looked for assurance that the Fund is compliant with The Pension Regulator's Code 14 and CIPFA's guidance, as well as internal and external audit requirements. Looking forward to the next year, we expect to be able to spend more of our time on this basic scrutiny. The regulations governing the LGPS are complex and varied, and the LPB's second pair of eyes provides the PFC with a valuable check to ensure that the Fund is fully compliant.

Your Fund is, in my view, currently in a good position. The funding level at 31<sup>st</sup> March 2019 is likely to be not too far off 100% and fund governance is seen as a market leader in many respects within the LGPS. The LPB is looking forward to being part of the process of continuing to seek improvements, particularly in administration service quality.

I would like once again to thank the officers at LCPF who support us in our duties. As part of our annual Board appraisal I speak individually to each member, and I can again record unanimous agreement that we are ably and effectively supported by the

team at LCPF. In my view it is important that we recognise that publicly in this report.

**William Bourne**

Independent Chair of the Lancashire Local Pension Board

April 2019



## Lancashire Local Pension Board

Meeting to be held on Tuesday, 30<sup>th</sup> April 2018

Electoral Division affected: None;
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## Report on the Lancashire Local Pension Board Appraisal

(Appendix 'A' refers)

Contact for further information: Mike Neville, Tel: (01772) 533431, Senior Democratic Services Officer, [mike.neville@lancashire.gov.uk](mailto:mike.neville@lancashire.gov.uk)

### Executive Summary

This report presents a summary of the main points which came out of the appraisal meetings which the Chair of the Pension Board held with individual members of the Board and makes recommendations for the future.

### Recommendation

The Board is asked to consider the recommendations from the Chair, as set out in Appendix 'A'.

### Background and Advice

In January 2019 arrangements were made for the third appraisal of the Lancashire Local Pension Board which involved the Chair meeting with members of the Board, the Chair of the Pension Fund Committee, Abbi Leech, the Head of Fund, and Mike Neville the Senior Democratic Services Officer.

Following the appraisals the Chair produced an initial report which was shared with the members of the Board. A copy of the final report on the appraisals is set out at Appendix 'A'.

### Consultations

N/A

### Implications:

This item has the following implications, as indicated:

### Risk management

There are no significant risk management implications.

**Local Government (Access to Information) Act 1985  
List of Background Papers**

Paper	Date	Contact/Tel
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N/A

Reason for inclusion in Part II, if appropriate

N/A

# Appendix A

## Report on Lancashire Pension Board Appraisals 2019 FINAL

*This note summarises the main points which came out of the appraisal meetings I held with Local Pension Board (LPB) members and Officers, and makes recommendations to improve its effectiveness and efficiency.*

*William Bourne, Independent Chair of the Local Pension Board*

*11<sup>th</sup> February 2019*

### Appraisal meetings held

Name	Representative	Date
Abigail Leech	Officer	29th January
Christian Wakeford	Employers	29th January
Eddie Pope (informal)	Chair of PFC	30th January
Kathryn Haigh	Members	29th January
Keith Wallbank	Members	29th January
Mike Neville	Officer	29th January
Steve Thompson	Employers	30th January
Tony Pounder	Employers	29th January
Yvonne Moulton	Members	30th January

I was unable to meet with Carl Gibson (Employers) and Bob Harvey (Members), but both have seen a draft of this report and agreed with the main points made.

### General

Twelve months ago the focus of the review was primarily on how the Local Pension Board (“the LPB”) can effectively review LPP and other service provider’s activities, and separately how Board members can be expected to assimilate the considerable volume of papers on each agenda. The main recommendations I made were to ask individual LPB members to take responsibility for particular areas of scrutiny, to suggest training for the PFC on the LPB’s role, and to suggest training on breach reporting and record-keeping in particular.

The LPB is obliged to conduct an annual appraisal under its Terms of Reference, with the purpose of reviewing and improving its efficiency and effectiveness. As Chair, I also find it helpful to have one-on-one conversations with members and Officers outside formal LPB meetings. This year I have met with six out of eight LPB members, the PFC Chair and two Officers.

### Efficiency

There was universal agreement that the LPB works well as a body. The mix of members provides varied input and experience, while there is a good sense of collective responsibility. The three members appointed over the last fifteen months have all found their feet and contribute to our discussions actively. The detailed experience individual members can bring to bear in areas such as administration, risk registers and IT has been particularly helpful over the past year.

A number of members suggested that there is little chance at meetings to get to know their colleagues, particularly those appointed recently. I therefore recommend we aim to hold a lunch for LPB members in

2019 as a thank you for their time and contribution and to provide an opportunity to socialise in a less formal setting. We did the same in 2017, and this should be either an annual or a biennial event.

The experiment of allocating particular areas to individual members to lead LPB debates has not worked perfectly. There was support for the principle and I recommend that we continue to trial it for at least another twelve months. I have set out in the recommendations below suggested areas of responsibility for each member in 2019 for consideration. When meeting papers are published I will undertake to let members know which agenda items I expect them to lead on.

There has been a considerable reduction in the volume of reports for each meeting, in accordance with LCC policies, but many members still highlight this as a problem. Under the system we are trialing I expect them to read the reports backing up their area of responsibility in detail, but note that this does not remove the responsibility for members to make themselves familiar with the main issues in all areas.

I again record universal agreement from members that Officers provide effective support to the LPB. As Chair I also record my thanks to Democratic Services for efficient and responsive management of the LPB's affairs. I was also told that the LPB runs smoothly from the Officers' perspective. LPB members should use the papers provided to the PFC wherever possible to avoid duplication and extra work for Officers. These are always available in the Pensions Library and members are alerted to new PFC as well as LPB agendas.

## Effectiveness

The majority of feedback from my meetings was that the LPB, which has now been established for nearly four years, is genuinely adding value to the PFC according to its remit to 'assist', though one member was doubtful. It has been able to provide constructive comment in areas such as Responsible Investment and the Risk Register for the benefit of the PFC, and also - because its members are 'clients' of the Pension Fund - to provide early warning when problems arise, for example the administration transformation project, and recommend remedies.

The LPB's non-executive role also makes it well placed to provide feedback and make practical suggestions to Local Pensions Partnership Group "LPP", and we are proposing to set up an advisory forum to facilitate this on the administration service.

LPB members' number one concern today continues to be the lack of processes and structures to monitor LPP's activities apart from investments, which is covered by the Investment Panel. Members are clear that our role focuses on assisting the PFC manage the Fund's role as a client of LPP, and not LCC's position as a shareholder. That notwithstanding, there are areas of overlap such as the future evolution of the administration service. This is technically a shareholder issue, but is also a concern for us in our role representing members' interests.

LPB members have concerns that the data they need to fulfil their duty to assist the PFC ensure the effective running of the Fund has not always been available in a timely manner. While this is partly a function of the cycle of Committee and Board meetings, some members found it difficult to have confidence in our ability to fulfil our duties without it. We note that a Balanced Score Card approach will be used to evaluate LPP for the next three years, and we recommend that the interviewees for this include representation from the LPB.

In 2018, various members spoke about the LPB's role at various events (PFC training, Annual Forum, Stakeholder Day, Employers Forum). Notwithstanding, not everyone understands its role in the Fund's governance structure, and I recommend a continued emphasis on this through articles in newsletters and presence and presentations at events.



## **Training**

Members felt that training through Workshops was generally at the right level and effective, though some members commented that it was quite high level and focused more at the PFC than LPB's needs. The recording of these sessions is undoubtedly helpful, and members should let Officers know if they do use this facility, as it can be counted towards their Training, Knowledge, and Understanding requirements. To meet the LPB's needs, I suggest short 30 minute training sessions twice a year before the LPB meetings focused on topics relevant to the LPB.

We have also agreed in meeting that all members will complete one set of training modules from either CIPFA or TPR, whichever is more relevant. This should ensure that all members are up to at least the same minimum standards of knowledge.

The Pensions Library is seen as a useful resource, although the volume of material there can be daunting and better signposting would make it easier to access.

This year three members suggested that further training on the legal and regulatory structure within which the Fund sits would be helpful to them.

## **Topics for 2019**

It was generally agreed that the WorkPlan agreed at the 29/01/2019 meeting provides a good basis for 2019's work schedule. It should, as one member said, be 'back to basics' with an emphasis on doing the boring things well.

A number of members suggested that, once the administration service has stabilized after the problems with the Transformation project, it would be useful to review the KPIs to ensure that they are appropriate and provide the LPB with the relevant data which both it and the PFC need to monitor LPP's performance.

## Recommendations

1. Continue the trial of allocating particular areas of Board activities to selected Board members as per the table and asking them to take formal responsibility for leading discussions in meetings.

Area	Includes	Members
Compliance with regulations and statutory guidance	TPR, LGPS regulations,	KH, CG
Communications	Engagement, comms policy	CW, KW
Administration	KPIs, ABSs, admin breaches	YM, ST
IT	Fraud Control, data protection, cyber	Vacant, CW
Investment policy documents	ISS, actuarial report, Responsible Investment	RH, ST
Service providers governance	LPP, custodian, audit	RH, TP
Risk register		CG, Vacant

2. Officers be asked to notify LPB of opportunities either to give presentations or to write short articles in newsletters in order to publicise the LPB's role.
3. Training be provided on the following subjects in 2019, if not through workshops, then through 30 minute sessions ahead of the LPB meetings.
  - a. record-keeping and reporting breaches of law (recommended last year),
  - b. the legal and regulatory structure of the fund.
4. Consideration be given as to whether the Pensions Library could be better signposted to make it easier for Board members to identify the training and guidance relevant to their needs.
5. At least one LPB Employer and one Member representative be included among the interviewees when the Balanced Scorecard Report to evaluate LPP's activities is conducted
6. Officers be asked to include a review of the administration KPIs provided by LPP in the LPB 2019 Workplan.
7. Organise a social lunch ahead of a Board meeting in 2019 (or possibly a social event after one) and aim to do this on an annual or biennial basis going forward.

## Lancashire Local Pension Board

Meeting to be held on Tuesday, 30 April 2019

Electoral Division affected:  
None;

## Local Pension Board Work Plan

(Appendix A refers)

Contact for further information:

Abigail Leech, Head of Fund, 01772 530808,

Abigail.leech@lancashire.gov.uk

### Executive Summary

An update on the work plan for 2019/20 including the amendments made by the Board at its meeting on 29<sup>th</sup> January 2019.

### Recommendation

The Board is asked to note the amendments to the work plan and agree the plan for 2019/20 as set out in Appendix 'A' to this report.

### Background and Advice

The 2019/20 work plan details the timing and frequency of activity to be undertaken by the Lancashire Local Pension Board and has been designed to ensure all the responsibilities set out in the Board's Terms of Reference can be met.

At its meeting on the 29 January 2019 the Board considered a draft work plan for the year and agreed that the work plan be submitted to the Pension Fund Committee for approval, subject to the following amendments:

1. That the Board receive an update regarding contributions breaches on a 6 monthly basis and at every meeting in relation to data.
2. That an update on the Local Pension Partnership Transformation Plan be presented to each meeting of the Board.

A work plan incorporating these changes was approved by the Pension Fund Committee on 29<sup>th</sup> March 2019, a copy of which is set out at Appendix A.

### Consultations

N/A

### Implications:

This item has the following implications, as indicated:

**Risk management**

The Pension Board is required under regulations to secure compliance and ensure the effective, efficient governance and administration of the Fund.

**Local Government (Access to Information) Act 1985  
List of Background Papers**

Paper	Date	Contact/Tel
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N/A

Reason for inclusion in Part II, if appropriate

N/A

## Lancashire Local Pensions Board - Work programme 2019/20

	Meeting Date			
	30-Apr-19	09-Jul-19	15-Oct-19	14-Jan-20
<b>Introductory Matters</b>				
Welcome/Apologies, Disclosure of interests, Minutes of Previous Meeting, Urgent business, date of next business, exclusion of press and public	Y	Y	Y	Y
Chair's report on the appraisal of the Pension Board and terms of reference	Y			Y
Work Plan for next financial year				Y
Progress on workplan	Y	Y	Y	Y
Feedback from Board members on attendance at training events and conferences	Y	Y	Y	Y
Annual Review of Member Training Records		Y		
Reports considered by the recent Pension Fund Committee	Y	Y	Y	Y
Update on regulatory changes	Y	Y	Y	Y
LPP Administration Transformation Plan and progress updates	Y	Y	Y	Y
<b>Key Policy Documents</b>				
Terms of reference for Board (Annual Review)				Y
Termination Policy (Annual Review)	Y			
Governance Policy Statement (Annual Review)	Y			Y
Pensions Administration Strategy Statement (Annual Review)	Y			Y
Investment Strategy Statement – consideration of investment on non financial grounds				Y
Administration Performance Report (Annual Review)		Y		
UK Stewardship Code Compliance (Annual Review)		Y		
Review of scheme risk register (bi-annual)	Y		Y	
Communications Policy Statement		Y		
Funding Strategy Statement				Y
High level scrutiny of LPP (annual review)				Y
<b>Performance</b>				
Monitoring of KPIs for administration, complaints, governance and investments	Y	Y	Y	Y
Pension Fund Administration Service Quality of Service Report		Y		
Data quality				
Data breaches update	Y	Y	Y	Y
<b>Financial Monitoring</b>				
Review the pension fund budget with particular regard to the following areas:				
a)Cost savings	Y			
b)Productivity gain	Y			
c)Risk reduction	Y			
d)Service improvement	Y			
e)Performance	Y			
Breaches reported to Pension Fund Committee since last meeting	Y	Y	Y	Y
Contributions monitoring and breaches	Y		Y	
<b>Communications and updates to employers and members</b>				
Scrutiny of all annual documents and processes including communications to employers and members, to include:				
Formal reports and internal/external reports	Y	Y	Y	Y
Assistance with communication to employers and members as arising out of regulations and current issues.	Y	Y	Y	Y
Results of regulator survey			Y	
Review of the board effectiveness			Y	
Review of :				
a)compliance with COP14.				Y
<b>Advance Work Plan - Triennial review</b>				
Funding Strategy Statement			Y	
Actuarial Report	Y			
Communications Policy Statement			Y	
Monitor employer and administrating authority discretions	Y			2023/24
Actuarial Valuation			Y	
Investment Strategy Statement			Y	
Pensions Administration Statement	Y			2023/24

Note

Actuarial Valuation progress will be provided by considering reports submitted to the the Pension Committee

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## Lancashire Local Pension Board

Meeting to be held on Tuesday, 30 April 2019

Electoral Division affected:  
(All Divisions);

### Regulatory Update

Contact for further information:

Colin Smith, 01772 534826, Technical Advisor, Lancashire County Pension Fund,  
Colin.Smith@lancashire.gov.uk

#### Executive Summary

This report sets out an update on various pension related regulatory issues to assist members of the Pension Board to exercise their functions as a member of the Pension Board effectively.

#### Recommendation

The Board is asked to consider and note the contents of the report.

### Background and Advice

#### Regulatory Update

##### 1. Cost Cap update

As reported in the last regulatory update to the Board, as a result of the cost management process undertaken by the Scheme Advisory Board it was anticipated that a consultation would be published in late January/early February 2019 in order that any regulation changes agreed could take effect from 1 April 2019. The proposed regulatory changes to be included in that consultation included improvements to ill health benefits, death in service benefits, early retirement reduction factors and employee contributions.

However, currently there is an on-going court case which concerns the transitional protections given to scheme members in public sector schemes, who in 2012 were within 10 years of their normal retirement age. On the 20th December 2018 the Court of Appeal found that these protections were unlawful on the grounds of age discrimination and could not be justified. As a result should the finding of the Court of Appeal stand then significant changes to public service schemes may be required to compensate those members found to have been discriminated against. Depending on extent and cost of these changes there could be a material impact on the outcome of the cost cap process

As a result the Scheme Advisory Board confirmed it had no option but to pause its own cost management process pending the outcome of the case. Consequently there are currently no changes to benefits planned in respect of the cost management process (either the LGPS process or HM Treasury process) from 1 April 2019. This situation will be reviewed once the case is resolved, which is not expected for some months.

In terms of costing for the current valuation Administering Authorities were asked about their preference regarding the approach to the 2019 valuation in the light of Cost Cap and court case – do administering authorities want to receive guidance from the Scheme Advisory Board on how cost management should be taken account of in the 2019 triennial valuation exercise, or do they want no central guidance and make local decisions on what approach to take?

The deadline for responses was 1 March 2019 with around 70 responses received. The majority, including Lancashire, confirmed that they preferred to receive guidance from the Scheme Advisory Board designed to promote a consistent approach, and work has now begun on producing the guidance.

## **2. Employee Contribution Bands 2019/20**

The table below sets out the contribution bands, which are now effective from 1 April 2019. These are based on the pay bands for 2018/19 as increased by the September 2018 CPI figure of 2.4%, with the result rounded down to the nearest £100.

Band	Salary Range	MAIN Section	50/50 Section
		Contribution %	Contribution %
1	£0 to £14,400	5.5%	2.75%
2	£14,401 to £22,500	5.8%	2.9%
3	£22,501 to £36,500	6.5%	3.25%
4	£36,501 to £46,200	6.8%	3.4%
5	£46,201 to £64,600	8.5%	4.25%
6	£64,601 to £91,500	9.9%	4.95%
7	£91,501 to £107,700	10.5%	5.25%
8	£107,701 to £161,500	11.4%	5.7%
9	£161,501 or more	12.5%	6.25%



### **3. Fair Deal – Strengthening pension protection - Consultation**

As reported previously this consultation was launched on the 10th January 2019 and contained proposals to strengthen the pension protections that apply when an employee of a LGPS employer is compulsorily transferred to the employment of a service provider. The proposed amendments to the LGPS Regulations 2013 would, in most cases, give transferred staff a continued right to membership of the LGPS and introduces the notion of a 'deemed' employer. These changes are intended to bring the LGPS in line with the government's October 2013 Fair Deal guidance that applies in relation to transfers from central government.

The consultation closed on 4 April 2019. A copy of the Lancashire Fund's response is provided at Appendix A.

### **4. Consultation on implementation of late retirement factors**

This relates to actuarial factors uplifting a members benefits where they retire after their normal retirement date.

The proposals include a change in methodology as well as a change in factors which is intended to remove the 'cliff edge' that was the result of the last factor change in January 2017 for some members. The change of methodology and subsequent cost to the Fund is considered to be neutral actuarially.

The consultation will close at 4pm on Wednesday 17 April 2019.

### **5. Exit credits**

In December 2018, the Local Government Association asked administering authorities for information about exit credits that have been paid since this was introduced into the regulations on 14 May 2018. We confirmed that to date the Lancashire Fund had not paid any.

The payment of exit credits is causing issues, particularly where there is a side contractual agreement in place with the employer and also where contractors are no longer extending contracts but are looking to terminate the contract and re-bid in order to receive payment of an exit credit.

MHCLG have confirmed they will consult on a retrospective change to the regulations to provide that, where an employer bears no risk, this can be taken into account in the calculation of an exit credit payment.

## 6. Exit Payment reform

Following the launch of the original consultation on exit payment reform nearly four years ago, on 10<sup>th</sup> April 2019 HM Treasury announced a further consultation on limiting exit payments for public sector workers. The full documents can be found [here](#). This consultation will run for twelve weeks and will close on 3 July.

The key points in the latest consultation are as follows:

- No change from the earlier proposal that the maximum exit payment will be £95,000.
- The cap will apply to a wide range of public sector employers, including employees of councils in England and Wales, fire authorities, police forces, academies and maintained schools. It will not generally apply in Scotland, and there are some limited categories of public servants in Wales which are exempt. It remains to be seen whether it is extended to Scotland in due course.
- The £95,000 cap will include the value of any early retirement strain payments, and it is envisaged that the ability to take an unreduced early retirement pension will therefore be severely restricted in some cases.
- Certain employers in the LGPS e.g. Universities and Colleges appear not to be covered which will mean members would be treated differently within the LGPS depending on their employer on exit.
- As previously indicated, there will be provisions for the cap to be waived in some circumstances. However, the tone of the consultation makes clear that any waiver is expected to be the exception rather than the norm, and that there is a “high bar” for them to be justified (e.g. subject to ratification by the full council in relation to a local authority).
- Clearly there will be some details to be ironed out in relation to the LGPS in England and Wales (and possibly Scotland in due course). We expect the MHCLG will run a separate consultation, and which will cover amongst other things the agreement and implementation of a common costing methodology and factors for strain payments.

### Consultations

N/A

### Implications:

This item has the following implications, as indicated:

### Risk management

No significant risks have been identified

### Local Government (Access to Information) Act 1985 List of Background Papers

Paper	Date	Contact/Tel
Appendix A - Fair Deal	04/04/2019	Colin Smith 01772 534826

Consultation response

Reason for inclusion in Part II, if appropriate  
N/A



## Appendix A

Phone (01772) 534826  
Email Abigail.Leech@lancashire.gov.uk

LGF Reform and Pensions Team  
Ministry of Housing, Communities and Local  
Government  
2nd Floor, Fry Building  
2 Marsham Street  
London  
SW1P 4DF

Your ref  
Our ref LCPF/AL  
Date 04 April 2019

Dear Sirs

### **Local Government Pension Scheme Fair Deal – Strengthening pension protection**

I refer to your consultation entitled "Local Government Pension Scheme: Fair Deal – Strengthening pension protection".

The response here is provided by Lancashire County Council in its capacity as administering authority to the Lancashire County Pension Fund. As requested my details are:

Abigail Leech, Head of Fund, Lancashire County Pension Fund

Lancashire County Council  
PO Box 100  
County Hall  
Preston  
PR1 0LD

The response below addresses each question raised with the consultation document.

Q 1	RESPONSE
Do you agree with the definition of Protected Transferee?	The draft regulations define a “protected transferee” as someone who has transferred from the Fair Deal employer at the outset, and also clarify that an employee who joins after the contract has started does not acquire protected status when the contract is retendered.

	<p>We agree that the definition seems sensible although we see this as an employer consideration. However, as a Pension Fund it is critical that the protected status of employees is communicated to the Fund clearly at the outset of a contract and any subsequent re-letting. It is therefore paramount that the employers (including any subsequent employers) are compelled to maintain this information on their records in a clear and concise fashion and that it is provided automatically. Their payroll providers also need to be aware of this.</p>
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Q 2	RESPONSE
<p>Do you agree with the definition of Fair Deal Employer?</p>	<p>It seems to us that the definition will cover all LGPS scheme employers other than admission bodies, charities, further education corporations, sixth form college corporations and higher education corporations, although such employers could choose to apply the provisions if they wished. It now specifically <u>includes</u> academy schools and police and crime commissioners.</p> <p>We see the definition of Fair Deal employer as a general policy decision by the Government, but it does not seem unreasonable. The scope is similar to existing provisions, albeit a little wider, which simplifies matters and provides greater clarity. It does mean that employers will need to be clear on their policy decisions and ensure the Fund is kept up to date on these.</p> <p>However, under draft Regulations 3B(1) and 3(B)11 it appears that employees working for a different Fair Deal Employer from the one carrying out the outsourcing are not protected. This seems unlikely to be a policy decision so needs clarity for all parties. The Regulations seem to us to introduce an anomaly in this area, best illustrated by an example. If, say, an academy school sources its cleaning service from the local authority in its area, but decides it wants to outsource that service then the academy is not the “Fair Deal Employer” in relation to those employees, and our reading of the draft Regulations is that these employees’ pension rights are not protected. If, on the other hand, they had been working directly for the academy school then the academy would be their “Fair Deal Employer” so the employees would be protected. For consistency of treatment we would</p>

	suggest that such employees should be protected by virtue of the fact that they are working for a Fair Deal Employer, but either way we feel this should be a deliberate policy decision which needs clarifying.
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Q 3	RESPONSE
Do you agree with the transitional arrangements?	<p>Overall, this seems to us a sensible proposal. Broadly comparable schemes are now relatively rare in practice and we think this will achieve more consistency of approach with other public sector schemes. Equally any historic staff under the existing protections should be brought into the new regime otherwise you would be operating two regimes for many years to come.</p> <p>Where a service provider currently has a broadly comparable scheme, that service provider and the Fair Deal Employer will need to prepare for a change of approach when the contract is next retendered. It is important that authorities review their historic contracts to consider if they are affected and decide on their policy. <b>This should be made compulsory under any new guidance.</b></p>

Q 4	RESPONSE
Do you agree with our proposals regarding the inward transfer of pension rights?	<p>The employees concerned will be able to take a transfer from their existing scheme and use it to secure career average benefits within the LGPS, we suspect using the normal individual LGPS transfer in terms (although the intention here needs to be clarified). Under the proposals, the relevant LGPS or Fair Deal employer will <u>not be able</u> to refuse such a transfer. This will mean additional (and potentially large) risk and cost is taken on by the Fair Deal Employer.</p> <p>The number of contracts operated on the basis of a broadly comparable scheme is relatively small, and the proposal will apply only to those still in service at the end of the contract, so we suspect it will have only limited effect in practice. It also does not necessarily provide the employees with full continuity of pension benefits. However, given that the transfer in terms offered by the LGPS are currently relatively generous compared to those normally offered in private sector schemes, on average we suspect members will not lose out if this proposal is implemented and may in fact gain (possibly</p>

	<p>materially) in relative terms. Nevertheless, we would expect there to be a mixture of gainers and losers. Also, if there are guaranteed bulk transfer terms written into the original contract then these could be very generous and could produce windfall gains for members and increase the exposure for the new employer and ultimately the Fair Deal Employer through the pass through arrangement where before there would not necessarily have been any exposure to additional cost/risks.</p> <p>Overall we understand the policy intention here but have some concerns over the possibility of windfall gains for members given the individual transfer-in terms on offer in the LGPS. What might be preferable is that some standardisation of the terms offered on transfer back (depending on the original LGPS benefits secured in the broadly comparable scheme) would be more equitable.</p> <p>However, given the relatively low number of broadly comparable schemes still in existence, on balance it is something that could be overall acceptable to the LGPS to achieve the policy outcome.</p>
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Q 5	RESPONSE
<p>Do you agree with our proposals on Deemed Employer status?</p>	<p>It appears it will be the Fair Deal Employer's choice, when initially putting the contract out to tender, whether the Admission Agreement or Deemed Employer approach will be used. <b><i>This makes it imperative that each Fair Deal Employer has a clear policy on the treatment of each type of employer.</i></b></p> <p>This is a simplified method of achieving pension protection for the employees, as it avoids the new employer having to consider and sign an admission agreement with the Fund which is a positive from an administrative viewpoint. It could be used in conjunction with some limited risk sharing (i.e. where the contractor is only responsible for redundancy costs etc.) between the Fair Deal Employer and the new employer, but in our view any significant passing of the pensions risks to the new employer would be better served by the existing approach using an admission agreement with the Fund. Therefore, the policy of the Fair Deal Employer is critical to the successful operation from a Fund perspective.</p>



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Q 6	RESPONSE
<p>What should advice from the SAB contain to ensure that Deemed Employer status works effectively?</p>	<p><b><i>At a high level the advice should cover that the Fair Deal employer must have a clear policy on the approach it will take. Equally the advice should cover what Funds are required to do both on a policy basis and operationally in terms of dealing with both “Employers” in the arrangement given there will be no admission agreement to define all parties’ obligations.</i></b></p> <p>It should also cover when the Deemed Employer route works better versus the Admitted Body route and vice versa. We have set out below the main benefits and issues for further clarification in the advice from SAB.</p> <p>Main benefits of Deemed Employer Route:</p> <ul style="list-style-type: none"> <li>• Simple to put in place as no admission agreement needed</li> <li>• Very convenient for contracts done on a pure “pass-through” or “fixed cost” basis</li> <li>• Can incorporate some limited risk sharing arrangements relatively easily, albeit probably only the more straightforward ones such as early retirement strains and awards of additional pension</li> <li>• It avoids the need to assess exit debt or credit for the Fund at the end of the contract.</li> </ul> <p>Issues needing further advice:</p> <ul style="list-style-type: none"> <li>• The admission agreement approach works better than Deemed Employer where the outsourced employer takes on wider risks, as the admission agreement route provides for a better segregation of the assets and liabilities from the those of the Fair Deal Employer</li> <li>• Clarity will be needed on whether the Fund deals for administrative purposes with the Fair Deal Employer or the new employer (it could be a mixture of both, and Funds may still need to establish a separate employer code for the new employer e.g. for dealing with payroll queries)</li> <li>• Clarity will be needed on whether the new employer operates its own discretions policy or whether the Fair Deal Employer’s policies will</li> </ul>

	<p>apply</p> <ul style="list-style-type: none"> <li>• Clear communication will be needed and Funds/employers will need to update the relevant policies</li> <li>• The contribution rate in respect of the outsourced employees will need to be agreed and documented, as will the mechanism for making payments under any risk-sharing arrangements: given that there is no direct link between the Fund and the new employer, we would expect these would be matters between the Fair Deal Employer and the new employer and as such would need to be covered under the contractual arrangements. However, there would need to be a clear agreement on how costs (e.g. strain costs on redundancy etc.) would be funded and by whom. Specific allocation of costs would mean that the Deemed Employer would still need to be monitored somehow unless it was a complete pass through of all costs</li> <li>• It needs to be clear on whether the service provider is required to account for pension costs (under IAS 19 or otherwise) in the same way as under Admitted Body status. Therefore the advice from the SAB needs to address this point, whilst at the same time recognising that the service provider and its auditors may need to have the final say.</li> </ul>
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Q 7	RESPONSE
<p>Should the LGPS Regulations 2013 specify other costs and responsibilities for the service provider where deemed employer status is used?</p>	<p>We believe the responsibilities of the service provider need to be made absolutely clear and they are <b>compelled to adopt these</b> as per the service contract or a separate agreement with the Fair Deal Employer. Essentially this needs to replicate the provisions of an admission agreement where relevant and could be embedded in the Regulations but we would prefer the Regulations to refer to specific guidance from the SAB as this would allow easier updates to the process as undoubtedly it would need some adaptation as all parties become accustomed to the new environment. It would then seem sensible for this to be part of the advice from the SAB with template clauses or wording for Fair Deal Employers to include in their bidding documentation.</p>

	<p>With regards to costs we would not agree that the Regulations or Guidance should prescript this for all costs but instead give guidance on Fair Deal Employers adopting their policy. For example where the ill health costs are insured outside the Fund it may be sensible for those costs to be passed across in a different way.</p>
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Q 8	RESPONSE
<p>Is it right that the Admitted Body route is retained and that risk sharing arrangement can be included in the Admission Agreement?</p>	<p>We agree that the existing arrangements should be retained as they are more appropriate in certain circumstances e.g. a separate local authority trading company set up by the Council.</p> <p>However, the change should add more flexibility to the drafting of admission agreements although we see no barrier to including risk sharing arrangements under the current regulations.</p> <p>Traditionally our preference has been for admission agreements to be standardised and simply reflect the responsibilities of all parties on participation. Any risk sharing arrangements could be covered in the contractual agreements as they are a matter for the authority and the outsourced employer.</p> <p>On a general basis this would still be our preference (as the risk sharing is a matter for the two parties not the pension fund) but allowing for this explicitly in the Admission Agreement would help all parties with clarity on how the employer should be treated and what arrangements are in place. This is particularly important given the introduction of Exit Credits.</p>

Q 9	RESPONSE
<p>What further steps can be taken to encourage pension issues to be given full and timely consideration by Fair Deal Employers when services or functions are outsourced?</p>	<p>We agree that the Regulations and advice from SAB needs to prescript and encourage timely consideration of the pension issues. However, this is likely to only have limited impact given that often the problem is those departments or officers (who aren't pension specialists) in a Council are usually unaware of the obligations in the Regulations or guidance and are understandably focused on the service being outsourced. This is principally the reason for the lack of engagement under the current arrangements.</p>

	<p>Initially an effective way will be to educate the various parties on the new requirements and this would likely be best through each pension fund so some guidance from the SAB on how that should be done would seem sensible. However, this is not always effective unless a continued campaign is sustained.</p> <p>A long term solution that we think would be effective is make consideration of the pension issues part of the mandatory tendering process and guidance which would mean a Fair Deal Employer's procurement department (or national framework) would need to include reference to the approaches as a mandatory requirement. This could even cover standard clauses to include in contracts and/or bid documents and could refer to the SAB advice, the LGPS Regulations and the Fair Deal Employer's policy on the matter. We do not know how easy this is to achieve but we would recommend it is at least considered by the SAB and MHCLG.</p>
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<b>Q 10</b>	<b>RESPONSE</b>
<p>Are you aware of any other equalities impacts or any particular groups with protected characteristics which would be disadvantaged by our Fair Deal proposals?</p>	<p>We have not considered this issue in detail the context of general equality impacts but none immediately come to mind.</p> <p>However, as identified in Q2 in relation to a subset of employees it would appear to us that under draft Regulations 3B(1) and 3(B)11 it appears that employees working for a different Fair Deal employer from the one carrying out the outsourcing are not protected therefore causing some inequality in terms of pension treatment. This seems unlikely to be a policy decision so needs clarity for all parties.</p> <p>The Regulations seem to us to introduce an anomaly in this area, best illustrated by an example. If, say, a fire authority sources its cleaning service from the local authority in its area, but decides it wants to outsource that service then the fire authority is not the "Fair Deal employer" in relation to those employees, and our reading of the draft Regulations is that these employees' pension rights are not protected. If, on the other hand, they had been working directly for the fire authority then the fire authority would be their "Fair Deal</p>

	<p>employer” so the employees would be protected. For consistency of treatment we would suggest that such employees should be protected by virtue of the fact that they are working for a Fair Deal employer, but either way we feel this should be a deliberate policy decision which needs clarifying.</p>
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Q 11	RESPONSE
<p>Is this the right approach?</p>	<p>There has been concern amongst some Funds about the potential for employers to be dissolved without paying off any exit debt (whilst in some cases even transferring the active members to a successor employer). This amendment seeks to change that, by making any successor employer responsible for the original employer’s LGPS assets and liabilities, even if the successor employer is in a different LGPS Fund. This seems a positive step to us as it gives clarity and certainty to all parties.</p> <p>In our view the aim of this policy is sensible, and on the whole it will work well when the intention is for the assets and liabilities to simply consolidate into one Fund. However, we have concerns about it not needing the consent of at least the receiving Fund as essentially it could increase risk to taxpayers if the employer could not support the combined liabilities in the long term – for example where an employer with a weak covenant consolidates a large pension deficit in one Fund. We would therefore prefer it to <b><u>still require consent</u></b> subject to that not being unreasonably withheld to provide protection to the receiving Fund.</p>

Q 12	RESPONSE
<p>Do the draft regulations effectively achieve our aims?</p>	<p>We cannot of course give a legal view on the enforceability/application of the Regulations but they do appear to achieve the aims of the policy set out in the consultation document assuming the guidance is clear on how this should be done effectively.</p>

Q 13	RESPONSE
<p>What should the guidance issued by the Secretary of State state regarding the terms of the asset and liability transfers?</p>	<p>As per the answer to Q11 above we believe some sort of consent should be needed taking into account the circumstances of the transfer.</p> <p>With regards to the terms of the transfer of assets and liability transfers the main issue is usually to</p>

	<p>determine the assets transferred (as normally the liabilities transferred are determined by the membership records).</p> <p>We think the guidance should as a minimum include:</p> <ul style="list-style-type: none"><li>• Details of how the date and transfer of administration and payroll records to the successor employer and Fund should be dealt with (in terms of verification and transitional arrangements such as pension payments). If the original and successor employer are in the same Fund some of the requirements will fall away but verification of the data should still be a requirement to avoid dispute at a later date when it is possible that the original employer records do not exist anymore.</li><li>• Details of the acceptable approaches to determining the asset amount which could be based on a roll forward from the previous valuation or a share of assets if the original employer was part of a group of employers for contribution purposes. This asset value should be agreed and certified as reasonable by the Actuary (or the Actuary to each Fund where a transfer is to another Fund)</li><li>• Confirmation that the costs of the transfer should be incurred by the successor employer including any asset transition costs or other fees.</li></ul>
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Yours faithfully



Abigail Leech  
Head of Fund  
Lancashire County Pension Fund

## Lancashire Local Pension Board

Meeting to be held on Tuesday, 30 April 2019

Electoral Division affected:  
None;

### Update on Part I reports presented to the recent Pension Fund Committee

Contact for further information: Mike Neville, Tel: (01772) 533431, Senior Democratic Services Officer, [mike.neville@lancashire.gov.uk](mailto:mike.neville@lancashire.gov.uk)

#### Executive Summary

This report lists the 'Part I' items that were presented to the Pension Fund Committee in March 2019 and members of the Board will be given an update on decisions taken in respect of the reports at the meeting.

#### Recommendation

The Board is asked to comment in relation to the Part I reports that were considered by the Pension Fund Committee on the 29<sup>th</sup> March 2019 and any decisions taken.

#### Background and Advice

At the meeting on the 29<sup>th</sup> March 2019 the Pension Fund Committee considered a number of reports in Part I of the agenda (available to the press and public) which included the following:

- Minutes of the Meeting held on the 1st February 2019
- Lancashire County Pension Fund - External Audit Plan 2018/19
- Lancashire County Pension Fund - Q3 2018/19 Budget Monitoring
- Lancashire County Pension Fund 2019/20 Budget
- Responsible Investment Report
- Lancashire County Pension Fund Discretions Policy Statement
- Lancashire County Pension Fund Training Plan 2019
- Data Quality Report (Mercers)
- 2019/20 Workplan of the Lancashire Local Pension Board

- Feedback from members of the Committee on pension related training, conferences and events.
- Transaction of Urgent Business - appointment of a Scheme Member representative on the Lancashire Local Pension Board.
- 2019/20 Programme of meetings

Members of the Board received notification when the agenda for the Committee was published and available to view on the [County Council website](#). A full copy of the agenda was also made available for Board members to view via the secure Pensions Library.

**Consultations**

N/A

**Implications:**

This item has the following implications, as indicated:

**Risk management**

There are no significant risk management implications associated with this report

**Local Government (Access to Information) Act 1985**

**List of Background Papers**

Paper	Date	Contact/Tel
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N/A

Reason for inclusion in Part II, if appropriate

N/A



## Lancashire Local Pension Board

Meeting to be held on Tuesday, 30 April 2019

Electoral Division affected: None;
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### **Feedback from members of the Board on pension related training, conferences and events.**

Contact for further information: Mike Neville, Tel: (01772) 533431, Senior Democratic Services Officer [mike.neville@lancashire.gov.uk](mailto:mike.neville@lancashire.gov.uk)

#### **Executive Summary**

This report relates to training which members of the Board have received since the last meeting and gives individuals an opportunity to provide feedback on their experience.

#### **Recommendation**

Individual members of the Board are asked to provide feedback on their experience of any internal/external or online pension related training referred to in the report.

#### **Background and Advice**

At the meeting on the 29<sup>th</sup> March 2019 the Pension Fund Committee agreed a revised Training Policy which set out the Fund's approach to supporting the learning and development needs of individuals with responsibility for the strategic direction, governance and oversight of the LCPF through their membership of the Pension Fund Committee or the Lancashire Local Pension Board.

The following conferences, events and internal workshops were attended by members of the Board since the last meeting:

**7<sup>th</sup> February 2019 - 6th Annual Public Sector update for Payroll and HR Professionals** in London attended by Miss Y Moulton.

**12<sup>th</sup> March 2019 – Internal Workshop on Asset Safety and Cyber Resilience** at County Hall, Preston, attended by K Haigh and K Wallbank.

**13<sup>th</sup> March 2019 - CIPFA Local Pension Board Seminar** in Liverpool attended by K Haigh.

**2<sup>nd</sup> April 2019 – Workshop on the Local Pension Partnership pension administration service (Service Improvement Plan)** attended by K Haigh, Miss M Moulton and K Wallbank.

**Online training** – The Chair, K Haigh and Miss Y Moulton have all confirmed that they have completed various online training modules in The Pension Regulators Public Service Toolkit.

Board members will be asked to provide feedback on the above at the meeting.

### **Consultations**

N/A

### **Implications:**

This item has the following implications, as indicated:

### **Risk management**

Without the required knowledge and skills members of the Board may be ill-equipped to make informed considerations regarding the direction and operation of the Pension Fund.

### **Financial**

Where appropriate any attendance, travel or accommodation costs are met by the Pension Fund.

### **Local Government (Access to Information) Act 1985 List of Background Papers**

Paper	Date	Contact/Tel
Attendance at Conferences/events approved by the Head of Fund under the Scheme of Delegation to Heads of Service	March 2019	Abigail Leech, (01772) 530808
Attendance sheets for internal pension workshops.	March 2019	Mike Neville (01772 533431)
Notifications from individual members of the Pension Board confirming completion of online modules from The Pension Regulators Public Service toolkit.	March 2019	Mike Neville (01772 533431)

Reason for inclusion in Part II, if appropriate  
N/A

## Lancashire Local Pension Board

Meeting to be held on Tuesday, 30 April 2019

Electoral Division affected: None;
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### Report of the Advisory Group on the Service Improvement Plan

Contact for further information: Mike Neville, Tel: (01772) 533431, Senior Democratic Services Officer. [mike.neville@lancashire.gov.uk](mailto:mike.neville@lancashire.gov.uk)

#### Executive Summary

Feedback from the Advisory Group established by the Board to work with the Deputy Director of Member Operations at the Local Pensions Partnership on the implementation of the Service Improvement Plan.

#### Recommendation

The Board is asked to comment on the feedback from the Advisory Group as set out in the report.

#### Background and Advice

The Deputy Director of Member Operations from the Local Pensions Partnership attended the Pension Board on the 29<sup>th</sup> January 2019 to discuss the performance of the pension administration service.

Following an open and positive discussion about a number of planned improvements intended to both assist with the stabilisation of the service over the next 12 months and develop future service provision, the Board agreed to establish a small Advisory Group to meet with the Deputy Director and discuss the proposals further from a user's perspective.

Arrangements were subsequently made for a one off meeting of the Advisory Group (comprising Mr S Thompson and Miss Y Moulton, accompanied by Mr C Smith, Technical Adviser Pensions) with the Deputy Director on the 6<sup>th</sup> March 2019.

At the meeting the Deputy Director discussed in more detail proposals included in the service improvement plan (some of which were still in the initial stages of development and had yet to be agreed internally) and members of the Advisory Group had an opportunity to give her the benefit of their knowledge and experience of the administration service from a user's perspective.

Feedback from the Advisory Group on various items discussed is set out below for consideration by the Board.

## **Contact Centre**

1. Call waiting times had been reduced to between 1 and 1½ minutes and it was acknowledged that in view of the volume of calls received this was most likely to be a minimum period which could be achieved. It was suggested that the 10 minute cut off for call waiting should be treated as a priority.
2. In future employers calling on behalf of a member should be given the option to have their call directed to a dedicated Team in the Contact Centre as this would also improve call handling. A specific mailbox for employers would also be beneficial as it would separate employer emails from those in the single shared inbox.
3. In future calls to the Contact Centre should be monitored in order to identify specific trends or issues from employers so that they can be referred to the Engagement Team who can use the data to target and address any identified issues.
4. Whilst callers were waiting there was an opportunity to provide them with automated messages about the services available through My Pension Online and this should be explored.
5. Consideration should be given to including a facility on My Pension Online where files or template documents could be available for use or information could be uploaded, removing the need for emails or posting documents which would be both more efficient and better in terms of GDPR.
6. An effort should be made to retain experienced staff in the Contact Centre rather than having the Centre viewed as an entry point into the local Pensions Partnership where staff would gain experience before moving on to positions elsewhere in the organisation.

## **Communications**

1. Current standard letters should be reviewed and where necessary amended to make them clearer and more user friendly.
2. Consideration should be given to the length of time that a case is left open. Provided sufficient monitoring is in place and that the member concerned is informed the majority of cases should not remain open for longer than 12 months without any progress.
3. Smaller employers may require additional support with regard to keeping up to date on policy/processes and may benefit from bulletins or events specific to them.
4. Providing individuals with clear information about processes for things like retirement, including realistic timescales, would help minimise queries and help manage expectations.

5. Through newsletters and planned visits employers should be encouraged to check information held by them on the EPIC system and where necessary amend/update it.
6. Similarly the Engagement Team should review contact information which it holds.

**Internal Processes**

1. Both members and employers should be encouraged to register for the My Pension Online facility.
2. It would benefit members if, when running an estimate on My Pension Online that it included a clear explanation of the rationale behind the pre populated figures, for example: why one figure is up to 31<sup>st</sup> march whilst another is rounded up to the end of the last month.
3. Members and employers should be given an opportunity to provide feedback on the service they have received in order to identify any issues and inform future improvements.
4. The Key Performance Indicators in the Service Level Agreement between the Fund and the Local Pensions Partnership should be reviewed in order to ensure that they give a realistic reflection of the member experience.

**Consultations**

The Deputy Director of Member Operations at the Local Pension Partnership

**Implications:**

This item has the following implications, as indicated:

**Risk management**

The aim of the Advisory Group is to provide the Deputy Director with an opportunity to discuss proposed improvements to the pension administration service with members of the Pension Board and get the benefit of their insight and experience as users of the service.

**Local Government (Access to Information) Act 1985  
List of Background Papers**

Paper	Date	Contact/Tel
NA		
Reason for inclusion in Part II, if appropriate		
N/A		



# Agenda Item 15

(NOT FOR PUBLICATION: By virtue of paragraph(s) 1,2,3 of Part 1 of Schedule 12A of the Local Government Act 1972. It is considered that all the circumstances of the case the public interest in maintaining the exemption outweighs the public interest in disclosing the information)

Document is Restricted

