



Agenda for a meeting of the West Yorkshire Pension Fund Pension Board to be held on Wednesday, 20 March 2024 at 10.00 am in Aldermanbury House, Godwin St, Bradford

Members of the Committee

Employer Representatives	Member Representatives
Councillor Shakeela Lal, Bradford Council	Isaac Dziya, Unison
Cllr Mahalia France-Mir, Leeds City Council	Mick Binks, Unison
David Butcher, Leeds Trinity	Vacancy - Unite the Union
Cllr D Pickersgill, Wakefield Council.	Philip Charlton, GMB

Notes:

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- The taking of photographs, filming and sound recording of the meeting is allowed except if Councillors vote to exclude the public to discuss confidential matters covered by Schedule 12A of the Local Government Act 1972. Recording activity should be respectful to the conduct of the meeting and behaviour that disrupts the meeting (such as oral commentary) will not be permitted. Anyone attending the meeting who wishes to record or film the meeting's proceedings is advised to liaise with the Agenda Contact who will provide guidance and ensure that any necessary arrangements are in place. Those present who are invited to make spoken contributions to the meeting should be aware that they may be filmed or sound recorded.
- If any further information is required about any item on this agenda, please contact the officer named at the foot of that agenda item.

From:

Jason Field

Interim Director of Legal and Governance

Agenda Contact: Jane Lythgow/Su Booth/Su Booth

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To:

A. PROCEDURAL ITEMS

1. DISCLOSURES OF INTEREST

(Members Code of Conduct – Part 4A of the Constitution)

To receive disclosures of interests from members and co-opted members on matters to be considered at the meeting. The disclosure must include the nature of the interest.

An interest must also be disclosed in the meeting when it becomes apparent to the member during the meeting.

Notes:

- (1) *Members must consider their interests, and act according to the following:*

Type of Interest	You must:
<i>Disclosable Pecuniary Interests</i>	<i>Disclose the interest; not participate in the c or vote; and leave the meeting <u>unless</u> yo dispensation.</i>
<i>Other Registrable Interests (Directly Related)</i> OR <i>Non-Registrable Interests (Directly Related)</i>	<i>Disclose the interest; speak on the item c public are also allowed to speak but othe participate in the discussion or vote; and meeting <u>unless</u> you have a dispensation.</i>
<i>Other Registrable Interests (Affects)</i> OR <i>Non-Registrable Interests (Affects)</i>	<i>Disclose the interest; remain in the participate and vote <u>unless</u> the matter a financial interest or well-being</i> <i>(a) to a greater extent than it affects the interests of a majority of inhabitants of the ward, and</i> <i>(b) a reasonable member of the public ki the facts would believe that it would a view of the wider public interest; in wl</i>

Speak on the item only if the public allowed to speak but otherwise not participate in the discussion or vote; and meeting unless you have a dispensation.

- (2) *Disclosable pecuniary interests relate to the Member concerned or their spouse/partner.*
- (3) *Members in arrears of Council Tax by more than two months must not vote in decisions on, or which might affect, budget calculations, and must disclose at the meeting that this restriction applies to them. A failure to comply with these requirements is a criminal offence under section 106 of the Local Government Finance Act 1992.*
- (4) *Officers must disclose interests in accordance with Council Standing Order 44.*

2. MINUTES

1 - 10

Recommended –

That the minutes of the meeting held on 13 December 2024 be signed as a correct record (previously circulated & attached).

(Jane Lythgow – 01274 432270 / Su Booth 07814 073884)

3. INSPECTION OF REPORTS AND BACKGROUND PAPERS

(Access to Information Procedure Rules – Part 3B of the Constitution)

Reports and background papers for agenda items may be inspected by contacting the person shown after each agenda item. Certain reports and background papers may be restricted.

Any request to remove the restriction on a report or background paper should be made to the relevant Strategic Director or Assistant Director whose name is shown on the front page of the report. If that request is refused, there is a right of appeal to this meeting.

Please contact the officer shown below in advance of the meeting if you wish to appeal.

(Jane Lythgow / Su Booth – 01274 432270/07814 073884)

B. BUSINESS ITEMS

4. RISK REGISTER

11 - 64

The report of the Managing Director, West Yorkshire Pension Fund (**Document “AH”**) will be presented to the Board to provide Members

with the details of West Yorkshire Pension Fund's Risk Policy and Strategy which is subject to annual review.

Recommended –

That the report be noted.

(Yunus Gajra - (01274 432343))

5. REGISTER OF BREACHES OF LAW 65 - 76

The Managing Director, West Yorkshire Pension Fund, will present a report (**Document "AI"**) which informs Members that, in accordance with the Public Service Pensions Act 2013, from April 2015, all Public Service Pension Schemes fall under the remit of the Pensions Regulator.

Section 70 of the Pensions Act 2004 (the Act) imposes a requirement to report a matter to The Pensions Regulator as soon as it is reasonably practicable where that person has reasonable cause to believe that:

- a) A legal duty relating to the administration of the scheme has not been or is not being complied with, and
- b) The failure to comply is likely to be of material significance to The Pensions Regulator in the exercise of any of its functions.

A register of any breaches of the Pensions Code of Practice is maintained in accordance with the WYPF Breaches Procedure.

Recommended –

That the entries and actions taken on the Register of Breaches of Law contained in the appendices to Document "AI" be noted

6. LOCAL GOVERNMENT PENSION SCHEME (LGPS) UPDATE 77 - 84

The report of the Managing Director of West Yorkshire Pension Fund (**Document "AJ"**) provides Members with details of changes to the Local Government Pension Scheme (LGPS) 2014 and information on associated matters.

Recommended –

That the report be noted.

(Tracy Weaver – 01274 433571)

7. COMMUNICATIONS POLICY AND PENSION ADMINISTRATION STRATEGY 2024Y 85 - 112

The report of the Managing Director, West Yorkshire Pension Fund (WYPF), **Document "AK"** advises Members that in compliance with the LGPS Regulations 2013, WYPF prepares a written statement of

the authority's policies in relation to such matters as it considers appropriate in relation to procedures for liaison and communication with scheme employers and the levels of performance which the employers and WYPF are expected to achieve.

The Pensions Administration Strategy and Communications Policy are brought before JAG each year to review and approve, particularly if there are any new regulations and revisions to working practices.

The Pensions Administration Strategy has not required any update. The Communications Policy has been updated to reflect activities planned for 2024.

Recommended –

That the Pension Administration Strategy and the Communications Policy 2024, appended to Document “AK”, be noted.

(Yunus Gajra 01274 432343)

8. **PENSIONS ADMINISTRATION REPORT - 1 OCTOBER 2023 TO 31 DECEMBER 2023** 113 - 142

The report of the Managing Director, West Yorkshire Pension Fund (**Document AL**) provides an update on West Yorkshire Pension Fund's (WYPF) pensions administration for the period 1 October 2023 to 31 December 2023

Recommended –

That the report be noted.

(Yunus Gajra - 01274 432343)

9. **PENSIONS DASHBOARD** 143 - 146

The Managing Director, West Yorkshire Pension Fund (WYPF) will present a report, **Document “AM”** which outlines the progress on the introduction of the Pensions Dashboard.

Recommended –

That the report be noted.

(Elizabeth Boardall 07890 532188)

10. **WYPF GOVERNANCE REVIEW UPDATE** 147 - 156

The report of the Managing Director, West Yorkshire Pension Fund, (**Document “AN”**) reminds Members that further to reports presented to previous meetings of the Pension Board, a review of the effectiveness, roles and responsibilities of the WYPF Investment

Advisory Panel ('IAP'), Joint Advisory Group ('JAG') and the Pension Board ('Board') is currently being undertaken.

Muse Advisory was appointed following a procurement process to provide advice and support on the review and has undertaken a range of fieldwork to help it to build a detailed picture of the way in which WYPF operates and is governed; and to enable it to form an accurate assessment of what is working well, and where improvements could be made.

Muse Advisory's report summarising their initial observations and findings is attached as an Appendix to this report and slides drafted for the January JAG meeting are attached as Appendix B.

Recommended –

That the report, the initial observations and findings set out in Appendix A to Document "AN" and the proposed next steps of the Governance Review be noted.

(Euan Miller – 01274 432317)

11. DRAFT INVESTMENT STRATEGY STATEMENT

157 -
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The Managing Director, West Yorkshire Pension Fund (WYPF), **Document "AO"**, provides Members with a draft of an updated Investment Strategy Statement (ISS) which has recently been issued for consultation with WYPF stakeholders following consideration at the WYPF Investment Advisory Panel ('IAP') meeting on 25 January 2024. The ISS has been revised to reflect developments in WYPF's investment arrangements and beliefs; and in particular the changes in strategic asset allocation agreed by the Investment Advisory Panel during 2023.

The closing date for consultation responses is 5 April 2024.

Recommended –

That the Board;

- a) notes the draft ISS, the relevant regulations and guidance and the consultation process which is currently ongoing and;**
- b) considers whether it wishes to feed into the consultation.**

(Euan Miller – 01274 432317)

12. PAYMENT OF DEATH GRANTS

161 -
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The LGPS Regulations 2013 allows the administering authority (WYPF), at their absolute discretion, to make payments in respect of a death grant lump sum.

The report of the Managing Director, West Yorkshire Pension Fund (WYPF), **Document “AP”** highlights the process undertaken by WYPF to ensure that death grants are paid correctly and to the right beneficiaries.

Recommended –

That the report be noted.

(Matt Mott - 07815 476877)

13. THE PENSION REGULATOR GENERAL CODE OF CONDUCT

169 -
172

The Managing Director, West Yorkshire Pension Fund, WYPF, will present a report (**Document “AQ”**) which reminds Members that the role of The Pension Board, as defined by sections 5(1) and (2) of the Public Service Pensions Act 2013 is to assist the Council as Scheme Manager in ensuring the effective and efficient governance and administration of the Local Government Pension Scheme (LGPS) including securing compliance with the LGPS regulations and any other legislation relating to the governance and administration of the LGPS; securing compliance with the requirements imposed in relation to the LGPS by the Pensions Regulator (TPR); and any other such matters as the LGPS regulations may specify.

To be able to assist the Scheme Manager and meet the requirements of the Public Service Pensions Act 2013, Pension Board Members should understand what WYPF needs do in order to meet their legal responsibilities and regulatory expectations.

TPR’s General Code of Practice sets out what all governing bodies should do or must do in order to meet these legal responsibilities and regulatory expectations. Work is underway to help confirm the Fund complies with the requirements within the new Code. After the initial review, ongoing compliance checks will be carried out on a regular basis.

Members are asked to be aware of the TPR General Code of Practice and how it applies to the administration of the LGPS and to watch an Aon webinar about the TPR General Code of Practice.

(Matt Mott - 07815 476877)

14. TRAINING UPDATE AND PLANS

173 -
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The Managing Director, West Yorkshire Pension Fund, (WYPF) will present **Document “AR”** which reminds Members that the role of The Pension Board, as defined by sections 5(1) and (2) of the Public Service Pensions Act 2013 is to assist the Council as Scheme Manager in ensuring the effective and efficient governance and administration of the Local Government Pension Scheme (LGPS) including securing compliance with the LGPS regulations and any

other legislation relating to the governance and administration of the LGPS; securing compliance with the requirements imposed in relation to the LGPS by the Pensions Regulator; and any other such matters as the LGPS regulations may specify.

To be able to assist the Scheme Manager and meet the requirements of the Public Service Pensions Act 2013, Pension Board Members must be able to demonstrate suitable knowledge and skills of the LGPS to effectively scrutinise the decisions made by officers.

The training of Pension Board members to understand their responsibilities and the issues they are dealing with is a very high priority. Details of training courses, conferences and seminars listed may assist Board Members.

Recommended –

- 1. Members are asked to complete the TPR Public Sector Toolkit online training, including the Scam module, by 31 March 2024 and the relaunched Hymans Robetson online LGPS Learning Academy Training to meet the expectations of the TPR and the requirements define by the Public Service Pensions Act 2013.**
- 2. Board Members are also encouraged to attend external training events provided by PLSA, LGA & Actuarial firms. Consideration should also be given to Local Pension Board Member representation at various national events such as the PLSA Conference and LGA Governance conference.**

(Matt Mott - 07815 476877)

15. BUSINESS PLAN 2024 - 2029

201 -
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The report of the Managing Director, West Yorkshire Pension Fund, (WYPF) **Document “AS”** presents WYPF’s five year business plan, highlights objectives for the Fund and documents the priorities and improvements to be implemented to help achieve those objectives.

Recommended –

That Business Plan 2024 – 29, the progress on existing key initiatives and the new initiatives listed be noted.

(Yunus Gajra – 01274 432343)

16. EXCLUSION OF PUBLIC

Members are asked to consider if the **Not for Publication** Appendix to **Document “AT”** containing the minutes of the West Yorkshire Pension Fund Investment Advisory Panel meeting held on 27 January 2024 should be considered in the absence of the public and, if so, to approve the following recommendation:

Recommended –

That the public be excluded from the meeting during consideration of the Not for Publication Appendix to Document “AG” containing the minutes of the West Yorkshire Pension Fund Investment Advisory Panel meeting held on 27 January 2024 because information would be disclosed which is considered to be exempt information within paragraph 3 (Financial or Business Affairs) of Schedule 12A of the Local Government Act 1972 (as amended).

It is considered that, in all the circumstances, the public interest in maintaining this exemption outweighs the public interest in disclosing this information as it is in the overriding interest of proper administration that Members are made aware of the financial implications of any decision without prejudicing the financial position of the West Yorkshire Pension Fund

**17. WEST YORKSHIRE PENSION FUND INVESTMENT ADVISORY
PANEL MINUTES 27 JANUARY 2024**

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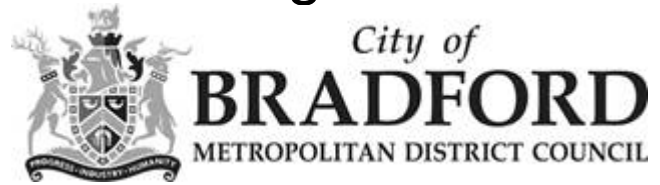
Members are reminded that the role of The Pension Board, as defined by sections 5(1) and (2) of the Public Service Pensions Act 2013 is to assist the Council as Scheme Manager in ensuring the effective and efficient governance and administration of the Local Government Pension Scheme (LGPS) including securing compliance with the LGPS regulations and any other legislation relating to the governance and administration of the LGPS; securing compliance with the requirements imposed in relation to the LGPS by the Pensions Regulator; and any other such matters as the LGPS regulations may specify.

Appended to the report of the Managing Director, West Yorkshire Pension Fund, **Document “AT”** are the minutes of the meeting of WYPF Investment Advisory Panel, 27 January 2024, and are submitted to the Pension Board to enable the Board to ensure effective and efficient governance and administration of the LGPS.

Members are asked to review the Not for Publication minutes of the WYPF Investment Advisory Panel, 27 January 2024.

(Euan Miller - 01274 434517)

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Minutes of a meeting of the West Yorkshire Pension Fund Pension Board held on Wednesday, 13 December 2023 in Aldermanbury House, Godwin St, Bradford

Commenced 10.00 am
Concluded 12.30 pm

Present – Members

Employer Representatives	Member Representatives
Councillor Shakeela Lal, Bradford Council	Mick Binks, Unison
David Butcher, Leeds Trinity	Mark Morris, Unite the Union
Cllr D Pickersgill, Wakefield Council	Philip Charlton, GMB

Councillor Lal in the Chair

37. DISCLOSURES OF INTEREST

Members were advised that, following advice from The Pensions Regulator a revised Conflict of Interest Policy would be circulated.

All those present who were members or beneficiaries of the West Yorkshire Pension Fund disclosed, in the interests of transparency, an interest in all relevant business under consideration.

***Action:* Director of Legal and Governance**

38. MINUTES

Resolved –

That the minutes of the meeting of 13 September 2023 be signed as a correct record.

39. INSPECTION OF REPORTS AND BACKGROUND PAPERS

There were no appeals made to view restricted documents.

40. WYPF INVESTMENTS TRAINING PRESENTATION

Board Members were aware that to be able to assist the Scheme Manager and meet the requirements of the Public Service Pensions Act 2013, Pension Board Members must be able to demonstrate suitable knowledge and skills of the LGPS to effectively scrutinise the decisions made by officers.

To enhance Members' understanding the Chief Investment Officer, West Yorkshire Pension Board, provided a presentation on West Yorkshire Pension Fund Investments.

Members were advised of the Chief Investment Officer's (CIO) extensive previous experience and of his (CIO) role within WYPF. A detailed PowerPoint presentation was provided including strategic asset allocation; stakeholder management, investment strategy and staffing developments throughout 2023; alignment of the investment strategy and the belief and execution of those investments.

Resolved –

That the West Yorkshire Pension Fund's Chief Investment Officer be thanked for the production of an interesting and informative presentation.

ACTION: Managing Director, West Yorkshire Pension Fund

41. RISK MANAGEMENT

The Managing Director, West Yorkshire Pension Fund (WYPF) submitted a report (**Document "Y"**) which presented WYPF's Risk Policy and Strategy.

Board Members were advised that the purpose of the Policy and Strategy was to effectively mitigate risks which may otherwise impact on WYPF meeting its statutory responsibilities and strategic objectives. That was achieved by the development and maintenance of a comprehensive risk register. For each risk identified its likelihood of occurrence and materiality was considered and actions were identified in order to mitigate the risk.

It was explained that the Risk Policy and Strategy was subject to regular review by the WYPF Investment Advisory Panel (IAP) and Joint Advisory Group (JAG) and would be reported to each Pension Board meeting.

A Member queried how dynamic the register was and questioned if it evolved and changed. In response it was confirmed that amendments had not been made since it was last presented and if they had those changes would have been highlighted. Consideration had been given to downgrading the severity of risks around recruitment, but the Investment Advisory Panel had wanted to retain the red status.

The risk to the fund should a number of employers issue S114 notices, a notice indicating that a council's forecast income was insufficient to meet its forecasted expenditure, was discussed. Members were assured that there would be no financial impact on the fund and contributions would continue to be paid by employers. Increased workload to deal with pension enquiries from members who may be facing redundancy about pension calculations would have an impact on staff workloads. Discussions had been held with colleagues involved in pension calculations for authorities which had issued those notices to plan for the increases in workloads. The impact on the cost per member was queried and it

was explained that there would have to be a significant reduction in members for any material effect to be felt.

A Member suggested it would be useful to see the residual level of risk in the register following mitigating actions and it was agreed that the next version of the risk register would be updated to reflect that request.

The confidence of the fund to mitigate risks of cyber-attacks was questioned and it was explained that this was covered in the Pensions Administration report being presented later in the meeting.

Resolved –

- 1. That the report be noted.**
- 2. That risks be rated before and after management actions or controls are in place.**

ACTION: Managing Director, West Yorkshire Pension Fund

42. REGISTER OF BREACHES OF LAW

The Managing Director, West Yorkshire Pension Fund, presented a report (**Document “Z”**) which informed Members that, in accordance with the Public Service Pensions Act 2013, from April 2015, all Public Service Pension Schemes fall under the remit of the Pensions Regulator.

Section 70 of the Pensions Act 2004 (the Act) imposed a requirement to report a matter to The Pensions Regulator as soon as it was reasonably practicable where that person had reasonable cause to believe that:

- a) A legal duty relating to the administration of the scheme has not been or is not being complied with, and
- b) The failure to comply is likely to be of material significance to The Pensions Regulator in the exercise of any of its functions.

A register of any breaches of the Pensions Code of Practice was maintained in accordance with the WYPF Breaches Procedure. The Register of Breaches 2023/24 was appended to Document “Z”.

Members were informed that the breaches on the register for 2023/2024 related to contributions being paid late by employers and not being received by the fund until after the deadline of the 21st day of the following month and the non-issue of Annual Benefit Statements by 31 August 2023 for a small number of active members.

It was explained that the proportion of Annual Benefit Statements not being received by the target date was very small at 99.4%. Since the report had been drafted the figure had risen to 99.5%. The regulations stipulated that should the 100% target not be met it must be reported to TPR if it was felt that the breach was of material significance. It was believed it would be very difficult for any

pension fund to meet the 100% target due, in part, to a small number of members not advising the fund of changes to contact details.

Members were advised of a new process developed to deal with late payments and that alerts would be raised should an employer be 60 days late with payments to ensure warning letters could be issued. If payments were not received within 90 days, the employer would be reported to The Pensions Regulator.

It was questioned if members employed by any late paying employer were informed of the situation. In response it was explained that discussions were being held with The Pensions Regulator on that point, TPR wanted funds to do so, however, the fund did not want to alarm members unnecessarily. It was confirmed that there would be no direct impact on members from late payment of contributions as their benefits were protected.

It was questioned if late payments incurred interest charges and it was reported that interest was charged. It was explained that all late payments were pursued although some could be innocent mistakes due to new personnel who were unfamiliar with processes. For employers with a culture of persistent non-payment more forceful pursuits would be made going forward. As part of the valuation process all employers were assessed to determine affordability of contributions and the fund monitored those who may be struggling.

The action taken by The Pensions Regulator when reports were received was questioned. A recent example of an employer who had been reported was discussed and Members were advised that the TPR had communicated with that business and asked them to resolve the situation. It was unclear what action would be taken for repeated reports.

It was questioned if the Fund would cease to work with persistent late paying employers and it was explained that some employers had a statutory right or requirement under employment law to be in the Fund and could not be removed. It was explained that the Fund had a responsibility, under the regulations to admit all employers that met the eligibility criteria and removing employers from the Fund would likely have a negative impact on members. It was stressed that the engagement of the Employer Relations Team resulted in very few late payments occurring.

A Board Member supported TRP's view that members should be made aware of any non-payments by their employer. In response he was signposted to the TPR enforcement policy on the website and advised that the fund was required to inform members if wilful non-compliance was reported to TPR.

Resolved –

- 1. That the entries and actions taken on the Register of Breaches of Law contained in the appendix to Document “Z” be noted.**
- 2. That the Board support that members of employers who failed to**

make payments by the due date be advised of those incidents.

ACTION: Managing Director, West Yorkshire Pension Fund

43. LOCAL GOVERNMENT PENSION SCHEME REGULATIONS UPDATE

The report of the Managing Director, West Yorkshire Pension Fund, (**Document “AA”**) updated the Pension Board on changes to the Local Government Pension Scheme (LGPS) 2014 and provided information on associated matters.

Board Members’ attention was drawn to the Government’s response to consultation on investment reforms and the Local Government Pension Scheme statistics for 2022/23.

In relation to The Pensions Regulator’s consultation on a new code of conduct it was explained that this had been expected before Christmas but was now likely to be available mid to late spring 2024.

The report revealed that on 18 October 2023 the Office for National Statistics announced the Consumer Price Index (CPI) rate of inflation for September was 6.7 per cent. Government policy in recent years had been to base increases under the Pensions (Increase) Act 1971 and revaluation of pension accounts under section 9 of the Public Service Pensions Act 2013 on the rate of CPI in September of the previous year. Confirmation was awaited from Government that the revaluation and pensions increase that would apply to LGPS active pension accounts deferred pensions and pensions in payment in April would be 6.7 per cent.

It was explained that a more detailed response to the McCloud remedy would be presented later in the meeting.

Resolved –

That the report be noted.

ACTION: Managing Director, West Yorkshire Pension Fund

44. PENSIONS ADMINISTRATION UPDATE

The report of the Managing Director, West Yorkshire Pension Fund (**Document “AB”**) provided an update on West Yorkshire Pension Fund’s (WYPF) pensions administration activities for the period 1 July 2023 to 30 September 2023.

The report outlined performance and benchmarking statistics; scheme information including a full breakdown of membership between the different funds and schemes which WYPF administered; praise and the process of resolution of internal disputes. Details of the Pension Awareness Week and Employer Engagement were also provided.

Board Members were also advised of an Incident Response (IR) test which had

been conducted with the City of Bradford Metropolitan Council (CBMDC). The exercise had focused on challenging the IT and management team's response to multiple cyber incidents, offering an opportunity to review plans, rehearse situations and to learn if improvements could be made. A positive report of the exercise had been received revealing that good decisions were made on the day and officers were aware of what they should be doing. Lessons learned from that exercise included that, in the absence of key officers, all actions should be documented.

In addition, the fund had operated, for one week and without prior notice to staff, from its secondary recovery site, with no noticeable difference being reported.

In response to questions, it was confirmed that all officers completed mandatory training sessions on information security.

Details of the annual meetings for Employers and Members, held on 26 October 2023, were also provided together with staffing headcount statistics and registrations on the fund's member portal.

A Member referred to a previous suggestion that the retirement packs issued could be simplified and questioned if any progress had been made. In response it was acknowledged that retirement was a complex issue and it was agreed to check if any progress had been made to make them easier to understand. It was also agreed to report on any changes made to working practices as a result of comments or suggestions from members through the customer surveys.

It was requested that performance and benchmarking be reported with graphic images to show progress and it was agreed that this could be actioned in future reports. The impact on workload since September 2023 with potential increases in requests for pension estimates was queried. It was explained that, when workloads were high, deferred estimates were not treated with the same urgency as those which were due for payment. It was expected that an increase in those tasks would be seen in the next report. Board Members were advised that fund members could calculate their own estimates using the online portal.

In response to concerns that estimates may be required quickly Members were assured that the Fund had the ability to move staffing resources into areas requiring priority.

Resolved –

That the report be noted.

ACTION: Managing Director, West Yorkshire Pension Fund

45. MCCLOUD REMEDY

The Managing Director, West Yorkshire Pension Fund (WYPF) presented a report (**Document "AC"**) including the Governments response, issued on 8 September 2023, to the consultation 'McCloud' remedy in the Local Government Pension Scheme (LGPS) – supplementary issues and scheme regulations' which closed

on 30 June 2023.

On 8 September 2023 the final LGPS regulations, which enabled the McCloud remedy to be implemented, were also laid in parliament and came into force on 1 October 2023.

It was explained that the Fund was working with the software provider, Civica, to provide updates to allow calculations arising from the remedy to be conducted.

The regulations issued included retrospective actions required from 1 April 2023 so there was a lot of work to be revisited. Whilst the regulations had been issued a large amount of statutory and non-statutory guidance was still outstanding. Regular internal project meetings were being conducted; a newsletter would be issued before Christmas and the website had been updated.

Resolved –

That the report be noted.

ACTION: Managing Director, West Yorkshire Pension Fund

46. EXCLUSION OF THE PUBLIC

It was reported that information contained in the report would no longer be prejudicial to the Council’s case in any future legal proceedings that may be initiated, and no resolution was taken to exclude the public.

47. PENSIONS DASHBOARD

The Managing Director, West Yorkshire Pension Board, presented Document “AD” which provided an update on the progress of the introduction of the Pensions Dashboard. The report had initially been published as a Not for Publication document which it had since been deemed could be discussed, without prejudice, in public.

Members were advised that work was required in readiness for the commencement of the dashboard to ensure that information held by the Fund was up to date and accurate. The dashboard comprised of a complex technical eco system, however, officers were confident about the processes required. It was questioned if the system would add complexity for members and Board Members were assured that the system should simplify and make it easier for members to view their pensions.

Resolved –

That the report be noted.

ACTION: Managing Director, West Yorkshire Pension Fund

48. EMPLOYER ROLES AND RESPONSIBILITIES - TRAINING PRESENTATION

Board Members were aware that to be able to assist the Scheme Manager and meet the requirements of the Public Service Pensions Act 2013, Pension Board Members must be able to demonstrate suitable knowledge and skills of the LGPS to effectively scrutinise the decisions made by officers.

To enhance Members' understanding the Managing Director, West Yorkshire Pension Board, provided a report (**Document AE**) and the Employer Service Manager delivered a presentation on Employer Roles and Responsibilities. For information copies of the presentation would be provided to Members following the meeting.

A detailed PowerPoint was provided including details of the employers in the West Yorkshire Pension Fund, the employer's responsibility to the Fund, the employer responsibility to the scheme member and how the Fund worked, via the Employer Relations Team, with those employers.

It was questioned whether all shared service partners were treated the same way, and it was confirmed that as part of their contracts with the Fund regular reports were made to their Pension Boards. Efforts were made to ensure there were parallel arrangements with all partners, however, the London Borough of Hounslow conducted their own payroll.

Resolved –

That the presentation on Employer Roles and Responsibilities be noted.

ACTION: Managing Director, West Yorkshire Pension Fund

49. WEST YORKSHIRE PENSION FUND TRAINING STRATEGY

Board Members were aware that to be able to assist the Scheme Manager and meet the requirements of the Public Service Pensions Act 2013, Pension Board Members must be able to demonstrate suitable knowledge and skills of the LGPS to effectively scrutinise the decisions made by officers.

The training of Pension Board members to understand their responsibilities and the issues they are dealing with was a very high priority.

The Managing Director, West Yorkshire Pension Fund (WYPF) provided a report (**Document "AF"**) which presented the WYPF Training Strategy and provided details of training courses, conferences and seminars available to assist Board Members.

It was explained that the Training Strategy was being reintroduced and set out the training requirements expected of Board Members. The requirements of the strategy must be completed within six months of them joining the board or by 31 March 2024.

To comply with TPR request for progress, Board Members were asked to send details to the Head of Governance and Business Development (Matt Mott) or Senior Governance and Business Development Officer (Sukhjot Kaur) of the

completed TRP Public Service Toolkit or, if not completed, to complete that as a matter of urgency.

Board Members were asked to consider the Knowledge and Skills Training Strategy, contained at Appendix A to Document “AF” along with the Pension Board attendance and training record 2023 at Appendix B. The training records would be utilised to plan future training.

A Board Member explained that he could not download the certificate of completion of the TPR Public Service Toolkit, and it was agreed that he would take a screen shot of that certificate and forward for inclusion on his personal training record.

Following discussion about the annual LGA Fundamentals training programme it was confirmed that Board Members were encouraged to complete the training as often as they wished and should advise the Fund if they would like that training to be booked. For those Members who did not want to repeat the Fundamentals programme training it was confirmed that that it was not a requirement for them to repeat the training annually. A Member who had conducted that training many times reported that his training record did not include that programme and it was agreed to update his record.

Resolved -

- 1. That Members would complete TPR Public Sector Toolkit online training, including the Scam module, by 31 March 2024 and the relaunched Hymans Robertson online LGPS Learning Academy Training and meet the expectations of TPR and the requirements defined by the Public Service Pensions Act 2013.**
- 2. That Board Members would attend external training events provided by PLSA, LGA & Actuarial firms. Consideration should also be given to Local Pension Board Member representation at various national events such as the PLSA Conference and LGA Governance conference.**

ACTION: Managing Director, West Yorkshire Pension Fund

50. EXCLUSION OF THE PUBLIC

Resolved –

That the public be excluded from the meeting during consideration of the Not for Publication Appendix to Document “AG” containing the minutes of the West Yorkshire Pension Fund Investment Advisory Panel meeting held on 26 October 2023 because information would be disclosed which is considered to be exempt information within paragraph 3 (Financial or Business Affairs) of Schedule 12A of the Local Government Act 1972 (as amended).

It is considered that, in all the circumstances, the public interest in maintaining this exemption outweighs the public interest in disclosing this information as it is in the overriding interest of proper administration that

Members are made aware of the financial implications of any decision without prejudicing the financial position of the West Yorkshire Pension Fund

51. WEST YORKSHIRE PENSION FUND INVESTMENT ADVISORY PANEL MINUTES 26 OCTOBER 2023

Members were reminded that the role of The Pension Board, as defined by sections 5(1) and (2) of the Public Service Pensions Act 2013 was to assist the Council as Scheme Manager in ensuring the effective and efficient governance and administration of the Local Government Pension Scheme (LGPS) including securing compliance with the LGPS regulations and any other legislation relating to the governance and administration of the LGPS; securing compliance with the requirements imposed in relation to the LGPS by the Pensions Regulator; and any other such matters as the LGPS regulations may specify.

Appended to the report of the Managing Director, West Yorkshire Pension Fund, **Document “AG”** were the minutes of the meeting of WYPF Investment Advisory Panel, 26 October 2023, and were submitted to the Pension Board to enable the Board to ensure effective and efficient governance and administration of the LGPS.

Resolved –

That the minutes of the West Yorkshire Pension Fund, Investment Advisory Panel 26 October 2023, be noted.

ACTION: Managing Director, West Yorkshire Pension Fund

52. CHAIR'S NOTE

A Board Member was leaving the Board to take up a new position as an officer of West Yorkshire Pension Fund and the Chair, on behalf of the Board, thanked the Unite the Union representative Mark Morris, for his valuable contribution. Mark was wished well, by all, in his new role.

Chair

Note: These minutes are subject to approval as a correct record at the next meeting of the West Yorkshire Pension Fund Pension Board.

THESE MINUTES HAVE BEEN PRODUCED, WHEREVER POSSIBLE, ON RECYCLED PAPER



Report of the Managing Director, West Yorkshire Pension Fund to the meeting of Local Pension Board to be held on 20 March 2024.

AH

Subject:

Risk Register

Summary statement:

This report presents West Yorkshire Pension Fund's Risk Policy and Strategy which is subject to annual review.

The two risks which are currently rated 'red' are:

- Risk 41 – Recruitment and retention of experienced staff, and
- Risk 49 – Provision of IT services and equipment from CBMDC

EQUALITY & DIVERSITY:

No specific equality and diversity issues.

Euan Miller
Managing Director

Portfolio:

Report Contact: Yunus Gajra
Assistant Director (Finance,
Administration and Governance)
Phone: (01274) 432343
E-mail: Yunus.gajra@wypf.org.uk

Overview & Scrutiny Area:

1. SUMMARY

This report presents West Yorkshire Pension Fund's Risk Policy and Strategy which is subject to annual review.

The two risks which are currently rated 'red' are:

- Risk 41 – Recruitment and retention of experienced staff, and
- Risk 49 – Provision of IT services and equipment from CBMDC

2. Introduction

2.1 This document sets out West Yorkshire Pension Fund's Risk Management Policy, Strategy and risk appetite, describing the approach to risk which WYPF adopts.

2.2 The purpose of the Policy and Strategy is to effectively mitigate risks which may otherwise impact on achieving the Fund's objectives, by the development and maintenance of a comprehensive risk register. This assists the Fund in ensuring that risks which may impact on the achievement of objectives are effectively managed.

3. Background

3.1 Risk can be defined as the combination of the likelihood of an event occurring, and the level of impact on the Pension Fund's ability to achieve its objectives if it does occur. Pension funds exist in order to pay future pension benefits. The principal types of investment risk facing WYPF can be summarised as:

- Governance
- Regulatory
- Investment Strategy
- Responsible Investment
- People

4. Risk Policy

4.1 Risk should be eliminated, reduced, or controlled as far as possible. To achieve this WYPF will ensure that risk management is integral to the governance and management of the investments at both strategic and operational levels. The aim is to integrate risk awareness and management into both the processes and the culture to help ensure that the Fund's investment objectives are met. This policy will be subject to annual review.

5. Risk Management Strategy

5.1 The WYPF's principal investment risk management objectives are to:

- Establish and maintain a robust framework and procedures for identification, analysis, assessment and management of risk
- Ensure consistent application of the risk management methodology
- Minimise the cost of risk.

- 5.2 How this is achieved will vary depending on the type of risk and the activity involved. In relation to governance and operational risk, the objective is to eliminate risk as far as possible, whereas for investments it is to balance risk and return in the context of the pension fund investment policies.
- 5.3 The risk management process is a continuous cycle of identifying, analysing, controlling and monitoring, as set out in Appendix A, to ensure the report is up to-date and relevant.

6. Risk Assessment

- 6.1 Thirty two of the risks are above their acceptable tolerance level and therefore require Management Action Plans (MAPs) which frame the risk management actions that are required. They map out the target for each risk i.e. to reduce the likelihood, impact or both. They also include targets and critical success factors to allow the risk management action to be monitored.
- 6.2 The risk assessment identified that significant levels of activity are required to manage the risks. Many of the key risks require immediate attention and it is important that having identified risks that could have critical impact, that the required action is undertaken.
- 6.3 The risk register contained with the Risk Management Policy and Strategy sets out a number of risks which have been identified in relation to WYPF.

The structure of the attached report is as follows:

2.2.1 Categorisation of Risks	Pages 4 to 11
2.2.2 The most important risks requiring continuing scrutiny	Pages 12 to 34
2.2.3 The future review and revision of risks	Page 35
2.2.3 The full list of identified active risks (inc. risks in 2.2.2 above)	Pages 36 to 51

- 6.3 A matrix summarising where the risks lie is on page 11 of Appendix A.

7. OTHER CONSIDERATIONS

None

8. FINANCIAL & RESOURCE APPRAISAL

None

9. RISK MANAGEMENT AND GOVERNANCE ISSUES

Risks are outlined within the Risk Register.

10. LEGAL APPRAISAL

None

11. OTHER IMPLICATIONS

11.1 SUSTAINABILITY IMPLICATIONS

None

11.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

None

11.3 COMMUNITY SAFETY IMPLICATIONS

None

11.4 HUMAN RIGHTS ACT

None

11.5 TRADE UNION

None

11.6 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

None

12. NOT FOR PUBLICATION DOCUMENTS

None

13. OPTIONS

None

14. RECOMMENDATIONS

That the Risk Register is noted.

15. APPENDICES

Appendix A – Risk Register

16. BACKGROUND DOCUMENTS

None

Appendix A

WYPF Departmental Risk Management and Opportunities Report

Introduction

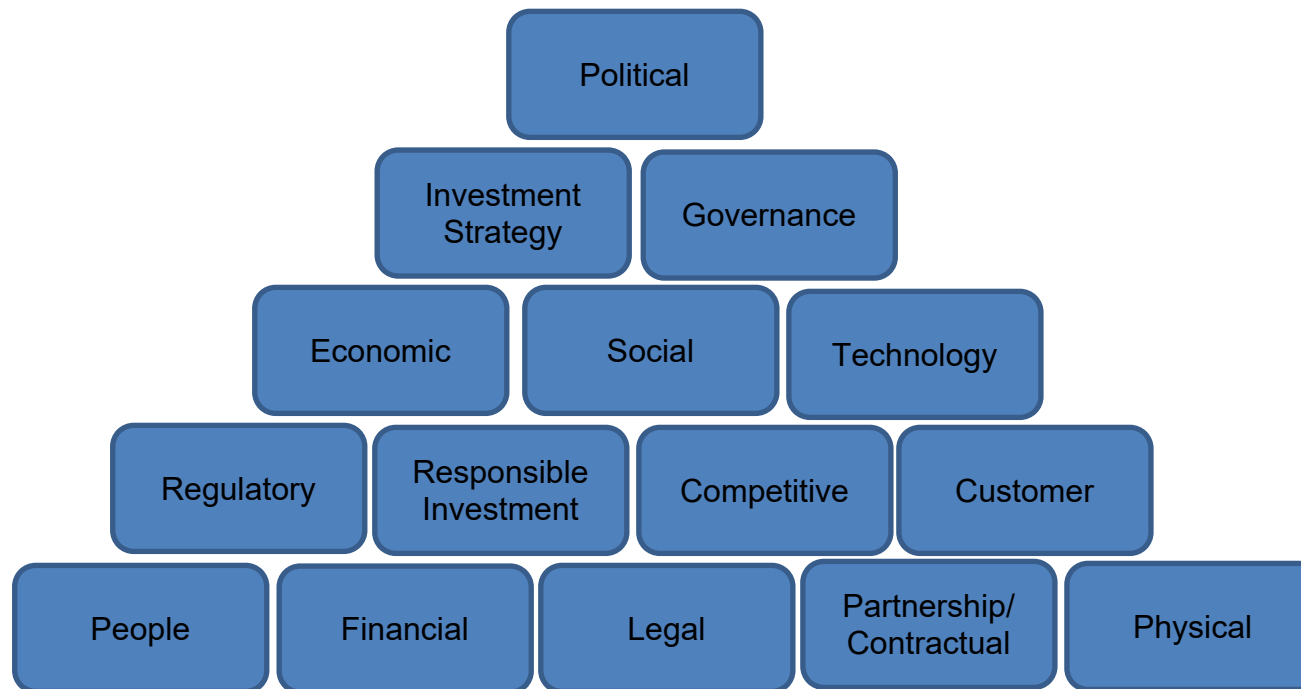
WYPF's Risk Management Plan establishes the process for implementing proactive risk management as part of the overall management of the pension fund. The purpose of risk management is to identify potential problems before they occur, so that risk handling activities may be planned and invoked as needed to mitigate adverse impacts on achieving objectives. Risk management is a continuous, forward looking process that addresses issues that could endanger the achievement of critical objectives and includes the early risk identification through the collaboration and involvement of relevant stakeholders.

WYPF have identified risks which have been rated and plotted on a matrix and a risk tolerance line agreed to prioritise the risks. The risk matrix measures each risk for its likelihood and impact in terms of its potential for affecting the ability of WYPF to achieve its objectives.

The process

Risk identification

The first of five stages of the risk management cycle require risk identification. This has been achieved through discussion with senior Managers and covers 15 categories of risk as shown below.



Identified risks

Economic

Scenario	Short name
1	Valuation registers a deficit in the pension fund
2	Reduction in proportion of active members
16	Lack of Admissions and Guarantors

Political

Scenario	Short name
3	Bradford initiatives
4	Central Government regionalisation agenda

Technological

Scenario	Short name
5	Improved Pensions and Investments systems are not developed and adopted
6	Lack of information sharing with employers
7	Current software providers pull out of the market or are taken over
39	Disaster recovery
40	Internal Fraud
42	Loss of sensitive personal data
45	Cyber Crime
49	Provision of IT services and equipment from CBMDC

Legislative/Regulatory

Scenario	Short name
8	Failure to administer the scheme in line with regulations and policies
25	Failure to adhere to relevant statutory regulations and guidance.
46	Compliance with GDPR requirements
48	Failure to include all required information issued to members under disclosure regulations

People

Scenario	Short name
9	Greater level of support expected by district councils than other employers
41	Recruitment and retention of experienced staff
43	Key staff on long term absence
44	Access to sensitive/personal data by staff

Financial

Scenario	Short name
10	Finance aren't always involved in other sections' decision making processes
12	External Fraud
13	Admin costs increase above budgeted costs
15	Prompt payment of pensions on the due date.
17	Failure to obtain ISAE 3402 reports from Hedge Fund and Currency Fund Managers

Physical

Scenario	Short name
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Competitive

Scenario	Short name
11	National and local KPI's are not being met

Customer

Scenario	Short name
14	Customer Satisfaction below acceptable levels
47	Failure to communicate adequately with scheme members

Social

Scenario	Short name

Partnership / Contractual

Scenario	Short name
18	Provision of shared services to Fire Authorities and other LGPS Funds

Governance

Scenario	Short name
19	The IAP's role within the council is not clearly defined.
20	The IAP's terms of reference are not reviewed regularly, do not meet best practice and/or are not fit for purpose.
21	Those charged with governance of the Fund and Scheme are unable to fulfil their responsibilities effectively.
22	The IAP's membership is not chosen with reference to members' investment skills/knowledge.
23	Members take decisions without due regard to advice, along party political lines or with a personal agenda.
24	Independent Advisors not suitably qualified or diverse. Advice of poor quality or not tailored to WYPF.

35	Custody arrangements may not be sufficient to safeguard Pension Fund’s assets.
36	Stock lending counterparty failure.
37	Internal Investment Management may not have appropriate control frameworks in place to protect Pension Fund assets.
38	Pension Fund investments may not be accurately valued.
50	Focus on investments means consequential non-investment risks are overlooked

Investment Strategy

Scenario	Short name
26	Strategic benchmark not set to meet the return required by the actuarial valuation.
27	Lack of asset class diversification in the strategic benchmark.
28	Investment returns achieved fall below that required by the actuarial valuation.
29	Cash resources insufficient to meet short term liabilities.

Responsible Investment

Scenario	Short name
30	Policies not linked to sustainability goals and actions focussed on a small number of issues e.g. fossil fuels
31	Measurement and reporting of Engagement is not performed, unfocussed or insufficient.
32	Climate Risks identified
33	Lack of consistent data (e.g. on Green House Gas emissions) for all asset classes hinders understanding of climate risks.
34	Lack of focus or information means the investment opportunities of Climate change are overlooked or not taken.

Risk analysis, profile and tolerance

The risks are assessed for impact and likelihood and plotted onto a matrix. The impact is measured as being negligible, marginal, critical or catastrophic. The likelihood is measured as being almost impossible, very low, low, significant, high or very high.

Appendix 1 shows all the risks that are rated on the profile.

The top risks facing WYPF are identified as:

Scenario	Short name
1	Valuation registers a deficit in the pension fund
2	Reduction in proportion of active members
5	Improved Pensions and Investments systems are not developed and adopted
6	Lack of information sharing with employers
9	Greater level of support expected by district councils than other employers
14	Customer Satisfaction below acceptable levels
15	Prompt payment of pensions on the due date.
18	Provision of shared services to Fire Authorities and other LGPS Funds
19	The IAP's role within the council is not clearly defined.
20	The IAP's terms of reference are not reviewed regularly, do not meet best practice and/or are not fit for purpose.
21	Those charged with governance of the Fund and Scheme are unable to fulfil their responsibilities effectively.
22	The IAP's membership is not chosen with reference to members' investment skills/knowledge.
23	Members take decisions without due regard to advice, along party political lines or with a personal agenda.
24	Independent Advisors not suitably qualified or diverse. Advice of poor quality or not tailored to WYPF.

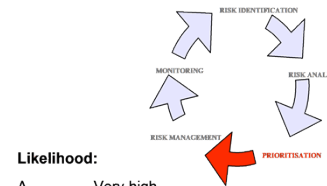
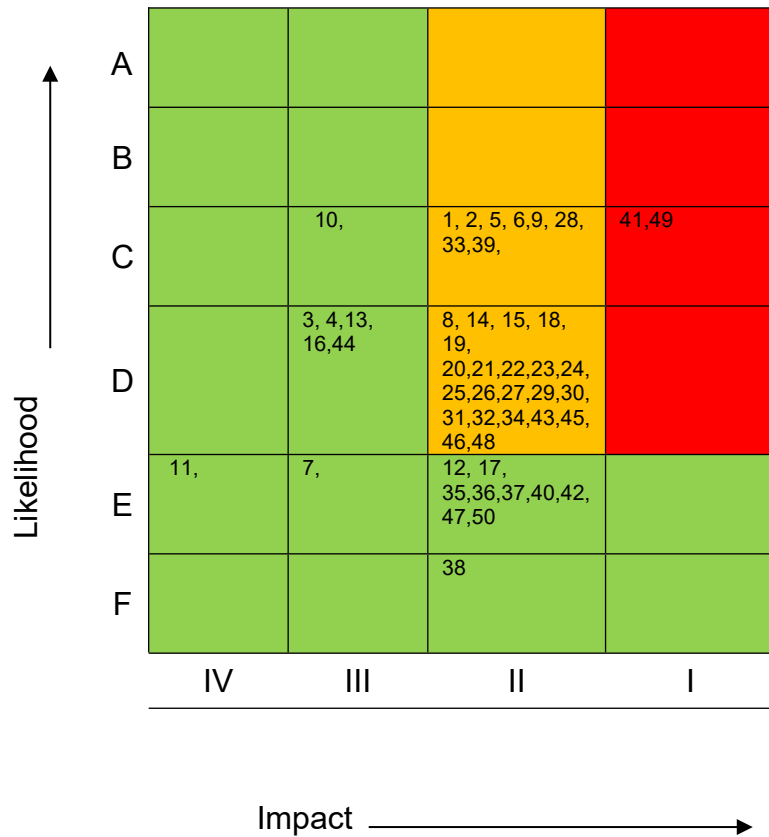
25	Failure to adhere to relevant statutory regulations and guidance.
26	Strategic benchmark not set to meet the return required by the actuarial valuation.
27	Lack of asset class diversification in the strategic benchmark.
28	Investment returns achieved fall below that required by the actuarial valuation.
29	Cash resources insufficient to meet short term liabilities.
30	Policies not linked to sustainability goals and actions focussed on a small number of issues e.g. fossil fuels
31	Measurement and reporting of Engagement is not performed, unfocussed or insufficient.
32	Climate Risks identified
33	Lack of consistent data (e.g. on Green House Gas emissions) for all asset classes hinders understanding of climate risks.
34	Lack of focus or information means the investment opportunities of climate change are overlooked or not taken
35	Custody arrangements may not be sufficient to safeguard Pension Fund's assets.
36	Stock lending counterparty failure.
37	Internal Investment Management may not have appropriate control frameworks in place to protect Pension Fund assets.
38	Pension Fund investments may not be accurately valued.
39	Disaster recovery
40	Internal Fraud
41	Recruitment and retention of experienced staff
42	Loss of sensitive personal data
43	Key staff on long term absence
45	Cyber Crime
46	Compliance with GDPR requirements
49	Provision of IT services and equipment from CBMDC

50	Focus on investments means consequential non-investment risks are overlooked
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To determine the section's appetite to risk, each of the squares on the matrix are considered to decide if WYPF are prepared to live with a risk in that box or if it needs to be actively managed. This set a theoretical tolerance line. Those risks above the line requiring further scrutiny and those below the line having sufficient control in place. The tolerance line is agreed at risks with a low or greater likelihood and a critical impact.

As part of a regular review, 50 risks have been identified and framed into scenarios. The risks identified have been rated, 32 of these above their acceptable tolerance level, 18 below the tolerance line. The results are shown on the following risk profile.

WYPF Risk profile – October 2023



- Likelihood:**
- A Very high
 - B High
 - C Significant
 - D Low
 - E Very low
 - F Almost impossible

- Impact:**
- I Catastrophic
 - II Critical
 - III Marginal
 - IV Negligible

Risk management and monitoring

Management Action Plans (MAPs) frame the risk management actions that are required. They map out the target for each risk i.e. to reduce the likelihood, impact or both. They also include targets and critical success factors to allow the risk management action to be monitored.

The risk assessment identified that significant levels of activity are required to manage the risks. Many of the key risks require immediate attention and it is important that having identified risks that could have critical impact, that the required action is undertaken.

MAP's were then agreed for those risks above the tolerance line and are specified below:

Management Action Plans

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
1	C I	<p>Valuation registers a deficit in the Fund.</p> <p>Triennial Valuation undertaken on the Fund using a range of financial assumptions as agreed with the Fund Actuary. If the financial assumptions are not borne out in practice, because of a range of reasons not least :</p> <ul style="list-style-type: none"> • Falls in expected investment returns • Fall in markets values • Rising inflation • members living longer <p>the funding position of the fund could deteriorate</p>	<p>Training for Joint Advisory, Panel and Board members provided by the Actuary at the beginning of the Triennial Valuation exercise to aid assumption decision making</p> <p>Due to potentially decreasing payroll deficit amounts are set as -monetary amounts at the valuation</p> <p>Recovery period for deficit amounts assessed at each valuation to eliminate deficit within 22 years</p> <p>Monitoring of closed employers</p> <p>Quarterly funding updates provided by Funds Actuary</p>	<p>Deteriorating funding positions could result in increased employers' deficit contributions to eliminate deficit</p> <p>Growth is built into the medium term financial plan, stepped contribution increases for low to medium risk employers as per the FSS</p>	Managing Director WYPF JAG	Funding position to remain within 90% to 110% range	C II	triennial	Every three years - 31 March 2022/2025	

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
2	C I	Reduction in proportion of active members	Publicise the scheme and the benefits of membership in regular newsletters, website, ABS's, annual meetings as detailed in the Funds Communication Policy. Introduction of Auto Enrolment has increased membership.	Fund becomes more mature due to ageing and reduction in active members by outsourcing. Client base nationwide – employers 400+ including 5 district councils.	Assistant Director (Finance, Administration and Governance)	<ul style="list-style-type: none"> • Fund continues to have positive cashflow (including investment income) • The investment strategy is regularly reviewed to ensure it is consistent with maturity profile of the Fund 	C II	Annually	Ongoing	Increase membership by publicising the scheme and the benefits of membership in regular newsletters, website, ABS's, annual meetings.

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
5	D I	Pensions Admin System will not lead to improvements, efficiency and cost savings, or developments do not meet WYPF requirements.	Regular account meetings with Civica Senior Management. Representation on various user groups: <ul style="list-style-type: none"> • Civica user group • LGPS group • Payroll user group 	Ensure regular attendance and report back from the User Groups/Meetings as necessary.	Assistant Director (Finance, Administration and Governance)	Improved systems, costs savings, better reporting, employer internet, member internet facilities available, increase the number of UPM auto calculations Develop product that meets WYPF requirements	D II	Quarterly	Ongoing	Regular market testing to see if better systems on the market, Effective and efficient system, with scalable capacity to support shared services.

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
6	C II	Lack of information sharing with employers	Control adequate Enhancements to UPM2 are continuing. Monthly Returns expanded to increase the information supplied electronically	Develop employers web site	Assistant Director (Finance, Administration and Governance)/ Head of Finance	Increase in electronic medium of info sharing Improvements in KPI's	C II	Annual	Ongoing	Develop Employers' website to use that as the main medium for communication. Build scalable system capacity, improved vfm for shared services.
8	D I	Failure to administer the scheme in line with regulations and policies	Technical Services Manager reviews impending legislation changes and MSM's assess impact on their areas of responsibility. Project teams set up to assess major legislation changes.	Management Review meetings will monitor workloads and progress of any changes to be implemented.	Managing Director, Assistant Director (Finance, Administration and Governance)/ Head of Finance	Any changes implemented in line with legislation timescales.	D II	At each MR meeting	McCloud Remedy Autumn 2023, Pensions Dashboard Sept 2024	Increase in member satisfaction levels.
9	B II	Greater level of support required / expected by some employers	Employer Training courses available or charge for the additional work	Monitor number and type of requests for support	Assistant Director (Finance, Administration and Governance)	Reduce the number of non standard requests	C II	Monthly	Ongoing	Provide more online training. Could be offered to other LGPS funds.

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
14	D II	Customer satisfaction drops below acceptable levels	Newsletters issued regularly to members, Monthly info. update to employers ABS's to current and deferred members Member Annual meeting Employer Annual meeting Large employer group meeting Seminars for employers Leaver questionnaires Employer satisfaction questionnaires Complaints procedures Web site Published ISS Published FSS Contact Centre Member of Plain English Campaign 'Pensions Administration Strategy' document issued to each employing authority	Revise ISS each year Review annually: Pensions Administration Strategy, Communication Strategy	Assistant Director (Finance, Administration and Governance) JAG	Reduction in complaints Reduction in IDRP cases. Attract new bodies to the Fund More timely info from employers, Improved employer satisfaction KPI 8	D II	Annual	Annually	Attract new business to the Fund

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
			participating in the Fund. Governance compliance statement and Communications policy published.							
15	D I	Finance (Prompt payment of pensions on the due date.)	Control adequate	An annual timetable is prepared showing key dates when stages of payroll have to be done by to ensure payment is made on pay date	Assistant Director (Finance, Administration and Governance)	<ul style="list-style-type: none"> • Pensioners getting paid on time • Number of complaints. Callers/Visitors 	D II	Monthly		
18	D I	Partnership/ Contractual (Provision of shared services to Fire Authorities and other LGPS Funds)	Control adequate Collaboration Board and Shared Services meetings take place regularly to assess resource requirements	Review of adequacy of resources in light of shared service demands	Assistant Director (Finance, Administration and Governance)	<ul style="list-style-type: none"> • Shared service KPIs • Staff morale • Feedback from Shared Service partners • WYPF reputation amongst LGPS/Fire pensions community 	D II	Quarterly		Further economies of scale generated

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
19	D II	The IAP's role within the council is not clearly defined. Detrimental decisions made in relation to investments. Council constitution sets out the delegations, and the approved Statement of General Approach to the Management of Pension Fund Investments, also sets out the IAP role and that of its members	Control is adequate	Regular review of constitution and Statement of General Approach to the Management of Pension Fund Investments	City Solicitor Managing Director	Documents up to date.	D II	Annual and when regulation change.	May	Wider WYPF governance review currently ongoing
20	D II	The IAP's terms of reference are not reviewed regularly, do not meet best practice and/or are not fit for purpose. Detrimental decisions made in relation to investments. Annual Review of delegations.	Control is adequate, annual review when Independent Advisor reports on IAP Governance Arrangements.	Managing Director to consider changes required following Annual Governance Report.	City Solicitor Managing Director	Documents up to date.	D II	Annual and when regulation change.	May	Wider WYPF governance review currently ongoing

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
21	D II	<p>Those charged with governance of the Fund and Scheme are unable to fulfil their responsibilities effectively. Members fail to act in the best interests of the fund. A training policy is in place which requires Members to receive continuing training. The IAP membership includes Trade Union representatives, active and retired representatives, Independent Advisors and the Managing Director to maintain continuity of knowledge and experience over time. The Fund subscribes to relevant professional bodies and attend major conferences</p>	Control is adequate	Managing Director to facilitate training arrangements and to report to IAP as required.	Managing Director IAP Members	Training and other records kept up to date.	D II	Ongoing		

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
22	D II	The IAP's membership is not chosen with reference to members' investment skills/knowledge. Members unable to fully participate in the IAP decisions. As per risk 3 above.	Control is adequate	Managing Director to facilitate training arrangements and to report to IAP as required.	Managing Director IAP Members	Training and other records kept up to date.	D II	Ongoing		

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
23	D II	<p>Members take decisions without due regard to advice, along party political lines or with a personal agenda.</p> <p>Sub-optimal or inappropriate decisions impact investment returns and in due course funding levels, increasing contributions.</p> <p>All decisions of the IAP are subject to the Governance and Audit Committee's approval, where decisions not made in the best interests of the Fund may be overruled.</p>	Control is adequate.	Managing Director to raise any concerns with Independent Advisors and report to Governance and Audit Committee as required.	Managing Director	<p>Decisions to be in the best interest of the Fund.</p> <p>G&A Committee not overruling IAP/JAG decisions</p>	D II	Quarterly		

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
24	D II	Independent Advisors not suitably qualified or diverse. Advice of poor quality or not tailored to WYPF. Detrimental decisions made in relation to investments. Advisors appointed after a competitive process for a maximum period of 9 years with triennial reviews and a 12 month probationary period.	Control is adequate.	Advisor selection process followed. Advisors to confirm appropriate Continuing Professional Development during appointment.	Managing Director	CPD confirmation obtained.	D II	Annual.		

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
25	D I	Failure to adhere to relevant statutory regulations and guidance. Fund not invested in accordance with requirements. Reputational damage to fund within sector and investment markets. An established process exists to inform the IAP and the Investment team of regulatory requirements and any changes to these. Sufficient resources are in place to implement any changes.	Control is adequate.	Technical team to flag investment regulatory changes proposed at consultation stage. Investment team to maintain contacts within the sector to identify non LGPS specific regulatory changes.	Assistant Directors	Full compliance with all regulatory requirements .	D II	Ongoing		

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
26	D I	Strategic benchmark not set to meet the return required by the actuarial valuation. Funding shortfall has to be made good by employer contribution increases. Benchmark is reviewed by IAP after each valuation, taking appropriate advice, including expected volatility for each asset class, to ensure the target return is achieved with an acceptable level of portfolio volatility.	Control is adequate.	Benchmark reviewed after each actuarial valuation.	IAP Managing Director	Fund maintains a consistent high level of funding	D II	Triennial	2023 Strategic Asset Allocation Review	
27	D I	Lack of asset class diversification in the strategic benchmark. Increased risk of a funding shortfall due to excessive portfolio volatility.	Control is adequate.	Benchmark reviewed after each actuarial valuation.	IAP Managing Director	Fund maintains a consistent high level of funding.	D II	Triennial	2023 Strategic Asset Allocation Review	

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
28	C I	Investment returns achieved fall below that required by the actuarial valuation. Funding shortfall has to be made good by employer contribution increases. Actuarial return is based on a multi-decade expectation of return, and the benchmark is reviewed every three years and adjusted appropriately to achieve the required return.	Control is adequate.	Actuarial return agreed with actuary at each valuation date to achieve full funding on the 22 year horizon.	IAP Managing Director	Fund maintains a consistent high level of funding.	C II	Triennial	Receipt of 2022 valuation and subsequent funding updates	

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
29	D I	Cash resources insufficient to meet short term liabilities. Fund has to sell investment at an inopportune time, risking a loss of value. Strategic benchmark has a cash allocation sufficient for day to day running of the fund, and the cash returns of the portfolio are managed to ensure all commitments can be met on due date.	Control is adequate.	Cash resources and commitments managed to ensure liabilities are met on due date.	IAP Managing Director Head of Finance	Cash resources maintained at an appropriate level.	D II	Ongoing		

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
30	D II	Policies not linked to sustainability goals and actions focussed on a small number of issues e.g. fossil fuels. The fund fails to recognise and manage other risks and is exposed to undue loss of value or volatility.	Control is adequate.	ESG policies are based on a set of overarching environmental, social and governance principles which guide our processes and goals.	IAP	Fund assets safeguarded and returns achieved.	D II	Ongoing		
31	D II	Measurement and reporting of Engagement is not performed, unfocussed or insufficient. Actions not agreed where engagement has failed. Engagement is unsuccessful and does not promote change.	Control is adequate.	WYPF will engage with its investments, and will work with other like-minded shareholders to increase the impact where necessary. It will exercise its voting rights and publicly report its voting record quarterly.	Managing Director, Assistant Directors and Investment Managers.	Fund assets safeguarded and returns achieved.	D II	Ongoing		Improved corporate governance following engagement results in better company performance.

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
32	D II	Climate Risks identified - Green House Gas Emissions - Transition risk - physical risks use of scarce resources e.g. minerals, water. The fund fails to recognise and manage physical and transition risks due to focus on emissions and is exposed to undue loss of value or volatility.	Control is adequate.	We receive some external assurance: <ul style="list-style-type: none"> • Trucost's Carbon annual footprinting exercise attempts to identify potential stranded assets in the fossil fuel portfolio. • Our Property portfolio managers report the EPC ratings for assets in their portfolios. We believe that inefficient buildings, which may not legally be permitted to be rented, currently presents the greatest risk of stranded assets. We continue to monitor this risk. 	Managing Director, Assistant Directors and Investment Managers.	Fund assets safeguarded and returns achieved.	D II	Ongoing		Improved corporate governance following engagement results in better company performance.

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
33	C II	Lack of consistent data (e.g. on Green House Gas emissions) for all asset classes hinders understanding of climate risks. Managers unable to assess carbon intensity of current portfolio, set metrics and targets and measure progress towards goals in accordance with IAP policy.	Control depends on quality of external data.	An ESG manager has been appointed to research the available data sets to ensure WYPF can access appropriate data to assess ESG risks.	Managing Director, Assistant Directors and ESG Manager.	Fund assets safeguarded and returns achieved.	C II	Ongoing		
34	DII	Lack of focus or information means the investment opportunities of Climate change are overlooked or not taken. The fund fails to recognise opportunities to add value presented by the transition to a low carbon economy.	Control is adequate.	Managers will continue to seek opportunities to invest in companies which will benefit from the transition to a low carbon economy, and report these to the IAP regularly.	Managing Director, Assistant Directors and Investment Managers	Fund assets safeguarded and returns achieved.	D II	Ongoing		Investment in developing sectors diversifies the portfolio and improves returns.

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
39	C I	Disaster recovery	Control adequate Disaster recovery plan in place with Bradford Council for pensions and investments systems (refer to Business Continuity Plan).	Staff enabled to work from home with access to all systems.	Assistant Managing Director (Finance, Administration and Governance)	Full disaster recovery plan in place which enables business to operate as usual during any disaster	C II	Annual	Ongoing	System resilience, essential in providing 3 rd party services – shared services.
41	C I	Recruitment and retention of experienced staff	Control adequate Career grades in place for majority of staff to encourage professional training. Training Plans in place for all staff. Regular review of structure. Restructure of WYPF staffing completed September 2020	Monitor salaries in both public and private sector. Flexible working to retain staff, home working available to all staff. Looking at 2 to 3 days in the office.	Managing Director Assistant Director (Finance, Administration and Governance) Director of HR	Motivated and responsive staff Minimal staff turnover No breaches of time limits or maladministration issues	C I	6 monthly	Ongoing	Carry out a periodical review of salaries and grades. Attractive flexible working, home working and mobile working
43	D II	Key staff on long term absence	Control adequate Document all procedures to ensure cover is available from other staff.	Monitor absences and take action at key dates. Delegation and succession planning.	Senior Managers	No effect on service provision	D II	As required	As required Annually	A register of casual staff is maintained to provide cover at short notice.

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
45	C I	Threat of cyber crime	Adequate	Regular review by Bradford ICT of Firewalls, anti-virus programs to identify latest threats. WYPF also carry out penetration testing on the Fund's website and secure portal. Staff training / awareness, increased IT equipment / asset control. Routine blog to employers and members to raise cyber crime awareness	Assistant Director (Finance, Administration and Governance)	Business as usual with no impact on data or services	D II	Ongoing	Ongoing	Safeguard and protect WYPF data and systems.

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
46	C I	Compliance with GDPR requirements	Control adequate Review letters/internal processes and procedures, Privacy statements, data share agreements, contracts with 3 rd parties, Security breach process, website. Use of Galaxkey for secure emails, Use of secure portals to share information with key stakeholders, mandatory data protection training for staff. Accreditation to ISO 27001	Security policies in place, Mandatory Training for Staff	Assistant Director (Finance, Administration and Governance)	No major security breaches A reduction in minor security breaches	D II	Ongoing	Ongoing	
48	C II	Failure to include all required information issued to members under disclosure regulations	Letters updated and checked regularly	Working instructions updated, workflow processes updated	Head of Employer Relations and Compliance	Meet disclosure time limits	D II	Ongoing		

No	Rating	Risk description and Action / Controls already in place	Adequacy of action/ control to address risk	Required management action/ control	Responsibility for action	Critical success factors & KPI's	Residual Rating	Review frequency	Key dates	Opportunity
49	C1	Provision of IT services and equipment from CBMDC	Reduce connectivity issues, provide IT equipment in a timely manner.	Regular meetings with CBMDC Client Manger, escalation process in place, request equipment ASAP to give CBMDC as much notice as possible.	Managing Director Assistant Director (Finance, Administration and Governance)	Reducing connectivity issues, timely receipt of IT equipment	C I	Ongoing		

The risks identified but below their acceptable tolerance level require no further action at this time.

Future review and revision of risks

It is important that this work is monitored and measured and that management action plans are reassessed regularly to ensure that progress is being made and the targets can be met. In addition, each risk is owned where possible by one member of the management team to ensure that there is high level support, understanding and monitoring of the work that is required as part of the plans.

The management team have agreed that the timescale for re-visiting these risks in order to assess if they are still relevant and to identify new scenarios should be quarterly at Management Review.

Appendix 1
 Risks register

PENSIONS ADMINISTRATION RISKS

No	Rating	Cluster	Short name	Vulnerability	Trigger	Consequence
1	C II	Economic	Valuation registers a deficit in the pension fund	Rise in contribution rates to eliminate deficit. Growth is built into the medium term financial plan, stepped increases for low to medium risk employers as per FSS	Investment returns < actuarial and FSS assumptions Rise in longevity (Funding level remains the main comparator)	<ul style="list-style-type: none"> • Contribution rate rises • Budget cuts and/or council tax increases • Bad publicity for employers • Bad publicity for WYPF • Bad publicity for LGPS • Increased Central Government pressure for changes to LGPS • Admitted bodies review provision of LGPS to employees • Admitted bodies to WYPF seek reduced rates with other LGPS providers • Political impact • Customer complaints about 'pension pay-offs'
2	C II	Social/Economic	Reduction in proportion of active members	Fund becomes more mature due to ageing and reduction in active members by outsourcing. Client base nationwide – employers 190 including 5 district councils.	Reducing take up of admitted body status Continuing outsourcing	<ul style="list-style-type: none"> • Fund stop showing net inflows of cash • Investment strategy no longer consistent with maturity profile • FSS and ISS become out of date • Less time to make up any deficits so more unstable contribution rates

3	D III	Political	Bradford initiatives	<p>The fund is not autonomous and decision taken at a high level in Bradford and for Bradford could risk the efficiency of our business. the imposition of what we perceive to be unsuitable regimes upon WYPF by CBMDC can undermine the performance of the section and forcibly distract WYPF management from their prime responsibilities for long periods. Partnerships entered into on WYPF's behalf by CBMDC may not be suitable for WYPF's needs. Initiatives divert management time from core activities</p>	<p>WYPF as a financial service provider and not a LG service provider not recognised or considered</p>	<ul style="list-style-type: none"> • Loss of control over budget spend • Imposition of "Bradford" systems inappropriate to WYPF • Politicises JAG and Investment Panel • Service delivery reduced • Diversion from core activity
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4	D III	Political	Central Government regionalisation agenda	Possible regionalisation of pension funds Could be asked to compete against other LG Funds or the private sector	Becomes Government policy	<ul style="list-style-type: none"> • Admin costs rise to unacceptable levels • Culture change • Cost pressure • Fail to become provider for Yorkshire region • Staff relocation • Staff redundancies • Bad publicity for Bradford • Become provider for Yorkshire • Increased resource requirement • Good publicity
5	D II	Technological	Improved Pensions and Investments systems are not developed and adopted	Increased WYPF and Civica resources required to develop and adopt system.	Major parts of the system do not work efficiently or accurately.	<ul style="list-style-type: none"> • E-government cannot be supported • Increased time and support needed for number crunching • Less added value support
6	C II	Technological	Lack of information sharing with employers	Most information from employers is still paper based no direct feeds from their payroll and HR to the UPM system. Requires Pensions to work closely with employers and the Bfd-I partnership to ensure contribution returns are both correct and received on time to enable details to be provided to the Actuary for the Valuation and for Annual Benefit Statements.	Don't progress direct input or do but on a piecemeal basis Deadlines not met	<ul style="list-style-type: none"> • People can't access vital information in a timely manner • Sustainability issues • Transcription errors • Delays • Invalid employer contribution rates set • Invalid ABS's sent to members • ABS's not sent to members • Non compliance • Bad publicity • Key objective not met

7	E III	Technological	Current software providers pull out of the market or are taken over	Current providers –Civica	Civica not that well established in LG pensions sector but are starting to win LG business.	<ul style="list-style-type: none"> • other systems available but enforced change time consuming • pressure on staff
8	B II	Legislative/ Regulatory	Failure to administer the scheme in line with regulations and policies	Lots of legislative/regulatory change resulting in additional work. Changes to Regs must be made aware to members, employers and staff. The service endeavours to respond but is balancing resources. The unit has given a high commitment to professional training to its staff which may not be maintainable	Insufficient resources to respond to legislative/ regulatory changes adequately	<ul style="list-style-type: none"> • Benchmarking costs rise • Increased pressure on staff • Don't adopt legislation • Service criticised • Duties and responsibilities not fully adopted • Ombudsman cases • Incorrect payment of benefits • Growing complexity of administration • Risk of non compliance • Key objective not met • general pensions knowledge declines • pressure on staff • staff don't have up to date, consistent knowledge and understanding • recalculations of pensions to do

9	C II	People	Greater level of support expected by district councils than other employers	Bradford council and to a lesser extent the other 4 councils, request information from Pensions which should be available from their own HR department.	Resources diverted from other employers	<ul style="list-style-type: none"> • Staff frustrated • Reduced level of service to other employers
10	C III	Finance	Finance aren't always involved in other sections' decision making processes	Sections powers v financial responsibility. Sections act independently and don't always ask for advice, increase in delegated powers. Finance section isn't always involved in the decision making process.	Finance is unaware of structures/ approaches	<ul style="list-style-type: none"> • Act 'ultra vires' • Promises made that can't be met
11	E IV	Competitive	National and local KPI's are not being met		Poor performance leading to complaints and reduction in service to stakeholders	<ul style="list-style-type: none"> • Can't manage performance effectively • Fail to meet explicit objective
12	E II	Finance	External Fraud	Pensions paid where there is no entitlement	Returned payments/payslips, non return of life certificates, flagged by NFI	<ul style="list-style-type: none"> • overpaid pensions • court cases • time commitment • key objective not met
13	D III	Finance	Admin costs increase above budgeted costs	He cost per member increase and the Fund is expensive to run.	<ul style="list-style-type: none"> • Inefficiencies in operations • Lack of automation • Poor benchmarking returns 	<ul style="list-style-type: none"> • Review in-house provision • Budget cuts • Service cuts • Partnership arrangements • Bad publicity

14	D II	Customer	Customer Satisfaction below acceptable levels	Level of complaints received Consultation with all stakeholders: What WYPF provides How good is the provision?	Unacceptable level of complaints Not seen to act on consultation	<ul style="list-style-type: none"> • Fines • Bad publicity • Shrinking user base
15	D II	Finance	Prompt payment of pensions on the due date.	An annual timetable is prepared showing key dates when stages of payroll have to be done by to ensure payment is made on pay date	BACS Failure Problems encountered at key stages delaying follow on stages	<ul style="list-style-type: none"> • Pensioners not getting paid on time • Cause financial hardship • Damage to WYPF reputation • Increase in number of complaints. Callers/Visitors
16	D III	Economic	Lack of Admissions and Guarantors	In the past WYPF has had a fairly relaxed policy on admissions which has resulted in bodies being admitted without guarantees if the body was believed to be financially sound	Admitted body with no guarantor or bond – admission agreement comes to its end or is prematurely terminated then the costs of unfunded liabilities met by the Fund itself (i.e. all employers)	<ul style="list-style-type: none"> • Increase in employer contribution rate across the Fund • Increase in liabilities across the Fund Possible bad publicity

17	E II	Financial	Failure to obtain ISAE 3402 reports from Hedge Fund and Currency Fund Managers	Wouldn't know what risks are being taken and what controls they have in place	Failure to obtain reports	<ul style="list-style-type: none"> Investment Funds might go bust resulting in losses for the Fund
18	D II	Partnership/Contractual	Provision of shared services to Fire Authorities and other LGPS Funds	Staff cannot keep up with additional workloads	WYPF not being able to meet contractual obligations	<ul style="list-style-type: none"> Will not be able to provide a pensions administration service Will not be able to pay pensions or process work Staff leave Damage to WYPF Reputation Bad publicity Loss of income
47	E II	Customer	Failure to communicate adequately with scheme members	<ul style="list-style-type: none"> Website regularly updated. Newsletters are published at least annually, Annual Benefit Statements and Deferred benefit Statements issued annually 	Complaints or cases going to IDR P	<ul style="list-style-type: none"> Fines from TPR Bad publicity Members not able to make timely decisions Reduction in value of pension benefits
48	D II	Legislation	Failure to include all required information issued to members under disclosure regulations	Officers keep up to date with disclosure regulations and distribute knowledge to teams accordingly via working instructions, changes to workflow processes, Team Brief or emails.		<ul style="list-style-type: none"> Fines from TPR Bad publicity Members not able to make timely decisions
INVESTMENT RISKS						
19	D II	Governance	The IAP's role within the council is not clearly defined. Detrimental decisions made in relation to investments.	Council constitution sets out the delegations, and the approved Statement of General Approach to the Management of Pension Fund Investments sets out the IAP role and is provided to	Review of roles or constitution	<ul style="list-style-type: none"> Detrimental decisions made in relation to investments.

				Members, who agree to abide by them.		
20	D II	Governance	The IAP's terms of reference are not reviewed regularly, do not meet best practice and/or are not fit for purpose.		Annual Review of delegations	<ul style="list-style-type: none"> • Detrimental decisions made in relation to investments.
21	D II	Governance	Those charged with governance of the Fund and Scheme are unable to fulfil their responsibilities effectively.	<p>A training policy is in place which requires Members to receive continuing training and all new Members to attend the SAB training course.</p> <p>The IAP membership includes Trade Union representatives, active and retired representatives, Independent Advisors and the Managing Director to maintain continuity of knowledge and experience over time.</p> <p>The Fund subscribes to relevant professional bodies e.g. LAPFF, NAPF and representatives attend major conferences.</p> <p>The IAP is very experienced and knowledgeable and monitors the performance of the Fund</p>		<ul style="list-style-type: none"> • Members fail to act in the best interests of the fund.
22	D II	Governance	The IAP's membership is not chosen with reference to members' investment skills/knowledge. Members unable to fully participate in the IAP decisions	<p>A training policy is in place which requires Members to receive continuing training and all new Members to attend the SAB training course.</p> <p>The IAP membership includes Trade Union representatives, active and retired representatives, Independent Advisors and the Managing Director to maintain continuity of</p>		<ul style="list-style-type: none"> • Members fail to act in the best interests of the fund.

				<p>knowledge and experience over time.</p> <p>The Fund subscribes to relevant professional bodies e.g. LAPFF, PLSA and representatives attend major conferences.</p> <p>The IAP is very experienced and knowledgeable and monitors the performance of the Fund</p>		
23	D II	Governance	<p>Members take decisions without due regard to advice, along party political lines or with a personal agenda.</p> <p>Sub-optimal or inappropriate decisions impact investment returns and in due course funding levels, increasing contributions.</p>	<p>Managing Director to raise any concerns with Independent Advisors and report to Governance and Audit Committee as required.</p>	<p>All decisions of the IAP are subject to the Governance and Audit Committee's approval, where decisions not made in the best interests of the Fund may be overruled.</p>	<ul style="list-style-type: none"> • Sub-optimal or inappropriate decisions impact investment returns and in due course funding levels, increasing contributions.
24	D II	Governance	<p>Independent Advisors not suitably qualified or diverse. Advice of poor quality or not tailored to WYPF.</p>	<p>Detrimental decisions made in relation to investments.</p>	<p>Advisors appointed after a competitive process for a maximum period of 9 years with triennial reviews and a 12 month probationary period.</p>	<ul style="list-style-type: none"> • Advice of poor quality or not tailored to WYPF. • Detrimental decisions made in relation to investments.
25	D II	Legislative /Regulatory	<p>Failure to adhere to relevant statutory regulations and guidance.</p>	<p>An established process exists to inform the IAP and the Investment team of regulatory requirements and any changes to these.</p> <p>Sufficient resources are in place to implement any changes.</p> <p>Membership of relevant professional groups ensures any potential changes in statutory</p>	<p>Changes in regulations</p>	<ul style="list-style-type: none"> • Fund not invested in accordance with requirements. • Reputational damage to fund within sector and investment markets.

				requirements are known before the implementation dates		
26	D II	Investment Strategy	Strategic benchmark not set to meet the return required by the actuarial valuation.	Benchmark is reviewed by IAP after each valuation, taking appropriate advice, including expected volatility for each asset class, to ensure the target return is achieved with an acceptable level of portfolio volatility.	Benchmark reviewed after each actuarial valuation.	<ul style="list-style-type: none"> Funding shortfall has to be made good by employer contribution increases.
27	D II	Investment Strategy	Lack of asset class diversification in the strategic benchmark.	Benchmark is reviewed by IAP after each valuation, taking appropriate advice, including expected volatility for each asset class, to ensure the target return is achieved with an acceptable level of portfolio volatility.	Benchmark reviewed after each actuarial valuation.	<ul style="list-style-type: none"> Increased risk of a funding shortfall due to excessive portfolio volatility.
28	C II	Investment Strategy	Investment returns achieved fall below that required by the actuarial valuation. Funding shortfall has to be made good by employer contribution increases.	Actuarial return is based on a multi-decade expectation of return, and the benchmark is reviewed every three years and adjusted appropriately to achieve the required return.	Valuation	<ul style="list-style-type: none"> Funding shortfall has to be made good by employer contribution increases.
29	D II	Investment Strategy	Cash resources insufficient to meet short term liabilities. Fund has to sell investment at an inopportune time, risking a loss of value.	Strategic benchmark has a cash allocation sufficient for day to day running of the fund, and the cash returns of the portfolio are managed to ensure all commitments can be met on due date.	Negative cashflow	<ul style="list-style-type: none"> Fund has to sell investment at an inopportune time, risking a loss of value.
30	D II	Responsible Investment	Policies not linked to sustainability goals and actions focussed on a small number of issues e.g. fossil fuels.	The fund fails to recognise and manage other risks and is exposed to undue loss of value or volatility.	ESG policies are based on a set of overarching environmental, social and governance principles which guide our processes and goals.	<ul style="list-style-type: none"> Expected returns not achieved Asset values decrease

31	D II	Responsible Investment	Measurement and reporting of Engagement is not performed, unfocussed or insufficient.	WYPF will engage with its investments, and will work with other like-minded shareholders to increase the impact where necessary. It will exercise its voting rights and publicly report its voting record quarterly	Measurement and reporting of Engagement is not performed, unfocussed or insufficient.	<ul style="list-style-type: none"> • Actions not agreed where engagement has failed.
32	D II	Responsible Investment	Climate Risks identified - Green House Gas Emissions - Transition risk - physical risks use of scarce resources e.g. minerals, water.	Managers will consider the range of ESG risks as they relate to each investment before investing and while continuing to hold that investment.	Loss of value of assets or volatility in the value	<ul style="list-style-type: none"> • The fund fails to recognise and manage physical and transition risks due to focus on emissions and is exposed to undue loss of value or volatility.
33	C II	Responsible Investment	Lack of consistent data (e.g. on Green House Gas emissions) for all asset classes hinders understanding of climate risks.	An ESG manager has been appointed to research the available data sets to ensure WYPF can access appropriate data to assess ESG risks.	To safeguard Fund assets and achieve target returns.	<ul style="list-style-type: none"> • Managers unable to assess carbon intensity of current portfolio, set metrics and targets and measure progress towards goals in accordance with IAP policy.
34	D II	Responsible Investment	Lack of focus or information means the investment opportunities of Climate change are overlooked or not taken	Managers will continue to seek opportunities to invest in companies which will benefit from the transition to a low carbon economy, and report these to the IAP regularly.	To safeguard Fund assets and achieve target returns.	<ul style="list-style-type: none"> • The fund fails to recognise opportunities to add value presented by the transition to a low carbon economy.
35	E II	Governance	Custody arrangements may not be sufficient to safeguard Pension Fund's assets.	Complete and authorised agreements are in place with external custodian as part of NLGPS. External custodian is in compliance with ICAEW's Audit and Assurance Faculty's guidance on internal controls of service organisations, and report presented to IAP annually.	Regular reconciliations carried out to check external custodian records to nominal ledger.	<ul style="list-style-type: none"> • Fund assets not safeguarded

				Regular reconciliations carried out to check external custodian records to nominal ledger.		
36	E II	Governance	Stock lending counterparty failure. Fund assets at risk.	Credit rating of counterparties verified before adding to approved list. Guarantee from external custodian for all stock on loan.	Verify credit ratings of approved counterparties. Ensure custodian agreement fully documented.	<ul style="list-style-type: none"> • Losses on stock lending
37	E II	Governance	Internal Investment Management may not have appropriate control frameworks in place to protect Pension Fund assets.	A robust framework of controls, including separation of investment managers from settlement arrangements, is in place, which is regularly tested by internal audit. Daily reconciliation of transactions against external custodian records.	Settlement and reconciliation processes maintained and verified.	<ul style="list-style-type: none"> • Fund assets at risk, fraud.
38	F II	Governance	Pension Fund investments may not be accurately valued. Strategic asset allocation not delivered as a result, poor investment decisions on future investment, fund assets at risk.	Investments are valued using current prices obtained from independent pricing sources wherever possible. Unlisted valuations provided by managers monitored to ensure any sales are above manager valuation. Quarterly valuations reconciled to custodian valuation. Internal and external audit verification work completed for year-end valuation. Portfolio valuations are completed and reported to the IAP	Internal valuation reconciled to custodian data. Unlisted valuations from external managers reviewed for reasonableness and consistency over time or on sale.	<ul style="list-style-type: none"> • poor investment decisions on future investment, • fund assets at risk
50	E II	Governance	Focus on investments means consequential non-investment risks are overlooked	Implementation of investment strategy creates unavoidable non-investment credit and counterparty risks	<ul style="list-style-type: none"> • Cash and liquidity selection against appropriate limits • Clarity over where 'daylight' risks 	<ul style="list-style-type: none"> • Default of banks that the fund has cash with, and/or loss of par in any liquidity funds investments

					<p>might be present when cash is transferred to other vehicles ahead of investments</p> <ul style="list-style-type: none"> Understanding of any margin or other requirements as part of any hedging programmes in place. 	<ul style="list-style-type: none"> Counterparty default in any hedging and/or cash transitions. <p>One-off reset of this risk to be done in H2 23/H1 24.</p>
JOINT ADMINISTRATION AND INVESTMENT RISKS						
39	C II	Technological	Disaster recovery	<p>Pension and Investments systems are supported by a disaster recovery plan but some systems aren't including the e-mail system and the main council systems and communication links</p> <p>ICT – risk of loss of service because of physical disaster, system failure or deliberate attack. An offsite backup regime is in place for Pensions. Onsite backups are kept in a fire proof safe.</p> <p>System failure – protected by service and maintenance contracts</p> <p>WYPF is dependent on CBMDC for virus protection and firewalls etc.</p>	<p>Minor incident occurs</p> <p>Major incident occurs</p>	<ul style="list-style-type: none"> Can't back up the data Loss of service Permanent data loss Loss of income Inability to pay pensioners
40	E II	Technological	Internal Fraud	Risk of fraud by illicit alterations to our data security is in place using passwords, change logs	fraud	<ul style="list-style-type: none"> Loss of data Corrupt data Incorrect payments

				etc. but there remains a residual risk. WYPF is dependant on CBMDC's firewall to prevent attacks on its servers from outside the council.		<ul style="list-style-type: none"> • Breach of DP Act
41	C I	People	Recruitment and retention of experienced staff	Problems with recruitment and retention – the need to train people up, the need for continual process re-engineering. Managers of similar age Difficulties in attracting staff to Bradford	Recruitment and retention of staff does not improve	<ul style="list-style-type: none"> • Pressures on existing staff could lead to staff becoming demotivated or leaving • Activities are ineffectively carried out • Difficulties in succession planning • Pressure to offer more lucrative packages • Reliance on agency/temporary staff • Escalating staff costs • Gaps appear in structures • Adverse impact on service delivery • Carrying vacancies
42	E II	Technological	Loss of sensitive personal data	Data on laptops/USB devices and data sent by email is not encrypted	Loss of data	<ul style="list-style-type: none"> • Data falls in the wrong hands and used for criminal purposes • Bad publicity • Loss of trust and confidence in WYPF
43	D II	People	Key staff on long term absence	The absence of key staff who specialise in a particular role and there is no immediate deputy to cover in their absence	Absence Management	<ul style="list-style-type: none"> • Impact on service provision (Staff, Employers, Scheme Members etc) • Crucial tasks are not performed
44	D III	People	Access to sensitive/personal data by staff	All new staff undergo a DBS check, Access to certain records is restricted	Where DBS checks reveal a relevant conviction	<ul style="list-style-type: none"> • Information could be passed on • Records updated inappropriately • Contravene DP Act

45	D II	Technological	Cyber Crime	A cyber attack will put data at risk and data may fall in the wrong hands.	A successful cyber attack	<ul style="list-style-type: none"> • Vulnerable to extortion • Damage to WYPF reputation • Impact on service delivery • Bad publicity • Fines by tPR
46	D II	Legislative /Regulatory	Compliance with GDPR requirements	Documents and processes are not updated with requirements.	A breach of GDPR	<ul style="list-style-type: none"> • Massive fines by the ICO • Damage to WYPF reputation • Bad publicity • Loss of contracts
49	C1	Technological	Provision of IT services and equipment from CBMDC	Staff are not able to connect to the Council network because systems are down. Staff do not have IT equipment to undertake their duties.	No access to systems or no IT equipment	<ul style="list-style-type: none"> • Staff cannot carry out their duties • May miss out on investment opportunities



Report of the Managing Director, West Yorkshire Pension Fund to the meeting of Local Pension Board to be held on 20 March 2024

AI

Subject: Register of Breaches of Law

Summary statement:

In accordance with the Public Service Pensions Act 2013, from April 2015 all Public Service Pension Schemes come under the remit of the Pensions Regulator.

Section 70 of the Pensions Act 2004 (the Act) imposes a requirement to report a matter to The Pensions Regulator as soon as is reasonably practicable where that person has reasonable cause to believe that:

- (a) a legal duty relating to the administration of the scheme has not been or is not being complied with, and
- (b) the failure to comply is likely to be of material significance to The Pensions Regulator in the exercise of any of its functions.

A Register of Breaches of Law is therefore maintained in accordance with the Pensions Regulator's requirements and WYPF Breaches procedure.

EQUALITY & DIVERSITY:

None

Euan Miller
Managing Director, West Yorkshire
Pension Fund

Portfolio:

Report Contact: Caroline Blackburn
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Compliance
Phone: 07790353179
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Overview & Scrutiny Area:

1. SUMMARY

1.1 In accordance with the Public Service Pensions Act 2013, from April 2015 all Public Service Pension Schemes come under the remit of the Pensions Regulator.

1.2 A Register of Breaches of Law is maintained in accordance with the Pensions Regulator's requirements and WYPF Breaches procedure.

2. BACKGROUND

2.1 Section 70 of the Pensions Act 2004 (the Act) imposes a requirement to report a matter to the Pensions Regulator as soon as reasonably practicable where a person has reasonable cause to believe that:

- (a) a legal duty relating to the administration of the scheme has not been or is not being complied with, and
- (b) the failure to comply is likely to be of material significance to the Pensions Regulator in the exercise of any of its functions.

2.2 This requirement applies to:

- a trustee or manager of an occupational or personal pension scheme;
- a member of the pension board of a public service pension scheme;
- a person who is otherwise involved in the administration of an occupational or personal pension scheme;
- the employer in relation to an occupational pension scheme;
- a professional adviser in relation to such a scheme; and
- a person who is otherwise involved in advising the trustees or managers of an occupational or personal pension scheme in relation to the scheme.

2.3 The Act states that a person can be subject to a civil penalty if he or she fails to comply with this requirement without a reasonable excuse. The duty to report breaches under the Act overrides any other duties the individuals listed above may have. However, the duty to report does not override 'legal privilege'. This means that, generally, communications between a professional legal adviser and their client, or a person representing their client, in connection with legal advice being given to the client, do not have to be disclosed.

2.4 A record of past breaches may be relevant in deciding whether to report a breach (for example it may reveal a systemic issue). WYPF maintains a record of all reported or unreported breaches.

2.5 The Register of Breaches of Law (reported or otherwise) is provided to each Joint Advisory Group meeting, and is also shared with the Pension Board

3. BREACHES

3.1 The entries on the Register of Breaches for 2023/2024 to date relate to:

- Contributions being paid late by employers and therefore not being received by the Fund until after the deadline set out in the Pensions Administration Strategy.

Two employers continued to fail to pay member and employer contributions to the Fund by the required date. A decision to deem these continued failures to pay the outstanding contributions as a material significance has resulted in the Fund taking the step to report these employers to the Pension Regulator and to notify the affected members.

One employer has since made the outstanding payment (RFM Group Services limited) and the Fund is continuing to work with the other employer to ensure payment is received as soon as practicable.

- The non-issue of Annual Benefit Statements by 31 August 2023 for a small number of active members.

4. OTHER CONSIDERATIONS

- None.

5. FINANCIAL & RESOURCE APPRAISAL

- None.

6. RISK MANAGEMENT AND GOVERNANCE ISSUES

- None.

7. LEGAL APPRAISAL

Appendix A details whether each Breach has been deemed to be of material significance and as a result been reported to the Pensions Regulator in accordance with Section 70 of the Pensions Act 2004

8. OTHER IMPLICATIONS

8.1 SUSTAINABILITY IMPLICATIONS

- None

8.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

- None

8.3 COMMUNITY SAFETY IMPLICATIONS

- None

8.4 HUMAN RIGHTS ACT

- None

8.5 TRADE UNION

- None.
-

8.6 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

- None

9. NOT FOR PUBLICATION DOCUMENTS

- None

10. OPTIONS

- None

11. RECOMMENDATIONS

It is recommended that the Local Pension Board note the entries and action taken on the Register of Breaches

12. APPENDIX

Appendix A – Register of Breaches 2023/24

13. BACKGROUND DOCUMENTS

None

WYPF Breaches of Law 2023-2024

Date	Category (eg administration, contributions, funding, investments)	Pensions Regulator code of practice paragraph	Description and cause of breach	Possible effect of breach and wider implications	Reaction of relevant parties to breach	Reported/ Not reported	Outcome of report and or investigations	Out-standing Actions
See schedule below	Administration Maintaining contributions	147	<p>Employee's pension contributions must be paid to the manager of the scheme by the 19th day of the month following deduction (if 19th falls on weekend or bank holiday then the last working day before 19th)</p> <p>See schedule below for details of employers who failed to make payment by the appropriate date.</p> <p>Two employers have continually failed to make any payments</p> <ul style="list-style-type: none"> • RFM Group Services Limited (Sandy Lane Primary School)** • Relish School Food Ltd (Highfield School) 	Contributions not received by the scheme within the prescribed timescales	<p>Immediate action: All employers have a designated business partner who contact each employer to make them aware of any late payment. Subsequent late payments incur an admin fee and notification that further late payments may be reported to the Pensions Regulator.</p> <p>Continuing Action: Records of each employer who fail to make payment each month are maintained.</p> <p>The Fund has reported both of these employers to the Pension Regulator. In addition a letter has been sent to each member affected and the Scheme Employer. Outstanding contributions have now been received for RFM Group Services Ltd on 15/02/2024.</p> <p>The Fund is continuing to chase the outstanding payments for</p>	Not reported	In the process of Reporting	<p>All outstanding payments are chased up</p> <p>RFM Group contributions have now been received</p>

WYPF Breaches of the Law 2023 -2024

Date	Category (eg administration, contributions, funding, investments)	Pensions Regulator code of practice paragraph	Description and cause of breach	Possible effect of breach and wider implications	Reaction of relevant parties to breach	Reported/ Not reported	Outcome of report and or investigations	Out-standing Actions
					<p>Relish School Food Ltd (1 member in the Fund)</p> <p>A late payment charge will also be made to the employer as per the Pensions Administration Strategy list of charges</p>			
September 2023	Administration Issue of Annual Benefit Statements (ABS)	189	<p>Scheme Regulations require an ABS be provided to Active members by 31 August each year</p> <p>At 31 Augst 2023 99.41% of active statements had been sent out.</p>	ABS not issued within prescribed timescale	Only accurate ABS are sent out.	Not reported		Work continues to release ABS after the deadline

WYPF Breaches of the Law 2023 -2024

Employer and Month	Date due	Date paid	Employee Contributions	Employer Contributions	Total value of contributions
April 2023					
Ryhill Parish Council	19/05/2023	26/05/2023	43.84	87.67	131.51
Micklefield Parish Council	19/05/2023	19/06/2023	91.38	266.26	357.64
SSE Contracting Ltd	19/05/2023	22/05/2023	1619.69	0	1619.69
Ackworth Parish Council	19/05/2023	26/05/2023	555.59	1748.84	2304.43
Turning Lives Around	19/05/2023	22/05/2023	856.24	0	856.24
Castleford Academy Trust	19/05/2023	26/05/2023	11274.1	30987.67	42261.77
Carroll Cleaning Company Ltd (Whetley)	19/05/2023	16/08/2023	108.8	235.39	344.19
Carroll Cleaning Company Ltd (Wakefield)	19/05/2023	16/08/2023	35.39	0	35.39
Creative Support Limited	19/05/2023	21/06/2023	98.19	0	98.19
Carroll Cleaning Company Ltd (Holy Trinity Primary)	19/05/2023	16/08/2023	44.26	62.76	107.02
Carroll Cleaning Company Ltd (Birkenshaw Primary School)	19/05/2023	16/08/2023	28.71	113.8	142.51
Carroll Cleaning Company Limited (Frizinghall)	19/05/2023	16/08/2023	36.24	90.93	127.17
Carroll Cleaning Company (Nessfield Primary School)	19/05/2023	16/08/2023	22.41	63.17	85.58
Mellors Catering Services Ltd (Cavendish Primary)	19/05/2023	23/05/2023	92.89	97.95	190.84
Mellors Catering Services Ltd (WRAT)	19/05/2023	23/05/2023	499.51	1962.39	2461.9
Carroll Cleaning Company Ltd (Peel Park Primary School)	19/05/2023	16/08/2023	94.84	260.38	355.22
Carroll Cleaning Company Ltd (St Johns Wakefield)	19/05/2023	16/08/2023	24.7	100.59	125.29
Carroll Cleaning Company Ltd (Southmere Primary Academy)	19/05/2023	16/08/2023	31.58	130.93	162.51
Enviroserve (Priestley Academy Trust)	19/05/2023	07/06/2023	487.85	1871.56	2359.41
Mellors Catering Services (Share MAT)	19/05/2023	23/05/2023	1040.36	4290.99	5331.35
Carroll Cleaning Company Ltd (Saltaire Primary)	19/05/2023	16/08/2023	90.2	280.44	370.64
Mellors Catering Services Limited (Exceed Academies Trust)	19/05/2023	23/05/2023	348.77	1536.72	1885.49
Mellors Catering Services Limited (Heckmondwike Grammar School)	19/05/2023	23/05/2023	490.87	1647.8	2138.67
Enviroserve (St Pauls Primary School)	19/05/2023	07/06/2023	49.97	152.62	202.59
Mellors Catering Services Limited (Priestley Academy Trust)	19/05/2023	23/05/2023	749.55	2112.13	2861.68
Mellors Catering Services Limited (Appleton Academy)	19/05/2023	23/05/2023	526.1	1450.63	1976.73
SBFM Limited (Bradford College)	19/05/2023	02/08/2023	340.21	1371.49	1711.7

WYPF Breaches of the Law 2023 -2024

Mellors Catering Services Limited (Elevate MAT)	19/05/2023	23/05/2023	67.06	241.4	308.46
Mellors Catering Services Limited (Star Academies)	19/05/2023	23/05/2023	406.66	1261.23	1667.89
Maxim Facilities Management Limited (Southfield Grange)	19/05/2023	02/06/2023	0	50.07	50.07
Maxim Facilities Management Ltd (Ireland Wood Primary School)	19/05/2023	02/06/2023	0	177.42	177.42
Mellors Catering Services Ltd (Baildon Glen Primary School)	19/05/2023	19/06/2023	138.19	386.93	525.12
Midshire Signature Services Ltd (Guseley School)	19/05/2023	13/07/2023	134.05	385.09	519.14
ICS Ltd (Outwood Academy Trust)	19/05/2023	15/06/2023	254.85	741.34	996.19
Caterlink Limited (Kettlethorpe High School)	19/05/2023	18/07/2023	428.18	1311.78	1739.96
I.S.S. Mediclean Ltd (Outwood Academy Freeston)	19/05/2023	20/07/2023	441.74	1305.69	1747.43
Betterclean Services (Carlton Academy Trust)	19/05/2023	17/07/2023	56.89	221.05	277.94
Mellors Catering Services Limited (Ashlands Primary School)	19/05/2023	19/09/2023	173.16	517.49	690.65
Caterlink Limited (Abbey Multi Academy Trust)	19/05/2023	18/07/2023	1097.95	3302.69	4400.64
Caterlink Limited (Mackie Hill Primary School)	19/05/2023	18/07/2023	34.79	108.15	142.94
Independent Cleaning Services Limited (Garforth Academy)	19/05/2023	04/08/2023	370.7	1087.89	1458.59
Independent Cleaning Services Limited (Green Lane Academy)	19/05/2023	09/08/2023	22.71	67.31	90.02
Dolce Limited (Stanley St Peters School)	19/05/2023	22/09/2023	154.48	465.38	619.86
RFM Group Services Limited (Sandy Lane Primary School)	19/05/2023	15/02/2024			
Relish School Food Ltd (Highfield School)	19/05/2023	NO PAYMENT	0	0	0
May 2023					
SSE Contracting Ltd	19/06/2023	22/06/2023	1759.07	0	1759.07
Turning Lives Around	19/06/2023	23/06/2023	932.18	0	932.18
Carroll Cleaning Company Ltd (Whetley)	19/06/2023	16/08/2023	112.14	501.6	613.74
Carroll Cleaning Company Ltd (Wakefield)	19/06/2023	16/08/2023	39.54	163.21	202.75
Creative Support Limited	19/06/2023	22/06/2023	80.62	0	80.62
Carroll Cleaning Company Ltd (Holy Trinity Primary)	19/06/2023	16/08/2023	50.56	254.65	305.21
Carroll Cleaning Company Ltd (Birkenshaw Primary School)	19/06/2023	16/08/2023	34.16	165.82	199.98
Carroll Cleaning Company Limited (Frizinghall)	19/06/2023	16/08/2023	36.24	170	206.24
Equans Services Ltd	19/06/2023	27/06/2023	8829.59	0	8829.59
Carroll Cleaning Company (Nessfield Primary School)	19/06/2023	16/08/2023	22.41	88.44	110.85

WYPF Breaches of the Law 2023 -2024

Carroll Cleaning Company Ltd (Peel Park Primary School)	19/06/2023	16/08/2023	94.84	441.44	536.28
Carroll Cleaning Company Ltd (St Johns Wakefield)	19/06/2023	16/08/2023	24.7	93.4	118.1
Carroll Cleaning Company Ltd (Southmere Primary Academy)	19/06/2023	16/08/2023	34.1	145.68	179.78
Enviroserve (Priestley Academy Trust)	19/06/2023	13/07/2023	501.09	1922.37	2423.46
Carroll Cleaning Company Ltd (Saltaire Primary)	19/06/2023	16/08/2023	105.69	322.84	428.53
Enviroserve (St Pauls Primary School)	19/06/2023	13/07/2023	98.37	365.84	464.21
SBFM Limited (Bradford College)	19/06/2023	02/08/2023	404.82	1634.7	2039.52
Midshire Signature Services Ltd (Guseley School)	19/06/2023	19/07/2023	134.05	385.09	519.14
Caterlink Limited (Kettlethorpe High School)	19/06/2023	18/07/2023	428.18	1311.77	1739.95
I.S.S. Mediclean Ltd (Outwood Academy Freeston)	19/06/2023	20/07/2023	419.8	1282.53	1702.33
Betterclean Services (Carlton Academy Trust)	19/06/2023	17/07/2023	74.31	288.77	363.08
Mellors Catering Services Limited (Ashlands Primary School)	19/06/2023	19/09/2023	165.69	494.75	660.44
Caterlink Limited (Abbey Multi Academy Trust)	19/06/2023	18/07/2023	1021.51	3136.58	4158.09
Caterlink Limited (Mackie Hill Primary School)	19/06/2023	18/07/2023	32.92	102.36	135.28
Independent Cleaning Services Limited (Garforth Academy)	19/06/2023	04/08/2023	360.02	1056.23	1416.25
Independent Cleaning Services Limited (Green Lane Academy)	19/06/2023	09/08/2023	30.73	91.07	121.8
Dolce Limited (Stanley St Peters School)	19/06/2023	22/09/2023	166.96	502.92	669.88
Taylor Shaw (PAT)	19/06/2023	13/10/2023	995.44	3024.23	4029.68
RFM Group Services Limited (Sandy Lane Primary School)	19/06/2023	15/02/2024			
Relish School Food Ltd (Highfield School)	19/06/2023	NO PAYMENT	0	0	0
June 2023					
Normanton Town Council	19/07/2023	26/09/2023	508.94	1430.88	1939.82
Carroll Cleaning Company Ltd (Whetley)	19/07/2023	16/08/2023	108.03	483.19	591.22
Carroll Cleaning Company Ltd (Wakefield)	19/07/2023	16/08/2023	38.54	159.07	197.61
Creative Support Limited	19/07/2023	14/08/2023	98.19	0	98.19
Carroll Cleaning Company Ltd (Holy Trinity Primary)	19/07/2023	16/08/2023	48.36	243.58	291.94
Carroll Cleaning Company Ltd (Birkenshaw Primary School)	19/07/2023	16/08/2023	32.18	156.2	188.38
Carroll Cleaning Company Limited (Frizinghall)	19/07/2023	16/08/2023	36.24	170	206.24
Carroll Cleaning Company (Nessfield Primary School)	19/07/2023	16/08/2023	22.41	88.44	110.85

WYPF Breaches of the Law 2023 -2024

Mellors Catering Services Ltd (Cavendish Primary)	19/07/2023	24/07/2023	119.26	125.75	245.01
Mellors Catering Services Ltd (WRAT)	19/07/2023	24/07/2023	487.64	1917.72	2405.36
Carroll Cleaning Company Ltd (Peel Park Primary School)	19/07/2023	16/08/2023	94.84	441.44	536.28
Carroll Cleaning Company Ltd (St Johns Wakefield)	19/07/2023	16/08/2023	24.7	93.4	118.1
Carroll Cleaning Company Ltd (Southmere Primary Academy)	19/07/2023	16/08/2023	33.63	143.71	177.34
Enviroserve (Priestley Academy Trust)	19/07/2023	22/08/2023	504.37	1934.97	2439.34
Mellors Catering Services (Share MAT)	19/07/2023	24/07/2023	1052.31	4341.12	5393.43
Carroll Cleaning Company Ltd (Saltaire Primary)	19/07/2023	16/08/2023	101.27	309.36	410.63
Mellors Catering Services Limited (Exceed Academies Trust)	19/07/2023	24/07/2023	351.64	1549.36	1901
Mellors Catering Services Limited (Heckmondwike Grammar School)	19/07/2023	24/07/2023	519.67	1742.99	2262.66
Enviroserve (St Pauls Primary School)	19/07/2023	17/08/2023	49.06	149.85	198.91
Mellors Catering Services Limited (Priestley Academy Trust)	19/07/2023	24/07/2023	749.82	2112.83	2862.65
Mellors Catering Services Limited (Appleton Academy)	19/07/2023	24/07/2023	525.51	1448.99	1974.5
SBFM Limited (Bradford College)	19/07/2023	24/08/2023	354.82	1788.9	2143.72
Mellors Catering Services Limited (Elevate MAT)	19/07/2023	24/07/2023	67.06	241.4	308.46
Mellors Catering Services Limited (Star Academies)	19/07/2023	24/07/2023	404.6	1254.76	1659.36
Mellors Catering Services Ltd (Baildon Glen Primary School)	19/07/2023	24/07/2023	140.58	393.61	534.19
Mellors Catering Services Limited (Ashlands Primary School)	19/07/2023	19/09/2023	178.43	531.55	709.98
Independent Cleaning Services Ltd (Garforth Academy)	19/07/2023	04/08/2023	374.96	2087.89	1462.85
Independent Cleaning Services Ltd (Greeb Lane Academy)	19/07/2023	09/08/2023	30.73	91.07	121.80
Dolce Ltd (Stanley St Peters School)	19/07/2023	22/09/2023	154.48	465.38	619.86
Taylor Shaw (PAT)	19/07/2023	13/10/2023	995.44	3024.23	4029.68
Affinity Trust	19/07/2023	24/11/2023	449.97	0	449.97
RFM Group Services Limited (Sandy Lane Primary School)	19/07/2023	15/02/2024			
Relish School Food Ltd (Highfield School)	19/07/2023	NO PAYMENT			
July 2023					
Micklefield Parish Council	18/08/2023	23/08/2023	91.38	266.26	357.64
Shipley Town Council	18/08/2023	22/08/2023	213.92	658.22	872.14

WYPF Breaches of the Law 2023 -2024

SBFM Limited (Bradford College)	18/08/2023	24/08/2023	358.76	1809.95	2168.71
SSE Contracting Ltd	18/08/2023	23/08/2023	1647.57	0	1647.57
Mellors Catering Services Ltd (Ashlands Primary School)	18/08/2023	19/09/2023	183.92	545.73	726.65
Taylor Shaw (PAT)	18/08/2023	13/10/2023	995.44	3024.23	4029.68
RFM Group Services Limited (Sandy Lane Primary School)	18/08/2023	15/02/2024			
Relish School Food Ltd (Highfield School)	18/08/2023	NO PAYMENT			
August 2023					
SSE Contracting Ltd	19/09/2023	20/10/2023	1709.05	0	1709.05
Turning Lives Around	19/09/2023	20/10/2023	887.78	0	887.78
Halifax Opportunities Trust (Calderdale)	19/09/2023	20/10/2023	1515.4	0	1515.4
Oxenhope Village Council	19/09/2023	20/10/2023	63.45	222.96	286.41
Taylor Shaw (PAT)	19/09/2023	13/10/2023	995.44	3024.23	4029.68
Dolce Ltd (Stanley St Peters School)	19/09/2023	22/09/2023	152.97	460.69	613.66
Sodexo Ltd	19/09/2023	10/10/2023	736.91	641.49	1378.40
RFM Group Services Limited (Sandy Lane Primary School)	19/09/2023	15/02/2024			
Relish School Food Ltd (Highfield School)	19/09/2023	NO PAYMENT			
September 2023					
SBFM Limited (Bradford College)	19/10/2023	08/11/2023	501.26	1686.60	2188.16
Sitlington Parish Council	19/10/2023	23/10/2023	220.66	895.89	1116.55
JPL Catering Ltd (The Brigshaw Learning Partnership)	19/10/2023	17/11/2023	174.55	593.47	768.02
Enviroserve (St Pauls Primary)	19/10/2023	16/01/2024	48.63	148.53	197.16
RFM Group Services Limited (Sandy Lane Primary School)	19/10/2023	15/02/2024			
Relish School Food Ltd (Highfield School)	19/10/2023	NO PAYMENT			
Aspens Services Ltd (Ninelands Primary School)	19/10/2023	NO PAYMENT			New Employer
Sandy Lane Parish Council	19/10/2023	NO PAYMENT			New Employer
October 2023					
Ackworth Parish Council	17/11/2023	23/11/2023	671.46	2083.98	2755.44

WYPF Breaches of the Law 2023 -2024

Envioserve (Priestly Academy Trust)	17/11/2023	01/12/2023	517.80	1950.97	2468.77
Envioserve (St Pauls Academy school)	17/11/2023	01/12/2023	43.16	131.82	174.98
SBFM Limited (Bradford College)	17/11/2023	04/12/2023	522.73	1166.15	1688.88
SSE Contracting Ltd	17/11/2023	22/11/2023	1729.93	0	1729.93
BID Services	17/11/2023	15/12/2023	206.82	0	206.82
Relish School Food Ltd (Highfield School)	17/11/2023	NO PAYMENT			
Aspens Services Ltd (Ninelands Primary School)	17/11/2023	NO PAYMENT			
Sandy Lane Parish Council	17/11/2023	NO PAYMENT			
November 2023					
Kirklees Citizens Advice and Law Centre	19/12/2023	10/01/2024	318.31	372.91	691.22
Micklefield Parish Council	19/12/2023	16/01/2024	91.38	266.26	357.64
SSE Contracting Ltd	19/12/2023	22/12/2023	1601.52	0	1601.52
Envioserve (Priestley Academy trust)	19/12/2023	16/01/2024	504.07	1933.74	2437.81
Envioserve (St Paul's Primary School)	19/12/2023	16/01/2024	48.63	148.53	197.16
Maxim Facilities Management Ltd (Ireland Wood Primary)	19/12/2023	21/12/2023	18.73	50.07	68.80
JPL Catering LTD (The Brigshaw Learning Partnership)	19/12/2023	19/01/2024	446.99	1519.69	1966.68
Churchill Contracts Services (Outwood Grange Academies Trust)	19/12/2023	05/01/2024	93.95	0	93.95
Relish School Food Ltd (Highfield School)	19/12/2023	NO PAYMENT			
Aspens Services Ltd (Ninelands Primary School)	19/12/2023	NO PAYMENT			
Sandy Lane Parish Council	19/12/2023	NO PAYMENT			



Report of the Managing Director of West Yorkshire Pension Fund to the meeting of West Yorkshire Pension Fund Pension Board to be held on 20 March 2024

AJ

Subject: Local Government Pension Scheme Regulations update

Summary statement:

This report updates the Pension Board on changes to the Local Government Pension Scheme (LGPS) 2014 and provides information on associated matters.

EQUALITY & DIVERSITY:

Not Applicable

Euan Miller
Managing Director
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1 Background

- 1.1 The career average Local Government Pension Scheme (LGPS) was introduced on 1 April 2014.
- 1.2 Since the introduction of the new LGPS there have been a number of consultations on proposed changes to the LGPS, following which amendment regulations have been issued.
- 1.3 On 19 September 2021, the Government announced that the Ministry of Housing, Communities and Local Government (MHCLG) became the Department for Levelling Up, Housing and Communities (DLUHC).

2. Consultation: Local valuation cycle and the management of employer risk

- 2.1 On 8 May 2019 MHCLG issued a 12-week policy consultation called 'LGPS: Changes to the local valuation cycle and the management of employer risk'.
- 2.2 The consultation closed on 31 July 2019.
- 2.3 On 20 March 2020 the LGPS (Amendment) Regulations 2020 came into force. These regulations provide administering authorities with a discretion to determine the amount of exit credit which should be payable to an employer leaving the LGPS with a surplus.
- 2.4 The LGPS (Amendment) (No.2) Regulations 2020 came into effect from 23 September 2020. These regulations provide for new flexibilities that allow employer contributions to be reviewed between valuations, an exiting employer to enter into a Deferred Debt Agreement and an exit deficit to be paid in instalments. Following a consultation WYPF's Funding Strategy Statement has been updated to include policies on applying these new flexibilities.
- 2.5 DLUHC has yet to publish its response to the other matters contained in the consultation, which included changes to the LGPS Local Valuation Cycle, and employers required to offer LGPS membership.

3. Consultation on investment reforms

- 3.1 On 11 July 2023, DLUHC launched a consultation on LGPS investment reforms. The consultation was announced by the Chancellor in his Mansion House Speech.
- 3.2 The consultation seeks views on proposals in five areas and closed on 2 October 2023.
- 3.3 On 22 November 2023, as part of the Chancellor's Autumn Statement, a response to this consultation was published.
- 3.4 The Government will amend regulations to require funds to set objectives for investment consultants and correct the definition of investment in the 2016 investment regulations. Government will also require all LGPS funds in England

and Wales to pool listed assets by 31 March unless a value for money case can be made not to do so; and to monitor pooling progress over the current valuation period to 31 March 2025.

4. Other LGPS matters

4.1 McCloud remedy

On 16 July 2020 both HMT and MHCLG published consultations on the McCloud remedy. The MHCLG consultation closed on 8 October 2020. On 6 April 2023, DLUHC published their response to this consultation.

On 13 May 2021 Luke Hall, the Local Government Minister made a written statement on McCloud and the LGPS. The statement confirms the key changes to scheme regulations that will be made to remove age discrimination from the LGPS.

On 19 July 2021 HM Treasury formally introduced to Parliament the Public Service Pensions and Judicial Offices Bill, which makes provision to rectify the unlawful age discrimination identified by the McCloud judgment.

On 10 March 2022, the Public Service Pensions and Judicial Offices Act 2022 received Royal Assent. The main purpose of the Act is to give the relevant government departments the regulatory powers to resolve the discrimination identified in the McCloud judgment.

On 24 November 2022, HMRC launched a consultation on how pension tax will apply to members protected by the McCloud remedy. This consultation closed on 6 January 2023. The Public Service Pension Schemes (Rectification of Unlawful Discrimination) (Tax) Regulations 2023 were laid before Parliament on 6 February 2023 and came into force on 6 April 2023. On 22 May 2023 HMRC launched a technical consultation on draft tax regulations which make further tax changes to the tax framework as a result of the public service pensions remedy. This consultation closed on 19 June 2023.

On 14 December 2022, HM Treasury (HMT) made the Public Service Pensions (Exercise of Powers, Compensation and Information) Directions 2022. They came into force on 19 December 2022 and apply to England, Northern Ireland, Scotland and Wales. The Directions set out how certain powers in the Public Service Pensions and Judicial Offices Act 2022 must be exercised. The Act gives relevant government departments powers to rectify McCloud discrimination.

The making of the Directions now allows relevant departments to start consulting on regulations exercising these powers. On 30 May 2023 DLUHC published a the [‘McCloud’ remedy in the LGPS consultation](#) to make the necessary changes to the LGPS Regulations 2013. This consultation closed on 30 June 2023.

On 8 September 2023 the outcome of the consultation was published and also the LGPS Amendment (No 3) Regulations 2023 were laid in Parliament and came into force on 1 October 2023. The regulations implement the McCloud remedy and amend the underpin rules to make sure they work correctly.

DLUHC has provided its initial policy on how authorities should prioritise this work and on 25 January 2024 issued new LGPS actuarial guidance, which provides additional information about how the McCloud remedy will affect certain calculations. The Local Government Pensions Committee has produced a factsheet for members and the first instalment of its McCloud Technical Guide for Administrators.

4.2 **Cost Control Mechanism**

Alongside publication of the McCloud consultation, HMT announced that the pause of the cost control mechanism would be lifted. The Scheme Advisory Board (SAB) also said it would be re-examining its results from its cost management process. It was also announced that there would be a review of the cost management process.

On 15 June 2021 the Government Actuary published his final report on his review of the cost control mechanism.

On 24 June 2021 HM Treasury launched consultations on proposed changes to the cost control mechanism and the SCAPE discount methodology.

On 4 October 2021, HMT published its response to the Public Service Pensions: cost control mechanism consultation.

SAB published the outcome of its cost management process for the 2016 valuation on 15 October 2021. SAB agreed to spread McCloud costs over a 10 year period (rather than the 4 years used by HMT) resulting in an outcome of 19.4% against a target cost of 19.5%. Despite the slight shortfall in cost SAB agreed not to recommend any scheme changes.

GAD has now published cost cap valuation reports for all 20 public service pension schemes and it has confirmed that no changes to member benefits or contributions are required as a result of these reports.

However, on 4 July 2022, the Fire Brigades Union and the British Medical Association were given permission to judicially review the UK Government's decision to include the McCloud remedy costs in the 2016 cost control valuations. The cases would be heard together. Though the case will look at the firefighters' and NHS pension schemes, the outcome may have an impact on the LGPS. This is because the first cost control valuations in the LGPS also included the McCloud remedy costs. The High Court Hearing began on 31 January 2023 and on 10 March 2023, it ruled that HM Treasury's decision to include the McCloud remedy in the cost cap mechanism was not unlawful. On 2 June 2023 the Court of Appeal granted unions permission to appeal against the High Court judgement.

4.3 **Scheme Advisory Board's Good Governance Report**

In 2019 SAB commissioned Hymans Robertson to prepare a report on the effectiveness of current LGPS governance models and to consider alternatives or enhancements to existing governance models which can strengthen the LGPS going forward. On 31 July 2019 SAB published this report. The phase two report from the Working Groups to SAB was published in November 2019.

When it met on the 8th February 2021 the SAB agreed that the Good Governance – Final Report should be published, and for the Chair to submit the Board’s Action Plan to the Local Government Minister for consideration. SAB has now published its action plan and SAB are now waiting to see how DLUHC responds to its proposals.

4.4 **SAB statement on surpluses**

On 20 December 2023 SAB issued a [Statement on Surpluses](#). The key points of the statement are:

- Funding levels across the scheme increased at the 2022 valuation and subsequent market movements have led to some funds experiencing further improvements
- LGPS regulations emphasise the desirability of stability in primary contributions for employers
- Funds should carefully consider their approach to employer-specific investment and funding strategies and take professional advice as needed
- Clear communication with employers about the impact (or lack of impact) of funding improvements is key – as well as the potential longevity of those improvements
- Funds should have a clear rationale and be able to explain their approach to setting secondary contributions and how employers’ covenant positions have been recognised
- Employer flexibilities regulations, statutory guidance and SAB are clear on the circumstances in which mid-cycle reviews of employer contributions are appropriate

5 **Other matters**

5.1 **Money and Pensions Service - Pensions dashboard update**

On 2 March 2023 The Department for Work and Pensions (DWP) announced plans for a "reset" of the Pensions Dashboards Programme with a further update on the plan for the delivery of pensions dashboards expected before summer recess.

The framework for dashboards will remain unchanged, although DWP will legislate to provide new connection deadlines and further information on the revised timeline will be made available following an agreement on PDP’s delivery plan.

On 8 June 2023 the Pensions Minister issued an updated statement setting out further details of the delay.

The DWP laid the Pensions Dashboards (Amendment) Regulations 2023 in Parliament on 19 July 2023. A revised staging timetable will be set out in guidance and all schemes in scope will need to connect by 31 October 2026. The staging timetable will indicate when schemes are scheduled to connect, based on their size and type.

On 2 February 2024, DWP published updated guidance on deferring dashboards connection. The updated guidance sets out the issues that trustees or managers of occupational pension schemes and their advisers should consider if they are applying

for a deferral of the connection deadline.

5.2 The Pensions Regulator Consultation on a new Code of Practice

On 17 March 2021 the Pensions Regulator (TPR) published a consultation on a new code of practice. This consultation focuses on the draft content for the first phase of its new code of practice. The new code consists of 51 shorter, topic-based modules and will replace 10 of its existing codes of practice, which mainly deal with the governance and administration of pension schemes.

TPR has published an interim response to the new code of practice consultation. Responses to the consultation included around 10,000 individual answers. TPR has issued the interim response to allow time to consider these responses and to incorporate code content arising from the Pension Schemes Act 2021 into the new code.

On 10 January 2024, TPR published its General Code of Practice, previously known as the Single Code of Practice, which is expected to come into force on 27 March 2024.

5.4 Abolition of Lifetime Allowance

The Government has introduced legislation to abolish the lifetime allowance from 6 April 2024. It has introduced two new lump sum limits to restrict the amount of tax free cash an individual can take over their lifetime.

Lump sum limit	Limit	Lump sums included
Lump sum allowance (LSA)	£268,275	Pension commencement lump sums (PCLS) and uncrystallised funds pension lump sums (UFPLS)
Lump sum and death benefit allowance (LSDBA)	£1,073,100	PCLS, UFPLS, serious ill health lump sums, authorised lump sum death benefits

A member will be able to apply for a transitional tax-free certificate if they opted to take a PCLS or UFPLS of less than 25 per cent when they took their benefits before 6 April 2024.

5.5 Annual revaluation, earnings and pensions increase

On 25 January 2024, HM Treasury (HMT) published a written ministerial statement confirming the rates of annual revaluation, earnings and pensions increase due to apply from April 2024. The statement confirms:

- public service pensions will increase on 8 April 2024 by 6.7%, in line with the Consumer Prices Index for the year up to September 2023

- revaluation of 6.7% plus any local addition will be used in April 2024 to revalue CARE accounts in public service pension schemes that use prices as the measure of revaluation
- revaluation of 7.7% will be used in April 2024 to revalue the CARE accounts in public service pension schemes that use earnings as the measure of revaluation

6. OTHER CONSIDERATIONS

None

7. FINANCIAL & RESOURCE APPRAISAL

None

8. RISK MANAGEMENT AND GOVERNANCE ISSUES

None

9. LEGAL APPRAISAL

None

10. OTHER IMPLICATIONS

10.1 SUSTAINABILITY IMPLICATIONS

None.

10.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

None

10.3 COMMUNITY SAFETY IMPLICATIONS

None

10.4 HUMAN RIGHTS ACT

None

10.5 TRADE UNION

None

10.6 WARD IMPLICATIONS

None

10.7 AREA COMMITTEE LOCALITY PLAN IMPLICATIONS

None

10.8 IMPLICATIONS FOR CHILDREN AND YOUNG PEOPLE

None.

10.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

None

11. NOT FOR PUBLICATION DOCUMENTS

None

12. OPTIONS

None

13. RECOMMENDATIONS

It is recommended that the Pension Board note the report.

14. APPENDICES

None

15. BACKGROUND DOCUMENTS

None



Report of the Managing Director, West Yorkshire Pension Fund to the meeting of Local Pension Board to be held on 20 March 2024.

AK

Subject:

Pensions Administration Strategy and Communications Policy 2024

Summary statement:

In compliance with the LGPS Regulations 2013, WYPF prepares a written statement of the authority's policies in relation to such matters as it considers appropriate in relation to procedures for liaison and communication with scheme employers and the levels of performance which the employers and WYPF are expected to achieve.

The Pensions Administration Strategy and Communications Policy are brought before JAG each year to review and approve, particularly if there are any new regulations and revisions to working practices.

The Pensions Administration Strategy has not required any update. The Communications Policy has been updated to reflect activities planned for 2024.

EQUALITY & DIVERSITY:

No specific equality and diversity issues.

Euan Miller
Managing Director

Portfolio:

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Assistant Director (Finance,
Administration and Governance)
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Overview & Scrutiny Area:

1. SUMMARY

- 1.1 In compliance with the LGPS Regulations 2013, WYPF prepares a written statement of the authority's policies in relation to such matters as it considers appropriate in relation to procedures for liaison and communication with scheme employers and the levels of performance which the employers and WYPF are expected to achieve.
- 1.2 The Pensions Administration Strategy (PAS) and Communications Policy (CP) have been produced by WYPF and are taken to JAG each year to review and approve.
- 1.3 The JAG meeting in January did not take place as the meeting was not quorate. As a result both the PAS and the CP have not been approved by JAG and therefore have been presented to the Board for information.

2. BACKGROUND

- 2.1 The Pensions Administration Strategy is made under Regulation 59 of The Local Government Pension Scheme Regulations 2013.
- 2.2 In line with these regulations West Yorkshire Pension Fund (WYPF), Lincolnshire Pension Fund (LPF), Hounslow Pension Fund (HPF) and Barnet Pension Fund (BPF) employers have been consulted on the strategy, and a copy will be sent to the secretary of state once approved by JAG.
- 2.3 The strategy outlines the processes and procedures to allow WYPF, LPF, HPF, BPF and employers to work together in a cost-effective way to administer the LGPS whilst maintaining an excellent level of service to members and employers. It recognises that working co-operatively and collaboratively will be key to achieving these aims.
- 2.4 The charges in Appendix B and C have been updated to reflect the increased costs of pensions administration (10% increase).
- 2.5 The Communications policy is published as a requirement under regulation 61 of the Local Government Pension Scheme Regulations 2013.
- 2.6 The policy has been prepared to meet our objectives about how we communicate with key stakeholders. WYPF currently administers the Local Government Pension Scheme (LGPS) for over 800 employers and have over 100,000 active members in the LGPS. We also administer the Legacy Councillor Pension Scheme and the Firefighters' Pension Schemes both old and new for a number of fire authorities. This policy will be effective from April 2024 and is reviewed annually.

3. OTHER CONSIDERATIONS

None

4. FINANCIAL & RESOURCE APPRAISAL

Sufficient budget to ensure adequate resources are available to meet the requirements of the Pensions Administration Policy and the Communications Policy.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

None

6. LEGAL APPRAISAL

None

7. OTHER IMPLICATIONS

7.1 SUSTAINABILITY IMPLICATIONS

None

7.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

None

7.3 COMMUNITY SAFETY IMPLICATIONS

None

7.4 HUMAN RIGHTS ACT

None

7.5 TRADE UNION

None

7.6 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

None

8. NOT FOR PUBLICATION DOCUMENTS

None

9. OPTIONS

None

10. RECOMMENDATIONS

It is recommended that the Pension Administration Strategy and the Communications Policy 2024 be noted.

11. APPENDICES

Appendix A – Pensions Administration Strategy
Appendix B – Communications Policy

12. BACKGROUND DOCUMENTS

None

Pension Administration Strategy

Contents

1. Regulatory framework and purpose
2. Review of the strategy
3. Liaison and communication
4. Employer duties and responsibilities
5. Payments and charges
6. Administering authority duties and responsibilities
7. Unsatisfactory performance
8. Appendices
 - a. Authorised contacts form
 - b. Schedule of charges
 - c. Charging levels

Regulatory framework and purpose

1. The regulations

This strategy is made under Regulation 59 of The Local Government Pension Scheme Regulations (LGPS) 2013.

In line with these regulations West Yorkshire Pension Fund (WYPF), Lincolnshire Pension Fund (LPF), Hounslow Pension Fund (HPF) and Barnet Pension Fund (BPF) employers have been consulted on the strategy, and a copy has been sent to the secretary of state.

1.1. Purpose

This strategy covers West Yorkshire, Lincolnshire, Hounslow and Barnet Pension Funds, administered under a collaboration agreement. Within this document the shared service administration, based in Bradford with a satellite office in Lincoln, will be referred to as 'the administrator'.

This strategy outlines the processes and procedures to allow WYPF, LPF, HPF, BPF and employers to work together in a cost-effective way to administer the LGPS whilst maintaining an excellent level of service to members and employers. It recognises that working co-operatively and collaboratively will be key to achieving these aims.

Each of the funds that make up WYPF's shared service arrangement also manage and maintain separate stand-alone fund policies which are available under the relevant fund's 'policies' area on the shared service website or on their own internally managed websites. Where there is a conflict between the shared administration strategy and a fund's stand-alone policy the individual fund's policy will prevail.

2. Review of the strategy

This strategy will be reviewed as soon as reasonably possible following any changes to the regulations, processes or procedures that affect the strategy or on an annual basis if this occurs sooner.

Changes to this strategy will be made following consultation with employers and a copy of the updated strategy will be sent to the secretary of state.

The administrator will constantly seek to improve communications between itself and the employers.

Employers are welcome to discuss any aspect of this strategy with the administrator at any time and may make suggestions for improvement to the strategy.

3. Liaison and communication

3.1. Authorised contacts for employers

Each employer will nominate a contact to administer the three main areas of the LGPS:

- a strategic contact for valuation, scheme consultation, discretionary statements and IDRPCs
- an administration contact for the day-to-day administration of the scheme, completing forms and responding to queries, and
- a finance contact for completion and submission of monthly postings and co-ordination of exception reports

If they wish, employers may also nominate additional contacts by completing an authorised user list. If a third-party organisation provides services for the employer they too can be added as an authorised contact. Overall responsibility for pension administration remains with the employer regardless of the services they outsource and proactive contract management of third-party providers is expected.

All contacts will receive a login name and password that allows them to access the Civica employer portal for online administration and the combined remittance and monthly return.

When registering, each contact should complete a Main contact registration form and Authorised user list form, and sign the administrator’s user agreement for the secure administration facility.

The three main contacts are responsible for ensuring that contacts are maintained by notifying the administrator when one leaves and registering new contacts where necessary.

3.2. Liaison and communication with employers

The administrator will provide the following contact information for employers and their members.

- A named Employer Pension Fund Representative for regulatory or administration queries, training, advice and guidance
- A named Finance Business Partner to assist with the monthly returns process
- A dedicated contact centre for member queries

In addition to this, the administrator takes a multi-channel approach to communication with its employers.

Format of communication	Frequency	Method of distribution
Employer Pension Fund Representatives	8.30am to 4.30pm Monday to Friday	Virtual meetings/face-to-face/telephone/e-mail
Website	Constant	Web
Fact card	1 per year	Mail
Fact sheets	Constant	Web
Employer guide	Constant	Web/electronic document
Ad hoc training	As and when required	Virtual meetings
Update sessions	Up to 2 per year	Meeting
Annual meeting	1 per year	Meeting
Manuals/toolkits	Constant	Web/electronic document
Pension Matters and round-up	12 per year and as and when required	Wordpress blog and gov.direct bulk mail
Social media	Constant	Web
Ad hoc meetings	As and when required	Virtual meeting/face-to-face
Employer webcasts	1 per week	Virtual meeting

4. Employer duties and responsibilities

When carrying out their functions employers must have regard to the current version of this strategy.

4.1. Events for notification

4.1.1. Employers should be able to provide the following information in relation to their employees in the Fund

Event	Preferred method of notification	Other methods available	Target	Acceptable performance
Monthly postings (submitted via secure portal)	Approved spreadsheet	None	19th day of the month following the month in which contributions were deducted	100% compliance of compliance of returns received in target
New starters	Monthly return		Notified via the monthly return, the administrator will process the data within two weeks following monthly return submission	100% compliance or better
Change of hours, name, payroll number or job title	Monthly return (exception report)	Web form	Notified via monthly returns, the administrator will process the data within two weeks following monthly submission. For exception report output from the monthly return, change data response must be provided to the administrator within two weeks of receipt of the exception report. If the employer isn't using monthly return then information is due within six weeks of change event.	90% compliance or better
50/50 and main scheme elections	Monthly return		Notified by the employer via monthly return, the administrator will process the data within two weeks following monthly data submission.	90% compliance or better
Service breaks/absences	Web form		Within six weeks of the date of the absence commencing	90% compliance or better
Under three-month optouts	Monthly return		Notified by the employer via monthly return, the administrator will process the data within two weeks following monthly data submission.	90% compliance or better
Leavers	Monthly return Web form		Notified by the employer via monthly return, the administrator will process the	90% compliance or better

	Monthly returns (exception reports)		data within two weeks following monthly data submission, else within six weeks of leaving. For exception reports, leaver forms must be provided within two months of receipt of the exception report.
Retirement notifications	Web form	10 days before the member is due to retire unless the reason for retirement is ill health or redundancy	100% compliance
Death in service notifications	Web form	Within three days of the date of notification	100% compliance

4.1.2. Notifiable events

Employers should also provide information on any circumstances which might affect their future participation in the Fund or their ability to make contributions to the Fund, known as "notifiable events". These include the following:

- A decision which will restrict the employer's active membership in the Fund in future**
 Examples include: ceasing to admit new members under an admission agreement, ceasing to designate a material proportion of posts for membership, setting up a wholly owned company whose staff will not all be eligible for Fund membership, outsourcing a service which will lead to a transfer of staff
- Any restructuring or other event which could materially affect the employer's membership**
 Examples include: a Multi-Academy Trust re-structuring so there is change in constituent academies, the employer merging with another employer (regardless of whether or not that employer participates in the Fund), a material redundancy exercise, significant salary awards being granted, a material number of ill health retirements, large number of employees leaving voluntarily before retirement or the loss of a significant contract or income stream
- A change in the employer's legal status or constitution which may jeopardise its participation in the Fund**
 Examples include the employer ceasing business (whether on insolvency, winding up, receivership or liquidation), loss of charitable status, loss of contracts or other change which means the employer no longer qualifies as an employer in the Fund
- If the employer has been judged to have been involved in wrongful trading**
- If any senior personnel, e.g. directors, owners or senior officers have been convicted for an offence involving dishonesty, particularly where related to the employer's business**
- Where the employer has, or expects to be, in breach of its banking covenant**
- Details of any improvement notice (or equivalent) served by the appropriate regulator, e.g. Education Funding and Skills Agency, Office for Students, Charity Commission, Regulator for Social Housing etc, or S114 notice for local authorities**

Employers should provide this information in advance of the event occurring (where possible) or as soon as practicable thereafter.

4.2. Responsibilities

Employers are responsible for ensuring that member and employer contributions are deducted at the correct rate, including any additional contributions. Organisations with third-party providers can't delegate responsibility for this even if day-to-day tasks are carried out by that provider.

The administrator is not responsible for verifying the accuracy of any information provided by the employer for the purpose of calculating benefits under the provisions of the Local Government Pension Scheme. That responsibility rests with the employer.

Any over-payment as a result of inaccurate information being supplied by the employer shall be recovered from that employer.

In the event of the administrator being fined by The Pensions Regulator, this fine will be passed on to the relevant employer where that employer's actions or inaction caused the fine.

Employers are responsible for keeping the Administering Authority informed of all events or decisions which might affect their participation in the Scheme, including the 'notifiable events' as set out in 4.1.2 above. In such circumstances the Administering Authority may increase an employer's contribution as set out in the Funding Strategy Statement. Any increase may be backdated where the employer has failed to provide information to the Administering Authority in a timely manner.

4.3. Discretionary powers

Employers are responsible for exercising the discretionary powers given to employers by the regulations. The employer is also responsible for compiling, reviewing and publishing its policy to employees in respect of the key discretions as required by the regulations. A copy of these discretions must be sent to the administrator.

4.4. Member contribution bands

Employers are responsible for assessing and reassessing the contribution band that is allocated to a member at least once a year in April or more frequently if required in their policy. The employer must also inform the member of the band that they have been allocated on joining the scheme and when they have been reallocated to a different band.

4.5. Internal dispute resolution procedure (IDRP)

Employers must nominate an adjudicator to deal with appeals at stage one of the IDRP where the dispute is against a decision the employer has made or is responsible for making. Employers are responsible for providing details of the IDRP and the adjudicator in writing to members when informing them of decisions they have made.

5. Payments and charges

5.1. Payments by employing authorities

Employers will make all payments required under the LGPS regulations, and any related legislations, promptly to the relevant pension fund and /or its additional voluntary contribution (AVC) providers (Prudential/Scottish Widows/Standard Life) as appropriate.

5.2. Paying contributions

Member and employer contributions can be paid over at any time and should be accompanied by a monthly postings submission however they must be paid to the relevant fund by the 19th day of the month following the month in which the deductions were made. The monthly posting submission should be uploaded to the administrator by the same deadline and the data should reconcile to the payment made to the relevant fund.

Where the 19th falls on a weekend or bank holiday, the due date becomes the last working day prior to the 19th.

5.3. AVC deductions

Employers will pay AVCs to the relevant provider within one week of them being deducted.

5.4. Late payment

Employers can be reported to The Pensions Regulator where contributions are received late in accordance with the regulator's code of practice. If a matching monthly posting submission is not provided with a contribution payment by the deadline this will also be recorded as a late payment because the relevant pension fund will not be able to correctly allocate the payment received.

5.5. Awards of additional pension

Where an employer awards a member an additional pension all augmentation costs must be paid in full in one payment.

5.6. Early retirement costs

Employers should pay the full amount of the cost of any early retirements.

WYPF employers must pay this within the 30-day payment term stated on the invoice. Depending on the ability to pay, WYPF may agree to payment by monthly instalments over a maximum period of 12 months. Interest will be charged at a rate determined by the fund actuary.

LPF, BPF and HPF will invoice their respective funds' employers and will have their own payment terms that should be discussed with them if the need arises.

5.7. Interest on late payment

In accordance with the LGPS regulations, interest may be charged on any amount overdue from an employing authority by more than one month.

5.8. Employer contributions

Employers' contributions rates are not fixed and employers are required to pay whatever is necessary to ensure that the portion of the fund relating to their organisation is sufficiently funded to meet its liabilities.

5.9. Actuarial valuation

An actuarial valuation of the fund is undertaken every three years by the fund actuary. The actuary balances the fund's assets and liabilities in respect of each employer and assesses the appropriate contribution rate and any secondary payment, if appropriate, for each employer for the subsequent three years.

5.10 Administration charges

The cost of running pension administration is charged directly to the pension fund accounts, the actuary takes these costs into account in assessing employers' contribution rates. This is after recharging each shared service partners their share of the cost of providing shared service pension administration.

Shared service recharged to each service partner is based on the actual cost of pension administration in each financial year divided by the total member number at the end of the financial year to calculate a unit cost per member. The recharge of actual cost to each shared service partner is the unit cost per member multiplied by the total count of members for each partner at the end of the financial year.

6. Administering authority duties and responsibilities

When carrying out their functions the administrator will have regard to the current version of the strategy.

6.1. Scheme administration

The administrator will ensure that training sessions and annual meetings are held on a regular basis and actively seek to promote the Local Government Pension Scheme via the following events.

- Employer annual meeting
- Member annual meeting where appropriate
- Pre-retirement courses
- New starters induction courses
- Employer training webcasts (replacing workshops)
- Bite size training videos

6.2. Responsibilities

The administrator will ensure the following functions are carried out.

- 6.2.1. Provide a helpdesk facility for enquiries, available during normal office hours, providing a single point of access for information relating to the schemes being administered
- 6.2.2. Create a member record for all new starters admitted to the scheme
- 6.2.3. Collect and reconcile employer and employee contributions
- 6.2.4. Maintain and update members' records for any changes received by the administrator
- 6.2.5. At each actuarial valuation the administrator will forward the required data in respect of each member and provide statistical information over the valuation period

to the relevant fund so that their actuary can determine the assets and liabilities for each employer

- 6.2.6. Each fund will communicate the results of the actuarial valuation to the relevant employers
- 6.2.7. Produce a benefit statement each year for every active, deferred and pension credit member
- 6.2.8. Provide estimate of retirement benefits on request by the employer
- 6.2.9. Calculate and pay retirement benefits, deferred benefits and death in service benefits in accordance with LGPS rules, members’ options and statutory limits.
- 6.2.10. Comply with HMRC legislation

6.3. Decisions

The administrator will ensure that members are notified of any decisions made under the scheme regulations in relation to their benefits within 10 working days of the decision being made and will ensure the member is informed of their right of appeal.

6.4. Discretionary powers

The administering authorities with support from the administrator will ensure the appropriate policies are formulated, reviewed and publicised in accordance with the scheme regulations.

6.5. Internal dispute resolution procedure (IDRP)

The administrator will deal with employer appeals at stage two of the IDRP for WYPF, HPF and LPF. The Pension Manager of London Borough of Barnet Pension Fund will undertake this role for BPF.

An adjudicator will be nominated to deal with appeals at stage one and stage two of the IDRP where the appeal is against a decision the administrator has made or is responsible for making. For LPF, the decision maker in these stage one appeals is the Head of Pensions.

6.6. Fund performance levels

The minimum performance targets are shown below.

Service	Days	Minimum target
1. New member records created	10	85%
2. Update personal records	10	85%
3. Posting monthly contributions to member records	10	95%
4. Calculate and action incoming transfer values	35	85%
5. Deferred benefit – payment of lumps sums	3	90%
6. Provide details of deferred benefit entitlement	10	85%
7. Refund of contributions – notification of entitlement	5	85%
8. Refund of contributions - payment	5	90%
9. Pay transfers out on receipt of acceptance	35	85%
10. Provide estimate of retirement benefits	10	75%

11. Retirement benefits – payment of lump sum	3	90%
12. Retirement benefits – calculation of pension/lump sum	10	85%
13. Calculation and payment of death benefits on receipt of all necessary information	5	90%
14. Make death grant payment to the member’s nomination (provided all relevant information is received)	1 month	100%
15. Percentage of telephone calls answered within 20 seconds		90%
16. Annual benefit statements issued to deferred members		by 31 May
17. Annual benefit statements issued to active members		by 31 August
18. Make payment of pensions on the due date		100%
19. Issue P60s to pensioners within statutory deadlines		100%
20. Provide information on request in respect of pension share on divorce within legislative timescales		100%
21. Implement Pension Share Orders within legislative timescales		100%
22. Undertake annual reviews to establish continuing entitlement to pensions for children over the age of 17		100%

7. Unsatisfactory performance

7.1. Measuring performance

Both employer and administrator targets will be measured on a quarterly basis using the Civica document management system. Administrator performance levels will be published on a monthly basis to the shared service pension funds and fire authorities. Overall administrator performance will be published by the funds in their Report and Accounts.

7.2. Unsatisfactory performance

Where an employer materially fails to operate in accordance with the standards described in this strategy, and this leads to extra costs being incurred by the administering authority, the administering authority may issue a written notice to the employer requiring that these extra costs be met by the employer. A schedule of charges is detailed in Appendix B and C.

Appendix A – Main contact registration and authorised user list

Main contact registration form



Main contact registration form

Employer name and location code
Employer address

Important: please read the guidance note on **Managing your contacts** before you complete this form.

Strategic contact

Name	Address if different from above
Job title	
Phone	Specimen signature
Email	

Administration contact

Name	Address if different from above
Job title	
Phone	Specimen signature
Email	

Finance contact

Name	Address if different from above
Job title	
Phone	Specimen signature
Email	

Contact at third-party payroll provider (if applicable and not listed above)

Name	Company name and address
Job title	
Phone	Specimen signature
Email	

Date signatures valid from	Signed (by current authorised signatory)
-----------------------------------	---

Appendix B – Schedule of charges

Performance areas	Reason for charge	Basis of charge
1. Any overpayment made to a member due to inaccurate information provided by an employer will be recovered from employer, if the total overpaid is more than £50.	If the overpaid amount is the result of the employer's error, and the amount is over £50, then as such it will be recharged to the employer, plus costs of resolving and recovering the overpayment. If the overpayment is recovered from the member, then the amount recovered will be passed back to the employer, less any cost of overpayment recovery actions.	Actual amount overpaid + admin charge (admin charge will be based on managerial input at level III).
2. Contributions to be paid anytime but latest date by 19 th of month (weekends and bank holidays on the last working day before 19 th)	Due by 19 th of the month – late receipt of funds, plus cost of additional time spent chasing payment.	Number of days late interest charged at base rate plus 1%.
3. Monthly return due anytime but latest by 19 th of the month, errors on return, i.e. employer/employee rate deducted incorrectly, exception reporting errors to be resolved within two months.	Due by 19 th of the month, any additional work caused by late receipt of information incorrect information, incorrect contributions.	Failure to provide appropriate information, resulting in significant work will result in admin charge (at Senior Pensions Officers level II).
4. Change in member detail	If submitted via monthly data, the administrator will process data within 2 weeks following monthly data submission. For exception reports output from monthly returns, change data response must be provided to the administrator within 2 weeks of receipt of the exception report.	Failure to provide appropriate information, resulting in significant work will result in admin charge (at Pensions Officer level I).
5. Early leavers information	If submitted via monthly data, the administrator will process data within 2 weeks following monthly data submission, else within 6 weeks of date of leaving. For exception reports leaver forms provided to WYPF within two months of receipt of the exception report.	Failure to provide appropriate information, resulting in significant work will result in admin charge (at pension officers level I).
6. Retirement notifications	Due 10 working days before last day of employment unless the reason for retirement is ill health or redundancy – additional work caused by late receipt of information.	Failure to provide appropriate information, resulting in significant work will result in admin charge (at senior pension officers level II).
7. Death in membership	Due within 3 working days of the notification – additional work caused by late receipt of information.	Failure to provide appropriate information, resulting in significant work will result in admin charge (at pension manager level III).
8. AVC deducted from pay to be paid anytime but latest date by 19 th of the month (weekends and bank holidays on the last working day before 19 th).	Additional investigative work caused through lack of compliance by employer.	Failure to comply by employer, causing additional work for WYPF will result in admin charge (at pension officers level I).

9. Re-issue of invoices	Charge based on number of request.	Additional work caused by reproducing invoices will result in admin charge (at pension officer level I).
10. Authorised officers list not updated – Pension Liaison Officers, monthly contributions responsible officers	Costs of additional work resulting from employer’s failure to notify the administrator of change in authorised officers list.	Failure to comply by employer, causing additional work for WYPF will result in admin charge (at Pensions Officer level I).
11. Security breach on system re data protection	Recharge employers any fines imposed on us in this event	Actual amount fine imposed + admin charge (admin charge will be based on managerial input at level III).
12. Pension sharing order	For pension sharing order work, each party will be charged according to the instruction in the court order.	The charge is £350 + VAT for this work.
Miscellaneous items: <ul style="list-style-type: none"> Benefit recalculation Member file search and record prints Supplementary information requests 	Where information is requested by members that is in addition to routine information.	A notional charge of £55 + VAT will be levied. Where the member has more than one known record, the charge is for each record.

Appendix C – Charging Levels

Charges will be made on half a day basis, but for less than a quarter day no charge will be made and for more than half a day a full-day charge will be made. Any part or all of these charges may be waived at head of service discretion.

Charge levels	I	II	III
Daily charge	£106	£150	£240
Half day charge	£53	£75	£120

- Level I – work at Pensions Officer level
- Level II – work at Senior Pensions Officer level
- Level III – work at Pensions Manager level

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London Borough
of Hounslow



Communications Policy

Communications Policy 2024

This policy is published as a requirement under regulation 61 of the Local Government Pension Scheme Regulations 2013.

Introduction

West Yorkshire Pension Fund (WYPF), Lincolnshire Pension Fund (LPF), Hounslow Pension Fund (HPF) and Barnet Pension Fund entered into collaboration agreements for a shared service in April 2015 (LPF), August 2018 (HPF) and October 2020 (BPF). The funds are administered jointly by WYPF, referred to in this policy as 'the administrator'.

This policy has been prepared to meet our objectives about how we communicate with key stakeholders. The administrator currently administers the Local Government Pension Scheme (LGPS) for over 900 employers and has over 200,000 active members in the LGPS. We also administer the Councillor Pension Scheme and the Firefighters' Pension Schemes for 23 fire authorities (increasing to 24 in February 2024). This policy is effective from January 2024 and will be reviewed annually.

Our stakeholders

For all of the schemes that we administer, our stakeholders include:

- members
- representatives of members
- prospective members
- employing authorities
- third-party employer service providers

Key objectives

- Communicate scheme regulations and procedures in a clear and easy to understand style and help scheme members understand their pension, the benefits and options it provides
- Use plain English for all our communications with stakeholders
- Identify and use the most appropriate communication method to take account of stakeholders' different needs
- Use technologies to provide convenient, up to date and timely information to stakeholders
- Provide timely and sufficient information to scheme members, allowing access through the channel of their choice, so members can make informed decisions about their benefits
- Engage with our stakeholders face-to-face when appropriate

Evaluation and continuous development

To ensure we are meeting the expectations of our stakeholders and to evaluate the effectiveness of our communications we will use the following methods:

- feedback questionnaires and focus groups
- monitoring compliments and complaints
- customer surveys
- web feedback using hosted services

To ensure continuous development we plan to:

- replace the My Pension platform with a secure member self service portal developed in-house
- broaden our use of digital platforms to engage stakeholders including adoption of online chat using Live Agent

- improve the web provision for all members by launching a new persona driven website
- increase the information we give to employing authorities when they join the scheme or change main contacts
- experiment with other forms of social media such as LinkedIn

Communications events 2024 – Local Government Pension Scheme (LGPS)

Communication	Format	Frequency	Method of distribution
LGPS active members (including representatives of active members and prospective members)			
	Newsletter	2/3 per year becoming more frequent and modular as electronic communications increase	Bulk email and mail if members have opted out of electronic communications
	Annual meeting	1 per year	Meeting (WYPF/HPF)
	Annual Pension Statement	1 per year	E-mail and mail if members opted out of electronic communications
	www.wypf.org.uk	Constant	Web
	Member fact card	On request/constant	Print and web
	Member fact sheets	Constant	Web
	Introduction to WYPF	On employer request	Virtual or in person
	Presentation – Your pension explained	On employer request	Virtual or in person
	Presentation – Pre retirement	On employer request	Virtual or in person
	Pension surgeries/drop in's	On employer request	Virtual
	Engage with your LGPS pension	Monthly	Virtual events held online
	Pension Awareness Week	Once per year (Sept)	Virtual events held online
	Planning for a successful retirement	At least monthly	Held by Affinity Connect
	WYPF Contact centre and LPF satellite office	8.45 to 4.30 Monday to Friday	Face-to-face/ phone/email
	Scheme booklet	Constant	Web
	New member pack	On joining	Mail
	Social media	Constant	Web
	YouTube channel	Constant	Web

LGPS deferred members (including representatives of deferred members)

Newsletter	1 per year becoming more frequent and modular as electronic communications increase	Bulk email and mail if members opted out of electronic communications
Deferred Benefit Statement	1 per year	Email
Annual meeting	1 per year	Meeting (WYPF/HPF)
www.wypf.org.uk	Constant	Web
WYPF Contact centre and LPF satellite office	8.45 to 4.30 Monday to Friday	Face-to-face/ phone/email
Social media	Constant	Web
YouTube channel	Constant	Web

LGPS pensioner members (including representatives of retired members)

Newsletter	1 per year becoming more frequent and modular as electronic communications increase	Bulk email and mail if members opted out of electronic communications
Annual meeting	1 per year	Meeting (WYPF/HPF)
www.wypf.org.uk	Constant	Web
WYPF Contact centre and LPF satellite office	8.45 to 4.30 Monday to Friday	Face-to-face/ phone/email
Pension advice	As and when net pension changes by £5.00 or more	Mail if not registered with My Pension
P60	1 per year	Web unless opted out of electronic communications
Social media	Constant	Web
YouTube channel	Constant	Web

Communications events 2024 – firefighters

Communication	Format	Frequency	Method of distribution
Firefighter active members (including representatives of active members and prospective members)			
Newsletter		At least 1 per year becoming more frequent and modular as electronic communications increase	Bulk email and mail if members opted out of electronic communications
Annual Benefit Statement		1 per year	E-mail and mail if members opted out of electronic communications

www.wypf.org.uk	Constant	Web
New recruit presentation	On employer request	Virtual or in person
Presentation – Your pension explained	On employer request	Virtual or in person
Presentation – Pre retirement	On employer request	Virtual or in person
Pension surgeries/drop in's	On employer request	Virtual or in person
Planning for a successful retirement	2 to 4 per year	Held by Affinity Connect
WYPF Contact centre and LPF satellite office	8.45 to 4.30 Monday to Friday	Face-to-face/ phone/email
Scheme booklet	Constant	Web

Firefighter deferred members (including representatives of deferred members)

Annual Benefit Statement	1 per year	E-mail and mail if members opted out of electronic communications
www.wypf.org.uk	Constant	Web
WYPF Contact centre and LPF satellite office	8.45 to 4.30 Monday to Friday	Face-to-face/ phone/email

Firefighter – pensioner members (including representatives of pensioner members)

www.wypf.org.uk	Constant	Web
WYPF Contact centre and LPF satellite office	8.45 to 4.30 Monday to Friday	Face-to-face/ phone/email
Pension advice	As and when net pension changes by £5.00 or more	Mail if not registered with My Pension
P60	1 per year	Web unless opted out of electronic communications

Communications events 2024 – councillors

Communication	Format	Frequency	Method of distribution
Councillor members (including representatives of members)			
Newsletter		1 per year	Bulk email and mail if members opted out of electronic communications
Annual meeting		1 per year	Meeting (WYPF/HPF)

Deferred Benefit Statement	1 per year	E-mail and mail if members opted out of electronic communications
www.wypf.org.uk	Constant	Web
Ad hoc meetings	When required	Virtual/meeting/face-to-face
WYPF Contact centre and LPF satellite office	8.45 to 4.30 Monday to Friday	Face-to-face/phone/email
Social media	Constant	Web

Communications events 2024 – employing authorities

Communication	Format	Frequency	Method of distribution
Employing authorities			
Employer Pension Fund Representatives		8.30 to 4.30 Monday to Friday	Virtual / face-to-face / email / phone
Website		Constant	Web
Fact card		1 per year	Web
Fact sheets		Constant	Web
Employer guide		Constant	Web/electronic document
Employer webcasts		Weekly	Held on-line with recordings made available
Ad hoc training		When required	Face-to-face/virtual
Update sessions		Up to 2 per year	Meeting
Annual meeting		1 per year	Meeting
Manuals/toolkits		Constant	Web/electronic document
Pension Matters and round-up		12 per year and when required	Wordpress blog and gov. delivery bulk email
Social media		Constant	Web
Ad hoc meetings		When required	Face-to-face

Member contacts

Phone (01274) 434999

Email pensions@wypf.org.uk

Our offices are open to members of the public on an appointment basis.

Postal address

WYPF
PO Box 67
Bradford
BD1 1UP

WYPF contact centre

Aldermanbury House
4 Godwin Street
Bradford
BD1 2ST

LPF satellite office

Lincolnshire County Council
County Offices
Newland
Lincoln LN1 1YL

Employer contacts

Ammie Mchugh (Employer Relations Manager) 01274 432763

Employer Pension Fund Representatives

David Parrington (Fire)	01274 433840
Sheryl Clapham (LGPS)	01274 432541
Kaele Pilcher (LGPS)	01274 432739
Ahmed Surtee (LGPS)	01274 433517
Richard Quinn (LGPS)	01274 433646
Finola Middleton (LGPS)	01274 432726
Mark Morris (LGPS)	

WYPF Management

Euan Miller	Managing Director – WYPF
Yunus Gajra	Assistant Director (Finance, Administration and Governance)
Grace Kitchen	Head of Member Services
Ola Ajala	Head of Finance
Caroline Blackburn	Head of Employer Services and Compliance
Elizabeth Boardall	Head of Projects, Communications & IT
Matt Mott	Head of Governance and Business Development

Lincolnshire Pension Fund Management

Jo Kempton	Head of Pensions
Claire Machej	Accounting, Investment and Governance Manager

Hounslow Pension Fund Management

Hitesh Sharma	Strategic Pensions Manager
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Barnet Pension Fund Management

Mark Fox	Pensions Manager
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Fire and Rescue Pension Scheme Clients

Buckinghamshire & Milton Keynes Fire Authority
Cambridgeshire Fire & Rescue Service
County Durham and Darlington Fire and Rescue Service
Derbyshire Fire & Rescue Service
Devon & Somerset Fire & Rescue Service
Dorset & Wiltshire Fire & Rescue Service
East Sussex Fire and Rescue Service
Hereford & Worcester Fire & Rescue Service
Humberside Fire & Rescue Service
Leicestershire Fire & Rescue Service
Lincolnshire Fire & Rescue Service
Norfolk Fire and Rescue Service
Northamptonshire Fire & Rescue Service
Northumberland Fire & Rescue Service
North Yorkshire Fire & Rescue Service
Nottinghamshire Fire & Rescue Service
Royal Berkshire Fire and Rescue Service
Shropshire Fire & Rescue Service
South Yorkshire Fire & Rescue
Staffordshire Fire & Rescue Service
Tyne & Wear Fire & Rescue Service
Warwickshire Fire & Rescue Service
West Yorkshire Fire & Rescue Service

(From February 2024) Avon Fire & Rescue Service



Report of the Managing Director, West Yorkshire Pension Fund to the meeting of Local Pension Board to be held on 20 March 2024.

AL

Subject:

Pensions Administration report.

Summary statement:

This report gives an update on West Yorkshire Pension Fund's (WYPF) pensions administration activities for the period 1 October 2023 to 31 December 2023.

EQUALITY & DIVERSITY:

Issues of Equality and Diversity are included within the body of the document.

Mr Euan Miller
Managing Director

Portfolio:

Report Contact: Yunus Gajra
Assistant Director (Finance,
Administration and Governance)
Phone: (01274) 432343
E-mail: Yunus.gajra@bradford.gov.uk

Overview & Scrutiny Area:

1. SUMMARY

This report gives an update on West Yorkshire Pension Fund's (WYPF) pensions administration activities for the period 1 October 2023 to 31 December 2023.

2. Performance and Benchmarking

KPI's for the period 1.10. 23 to 31.12.23					
WORKTYPE	TOTAL CASES	TARGET DAYS FOR EACH CASE	TARGET MET CASES	MINIUM TARGET PERCENT	TARGET MET PERCENT
Age 55 Increase to Pension	2	20	2	85	100
AVC In-house (General)	420	20	414	85	98.57
Beneficiary To Update non payroll	20	5	16	85	80
Change of Address	801	20	794	85	99.13
Change of Bank Details	575	20	574	85	99.83
Death Grant to Set Up	227	10	211	85	92.95
Death In Retirement	990	10	906	85	91.92
Death In Service	50	10	35	85	70
Death on Deferred	58	10	49	85	84.48
Deferred Benefits Into Payment Actual	1001	10	968	90	96.7
Deferred Benefits Into Payment Quote	1270	35	1069	85	84.17
Deferred Benefits Set Up on Leaving	6756	20	4414	85	65.33
Dependant Pension To Set Up	426	5	368	90	86.38
Divorce Quote	236	40	233	85	98.73
Divorce Settlement Pension Sharing order Implemented	3	80	3	100	100
DWP request for Information	9	20	9	85	100
Estimates for Deferred Benefits into Payment	26	10	25	90	96.15
General Payroll Changes	674	20	673	85	99.85
Interfund Linking In Actual	423	35	205	85	48.58
Interfund Linking In Quote	380	35	210	85	55.26
Interfund Out Actual	623	35	402	85	64.53
Interfund Out Quote	623	35	382	85	61.32
Life Certificate	201	10	198	85	98.51
Linking Quote UPM	2501	5	2068	85	82.69
Monthly Posting	2363	10	2234	95	94.54
NI adjustment to Pension at State Pension Age	41	20	41	85	100
Pension Estimate	2071	10	1304	90	62.96
Pension Saving Statement	5	20	5	100	100
Phone Call Received	5328	3	5166	95	96.96
Refund Actual	998	10	998	90	100
Refund Quote	1743	35	1733	85	99.43
Retirement Actual	1080	10	1031	90	95.46
Retirement Quote	1363	10	927	85	67.96
Transfer In Actual	185	35	165	85	89.19

Transfer In Quote	439	35	436	85	99.32
Transfer Out Payment	76	35	49	85	64.47
Transfer Out Quote	432	35	389	85	90.05
Update Member Details	3886	20	3844	100	98.92

Reasons for underperforming KPI's:

- **Beneficiary To Update non payroll** – Awaiting information
- **Death in service** – Delays in receiving information from beneficiaries.
- **Deferred Benefits set up on leaving** - Moved to low priority.
- **Dependant Pension to set up** - Delays in receiving information from beneficiaries.
- **Pension Estimates** – High volumes of requests.
- **Retirement quote** – Quotes requested for future dates, priority given to those that were retiring.
- **Transfer/Interfund** - Work had to be put on hold due to changes in calculation factors which were not released by the Government Actuary's department until recently.

3. Scheme Information

3.1 Membership for all schemes administered as at 31 December 2023 was 503,488. A full breakdown between the different Funds and Schemes is shown at Appendix A.

3.2 Number of Employers in the West Yorkshire Pension Fund

	Actives	Ceased	Total
Scheme	275	0	275
Admission	144	3	141
Total	419	3	416

4. Praise and Complaints

4.1 As part of our commitment to improving our services we carry out a random survey of customers who have been in contact with us regarding their pension benefits. We also have an online survey which any member can complete at any time. An analysis of the responses received for the quarter October 23 to December 23 is shown:

Appendix B - WYPF

Appendix C – Lincolnshire Pension Fund

Appendix D – London Borough of Hounslow Pension Fund

Appendix E – Barnet Pension Fund

5. Internal Disputes Resolution Procedures

5.1 All occupational pension schemes are required to operate an IDRP. The LGPS has a 2-stage procedure. Stage 1 appeals, which relate to employer decisions or actions, are considered by a person specified by each employer to review decisions (the

‘Adjudicator’). Stage 1 appeals relating to appeals against administering authority decisions or actions are considered the Managing Director of WYPF. Stage 2 appeals are considered by the Chief Executive of the City of Bradford MDC.

A summary of the IDRP decisions is shown below:

	Number of Determinations	Outcomes	Type
STAGE 1	1		
		1 Upheld	1 Delays in providing deferred retirement quote
		0 Turned down	
STAGE 2	2		
AGAINST EMPLOYER	2		
		1 Referred back	1 Reductions not waived on flexible retirement
		1 Turned down	1 Extending transfer-in time limit
AGAINST WYPF	0		

6. Administration Update

6.1 ISO 9001:2015 Re-certification

A successful Quality Management System Re-certification took place in December 2023. No non conformities or observations were identified. The Assessor commented ‘The organisation continues to manage their quality and risks effectively with embedded processes and a high level of organisational knowledge’.

Internal Quality Audits

The following internal quality audits were completed by WYPF staff:

Diary control – Childrens’ Pensions

Guaranteed Minimum Pensions

Any suggestions for improvements to working practices will be analysed by the relevant managers.

6.2 Member Engagement

We worked with Affinity connect to provide our LGPS members with the opportunity to attend a Financial Wellbeing course. These courses are aimed at anyone who want to take check of their finances but aren’t quite ready to look at retiring yet.

We ran two courses which attracted 46 scheme members. Feedback tells us that members found these courses really useful, with 97% of delegates reporting that they would recommend the course to a colleague.

Because of the excellent feedback received we will look to schedule more of these courses, look out for details of these soon.

6.4 Recruitment

Recruitment to staffing in our pensions administration team is ongoing, with a number of new recruits starting last month.

6.7 Monthly Posting Phase 3 (MP3)

MP3 has finally gone live after undergoing rigorous penetration testing. A phased rollout will take place over the next few months.

7. Staffing

7.1 WYPF headcount is 211 (199 full time equivalent staff) with an average age of 45.9 (Appendix F).

7.2 For the year ending 1 April 2023 the average number of days absence due to sickness is 6.11 per staff member. This compares with the Council average of 14.04 days (Appendix G).

7.3 There were 15 new starters during the last 12 months (Appendix H)

7.4 There were 10 leavers during the last 12 months (see Appendix I).

7.5 A number of recruitment exercises are ongoing to fill vacancies and also for new posts created as a result of increasing workloads.

8. Member Portal

8.1 Web Registrations

The number of members registered for online member web are:

Membership Type	Number	Percentage
Active	50,613	46.39%
Deferred	28,311	32.56%
Pensioner	44,616	41.16%

9. OTHER CONSIDERATIONS

None

10. FINANCIAL & RESOURCE APPRAISAL

Sufficient budget to ensure adequate resources to deliver contractual obligations

11. RISK MANAGEMENT AND GOVERNANCE ISSUES

Failure to meet contractual obligations to our shared service partners may result in penalties or contract termination.

12. LEGAL APPRAISAL

None

13. OTHER IMPLICATIONS

13.1 SUSTAINABILITY IMPLICATIONS

None

13.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

None

13.3 HUMAN RIGHTS ACT

None

13.4 TRADE UNION

None

13.5 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

None

14. NOT FOR PUBLICATION DOCUMENTS

None

15. OPTIONS

None

16. RECOMMENDATIONS

It is recommended that the report be noted.

17. APPENDICES

- Appendix A – Membership Numbers
- Appendix B - Customer Surveys (WYPF)
- Appendix C – Customer Surveys (LPF)
- Appendix D – Customer Surveys (LBH)
- Appendix E – Customer Surveys (LBB)
- Appendix F – Headcount
- Appendix G – Absences
- Appendix H – Starters
- Appendix I - Leavers

18. BACKGROUND DOCUMENTS

None

Membership Numbers

SCHEME NAME	ACTIVES	DEFERREDS	PENSIONERS	BENEFICIARIES
Councillors	0	73	152	22
Gratuity Payments	0	0	3	0
LGPS	107470	89085	98522	11902
Teachers Compensation	0	0	1014	241
West Yorkshire Fire (1992 Scheme)	0	79	1967	358
West Yorkshire Fire (2006 Scheme)	0	89	8	6
West Yorkshire Fire (2006/RDS Scheme)	0	11	40	0
West Yorkshire Fire (2015 Scheme)	1008	154	45	10
West Yorkshire Fire (2015/RDS Scheme)	19	1	4	0
South Yorkshire Fire (1992 Scheme)	0	40	1102	207
South Yorkshire Fire (2006 Scheme)	0	34	3	1
South Yorkshire Fire (2006/RDS Scheme)	0	1	14	0
South Yorkshire Fire (2015 Scheme)	665	106	34	2
South Yorkshire Fire (2015/RDS Scheme)	4	1	0	0
North Yorkshire Fire (1992 Scheme)	0	27	424	93
North Yorkshire Fire (2006 Scheme)	0	143	22	4
North Yorkshire Fire (2006/RDS Scheme)	0	24	60	2
North Yorkshire Fire (2015 Scheme)	636	273	30	4
North Yorkshire Fire (2015/RDS Scheme)	31	3	1	0
Humberside Fire (1992 Scheme)	0	37	817	161
Humberside Fire (2006 Scheme)	0	102	19	4
Humberside Fire (2006/RDS Scheme)	0	5	76	3
Humberside Fire (2015 Scheme)	714	184	43	0
Humberside Fire (2015/RDS Scheme)	40	3	8	0
Lincolnshire Councillors	0	24	53	4
Lincolnshire LGPS	26228	25686	25575	2691
Lincolnshire Fire (1992 Scheme)	0	18	259	49
Lincolnshire Fire (2006 Scheme)	0	313	40	7
Lincolnshire Fire (2006/RDS Scheme)	1	9	42	1
Lincolnshire Fire (2015 Scheme)	584	347	27	4
Lincolnshire Fire (2015/RDS Scheme)	20	1	1	0
Royal Berks Fire (2015/RDS Scheme)	6	1	0	0
Royal Berks Fire (1992 Scheme)	1	48	413	59
Royal Berks Fire (2006 Scheme)	1	61	11	0
Royal Berks Fire (2006/RDS Scheme)	0	8	29	2
Royal Berks Fire (2015 Scheme)	409	140	17	0
Bucks and MK Fire (1992 Scheme)	0	30	358	61
Bucks and MK Fire (2006 Scheme)	0	155	20	14
Bucks and MK Fire (2006/RDS Scheme)	0	10	26	0
Bucks and MK Fire (2015 Scheme)	441	183	13	5
Bucks and MK Fire (2015/RDS Scheme)	3	1	0	0
Devon and Somerset Fire (1992 Scheme)	0	49	905	156
Devon and Somerset Fire (2006 Scheme)	1	403	142	19
Devon and Somerset Fire (2006/RDS Scheme)	0	67	213	3
Devon and Somerset Fire (2015 Scheme)	1588	715	73	14
Devon and Somerset Fire (2015/RDS Scheme)	56	8	13	0
Dorset and Wiltshire Fire (1992 Scheme)	0	58	640	97

Dorset and Wiltshire Fire (2006 Scheme)	0	266	41	17
Dorset and Wiltshire Fire (2006/RDS Scheme)	4	43	170	2
Dorset and Wiltshire Fire (2015 Scheme)	903	439	47	6
Dorset and Wiltshire Fire (2015/RDS Scheme)	75	4	14	0
Unknown Modified Scheme	0	0	1	0
Tyne and Wear Fire (1992 Scheme)	0	63	1210	202
Tyne and Wear Fire (2006 Scheme)	0	31	5	0
Tyne and Wear Fire (2006/RDS Scheme)	0	1	1	0
Tyne and Wear Fire (2015 Scheme)	561	64	22	0
Tyne and Wear Fire (2015/RDS Scheme)	0	0	1	0
Northumberland Fire (1992 Scheme)	0	18	276	47
Northumberland Fire (2006 Scheme)	0	82	15	6
Northumberland Fire (2006/RDS Scheme)	0	11	35	1
Northumberland Fire (2015 Scheme)	323	136	10	0
Northumberland Fire (2015/RDS Scheme)	5	3	4	0
Norfolk Fire (1992 Scheme)	0	42	377	68
Norfolk Fire (2006 Scheme)	0	100	23	7
Norfolk Fire (2006/RDS Scheme)	1	7	64	3
Norfolk Fire (2015 Scheme)	640	218	32	16
Norfolk Fire (2015/RDS Scheme)	15	2	2	0
Staffordshire Fire (1992 Scheme)	0	23	552	106
Staffordshire Fire (2006 Scheme)	1	306	32	7
Staffordshire Fire (2006/RDS Scheme)	0	30	90	1
Staffordshire Fire (2015 Scheme)	583	361	31	14
Staffordshire Fire (2015/RDS Scheme)	28	4	3	0
LB Hounslow LGPS	6943	7731	7368	919
LB Hounslow Teachers Compensation	0	0	121	43
Hereford and Worcester (1992 Scheme)	0	31	385	65
Hereford and Worcester (2006 Scheme)	0	126	31	8
Hereford and Worcester (2006/RDS Scheme)	0	9	44	1
Hereford and Worcester (2015 Scheme)	568	282	29	3
Hereford and Worcester (2015/RDS Scheme)	17	2	6	0
Durham and Darlington (1992 Scheme)	0	28	466	91
Durham and Darlington (2006 Scheme)	0	71	14	1
Durham and Darlington (2006/RDS Scheme)	0	9	27	0
Durham and Darlington (2015 Scheme)	437	174	20	3
Durham and Darlington (2015/RDS Scheme)	7	2	3	0
East Sussex (1992 Scheme)	0	56	512	104
East Sussex (2006 Scheme)	0	124	13	6
East Sussex (2006/RDS Scheme)	0	15	41	0
East Sussex (2015 Scheme)	543	199	24	2
East Sussex (2015/RDS Scheme)	8	2	2	0
LB Barnet Councillors	0	10	15	2
LB Barnet LGPS	9596	9711	8584	1041
LB Barnet Teachers Compensation	0	0	328	41
Derbyshire (1992 Scheme)	0	30	603	99
Derbyshire (2006 Scheme)	0	129	20	10
Derbyshire (2006/RDS Scheme)	0	29	69	1
Derbyshire (2015 Scheme)	671	235	20	3
Derbyshire (2015/RDS Scheme)	15	7	5	0

Leicestershire (1992 Scheme)	0	35	535	77
Leicestershire (2006 Scheme)	0	135	29	2
Leicestershire (2006/RDS Scheme)	0	9	53	2
Leicestershire (2015 Scheme)	584	181	36	2
Leicestershire (2015/RDS Scheme)	5	2	2	0
Nottinghamshire (1992 Scheme)	0	39	702	126
Nottinghamshire (2006 Scheme)	0	159	31	11
Nottinghamshire (2006/RDS Scheme)	0	31	68	0
Nottinghamshire (2015 Scheme)	612	193	44	1
Nottinghamshire (2015/RDS Scheme)	15	3	3	0
Cambridgeshire (1992 Scheme)	0	25	369	53
Cambridgeshire (2006 Scheme)	0	200	12	1
Cambridgeshire (2006/RDS Scheme)	0	10	48	0
Cambridgeshire (2015 Scheme)	459	254	29	0
Cambridgeshire (2015/RDS Scheme)	5	2	4	0
Northamptonshire (1992 Scheme)	0	19	351	55
Northamptonshire (2006 Scheme)	0	92	6	1
Northamptonshire (2006/RDS Scheme)	0	10	28	0
Northamptonshire (2015 Scheme)	399	237	11	0
Northamptonshire (2015/RDS Scheme)	9	0	0	0
Shropshire (1992 Scheme)	0	19	248	36
Shropshire (2006 Scheme)	0	104	6	10
Shropshire (2006/RDS Scheme)	0	11	69	1
Shropshire (2015 Scheme)	425	178	19	9
Shropshire (2015/RDS Scheme)	20	2	4	0
Warwickshire (1992 Scheme)	0	21	347	68
Warwickshire (2006 Scheme)	0	93	6	3
Warwickshire (2006/RDS Scheme)	0	7	19	0
Warwickshire (2015 Scheme)	391	155	13	3
Warwickshire (2015/RDS Scheme)	3	1	0	0

PRESERVED
REFUND

0	247
0	3
12976	319955
0	1255
0	2404
2	105
0	51
1	1218
0	24
8	1357
1	39
0	15
3	810
0	5
0	544
1	170
0	86
11	954
0	35
0	1015
2	127
0	84
2	943
0	51
0	81
2671	82851
1	327
20	380
0	53
15	977
0	22
0	7
2	523
0	73
0	39
1	567
1	450
2	191
0	36
3	645
0	4
1	1111
9	574
0	283
7	2397
0	77
3	798

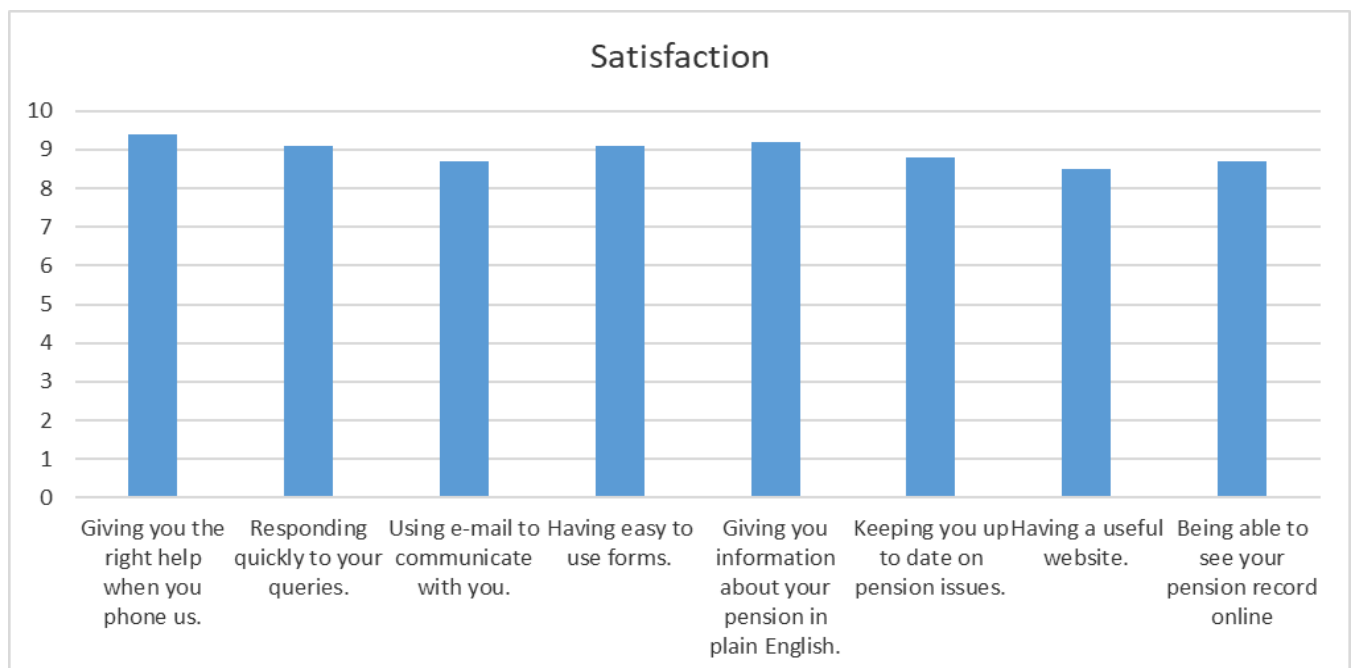
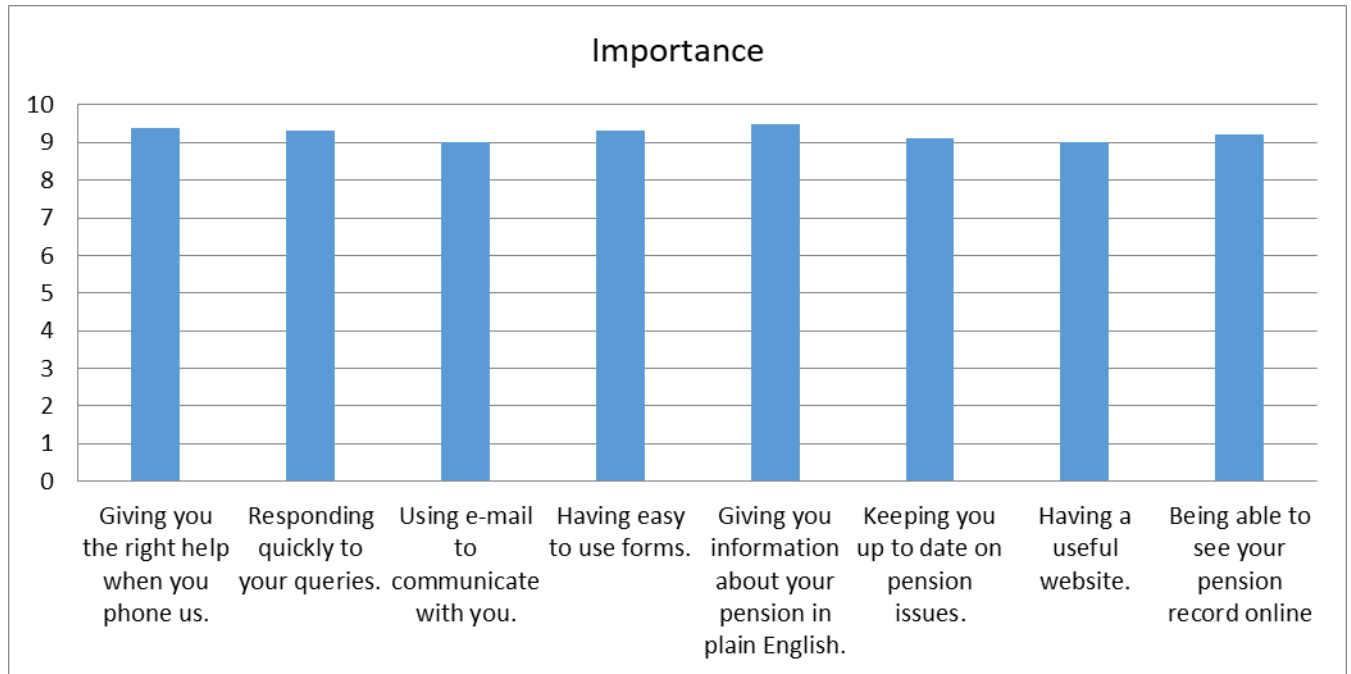
3	327
0	219
1	1396
0	93
0	1
0	1475
0	36
0	2
0	647
0	1
0	341
2	105
0	47
0	469
0	12
0	487
0	130
0	75
7	913
0	19
0	681
2	348
0	121
15	1004
0	35
1357	24318
0	164
0	481
1	166
0	54
3	885
0	25
0	585
0	86
0	36
0	634
0	12
1	673
3	146
0	56
1	769
0	12
0	27
1389	30321
0	369
0	732
5	164
0	99
8	937
0	27

1	648
9	175
0	64
1	804
0	9
1	868
6	207
0	99
0	850
0	21
4	451
3	216
0	58
4	746
0	11
0	425
10	109
0	38
4	651
0	9
2	305
4	124
0	81
2	633
0	26
0	436
2	104
0	26
3	565
0	4
	503488

Customer Survey Results – WYPF Members (1st October to 31st December 2023)

Over the quarter October to December, **2475** survey forms were emailed to WYPF members; of those, **88 (3.55%)** were returned.

The charts below give a picture of the customers overall views about our services;



Sample of positive comments:

Member Name /Number	Comments
1237570	Exceptional. Any time I have called, the staff have been friendly and so helpful.
353333	Just reached the age of 75 so now not paying into the scheme so the service I received was excellent. As I have just started to use a service, I will soon get on line to see how my pension is working for me.
20062	Friendly and helpful. Before I filled in my pension form , I rang to check everything was correct and in order, The gentleman on the phone went through everything for me , He was so friendly and helpful.
763665	Very efficient response really quick and the whole package was processed on time.

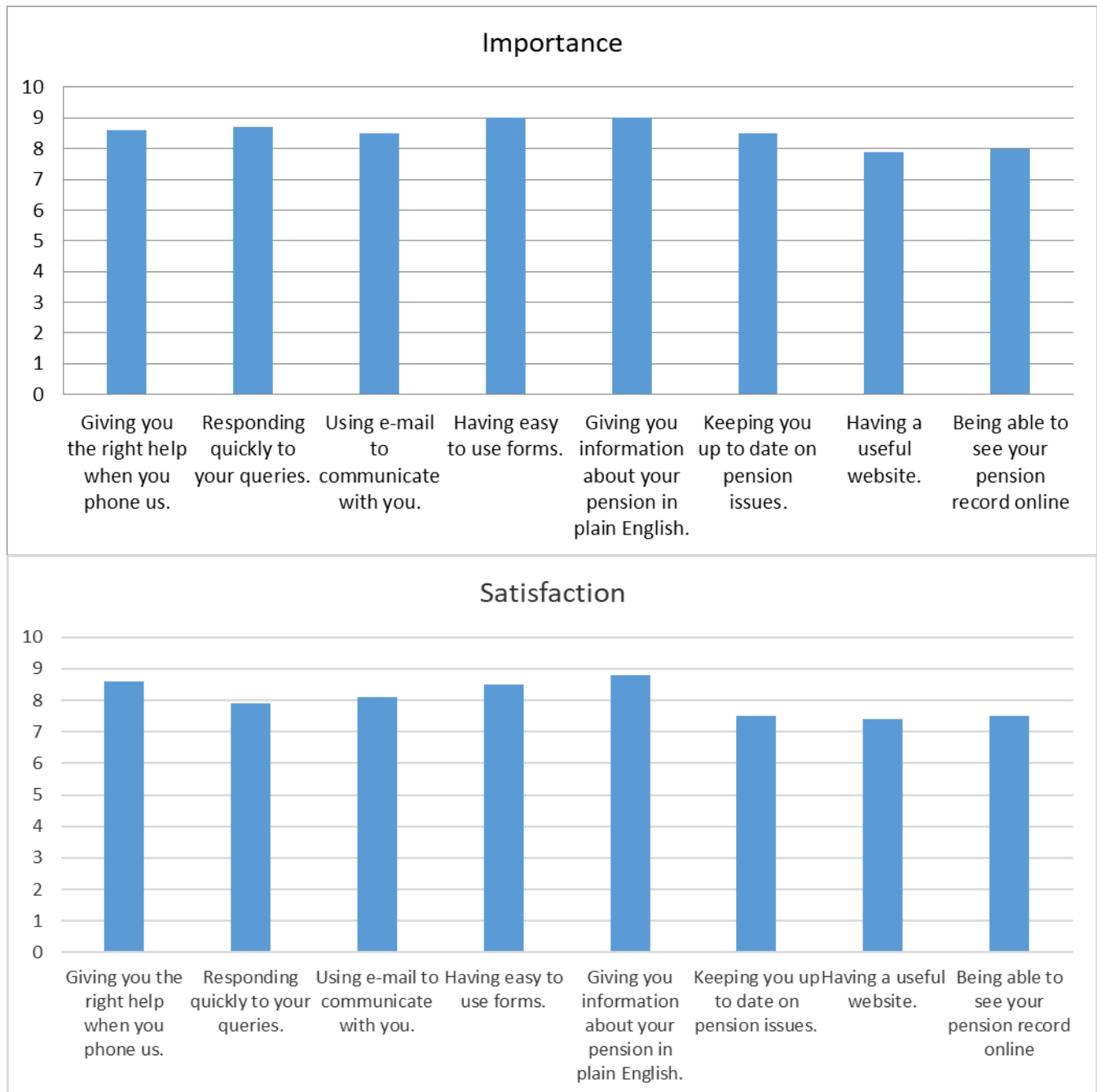
Complaints/Suggestions:

Member Number	Comments	Summary of Acknowledgement Letter Sent to Member
1047026	Rubbish service. 9 months to transfer a pension. Three emails to understand what I was being told as it isn't communicated well. A long time to sort a simple question.	<p>A detailed explanation letter was sent to member and apologised for delay.</p> <p>The process started on 21/11/2022 when member requested a Cash Equivalent Transfer Value (CETV), this was provided within the 3-month statutory deadline on 02/12/2022. We did not hear anything further until 19/04/2023. Further delay happened due to transfer value factor changes and backlogs resulting from this.</p>

Customer Survey Results - Lincolnshire Members (1st October to 31st December 2023)

Over the quarter October to December, **821** survey forms were emailed to Lincoln members; of those, **21 (2.55%)** were returned.

The charts below give a picture of the customers overall views about our services;



Sample of positive comments:

Member Number	Comments
8015350	Efficient system with good on-line, email and postal communication. Good Service, Quick Replies.
8070519	Excellent and efficient. Really Happy With Service And Prompt Release Of Lump Sum. Thanks 😊
8154996	Handled my retirement very efficiently.

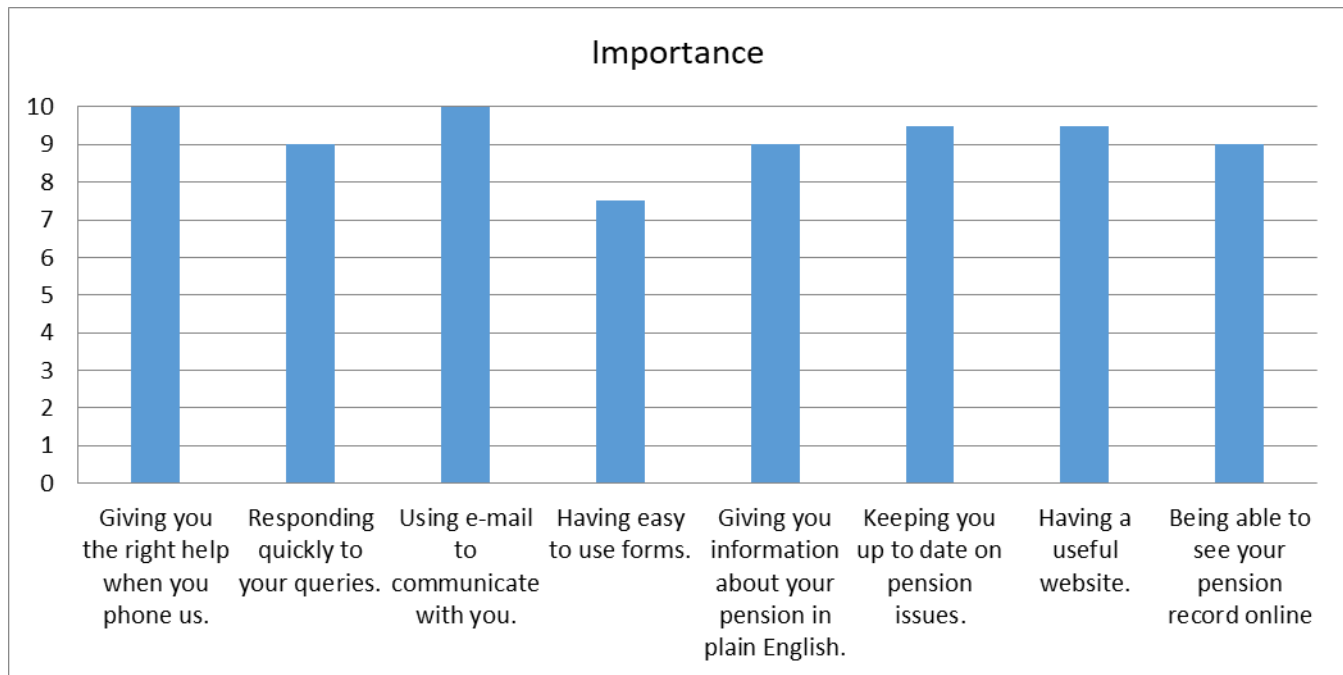
Complaints/Suggestions:

Member Number	Comments	Summary of Acknowledgement Letter Sent to Member
	Poor and not helpful in my position of terminally ill. No flexibility. Slow to process transfer. No communication.	Incorrect pension number supplied on the survey so unable to identify who the member is to investigate what the delays were.

Customer Survey Results - Hounslow Members (1st October to 31st December 2023)

Over the quarter October to December, **101** survey forms were emailed to Hounslow members; of those, **2 (1.98%)** were returned.

The charts below give a picture of the customers overall views about our services;



Sample of positive comments:

Member Number	Comments
18037646	It was helpful once you get to talk to someone. It was good to talk to a person and not a machine as this service is for the older generation that not good with modern technology.
18009315	Excellent and very pleased. Very Very Good.

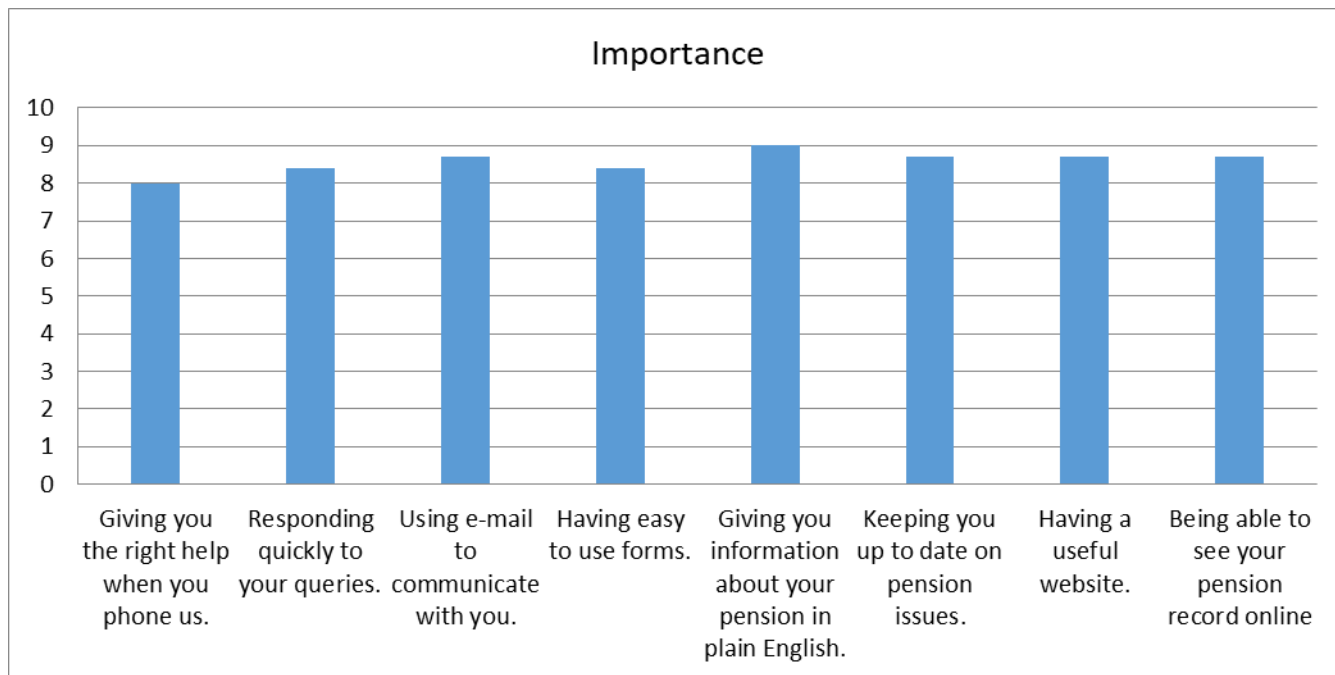
Complaints/Suggestions:

Member Number	Comments	Summary of Acknowledgement Letter Sent to Member
None		

Customer Survey Results – Barnet Members (1st October to 31st December 2023)

Over the quarter October to December, **208** survey forms were emailed to Barnet members; of those, **3 (1.44%)** were returned.

The charts below give a picture of the customers overall views about our services;



Sample of positive comments:

Member Name /Number	Comments
22034102	It is much better than the previous company. Communication Is essential could have done better. When paying into the bank description reference would be good For e.g like WYPF-so far I have received money without reference and had to ring the bank where has this money come from.

22002775	Very professional and excellent. Satisfactory All The Way.
----------	--

Complaints/Suggestions:

Member Number	Comments	Summary of Acknowledgement Letter Sent to Member
	<p>Slow, incorrect information at times. I left work in March this year. Its November and I am still waiting for my pension which I worked hard for. This is not a good service 😞</p>	<p>Member has not supplied the member number therefore unable to respond.</p>

Council Workforce

1 February 2024

Select a Department or Service to filter the information shown

Dept

Chief Executive

Service

West Yorkshire Pension Fund

Council Headcount & True FTE

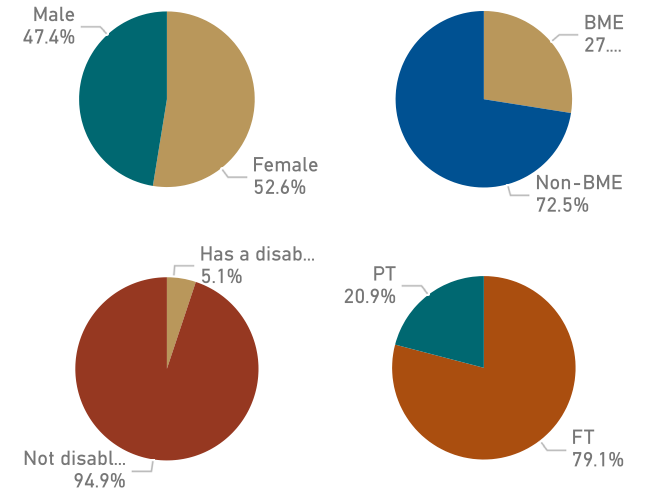


210
Established Employees

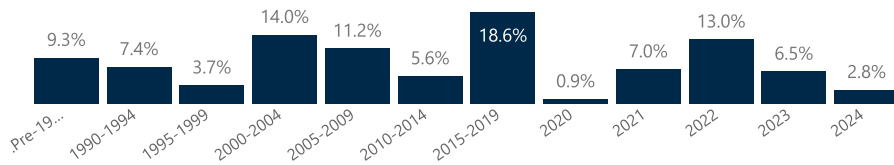
5
Temporary Employees

22
Casual Workers

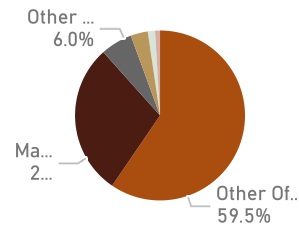
Protected Characteristics



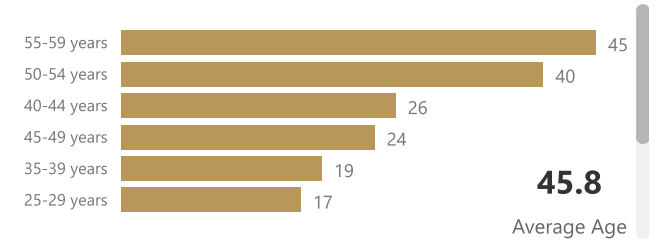
Current Employee Start Year



Job Types



Age Bands



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Absence Performance

Council staff in 12 month period to 1 April 2023

Select a Department or Category to filter the information shown:

Department

Sickness Category

West Yorkshire Pension F... ▾

All ▾

Department BV12 Sickness Outturns	2020	2021	2022	2023
Chief Exec's & Office of the Chief Exec	4.87	7.30	16.08	13.74
Children's Services	14.98	12.52	18.03	16.66
Corporate Resources	11.35	9.47	11.01	10.59
Health & Wellbeing	13.37	13.66	16.58	17.48
Place	13.58	9.23	13.98	13.30
West Yorkshire Pension Fund	6.05	5.48	7.33	6.11
Council Total (excluding Schools)	12.96	10.75	14.56	14.04

YE Total Sickness

1,136

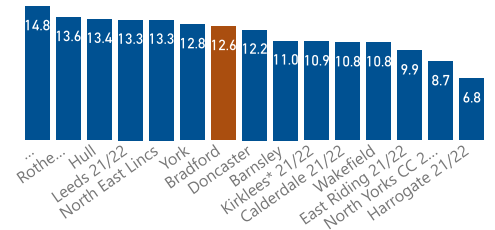
Total FTE Days Lost

YE Total Sickness

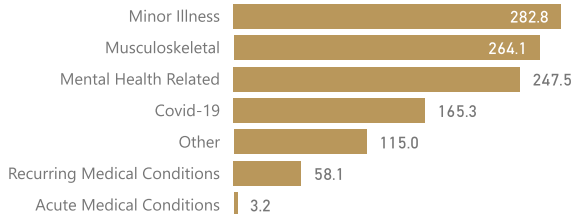
£142.5K

Total Sick Pay Cost

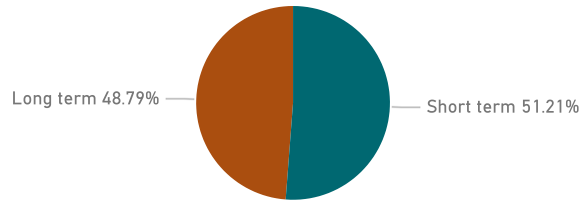
BV12 Local Authority Comparison 2021/22



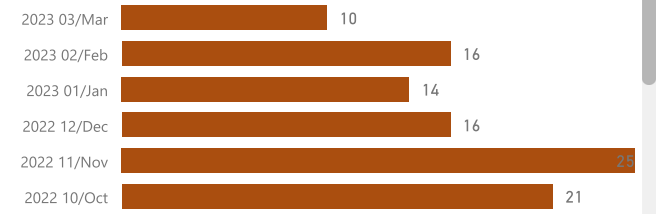
Sickness Category (FTE days) at Year End



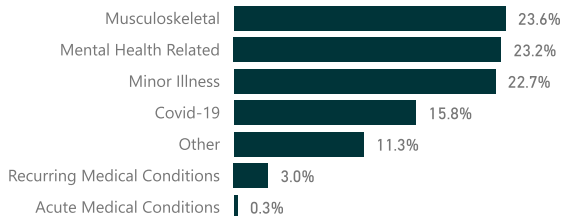
FTE Days by Term at Year End



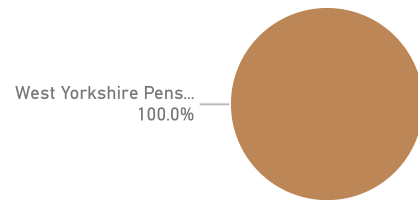
Sickness Spells Commenced per Month



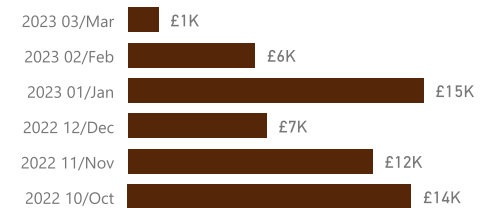
Sick Pay by Category (£) at Year End



Sick Pay Costs Split at Year End



Sick Pay Cost by Month Commenced (£)



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Starters

1 Feb 2024

Start Date

2/1/2023

1/31/2024

Number of Starters

Select a Department or Service to filter the information shown

Dept

Chief Executive

Service

West Yorkshire Pension Fund

Select an Employee type to filter the information shown (press CTRL key to make multiple selections from a single dropdown)

Age Band

All

BME

All

Disability

All

Employee Group

All

Gender

All

Payscale

All

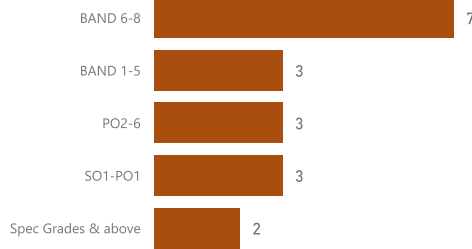
< Show All >

< Gender >

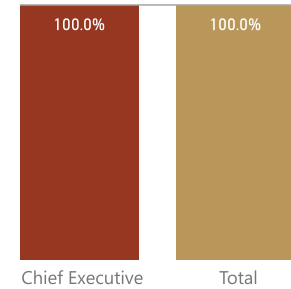
< Ethnicity >

< Disability >

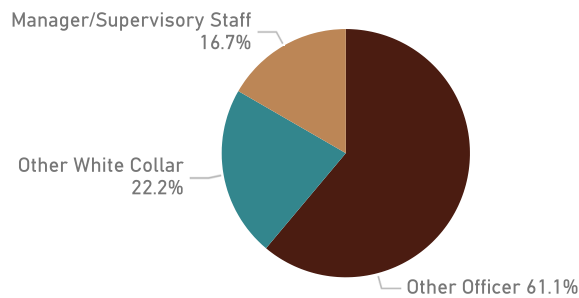
Starter Pay Band



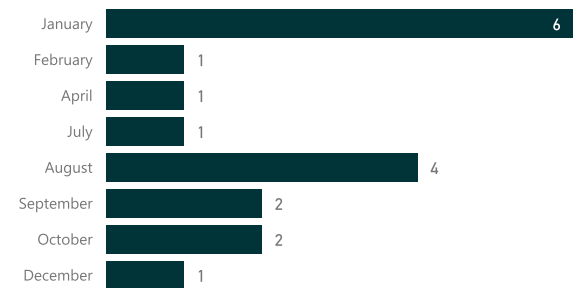
Percentage of Starters



Starter Job Types



Starters Over Time



Chief Executive



18

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Leavers

1 Feb 2024

Leaving Date

2/1/2023

1/31/2024

Number of Leavers

Chief Executive



11

Select a Department or Service to filter the information shown

Dept

Service

Chief Executive

West Yorkshire Pension Fund

Select an Employee type to filter the information shown (press CTRL key for multiple selections from a single dropdown)

Age Band

BME

Disability

Employee G ...

Gender

Payscale

All

All

All

All

All

All

< Show All >

Leavers by Payscale

< Gender >

< Ethnicity >

< Disability >

BAND 6-8

PO2-6

SO1-PO1

Spec Grades & above

5

2

2

2

Percentage of Leavers

100.0%

100.0%

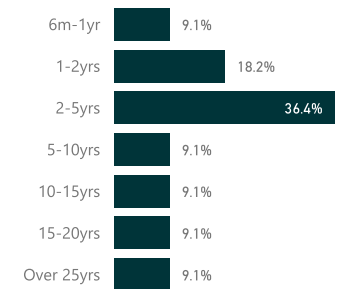
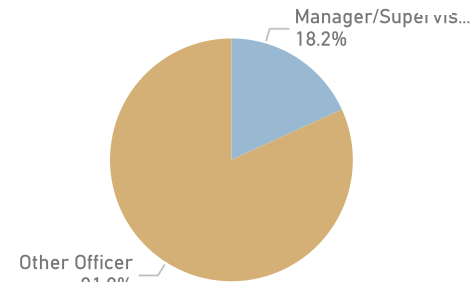
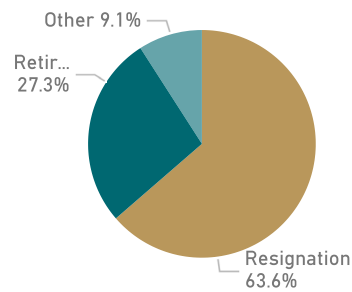
Chief Executive

Total

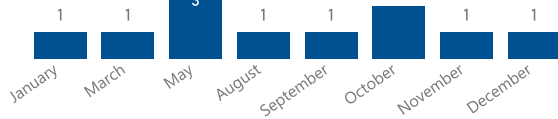
Leaving Reasons

Leaver Job Types

Leaver Length of Service



Leavers Over Time



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Report of the Director, West Yorkshire Pension Fund to the meeting of West Yorkshire Pension Fund Pension Board to be held on 20th March 2024

AM

Subject:

Pensions Dashboard

Summary statement:

This report outlines the progress of the introduction of the Pensions Dashboard.

EQUALITY & DIVERSITY:

Not applicable.

Euan Miller
Managing Director
West Yorkshire Pension Fund

Portfolio:

[Insert where appropriate]

Report Contact: Elizabeth Boardall
Phone: 07890 532188
E-mail: Elizabeth.boardall@bradford.gov.uk

Overview & Scrutiny Area:

[Insert where appropriate]

1. SUMMARY

- This paper provides the latest update on Pensions Dashboard. It is shared on a private and confidential basis and the report is for noting.

2. BACKGROUND

- Pensions Dashboards will enable individuals to access their pensions information online and securely, all in one place, thereby supporting better planning for retirement and growing financial wellbeing. Dashboards will provide clear and simple information about an individual's multiple pension savings, including their State Pension. They will also help them to reconnect with any lost pension pots.
- This online digital portal connects with all pensions providers in the UK. There will be a Government dashboard operated by the Money Advice and Pensions Service plus commercial providers can provide their own Dashboards.
- The Pensions Dashboards Programme ('PDP'), under the supervision of the Money and Pensions Service (MaPS), is responsible for delivering the digital architecture which underpins pensions dashboards.
- Last year, Pensions Minister Laura Trott announced a reset of the Pensions Dashboard Programme "I have initiated a reset of the Pensions Dashboards Programme in which DWP will play a full role. The new chair of the Programme Board will develop a new plan for delivery."
- An update is expected in Spring 2024 on the progress of the reset. All pensions providers are expected to continue working towards implementation of Pension Dashboards. WYPF, as other funds do, continues to report to The Pensions Regulator quarterly on progress. WYPF's project status remains Green.

3. OTHER CONSIDERATIONS

- The Local Government Pension Scheme (LGPS) has issued its second draft guidance to schemes combining much of the MaPS, PDP, DWP guidance and technical standards. This has been reviewed by the Project Board and is being actioned.
- The LGPS have written to DWP to raise concerns at the changes in operation for AVCs. In summary, the changes transfer the data quality responsibility of AVCs from AVC providers to the LGPS and the LGPS becomes responsible for the AVCs digital accessibility to Pension Dashboard. The original legislation required the AVC provider to ensure compliance with Pension Dashboard requirements.

4. FINANCIAL & RESOURCE APPRAISAL

- Budget for regulatory change work and project work has been allocated. This will be further refined into a go live budget and business as usual budget as the technology development path is more established.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

- The National LGPS Technical Group agreed to form a sub-group to assess AVCs and dashboards. The sub-group works with all LGPS AVC providers to establish common approaches on matching and providing value data. WYPF is part of this sub group.

6. LEGAL APPRAISAL

- Not applicable.

7. OTHER IMPLICATIONS

7.1 SUSTAINABILITY IMPLICATIONS

- Not applicable.

7.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

- Not applicable.

7.3 COMMUNITY SAFETY IMPLICATIONS

- Not applicable.

7.4 HUMAN RIGHTS ACT

- Not applicable.

7.5 TRADE UNION

- Not applicable.

7.6 WARD IMPLICATIONS

- Not applicable.

7.7 AREA COMMITTEE LOCALITY PLAN IMPLICATIONS

- Not applicable.

7.8 IMPLICATIONS FOR CHILDREN AND YOUNG PEOPLE

Not applicable.

7.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESSMENT

Not applicable.

8. NOT FOR PUBLICATION DOCUMENTS

➤ Not applicable.

9. OPTIONS

➤ Not applicable.

10. RECOMMENDATIONS

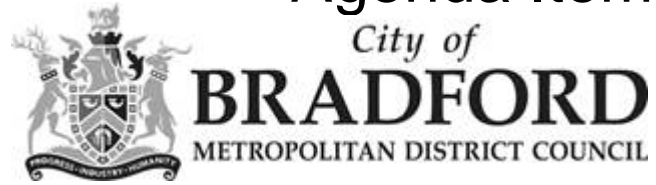
➤ It is recommended that the Board note this report.

11. APPENDICES

➤ Not applicable.

12. BACKGROUND DOCUMENTS

➤ Not applicable.



Report of the Managing Director, West Yorkshire Pension Fund, to the meeting of West Yorkshire Pension Fund Pension Board to be held on 20 March 2024

AN

Subject: WYPF Governance Review

Summary statement:

Further to reports presented to previous meetings of the Pension Board, a review of the effectiveness, roles and responsibilities of the WYPF Investment Advisory Panel ('IAP'), Joint Advisory Group ('JAG') and the Pension Board ('Board') is currently being undertaken.

Muse Advisory was appointed following a procurement process to provide advice and support on the review and has undertaken a range of fieldwork to help it to build a detailed picture of the way in which WYPF operates and is governed; and to enable it to form an accurate assessment of what is working well, and where improvements could be made.

Muse Advisory's report summarising their initial observations and findings is attached as an Appendix to this report and slides drafted for the January JAG meeting attached as Appendix B.

EQUALITY & DIVERSITY:

None

Euan Miller
Managing Director

Portfolio:

[Insert where appropriate]

Report Contact: Euan Miller
Head of Governance and Business
Development
Phone: 01274 432317
E-mail: euan.miller@wypf.org.uk

Overview & Scrutiny Area:

[Insert where appropriate]

1. SUMMARY

- 1.1 It was proposed at meetings of the Investment Advisory Panel ('IAP') and Joint Advisory Group ('JAG') that a review of the effectiveness, roles and responsibilities of the IAP, JAG and the Local Pension Board ('Board') should be undertaken, with the objective to ensure that the work that they do properly complements each other, while retaining their requisite independence. In simple terms this would check the remit of each, so that the IAP remains focused on investments issues, the JAG on administrative issues and the Board on its Fund oversight role (as defined by Regulations).
- 1.2 In addition, Government and the LGPS Scheme Advisory Board ('SAB') are expected to implement in the near future the recommendations of the SAB's Good Governance Project, which will provide further clarity on the requirements and best practice expected of LGPS administering authorities.
- 1.3 Further information on the SAB's Good Governance Project can be accessed via the link below:
[LGPS Scheme Advisory Board - Good Governance \(lgpsboard.org\)](http://lgpsboard.org)
- 1.4 WYPF governance arrangements are ultimately the responsibility of the Administering Authority (i.e. City of Bradford Metropolitan District Council) and therefore the implementation of the recommendations made by a governance review will require Council approval. However, the review is being driven by WYPF (with WYPF also meeting the costs).
- 1.5 To help minimise conflicts of interest and seek to draw on best practice from other LGPS administering authorities and the wider pensions and investment community; it was proposed that specialist consultancy support for the review was procured via the LGPS National Frameworks.
- 1.6 Muse Advisory have been appointed to advise and assist on the review following a call-off from the Governance Advisory Lot of the Actuarial Framework for LGPS services administered by Norfolk County Council.
- 1.7 Over the last few months Muse has reviewed all relevant WYPF documentation, issued and assessed responses to a questionnaire to members of the various governing bodies and undertaken structured, confidential interviews with agreed participants. Muse has also attended as an observer meetings of the IAP, Board and Bradford Governance and Audit Committee.
- 1.8 Based on the information gathered during these exercises, Muse has made some initial observations and findings which are set out in section 4 of the report attached as Appendix A and will be presented for discussion at the meeting.
- 1.9 Muse are continuing to work with WYPF officers and the Head of Governance at Bradford Council to develop proposed changes to governance arrangements which address Muse's observations and feedback received from members.

2. BACKGROUND

None

3 OTHER CONSIDERATIONS

None

4 FINANCIAL & RESOURCE APPRAISAL

Specialist consultancy support for the review has been procured via the LGPS National Frameworks. Provision has been made in the 2023/24 budget for this expenditure.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

None

6. LEGAL APPRAISAL

WYPF governance arrangements are ultimately the responsibility of the Administering Authority (i.e. City of Bradford Metropolitan District Council) and therefore any changes to governance arrangements will require Council approval.

7. OTHER IMPLICATIONS

7.1 SUSTAINABILITY IMPLICATIONS

None

7.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

None

7.3 COMMUNITY SAFETY IMPLICATIONS

None

7.4 HUMAN RIGHTS ACT

None

7.5 TRADE UNION

None

7.6 WARD IMPLICATIONS

None

7.7 AREA COMMITTEE LOCALITY PLAN IMPLICATIONS

None

7.8 IMPLICATIONS FOR CHILDREN AND YOUNG PEOPLE

None

7.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

None

8. NOT FOR PUBLICATION DOCUMENTS

None

9. OPTIONS

None

10. RECOMMENDATIONS

That the Board notes the report, the initial observations and findings set out in Appendix A and the proposed next steps of the Governance Review.



Strictly Confidential

West Yorkshire Pension Fund

Governance review – observations and key findings

City of Bradford Metropolitan District Council

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This report is confidential. It has been prepared by Muse Advisory for our client to whom it is addressed and for the purpose previously agreed with our client. Unless otherwise agreed, the content of this report should not be relied upon other than for the agreed purpose. Our client may share the content of this report with related parties without referral to Muse Advisory. The report must not be disclosed to any other party without the prior written consent of Muse Advisory. Muse Advisory does not accept any liability to any party other than the client in relation to the content of this report.

1. Executive summary

Muse Advisory was invited to carry out a governance review of the West Yorkshire Pension Fund ('WYPF') following a successful tender exercise during Summer 2023. Over the past few months the Muse team has worked closely with the WYPF officers to assess the governance of the Fund, to identify areas of good or excellent practice, and to seek out areas where changes could be made to improve the effectiveness and efficiency of governing WYPF.

We took account of LGPS regulations, Hymans Robertson's Good Governance Review Phase III and The Pension Regulator's (TPR) General Code of practice expected to come into force in 2024, as well as WYPF-specific documents comprising TPR's supervisory report and previous Governance Reviews.

This report sets out our findings, together with some suggestions for action.

In summary, we found evidence of a Fund that is run extremely well, with high quality staff, good and robust processes in place, careful and focused expense management and a clear focus on achieving excellence.

In line with many well-run Funds, seeking a review of governance is good practice in itself and should result in a programme of continual improvement. Accordingly, we identified some minor areas of operational practice that could potentially be improved.

We identified more significant scope for improvement in the process adopted for oversight of the Fund, delegated by the City of Bradford Metropolitan District Council to the Bradford Council Governance & Audit Committee ('G&AC') and in turn to other bodies. This is in order to gain greater clarity of roles and responsibility, avoid duplication, and hence increase the scope for effective oversight without increasing the burden on those who serve on the relevant bodies.

2. Introduction

The **independent governance review** undertaken by Muse Advisory looked at:

- The Local Pensions Board (Board), Joint Advisory Group (JAG) and Investment Advisory Panel (IAP) structures and terms of reference in place,
- The Scheme of delegation,
- The governance documents and policies,
- Other key documents including previous Governance Review reports and the TPR Supervisory report, and
- The use of external advice and support.

In general, we look at Governance from two perspectives:

- **Operational governance**, which covers your Board and Committee processes and supporting materials, committee composition and succession planning, looking at the role of the body, its Chair and its members, and an analysis of progress on implementing recommendations from previous reviews.
- **Behavioural effectiveness**, which focuses more on the way in which Board and Committee members behave with each other and how they interact with other stakeholders.

From our initial briefing it was clear that behavioural effectiveness was less relevant to this review, given the changes in personnel that take place fairly regularly. However, there were still some recommendations we could make in this area as you will see from our report, for example, regarding training and the chairing of meetings.

The **key conclusions** from our findings, that you will see throughout this report, are that the Fund is well run by the bodies in place and well supported by the officers, but as is to be expected, we also identified some areas for improvement.

Our process and observations are set out below. We would be happy to discuss any of these in further detail with you.

3. Methodology

The process we adopted to carry out this review is set out below.

Our methodology is designed to achieve two key objectives:

- a. To help us to build a detailed picture of the way in which WYPF operates and is governed; and
- b. To enable us to form an accurate assessment of what is working well, and where improvements could be made.

3.1. Initial discussions with the steering group

We met with the WYPF Managing Director, Head of Governance and Business Development and Assistant Director (Finance, Administration and Governance) to scope out the review. This enabled us to gain an overview of how WYPF operates, understand what the review sought to achieve, and agree the process by which we would gather our information, including key dates for meetings. We would like to thank those involved for their time and input.

3.2. Desktop review of relevant documents

Initially, as we do with all governance reviews, we undertook a detailed analysis of key documents, to build our understanding of WYPF, how it operates and is managed, and to test the operational effectiveness of the Fund. As the review progressed, we identified other relevant documents, including The Pensions Regulator's supervisory report on WYPF and Governance Review Reports for the last three years and reviewed those.

3.3. Preparation, issue and analysis of a tailored questionnaire

We prepared a confidential online questionnaire which was sent to all members of the WYPF Pension Board, Investment Advisory Panel ('IAP') and Joint Advisory Group ('JAG'). This was designed to give members of those bodies an opportunity to share their views on the effectiveness of their particular body - its structure, remit and operation – as well as comment on how they saw their body's role in the wider management and oversight of WYPF.

Some 30 questionnaires were issued and we received 17 responses. Graphical representations of responses to some of the questions are shown in Appendix D.

3.4. Structured, confidential interviews with agreed participants

Following completion of the questionnaires, and analysis of the responses, we invited the Chairs of each body and a cross-section of members for interview. The purpose of these interviews was to explore questionnaire responses in more depth, as well as asking key questions in areas that we had identified as meriting further examination.

We also spoke to other key stakeholders including Council representatives and WYPF officers.

3.5. Observation of meetings

We observed meetings of the Pension Board, IAP and G&AC. There were no meetings of the JAG during the period of the review.

The purpose of these observations was to assess the meeting packs and advice papers provided and see how these were used during the meeting, to observe the interactions of the meeting participants, and to assess the decision-making process.

We also assessed the way in which the different bodies complemented each other or duplicated activity, and looked at how progress was reported across the bodies and up to the G&AC.

3.6. Analysis of findings

At this stage we drew together our findings from all the previous activities to formulate our report. We also took account of LGPS regulations, Hymans Robertson's Good Governance Review Phase III and The Pension Regulator's General Code of practice expected to come into force in 2024, as well as WYPF-specific documents.

Throughout the process we checked in regularly with the members of the steering group, and with Euan Miller in particular, to report on progress, seek clarification on points of uncertainty, and test our findings as they evolved.

3.7. Our report

This report sets out our observations and some key findings. Recommendations will be developed in discussion with you.

4. Observations

4.1. What is working well

- The Fund appears to be well run in general and working effectively to fulfil its objectives.
- There is a high-quality staff in place, with all members of the governing bodies feeling well supported by the officers, and that the officers are easily contactable.
- The appointments of a separate Managing Director and CIO within the last eighteen months, splitting a large role previously covered by one person into two, has proved beneficial. There have been proactive changes/ improvements made, with more planned to come through as soon as possible.
- There was good reporting on the Fund's administration and operations, including on benefit statements delivery, GMP rectification, and data improvement plans in place and being followed.
- All members of the Fund's governing bodies behave professionally and engage well during the meetings.
- The holding of a session on investment beliefs for members of IAP, with an external facilitator, is to be applauded. This gave the members the opportunity to consider their fiduciary duties in a structured manner and will help with subsequent decision-making.

4.2. Areas for attention

- We believe there are ways that the Pension Board (required under the Public Service Pensions Act 2013) can be used more effectively, making the most of this requirement, rather than just adding another body to the Fund's governance.
- The IAP and JAG have large, rather unwieldy memberships. We also noted that attendance was somewhat patchy, with some individuals finding it difficult to commit the time to meetings.
- The roles and responsibilities of members within each group also appeared unclear at times, and there has been leakage of topics between the separate IAP and JAG; likely partly due to the overlapping membership.

Of second order:

- The content and structure of meeting papers could be improved to give greater clarity of purpose, and their presentation in meetings could be more focused to highlight key points and focus on the action required.
- The role of advisers on the IAP, and elsewhere for the Fund, could merit attention, including consideration of the metrics in place to monitor their support, and the voting rights in place; these do not appear to have been considered for some time, and voting rights, in particular, can cause confusion.
- It is important that training can be evidenced to TPR, if they were ever to ask about it. We have heard that this can be an issue, with some members (across all groups) failing to commit the time required to complete appropriate training and hence to build the appropriate understanding of pension matters to enable them to contribute as effectively as they could.

5. Next steps

We have enjoyed working with you on this review and hope that you find this report useful.

We look forward to discussing our observations and key findings with you, and working with you on developing recommendations.

Amanda, Ellie, Rosanne and Barry

Appendices

A. Meeting observations

We observed the following meetings:

- 13 September Pension Board meeting
- 26 October IAP meeting
- 23 November G&AC meeting.

B. Documents reviewed

We reviewed all of the documents publicly available, including report and accounts, key fund policies, business plans, funding and investment statements, the governance and compliance statement, terms of reference for the Pensions Board, and the last three years of governance reports from the independent advisers.

We also read the meeting packs for the meetings we observed and previous meeting packs, where relevant. For reference, we read TPR's supervisory report for the fund and Hymans Robertson's Good Governance report.

C. Interviews

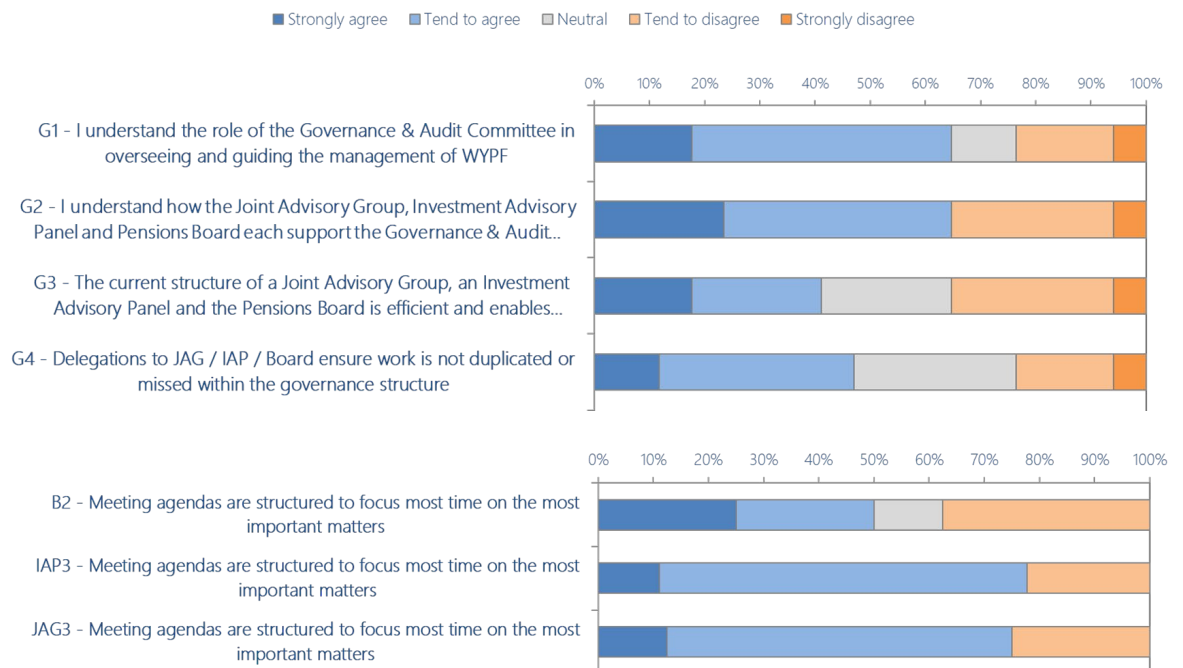
During October and November, we interviewed:

- The three independent advisers to the IAP (Marian George, Philip Hebson, Mark Stevens)
- Leandros Kalisperas, CIO
- Susan Hinchcliffe, leader of Bradford Council
- Asif Ibrahim, Borough solicitor
- Andrew Thornton, JAG & IAP Chair, and GAC member
- Angela Tait, GAC Chair
- David Pickersgill, PB member
- Isaac Dziya, PB member
- Andrew Scopes, JAG & IAP members
- Chris Greaves, IAP member
- Shakeela Lal, Board Chair

We also spoke to the members of the steering group, comprising Euan Miller, Yunus Gajra and Matt Mott, throughout the review.

D. Questionnaire results

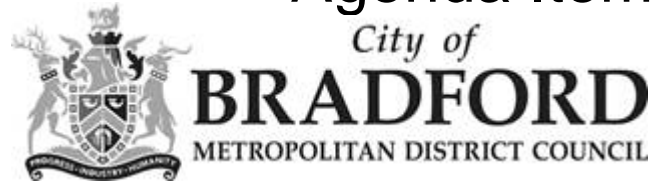
A few findings from the questionnaire are set out below in graphs. These are the findings that are reflected in our recommendations re the need for clarity of roles on the groups and within agendas.



E. Muse governance framework

As a reminder, our governance framework supported our review, ensuring all elements of good governance were considered.





Report of the Managing Director, West Yorkshire Pension Fund, to the meeting of West Yorkshire Pension Fund Pension Board to be held on 20 March 2024

AO

Subject: Investment Strategy Statement

Summary statement:

This report provides the Pension Board with a draft of an updated Investment Strategy Statement (ISS) which has recently been issued for consultation with WYPF stakeholders following consideration at the WYPF Investment Advisory Panel ('IAP') meeting on 25 January 2024. The ISS has been revised to reflect developments in WYPF's investment arrangements and beliefs; and in particular the changes in strategic asset allocation agreed by the Investment Advisory Panel during 2023.

The closing date for consultation responses is 5 April 2024.

Recommendation

That the Board;

- a) notes the draft ISS, the relevant regulations and guidance and the consultation process which is currently ongoing and;
- b) considers whether it wishes to feed into the consultation.

EQUALITY & DIVERSITY:

None

Euan Miller
Managing Director

Portfolio:

[Insert where appropriate]

Report Contact: Euan Miller
Head of Governance and Business
Development
Phone: 01274 432317
E-mail: euan.miller@wypf.org.uk

Overview & Scrutiny Area:

1. SUMMARY

- 1.1 The [Draft ISS](#) is intended to set out the high-level principles that govern WYPF's investment strategy. Those principles influence or are developed in some of WYPF's policies and procedures such as the Funding Strategy Statement, Responsible Investment policy (and the RI Policy of the NLGPS Pool) and Stewardship Code Submission.
- 1.2 The significant changes from the previous version of the ISS are the revised Strategic Asset Allocation and performance benchmarks; providing greater detail and clarity with regards to Responsible Investment policies; and better reflecting the current operation of the Northern LGPS Pool and its role in relation to WYPF's investment arrangements.
- 1.3 An earlier draft of the ISS was considered at the 25 January 2024 meeting of the Investment Advisory Panel ('IAP') with some changes suggested which were incorporated in the version which is linked to above.
- 1.4 LGPS regulations require that when material changes are made to the Investment Strategy Statement, the administering authority must consult such person as it considers appropriate. The consultation was launched on 12th February. The draft ISS and a [feedback form](#) for comments are available on the WYPF website. An e-mail alert regarding the consultation was issued to all WYPF members and employers for which WYPF holds an e-mail address. The closing date for responses is 5 April 2024 and responses received will be considered at the IAP meeting on 25 April.

2. BACKGROUND

- 2.1 Regulation 7(1) of [The Local Government Pension Scheme \(Management and Investment of Funds\) Regulations 2016](#) requires the administering authority of a LGPS pension fund to formulate an investment strategy which must be in accordance with guidance issued by the Secretary of State from time to time.
- 2.2 The Investment Strategy Statement required by Regulation 7 must include:-
 - a) A requirement to invest money in a wide variety of investments;
 - b) The authority's assessment of the suitability of particular investments and types of investments;
 - c) The authority's approach to risk, including the ways in which risks are to be measured and managed;
 - d) The authority's approach to pooling investments, including the use of collective investment vehicles and shared services;
 - e) The authority's policy on how social, environmental or corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments; and
 - f) The authority's policy on the exercise of rights (including voting rights) attaching to investments.

- 2.3 The Investment Strategy Statement must also set out the maximum percentage of the total value of all investments of fund money that it will invest in particular investments or classes of investment.
- 2.4 Under Regulation 7(6) and (7), the statements must be published by 1st April 2017 and then kept under review and revised from time to time and at least every three years.
- 2.5 The ISS should provide a prudential framework within which administering authorities can set their policy on asset allocation, risk and diversification, amongst other things. It is formulated in conjunction with the Funding Strategy Statement which identifies how each Fund employer's present and future pension liabilities are to be met.
- 2.6 The Department for Communities, Housing and Local Government issued [Statutory Guidance on Preparing and Maintaining an Investment Strategy Statement](#) in 2017. It appears likely that the measures set out in the recent consultation on LGPS Investment arrangements will be implemented by updating this guidance. It may therefore be necessary to review the ISS in light of any updated guidance when released.

3 OTHER CONSIDERATIONS

None

4 FINANCIAL & RESOURCE APPRAISAL

None

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

None

6. LEGAL APPRAISAL

The relevant legal considerations are set out in section 2 of this report.

7. OTHER IMPLICATIONS

7.1 SUSTAINABILITY IMPLICATIONS

None

7.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

The draft ISS sets out how WYPF considers responsible investment matters, including those which relate to the climate emergency.

7.3 COMMUNITY SAFETY IMPLICATIONS

None

7.4 HUMAN RIGHTS ACT

None

7.5 TRADE UNION

None

7.6 WARD IMPLICATIONS

None

7.7 AREA COMMITTEE LOCALITY PLAN IMPLICATIONS

None

7.8 IMPLICATIONS FOR CHILDREN AND YOUNG PEOPLE

None

7.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

None

8. NOT FOR PUBLICATION DOCUMENTS

None

9. OPTIONS

None

10. RECOMMENDATIONS

That the Board;

- a) notes the draft ISS, the relevant regulations and guidance and the consultation process which is currently ongoing and;
- b) considers whether it wishes to feed into the consultation.

Report of the Director, West Yorkshire Pension Fund, to the meeting of West Yorkshire Pension Fund Pension Board to be held on 20 March 2024

AP

Subject:

Payment of Death Grants

Summary statement:

The LGPS Regulations 2013 allows the administering authority (WYPF), at their absolute discretion, to make payments in respect of a death grant lump sum.

This paper highlights the process undertaken by WYPF to ensure that death grants are paid correctly and to the right beneficiaries.

EQUALITY & DIVERSITY:

None

Euan Miller
Managing Director

Portfolio:

Report Contact: Matt Mott
Head of Governance and Business
Development
Phone: 07815 476877
E-mail: matt.mott@wyopf.org

Overview & Scrutiny Area:

1. SUMMARY

- 1.1 This paper highlights the process undertaken by WYPF to ensure that death grants are paid correctly and to the right beneficiaries.

2. Background

- 2.1 Under the LGPS a death grant is payable on the death of a member if they are under age 75 and one of the following applies:
- they are still paying in the LGPS
 - they have left the LGPS but have not taken payment of your pension
 - they left after 31 March 2008 and have been receiving your pension for less than 10 years
 - they left the LGPS between 1 April 1998 and 31 March 2008 and have been receiving their pension for less than 5 years.
- 2.2 If a member left before 1 April 1998 and is receiving a pension, a death grant may be paid when they die.
- 2.3 The LGPS Regulations 2013 allows WYPF, at their absolute discretion, to make payments in respect of the death grant.

3. Absolute Discretion

- 3.1 Under the LGPS regulations WYPF has absolute discretion to pay the lump sum death grant to the deceased's nominee(s), personal representatives or any person who appears, at any time, to have been a relative or dependant.
- 3.2 In exercising its absolute discretion, WYPF will take into account the "expression of wish" made by the member in making a nomination but is not legally bound to pay the lump sum death grant to the specified nominee(s).
- 3.3 "Personal representative" in this context has the legal meaning of the person appointed by a court to administer the estate of another person – i.e. the member. Dependent is defined in the LGPS regulations as being financial – either dependent or mutually dependent – or dependent because of physical or mental impairment.
- 3.4 The main advantage of the exercise of absolute discretion is that the payment made by WYPF does not form part of the deceased's estate and is therefore not liable to inheritance tax, if payable. Another benefit is the speed with which payment can be made if desired.
- 3.5 The exercise of discretion does, however, require an active decision by WYPF after having taken relevant factors into account. The expression of wish form should not be followed blindly and equally a payment to the estate should not be made as a matter of course.

4. Number of death grants paid

4.1 Over the last few years the number of death grants paid were as follows:

Calendar Year	Number of cases	Total amount paid
2020	618	£12,825,391.68
2021	547	£10,417,666.85
2022	650	£12,687,961.87
2023	699	£13,833,618.63

4.2 The high volume of death grants paid and the amounts highlight the importance of ensuring that death grants are paid correctly and to the right beneficiaries.

5. Information Gathering

5.1 Notifications of death can be received from the employing body, a relative, friend, HMRC, DWP, bank, solicitors, National Fraud Initiative report or other sources.

5.2 An initial letter and forms to the person who is the point of contact or next of kin.

5.3 On receipt of completed forms, the death certificate, copy of a will and other pertinent information or documents, the amount of benefits due in respect of the deceased is calculated.

5.4 A letter and WYPF forms may at this stage be sent to other people named by the contact person or next of kin on their returned forms.

5.5 The papers are passed to the Pensioner Services Manager, who with the Service Centre Group Manager (or other senior managers in their absence), follow the guidelines described in this document to determine who should be paid the death grant. There may be occasions where the payment of a pension needs to be clarified or authorised by the same senior managers, where there may be an element of uncertainty, e.g. incapacitated child.

6. Who is the Death Grant paid to?

6.1 The following WYPF guidelines, which are not binding, are designed to assist in the decision making process.

General Principles

In making a decision the following overarching principles apply:

- To act impartially and fairly
- To take account of all the circumstances of the case
- To ensure there is no discrimination on the basis of religion, belief, orientation or disability

- to look at the domestic, personal and the financial situation

What is taken into account

The Nomination Form – is there one and if so:

- How recent is the nomination / expression of wish?
- Have there been previous nominations completed?
- Are any of the names the same on multiple nomination forms?
- Are only percentages changed where there is more than one nomination form?

A nomination does not have to be on a WYPF form. Sometimes the wishes are expressed in letters.

Since the introduction of our on-line website pensioners have the ability to complete an on-line nomination. However, we have a duty of care to ensure the nominations are genuine. There has been instances where an on-line nomination has been made after the members death.

Active and deferred members are reminded of their nomination on their Annual Benefit Statement and when someone retires we always ask them to complete a new nomination form.

Personal Status

- Is the member married or do they have a partner (co-habiting or non co-habiting)?
- How long have they been married / co-habiting?
- Does member have any children – from current and/or previous relationships?
- Does member keep in touch with children / siblings / parents etc.?
- Were the member and spouse / partner living together at the time of death?
- If there was a split, was this amicable or otherwise?
- Were there any other changes in relationships / status since the DG expression was made?

Financial Dependency

- Is there anyone (relative) who the deceased was assisting financially, but who is not nominated or named in any will? Such as, children from a previous marriage being supported at university or receiving an allowance etc.
- Nominated current partner / spouse but also has a child from a previous relationship who lives elsewhere and who isn't nominated, e.g. living with a grandparent or with the other parent.
- Have the financial circumstances of the deceased / next of kin / nominee etc. changed since the nomination was made, e.g. made as part of a divorce agreement originally.

Death Certificate

- Who has registered the death? (if not a coroner's interim certificate).
- Is the spouse the same on any other paperwork or nomination form?
- What was the cause of death and did the member know they were dying? (often evident by a recently made will).

Is there a will?

- Are similar people named in the will as on the nomination form (if there is one)?
- Is the will a recent will?
- Do any family members appear in the will who are not on the nomination form?
- Is anyone specifically excluded from benefitting from the death in the will?
- Are percentages or amounts to inherit similar to the nomination form?
- If there appears to be a discrepancy between a nomination and a will or other documentation, consult family and ask what they think the deceased would have wanted to happen with the DG money.

Obituaries and funeral

- Do any names appearing to be family members or close relationship members appear on an obituary but not on a nomination form or in a will?
- Who paid for the funeral or is the bill still outstanding?
- Who made the funeral arrangements?

Suicide note or other instructing note or message

- Is it draft?
- unsigned?
- unwitnessed?
- Letter to a friend/solicitor/HR/pension fund/work colleague etc
- Are there any instructions in any other document which would presume to supersede a previously submitted nomination form. Previous examples:
- Letter sent to WYPF the day prior to death to change instructions / nomination. (suspected suicide but not proven).
- Suicide note in one case to change the nomination – WYPF attended the inquest for further details to enable a decision to be made.
- Letters sent to friends leaving clear instructions (but no nomination on file).
- Letters sent to friend leaving clear instructions where there is a nomination on file.
- Often receive letters to WYPF where family members are specifically excluded or 'written out' of a nomination – not always a replacement nomination form submitted in these cases.

Other circumstances which can arise:

Out of date/old nomination form or no nomination form

- Nomination form so old that people nominated are dead or cannot be found and there are no relatives, or anybody else who might qualify to receive the DG.
- No nomination at all and no immediate evidence of any relatives, e.g. death cert. shows name of death informant as being from hospital bereavement service, funeral director etc.
- Speak to work colleagues about any comments the deceased may have made concerning events should they die.
- Attempts are made to trace any relatives. This is limited or often impossible with no information or names to go on.
- On finding any distant relatives, use guidance of 'rules of intestacy' flowchart to determine any eligibility.

Change of heart

- Nominated person asks us to pay a proportion of the DG to someone else - a friend or a relative (sometimes when they see how much money it is).
- Nominated person asks us to pay a proportion of the DG to someone else, then changes their mind (sometimes when they see how much money it is).
- Nominated person asks us to pay the share of another nominated person to them for 'safekeeping' (missing sibling, incapacitated, not worldly wise enough, to stop alcoholic buying drink etc.).

7. After a decision is made

- 7.1 Once a decision has been made all potential beneficiaries are contacted to inform them if we have decided to make a payment to them. We are also obliged to give each potential beneficiary the right of appeal under the Internal Dispute Resolution Procedure (IDRP).

The number of appeals made against decisions made by WYPF were:

Calendar Year	Number of appeals
2020	9
2021	5
2022	6
2023	6

8. Unusual cases

- 8.1 Cases can be complex and time consuming and not all cases are straight forward. Complexities include:

- murders and suicides
- We have uncovered a small number of cases where we suspected the will had been forged/allegedly completed by a pensioner who was mentally incapacitated.
- We have had a few cases where potential beneficiaries were not born and had to ask for a DNA test to prove they were a child of the deceased.
- We have attended a small number of inquests into suicides to gather further information.

9. OTHER CONSIDERATIONS

None

10. FINANCIAL & RESOURCE APPRAISAL

None

11. RISK MANAGEMENT AND GOVERNANCE ISSUES

None

12. LEGAL APPRAISAL

None

13. OTHER IMPLICATIONS

13.1 SUSTAINABILITY IMPLICATIONS

None

13.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

None

13.3 COMMUNITY SAFETY IMPLICATIONS

None

13.4 HUMAN RIGHTS ACT

None

13.5 TRADE UNION

None

13.6 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

None

14. NOT FOR PUBLICATION DOCUMENTS

None

15. OPTIONS

None

10. RECOMMENDATIONS

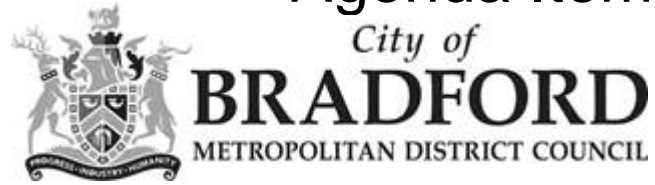
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11. APPENDICES

None

12. BACKGROUND DOCUMENTS

None



Report of the Managing Director, West Yorkshire Pension Fund, to the meeting of West Yorkshire Pension Fund Pension Board to be held on 20 March 2024

AQ

Subject:

TPR General Code of Practice

Summary statement:

The role of The Pension Board, as defined by sections 5(1) and (2) of the Public Service Pensions Act 2013 is to assist the Council as Scheme Manager in ensuring the effective and efficient governance and administration of the Local Government Pension Scheme (LGPS) including securing compliance with the LGPS regulations and any other legislation relating to the governance and administration of the LGPS; securing compliance with the requirements imposed in relation to the LGPS by the Pensions Regulator (TPR); and any other such matters as the LGPS regulations may specify.

To be able to assist the Scheme Manager and meet the requirements of the Public Service Pensions Act 2013, Pension Board Members should understand what WYPF needs do in order to meet their legal responsibilities and regulatory expectations.

TPR's General Code of Practice sets out what all governing bodies should do or must do in order to meet these legal responsibilities and regulatory expectations. Work is underway to help confirm the Fund complies with the requirements within the new Code. After the initial review, ongoing compliance checks will be carried out on a regular basis.

EQUALITY & DIVERSITY:

None

Euan Miller
Managing Director

Portfolio:

Report Contact: Matt Mott
Head of Governance and Business
Development
Phone: 07815 476877
E-mail: matt.mott@wyopf.org

Overview & Scrutiny Area:

1. SUMMARY

TPR's General Code of Practice sets out what all pension fund governing bodies should do or must do in order to meet their legal responsibilities and regulatory expectations. Work is underway to help confirm the Fund complies with the requirements within the new Code. After the initial review, ongoing compliance checks will be carried out on a regular basis.

2. BACKGROUND

- The Pension Regulator laid its long-awaited General Code of Practice (formerly referred to as the Single Code of Practice) before Parliament on 10 January 2024. This replaces ten of the previous Codes of Practice and for the LGPS and all Public Service Pension Schemes, replaces Code of Practice 14 (Governance and Administration of Public Service Pension Schemes).
- The Code is expected to be effective from 27 March 2024.
- The new Code includes many of the requirements of the current Code of Practice 14, but there are new areas such as elevating cyber controls to TPR code as well as additional expectations relating to managing advisers and service providers, maintenance of IT systems and scams (amongst others).
- [TPR's research on governance and administration](#) shows that the LGPS already has high standards of governance in place, but the Code provides an opportunity for funds to review current practices, but also presents challenges during what is an already busy time within the LGPS. Clarity is required on which parts of the Code specifically apply to the LGPS and what these mean for funds and how they should be applied in practice.
- The SAB will support funds in understanding any new requirements in the Code and, where needed, will produce new or update existing guidance to assist funds with their responsibilities.
- The published code is 177 pages long. For convenience a link to the code is provided. [TPR General Code of Practice](#)
- Aon held a webinar in late January for LGPS Officers, Pension Committee and Local Pension Board Members - [TPR New General Code of Practice](#) which is still available on this link.
- TPR have stated a priority list of amendments/improvements should be created within 6 months of the codes effective date with implementation within 12 months.
- Work is underway to help confirm the Fund complies with the requirements within the new Code and an analysis will be brought to a future meeting of the Board for consideration. After the initial review, ongoing compliance checks will be carried out on a regular basis. This is one of the tasks which features on WYPF's Business Plan.
- WYPF is also part of the LGPS Scheme Advisory Board TPR Code Focus Group and Matthew Mott attended the first meeting in February.
-



3. OTHER CONSIDERATIONS

➤ None

4. FINANCIAL & RESOURCE APPRAISAL

➤ None

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

➤ None

6. LEGAL APPRAISAL

➤ None

7. OTHER IMPLICATIONS

7.1 SUSTAINABILITY IMPLICATIONS

➤ None

7.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

➤ None

7.3 COMMUNITY SAFETY IMPLICATIONS

➤ None

7.4 HUMAN RIGHTS ACT

➤ None

7.5 TRADE UNION

➤ None

7.6 WARD IMPLICATIONS

➤ None

7.7 AREA COMMITTEE LOCALITY PLAN IMPLICATIONS

➤ None

7.8 IMPLICATIONS FOR CHILDREN AND YOUNG PEOPLE

➤ None

7.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

➤ None

8. NOT FOR PUBLICATION DOCUMENTS

➤ None

9. OPTIONS

➤ None

10. RECOMMENDATIONS

➤ To be aware of the TPR General Code of Practice and how it applies to the administration of the LGPS.

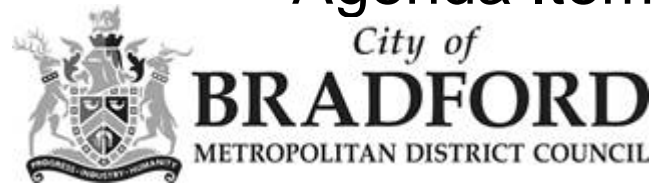
➤ To watch an Aon webinar about the TPR General Code of Practice

11. APPENDICES

➤ None

12. BACKGROUND DOCUMENTS

➤ None



Report of the Managing Director, West Yorkshire Pension Fund, to the meeting of West Yorkshire Pension Fund Pension Board to be held on 20 March 2024

AR

Subject:

Training Update and Plans

Summary statement:

The role of The Pension Board, as defined by sections 5(1) and (2) of the Public Service Pensions Act 2013 is to assist the Council as Scheme Manager in ensuring the effective and efficient governance and administration of the Local Government Pension Scheme (LGPS) including securing compliance with the LGPS regulations and any other legislation relating to the governance and administration of the LGPS; securing compliance with the requirements imposed in relation to the LGPS by the Pensions Regulator; and any other such matters as the LGPS regulations may specify.

To be able to assist the Scheme Manager and meet the requirements of the Public Service Pensions Act 2013, Pension Board Members must be able to demonstrate suitable knowledge and skills of the LGPS to effectively scrutinise the decisions made by officers.

The training of Pension Board members to understand their responsibilities and the issues they are dealing with is a very high priority. Details of training courses, conferences and seminars listed may assist Board Members.

EQUALITY & DIVERSITY:

None

Euan Miller
Managing Director

Portfolio:

Report Contact: Matt Mott
Head of Governance and Business
Development
Phone: 07815 476877
E-mail: matt.mott@wyopf.org

Overview & Scrutiny Area:

1.0 SUMMARY

- 1.1 To be able to assist the Scheme Manager and meet the requirements of the Public Service Pensions Act 2013, Pension Board Members must be able to demonstrate suitable knowledge and skills of the LGPS to effectively scrutinise the decisions made by officers.
- 1.2 The training of Pension Board members to understand their responsibilities and the issues they are dealing with is a very high priority. Details of training courses, conferences and seminars listed may assist Board Members.
- 1.3 Pension Board members should consider the following training and events.

2.0 Training and Events

TPR Public Service Toolkit

The Trustee toolkit is aimed specifically at Trustees of Occupational Pension Schemes. The Public Service Online Toolkits is aimed specifically at Public Service schemes including the LGPS and includes a series of online learning modules and downloadable resources developed to help Board Members meet the minimum required level of knowledge and understanding as defined by the Public Service Pensions Act 2013.

<https://trusteetoolkit.thepensionsregulator.gov.uk/>

All Pension Board members should complete the Pension Regulators toolkit training. Once completed a copy of the completion certificate should be given to the Governance and New Business Manager.

The mandatory training includes Modules across a range of pension topics including;

- Conflicts of Interest
- Maintaining Accurate Member Data
- Providing Information to Members and Others
- Reporting Breaches of the Law
- Managing Risk and Internal Controls
- Maintaining Member Controls
- Resolving Internal Disputes

Each modules takes approximately 30 to 60 minutes to complete and Board Members are requested to complete a minimum of two prior to each Board meeting until all modules are completed.

TPR Regularly update the content and may amend or add additional modules for Trustees. WYPF are considering signing up to the TPR transfer pledge, as discussed at Boards on 22 March 2022 and 28 June 2022, and to do so all Board Members are required to have completed the TPR Pension Scams Module.

Hymans Robertson online Learning Academy

Hymans offer a bespoke LGPS online training tool which provides various training modules regarding current pensions issues including:

- Committee Role and Pensions Legislation
- Pensions Governance
- Pensions Administration
- Pensions Accounting and Audit
- Procurement and Relationship Management
- Investment Performance and Risk Management
- Financial Markets and Risk Management
- Actuarial methods, Standards and Practices

Some Board Members undertook this training last year. Hymans have now refreshed and relaunched the LGPS Online Learning Academy (LOLA). They have retained those core fundamentals of short, sharp and engaging training videos and supplemented that with shorter learning modules and the ability to add your own fund specific training material. They have also refreshed many of the videos, jargon busters and knowledge checks.

What has changed?

The key changes for the LOLA 2.0 learning plan are:

more modules with shorter length videos:

- The new **8 core** modules now mirror the exact same topic number and headings as our [National Knowledge Assessment](#) and Knowledge Progress Assessment
- This means that there can be clear alignment between assessment tools and your core training plan. This will make it easier to 'fill in' those knowledge gaps for users.
- The introductory module and current issues module are still there but are not part of the **core** training plan.
- The modules have been streamlined and are now shorter and quicker to complete.
- We have moved the **printable and accessible slides**, and jargon buster to the new additional resource section (underneath the video).
- This provides a slimmer, easy to follow user experience
- Additional videos have been created to populate this new learning plan set up. All done to keep users up to date and aware of each module's requirement!
- Refreshed areas of the jargon busters and knowledge checks

Introduction of Gamification badges to increase user engagement. Badges will be issued for:

- First user to fully complete a module
 - Bronze badge for 3 correctly answered questions on each module knowledge check.
 - Silver badge for 4 correctly answered questions on each module knowledge check.
 - Gold badge for 5 correctly answered questions on each module knowledge check.
 - Each knowledge check has 5 questions.

This is a brand new learning plan and members are expected to work through all the modules (as you may have done with the previous learning plan). The expected timescale to complete this training is 6 months.

Please log on to the platform at your earliest opportunity to commence this training. This can be found at: <https://aspire.hymanslearning.co.uk>

If you have forgotten your sign on credentials or you are new to this training please contact matt.mott@wypf.org.uk or sukhjot.kaur@wypf.org.uk

LGA Fundamentals training 2024

Fundamentals is a bespoke three-day training course aimed at elected members and others who attend pension committees/panels and local pension boards. Past delegates include elected members, trade union representatives, member and employer representatives, as well as a variety of officers who attend/support committees and some private sector organisations who provide services to administering authorities. The course provides a scheme overview and covers current issues in relation to administration, investments and governance of the LGPS.

Attending all three days will assist delegates in meeting the relevant requirement for knowledge, skills and understanding either required in statute or encouraged by relevant guidance.

Each day has a different theme and will include sessions delivered by experts in their field. The event also provides delegates with valuable networking opportunities

The training usually takes place in two locations, London and Birmingham. The option to attend online only sessions is usually available. Dates for this years have yet to be published.

PLSA Trustee Training Programme

The PLSA trusteeship courses have been expertly crafted to support trustees of all levels. Experienced trainers help new trustees, prospective trustees, and anyone looking for a refresher.

At [Trusteeship Part 1: The Theory](#) trustees will learn about:

- Pension trustee duties, responsibilities and powers
- How trustees protect themselves against legal challenge
- How workplace pension schemes are financed and how they value their assets and liabilities
- Investment strategies ...and [more](#)

At [Trusteeship Part 2: The Practice](#) trustees will learn how to apply:

- The protocol and mechanics of decision making, including exercising discretions
- Decisions about investments
- Getting it wrong, IDRPs and the Pensions Ombudsman
- Maintaining a good relationship with the employer ...and [more](#)

At [Trusteeship Part 3: The Expert](#) trustees will become well-versed in:

- Incident response
- Managing risks associated with investment
- Exercising complex discretions
- Working as a team to agree negotiation strategy ...and [more](#)

Dates for 2024 are:

[Trusteeship Part 1: The Theory](#) | 14 March, 4 June, 12 September

[Trusteeship Part 2: The Practice](#) | 16 April, 2 July, 5 November

[Trusteeship Part 3: The Expert](#) | 20 November

If you are interested in booking a place on the LGA or PLSA training or please let Matt Mott or Suki Kaur know:

matt.mott@wypf.org.uk or sukhjot.kaur@wypf.org.uk

PLSA Annual Conference

The PLSA conference will be held in Liverpool from 15-17 October 2024. By attending you will get:

- Comprehensive industry insights: Gain valuable insights from a wide range of industry experts discussing everything that matters in pensions: member communications, new regulation, politics, the economy and innovation.
- Networking opportunities: Connect with a diverse group of professionals including scheme CEOs, pension fund managers, consultants, policymakers, trustees and service providers.
- Policy and regulatory updates: Stay up-to-date with the latest regulatory changes and policy developments that impact pension funds.
- Innovative solutions and trends: Learn about the latest innovations, hot topics

and trends in pensions. Discover new tools, technologies, and approaches to get the most for pension scheme members.

- Influence and advocacy: Participate in discussions that shape the future of the pensions industry and advocate for changes that benefit members and stakeholders.

Private & Public Pensions Summit

This is to be held from 27-28 November 2024 at Pennyhill Park Hotel Surrey.

The Summit gathers the most senior executives and trustees from leading corporate and local government pension plans, together with master trust and IGC chairs, senior government officials, regulators, members of influential trade bodies, and key advisers to the industry. They will debate the implications of the tectonic shifts taking place across the UK pensions landscape, the investment strategies that will be necessary to deliver future performance, and whether lasting solutions can be found to retirement funding needs on a nationwide basis.

LGA Annual Governance Conference

The event was attended by 2 Pension Board Members, 1 JAG Member and 2 Fund Officers on 19 & 20 January 2024 in York. The event was fully subscribed and included speakers and presentations from across the LGPS.

For those that were not able to attend, the link to the slides from the conference are attached.

- [The Pensions Ombudsman](#)
- [SAB and LGPC update](#)
- [The employer landscape](#)
- [How to keep on the right side of the law](#)
- [DLUHC Update](#)
- [Improving and measuring your knowledge and skills](#)
- [Investment outlook](#)

LGA circulars and bulletins

- Members can also make use of the LGA website where circulars, bulletins and updates are published on a regular basis: <http://www.lgpsregs.org/index.php>

Scheme Advisory Board website

- Members can find lots of useful information on the Scheme Advisory Boards website: <https://www.lgpsboard.org/>

3.0 Training Strategy

TPR consider the Public Service Toolkit to be part of initial or induction training and to meet their expectation the Training Strategy has been amended.

All Pension Board members will now be required to complete the Toolkit training within 6 months of joining the Board or within 6 months if any modules are updated,

meaning all Board members who have not yet completed their TPR Toolkit should do so by 31 March 2024.

4.0 Training Record of Achievements

WYPF report on training completed by Board Members within the Fund's annual Report and Accounts.

The most recent record of Pension Board Member training achievements will be collated and brought to each Board meeting. The latest training record is included in Appendix B.

5.0 Dates for your diary

Pension Board Meetings 2024/25 – Provisional Dates

19 June 2024
11 September 2024
11 December 2024
19 March 2025

6.0 Training at Board Meetings

It is the intention of WYPF to provide additional training as part of the Board Meetings. These may be planned topics to support the existing training, current “hot” topics, or training presented prior to a discussion of a particular report. Training topics may also be at the suggestion of the Board or a Board Member.

Where additional training is not provided as part of the Board Meetings there may be an update or summary of training completed to date and events attended by Board Members.

7.0 Training Plans

Pension Board Members will be asked to complete an annual questionnaire on Board effectiveness and individual training needs. Training plans will be created based on this information for each Board Member and reported on at each Pension Board meeting.

Appendix A – Training Strategy
Appendix C – Pension Board Assessment of Board effectiveness
Appendix D – Pension Board training needs assessment

8.0 Additional Training

If any Pension Board member would like any specific training through one to one meetings with the in-house team, please contact the author of this report..

9.0 OTHER CONSIDERATIONS

None.

10.0 FINANCIAL & RESOURCE APPRAISAL

None.

11.0 RISK MANAGEMENT AND GOVERNANCE ISSUES

None.

12.0 LEGAL APPRAISAL

None.

13.0 OTHER IMPLICATIONS

None.

13.1 SUSTAINABILITY IMPLICATIONS

None.

13.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

None.

13.3 COMMUNITY SAFETY IMPLICATIONS

None.

13.4 HUMAN RIGHTS ACT

None.

13.5 TRADE UNION

None.

13.6 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

None.

13.7 NOT FOR PUBLICATION DOCUMENTS

None.

14.0 OPTIONS

N/A

15.0 RECOMMENDATIONS

It is recommended that Members of the Local Pension Board complete TPR Public

Sector Toolkit online training, including the Scam module, by 31 March 2024 and the relaunched Hymans Robertson online LGPS Learning Academy Training and meet the expectations of TPR and the requirements defined by the Public Service Pensions Act 2013.

Board Members are also encouraged to attend external training events provided by PLSA, LGA & Actuarial firms. Consideration should also be given to Local Pension Board Member representation at various national events such as the PLSA Conference and LGA Governance conference.

16.0 APPENDICES

- Appendix A – Training Strategy
- Appendix B – Pension Board Training and Attendance Record
- Appendix C – Pension Board Assessment of Board effectiveness
- Appendix D – Pension Board training needs assessment

17.0 BACKGROUND DOCUMENTS

None



WYPF Pension Fund Knowledge and Skills Training Strategy

1. Introduction

This is the Training Strategy for the West Yorkshire Pension Fund (WYPF).

It sets out the strategy for the Pension Fund to satisfy the regulations under the Public Service Pensions Act 2013 concerning training and development of:

- Members of the Pension Board and (when appropriate) other Boards and Committees that may be involved with the Pension Fund, such as the Joint Advisory Group (JAG) and the Investment Advisory Panel (IAP) (the “Members”); and
- Officers of WYPF responsible for the management of the Fund (the “Officers”).

The Training Strategy is established to aid Members in performing and developing personally in their individual roles and to equip them with the necessary skills and knowledge to challenge and act effectively within the responsibility put upon them.

The Pension Board will be effective in its scrutiny of decisions made by Officers, JAG, and IAP.

1.1 Strategy Objectives

The Fund’s objectives relating to knowledge and skills are to:

- Ensure the pension fund is managed and its services delivered by people who have the appropriate knowledge and expertise.
- Act with integrity and be accountable to our stakeholders for decisions, ensuring they are robust and well based.

To achieve these objectives, Members require an understanding of:

- Their responsibilities as an administering authority of a local government pension fund.
- The operation and administration of the pension fund.
- The fundamental requirements relating to pension fund investments.

As far as is possible, targeted training will also be provided that is timely and directly relevant to the Board’s responsibilities as set out in the Fund’s business plan. For example, valuation training was provided immediately preceding commencement of the valuation process 2022.

All Pension Board Members have a statutory obligation under the Public Service Pensions Act 2013 to demonstrate the appropriate knowledge and skills in relation to LGPS pension matters and will:

- Have their knowledge measured and assessed.
- Receive appropriate training to fill any knowledge gaps identified; and
- Seek to maintain their knowledge.
- Complete The Pensions Regulator's **Public Service Trustee Toolkit** online training by 31 March 2024 or for future appointments within 6 months of joining the Pension Board. All 7 Modules are on Public Sector DB pension schemes. <https://education.thepensionsregulator.gov.uk/login/>
- Also complete the relaunched LGPS online Learning Academy modules (LOLA) training provided by Hyman Robertson from October 2023. <https://www.hymans.co.uk/services/lgps-online-learning-academy/>
- Additionally, after 6 months, or after 31 March 2024, complete The Pension Regulator **Trustee Toolkit**. These modules cover broader areas of pension legislation and different types of Pension Schemes. <https://education.thepensionsregulator.gov.uk/login/>

1.2 Application of the training strategy

This Training Strategy will apply to all elected members and representatives with a role on the Pension Board and (if applicable) JAG and IAP, plus the Director of WYPF and the director's immediate reports. Other officers involved in the management and administration of the Fund will have their own sectional and personal training plans and career development objectives.

1.3 Purpose of training

The purpose of training is to:

- Equip Board Members and Officers with the necessary skills and knowledge to be competent in their role.
- Promote thorough scrutiny.
- Support effective and robust decision making.
- Provide individuals with integrity.
- Meet the required needs in relation to the Fund's objectives.
- Meet requirements of the Pension Act 2013

1.4 Summary

This training strategy will:

- Meet requirements of the Public Service Pensions Act 2013
- Assist in meeting the Fund's objectives.
- Assist in meeting the Fund's business plan
- Assist in achieving delivery of effective management
- Equip those responsible with appropriate knowledge and skills
- Promote the development of decision makers
- Demonstrate compliance with the TPR General Code of Practice and
- Contribute to good scheme governance

2 Meeting the business plan

2.1 Timely and relevant

There will be times in the year when different circumstances will require specific training. For example, Valuation training was provided before commencement of the valuation process 2022.

It is vital that training is relevant to meet the statutory requirement and any skills gap or business need, and training should be delivered in a manner that fits with the business plan.

The training plan will therefore be regularly reviewed to ensure that training will be delivered where necessary to meet immediate needs and fill knowledge gaps.

3 Delivery of Training

3.1 Training resources

Consideration will be given to various training resources available in delivering training to Members or Officers in order to achieve efficiencies. For Members and Officers these may include but are not restricted to:

Board Members	Officers
The Pensions Regulator's Public Service Toolkit	The Pensions Regulator's Public Service Toolkit
Hyman Roberson's updated (Oct 23) online Learning Academy (LOLA)	Hyman Roberson's updated (Oct 23) online Learning Academy (LOLA)
Conferences, seminars, and webinars	Conferences, seminars, and webinars
External training	Training for qualifications from recognised professional bodies (e.g. CIPFA, CIPP, PMI)
Internally developed training days and pre/post Board sessions	Desktop / work based training
Regular updates from officers and/or advisers	In-house / Internally developed sessions
In-house / Internally developed sessions	Pensions publications

The Pensions Regulator's Public Service Trustee Toolkit	The Pensions Regulator's Public Service Trustee Toolkit
The Pensions Regulator's Trustee Toolkit	The Pensions Regulator's Trustee Toolkit

3.2 Training Plans

Pension Board Members will be asked to complete annually a questionnaire of Board effectiveness and training needs. Based on their responses individual trainings plans will be produced each year for Board Member. These plans will form part of the training agenda item at Board meetings and updates provided to the Board how Members are achieving against training plans.

Induction Training will be provided for all new Officers and Members. This will involve an overview of the LGPS and WYPF, will cover the requirements of the Training Strategy alongside guidance and information on the requirements of their roles and the expectation to complete regular online training in addition to Board meetings and Board training. It is expected the initial Induction, which would include completion of TPR's Public Sector Toolkit Training for Members could involve approximately the equivalent of 3 hours training on a one-to-one basis, albeit this would be spread over a several days and sessions.

Newly appointed Board, JAG and IAP members will also be encouraged to complete the LGA Fundamentals training programme.

3.3 External Events

A log of potential external events attended will be maintained by the WYPF Officer responsible for Fund governance and will demonstrate necessary knowledge and skills training. This will be updated as information on events becomes available and will be provided at Pension Board meetings.

After attendance at an external event, Members will be required to complete a training evaluation form and provide verbal feedback at the following Pension Board meeting covering the following points:

- Their view on the value of the event and the merit, if any, of attendance
- A summary of the key learning points gained from attending the event; and
- Recommendations of any subject matters at the event in relation to which training would be beneficial to other Pension Board members

Officers attending external events will be required to complete a training evaluation form to give feedback on the training attended which they will discuss with their manager.

Conferences

Conference	Dates
LGPS Governance Conference	19-20 Jan 2024 - York
PLSA Investment Conference	27 – 28 Feb 2024 (Edinburgh)
LGC Investment Conference	14 - 15 March 2024 (Cheshire)
CIPFA Annual Local Pension Board Conference	18 May 2024 (Birmingham)
PLSA Local Authority Conference	11 - 13 June 2023 (Gloucestershire)
LAPF Strategic Investment Forum	1 - 3 July 2022 (Hertfordshire)
LGC Investment & Pensions Summit	September 2024 (Birmingham)
PLSA Annual Conference	15 - 17 October 2023 (Liverpool)
LGPS Governance Conference	39 – 31 Jan 2025 - Bournemouth
LAPFF Annual Conference	TBC
The Local Authority Responsible Investment Seminar	TBC

4 Continuing development

4.1 Maintaining knowledge

In addition to undertaking an on-going assessment in order to measure knowledge and skills against requirements of the Pension Act 2013 and identify knowledge gaps, Officers and Members are expected to maintain their knowledge of on-going developments and issues through attendance at external events and seminars.

Appropriate attendance at events for representatives of the Pension Board and (if appropriate JAG and IAP) will be approved by the Assistant Director (Finance, Finance, Administration and Governance). Appropriate attendance at events for Officers will be agreed through the normal training application process.

A list of future events and seminars will be presented at each Pension Board meeting.

Owing to the changing world of pensions, it will also be necessary to have ad hoc training on emerging issues or on a specific subject on which scrutiny is required by the Pension Board.

5 Training records

5.1 Progress and achievement

Progress and achievement will be recorded by the Fund collectively for the Board and individually for all Board Members and to meet expectations of TPR will be brought to each Board meeting. These will detail:

- The current assessment of an individual's knowledge
- Their attendance at internal/external training or events; and
- All training courses completed (online) and events attended by them to date

These plans will be regularly updated as required taking account of the changes to scheme regulation and overarching pension legislation.

5.2 Training Resource and Material

Training resource and material will include but will not be restricted to:

- TPR Public Sector Toolkit
- LGA Fundamentals Training
- Learning Academy
- CIPFA Skills & Knowledge Framework
- TPR Code of Practice 14
- SAB Good Governance Reports
- LGPS Regulations 2013
- Public Service Pensions Act 2013
- WYPF policy, process, and discretion
- TPR Regulators Trustee Toolkit

March 2024

Pension Board Training Record 2023/24

	PB Attendance	TPR Toolkit (7 modules)	TPR Toolkit (Scams module)	LOLA (6 modules)	In Board Training	Fundamentals LGA Training	Conferences	National Knowledge Assessment	Valuation Training
Employer Reps									
Cllr Lal	4		•		3	•	LGA Governance	•	•
Cllr Martin Left 30/11/23		•	•	2 modules				•	•
Cllr Pickersgill (joined June 2023)	2	•	•		2		LGA Governance		
David Butcher (joined June 2023)	2		•		2				
Member Reps									
Mick Binks	3	•	•	•	3			•	•
Phillip Charlton	4	•	•	•	3	•			•
Isaac Dziya	2		•		1		CIPFA, LGC, PLSA, LAPFF		
Mark Morris Left 31/12/23	4		•		3				

Training	Board
CARE revaluation	March 2023
No training	July 2023
No training	September 2023
WYPF Investments & Funding Employer Roles & Responsibilities	December 2023

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Pension Board Member Assessment of Board Effectiveness

Pension Board Member:

Board Effectiveness	Strongly Agree	Agree	Unsure	Disagree	Strongly Disagree
All board members have a clear understanding of their role and responsibilities					
Our pension board has the relevant skills to manage and scrutinise WYPF and is committed to continual development					
WYPF regularly reviews business strategy and monitor progress against objectives					
We meet as frequently as we need to in order to meet the statutory requirements of the pension board					
Board papers are timely, relevant, and focused on relevant topics					
Meeting minutes are accurate and record decisions made and actions agreed					
We are fully briefed on the agenda of meetings and prepared to discuss each item					
We have effective processes for the employer to provide information to the scheme					
We maintain and regularly review a risk register to formally log risks, evaluation of likelihood and impact, and steps taken to manage or mitigate them					
We regularly review our schemes exposure to new and existing risks					
We maintain a documented process for managing conflicts of interest including a register of interests					
All conflicts of the board members are declared					
We have a diverse membership on our board which includes different backgrounds, experience, skills, and demographics					
Our board has effective leadership					
Discussions are facilitated to allow all to contribute in order to seek opinion and develop ideas					
We actively listen without ulterior motive or judgement and respond appropriately					
We work collaboratively to develop good working relationships					
We communicate clearly and openly to ensure understanding					

We are able to have difficult conversations and challenge each other constructively					
We are not afraid to ask the obvious or simple questions to ensure collective understanding					
We are aware of our own strengths and weaknesses and undertake continual learning and development					
We are motivated and devote time and effort to our duties and responsibilities as board members					
We understand and are each committed to the objectives of WYPF					
We act with transparency and integrity, declaring and managing any personal conflicts of interest					
We maintain and regularly review our process for training new board members within 6 months					
We have access to appropriate learning and development resources to ensure our knowledge and understanding is maintained					
We have access to training which is linked to the LGPS regulations and statutory requirements					
All board members have completed the Trustee Public Service toolkit or equivalent training					
We regularly assess our knowledge and understanding to inform our individual learning and development plans					
Skills gaps are identified and appropriately managed through training					

lgps

WYPF: Pension Board learning needs analysis

Pension Board Member:

Step 1 – Plan your learning

Learning needs analysis

Personal development

1 – My role, responsibilities, and duties as a pension board member

Do I know...?	Rate my skills 1 – no knowledge 5 – highly skilled	My objectives	Timescale	What learning am I planning to do?	Where to find information
Who The Pensions Regulator is What is my role, responsibilities and duties How the regulator's code of practice will support me in assisting the scheme manager with running an effective and efficient scheme	1 2 3 4 5 1 2 3 4 5 1 2 3 4 5				Introduction to public service pension schemes: www.tpr.gov.uk/PS-introduction

2 – The knowledge and understanding I need as a pension board member

Do I know...?	Rate my skills	My objectives	Timescale	What learning am I planning to do?	Where to find information
What I need to know about the LGPS as a pension board member What I need to know about pensions law as a pension board member How to plan, follow and record my training, knowledge and understanding	1 2 3 4 5 1 2 3 4 5 1 2 3 4 5				Knowledge and understanding duty on pension board members: www.tpr.gov.uk/PS-knowledge

3 – Conflicts of interest					
Do I know...?	Rate my skills	My objectives	Timescale	What learning am I planning to do?	Where to find information
What information I need to provide WYPF	1 2 3 4 5				'Conflicts of interest' course in the Public Service toolkit: www.pensionseducationportal.com
How to disclose potential or actual conflicts of interest	1 2 3 4 5				
How to monitor and discuss the risk of potential or actual conflicts of interest	1 2 3 4 5				
4 – Publishing scheme information					
Do I know...?	Rate my skills	My objectives	Timescale	What learning am I planning to do?	Where to find information
What information needs to be published about the pension board	1 2 3 4 5				Publishing scheme information: www.tpr.gov.uk/PS-publishing
How that information is to be recorded and published	1 2 3 4 5				
What the pension board's role is regarding the publication of that information	1 2 3 4 5				
5 – Risk management and internal controls					
Do I know...?	Rate my skills	My objectives	Timescale	What learning am I planning to do?	Where to find information
How risks will be identified and assessed	1 2 3 4 5				'Managing risk and internal controls' course in the Public Service toolkit: www.pensionseducationportal.com
How internal controls will be set up	1 2 3 4 5				
How risk assessments will be documented	1 2 3 4 5				
How possible fraudulent activity will be identified and dealt with	1 2 3 4 5				
Who is involved in internal controls and risk management and their role	1 2 3 4 5				

What the pension board's role is in internal controls and risk management	1 2 3 4 5				
6 – Record-keeping					
Do I know...?	Rate my skills	My objectives	Timescale	What learning am I planning to do?	Where to find information
How an effective scheme record-keeping process will be set up	1 2 3 4 5				'Maintaining accurate member data' course in the Public Service toolkit: www.pensionseducationportal.com
How the required records of scheme members' data, transactions and pension board decisions will be kept	1 2 3 4 5				
Who is involved in record-keeping and their role	1 2 3 4 5				
7 – Maintaining contributions					
Do I know...?	Rate my skills	My objectives	Timescale	What learning am I planning to do?	Where to find information
How employer and employee payment contributions will be monitored and recorded	1 2 3 4 5				'Maintaining member contributions' course in the Public Service toolkit: www.pensionseducationportal.com
How late or failed payments which are likely to be of material significance to the regulator will be reported to the regulator	1 2 3 4 5				
8 – Communicating with members					
Do I know...?	Rate my skills	My objectives	Timescale	What learning am I planning to do?	Where to find information
What information must be provided to	1 2 3 4 5				'Providing information to members

members about the administration of the scheme and their benefits How that information will be provided to members Who is involved in member communications What the pension board's role is in member communications	1 2 3 4 5 1 2 3 4 5 1 2 3 4 5				and others' course in the Public Service toolkit: www.pensionseducationportal.com
9 – Resolving disputes					
Do I know...?	Rate my skills	My objectives	Timescale	What learning am I planning to do?	Where to find information
How disputes within WYPF will be resolved How disputes within LGPS and their resolutions will be documented What happens if disputes cannot be resolved	1 2 3 4 5 1 2 3 4 5 1 2 3 4 5				'Resolving internal disputes' course in the Public Service toolkit: www.pensionseducationportal.com

Step 2 – Complete the learning

Monthly study plan

	Monday	Tuesday	Wednesday	Thursday	Friday	Weekend
Month 1						
Month 2						
Month 3						
Month 4						
Month 5						
Month 6						
Month 7						
Month 8						
Month 9						
Month 10						
Month 11						
Month 12						

SAMPLE

Step 3 – Record the learning	Step 4 – Reflect on the learning		
	Event review		
What did I do? Course/event/activity Date, location and provider Learning objectives Content summary/programme Any qualification/mark I achieved	How did it go? What happened? Have I learnt what I hoped to learn from my training?	How have my knowledge, skills and mindsets been improved? What have I actually gained from this event? What do I know at the end of this event that I didn't know at the beginning? How have I benefited from the experience?	How will I be able to bring what I have learned into my work? How will the organisation benefit? Any feedback received – what do other people say [scheme manager, peers, etc]?

Step 4 – Reflect on the learning

Periodic review

Review Have I achieved my development plan for this period? Have I completed the training I identified?	The positives What type of development has delivered the greatest benefit? What and why was this?	The negatives What type of development has delivered the least benefit? What went wrong? How can I ensure this does not happen next time?	Next steps What development needs do I still feel I have? What are my priorities and deadlines for future development? What should I look to include in my next development planning cycle?



West Yorkshire Pension Fund

SAMPLE



Report of the Managing Director - West Yorkshire Pension Fund to the meeting of the West Yorkshire Pension Fund Pension Board to be held on 20 March 2024.

AS

Subject:

Business Plan 2024 - 2029

Summary statement:

WYPF's five year business plan highlights objectives for the Fund and documents the priorities and improvements to be implemented to help achieve those objectives.

EQUALITY & DIVERSITY:

Issues of Equality and Diversity are included within the body of the document in Appendix A.

Euan Miller
Managing Director

Portfolio:

Report Contact: Yunus Gajra
Assistant Director (Finance,
Administration and Governance)
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Overview & Scrutiny Area:

1.0 Background

Purpose

- 1.1 WYPF's five-year business plan for the period 2024-2029 outlines the Fund's goals and objectives. The business plan will be formally reviewed and agreed every year by JAG/IAP at their January meetings. It will also be monitored during the year and updated as required.
- 1.2 The purpose of this business plan is to:
 - explain the objectives for the management of the WYPF
 - document the initiatives to be implemented by WYPF during the next five years to help achieve those objectives
 - enable progress and performance to be monitored in relation to those initiatives; and
 - provide WYPF stakeholders with a clear vision of the Fund's objectives and how it will achieve those objectives.

2.0 Business Plan 2024 – 2029

- 2.1 The Business Plan is effectively split into two parts. The first part sets out WYPF's strategic objectives and business as usual activities. This part is likely to see only relatively minor changes from year to year. The second part sets out in detail each of the initiatives that feature in the Business Plan and anticipated timescales.
- 2.2 There are some relatively significant changes to the initiatives listed on the Business Plan since the last review. Some items previously on the Plan have been completed or have become business as usual. There are also some new items. An attempt has been made to reduce the number of items on the Plan and this has been achieved by amalgamating some similar items and focussing on high-level deliverables.
- 2.3 Items which have been moved to BAU include the following:
 - Pension Transfer Scams - All members of the Pensions Board and staff working on Transfers have completed their training which has enabled WYPF to sign up to TPR's Pension Scam pledge. The PB now has a new member so he will be asked to complete this training as soon as possible.
 - Data Improvement Plans – A DIP is now in place highlighting data issues and the target dates for rectifying them.
- 2.4 New initiatives added to the Business Plan include
 - **G8 - Launch and develop new WYPF website** - WYPF's current website has been in place for a number of years and needs to be upgraded. We have

developed a member first website which has been tested with 350 members and some WYPF contact centre staff. During Spring 2024 we are looking to put this new website live.

- **G9 - Improve stakeholder engagement** - Whilst it is difficult to measure, indications are that particular areas in which engagement could be improved include how we engage some groups of employers (for example increasing attendance at the Employer AGM) and how we communicate positive developments, for example in relation to responsible investment, to members, employers and the wider public.
- **F2 - Local and impact investment** - There are a number of drivers for WYPF to invest more in place-based investments in the West Yorkshire area as well as the UK more broadly. Investments must meet the twin aims of delivering a positive local impact and generating an appropriate return for WYPF given the risks involved.
- **F6- Investment administration** - investment administration has become more complex given the addition of asset classes, including private markets, and therefore the capacity for investment administration to support investment management efficiently is potentially under strain. A review of whether further delegation to our custodian and/or any order management system might be needed is proposed.
- **F7 - Investment compliance** - WYPF does not currently have a dedicated compliance function given that its investors (its c450 employers and c.300k members) are in a different position to investors in funds managed by an external manager. However, WYPF does have to play its part in ensuring markets are operating appropriately and WYPF seeks to follow best practice wherever possible. A review of what that should mean for WYPF, is merited and may include recommending centralising compliance controls within a small internal Legal & Compliance team.
- **A10 - Further develop key performance indicators** - Work with shared service administration partners to further develop key performance indicators. This improvement in Management Information should ultimately result in a more efficient administration service.
- **A11 - Administration shared service** - Work with the shared service partners to carry out a strategic review of the shared service arrangements to ensure partners' and WYPF's interests are aligned and risks to WYPF of hosting the service are appropriately managed. One of the matters to consider is whether the shared service would benefit from a 'brand', in a similar manner to several other LGPS shared service arrangements (Local Pensions Partnership, Peninsula Pensions etc...)

2.5 Progress against some of the initiatives retained on the Plan include:

- **G1 – Review of Governance arrangements** – Muse Advisory has undertaken the field work part of its review. A separate paper will give an update on the work undertaken to date.

- **G2 - Review Knowledge and Skills policy/delivery** – Hymans online training has been relaunched with an expectation for all members to undertake and complete by the end of the financial year.
- **G7 – Enhance cybersecurity** – A cyber exercise was undertaken towards the end of 2023 in conjunction with Bradford Council’s IT, WYPF, LGA. Learnings from this will be implemented.
- **A1 - Implement McCloud / Sargeant / Matthews remedies.** Final regulations have now been received for McCloud and Sargeant and work is ongoing to implement.
- **A2 - Implement employer self-service on-line functionality to all employers.** In progress. Significant work has gone into phase 3 development of the monthly postings software. This has now passed a series of penetration tests and has been implemented in live for a number of pilot Employers. A gradual rollout to the remaining Employers will follow.
- **A7 - Oracle transition to SQL.** Work has commenced on this progress. Currently testing processing monthly payroll on SQL.
- **A8 - GMP Reconciliation and Equalisation** - The systematic GMP Reconciliation work has now been completed. There are around 1,000 records that will need looking at to see if rectification is required.

3. OTHER CONSIDERATIONS

- None

4. FINANCIAL & RESOURCE APPRAISAL

- Financial requirements are detailed within the body of the appendix documents.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

- Risks are detailed within the body of the appendix document.

6. LEGAL APPRAISAL

- Not applicable.

7. OTHER IMPLICATIONS

7.1 SUSTAINABILITY IMPLICATIONS

- None

7.2 GREENHOUSE GAS EMISSIONS IMPACTS

- None

7.3 COMMUNITY SAFETY IMPLICATIONS

- None

7.4 HUMAN RIGHTS ACT

- None.

7.5 TRADE UNION

- None

8. NOT FOR PUBLICATION DOCUMENTS

- None

9. OPTIONS

- None.

10. RECOMMENDATIONS

It is recommended that the Board notes the Business Plan 2024 – 29, the progress on existing key initiatives and the new initiatives listed.

11. APPENDICES

Appendix A – Business Plan 2024 – 2029 (Key Tasks and Actions)

12. BACKGROUND DOCUMENTS

- None

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Appendix A - Business plan key tasks and actions

Information relating to key priorities

Work set out below will be included in the relevant budgets for those years.

Governance and communications key priorities

Key Action/Task	2024/25	2025/26	2026/27	2027/28	2028/29
G1. Review of governance arrangements	✓				
G2. Review Knowledge and Skills policy/delivery	✓				
G3. Review against new TPR Single Modular Code	✓				
G4. Review/development of risk register	✓				
G5. Business Continuity	✓	✓	✓	✓	✓
G6. Diversity, equality and Inclusion	✓	✓	✓	✓	✓
G7. Enhance cybersecurity	✓	✓	✓	✓	✓
G8. Launch and develop new WYPF website	✓	✓			
G9. Improve stakeholder engagement	✓				
G10. Procurement/Tenders	✓	✓	✓	✓	✓
G11. Succession Planning	✓	✓	✓	✓	✓

G1. Review of Governance arrangements

2024/25	2025/26	2026/27	2027/28	2028/29
✓				
<p>A WYPF governance review commenced during 2023 using external specialist support. Initial observations are due to be presented to JAG, IAP and Pension Board members in early 2024.</p> <p>It has been recognised previously that the WYPF committee structure, terms of reference and schemes of delegations all need to be reviewed and clearly defined.</p> <p>The revised Governance arrangements will seek to align with the recommendations of the LGPS Scheme Advisory Board's Good Governance project, albeit this has yet to be put into Regulations and guidance by DLUHC.</p> <p>The Pension Regulator's codes of practice and recommendations from its regulatory supervision process will also be factored in.</p> <p>It is expected that these tasks can be managed out of the existing budget</p>				

G2. Review knowledge and skills policy/delivery

2024/25	2025/26	2026/27	2027/28	2028/29
✓				
<p>The current training policy will be reviewed and updated to be in line with the new CIPFA framework and Code.</p> <p>Those involved in managing WYPF will undergo a knowledge and skills assessment based on the CIPFA competencies to inform training plans for future years – this will include who has done what training, including any skills training.</p> <p>The policy relating to Pension Board members (who have legal requirements in relation to obtaining the required knowledge) will be extended to JAG and IAP members – in anticipation of new requirements in this area expected from the Good Governance review.</p> <p>New members to JAG, IAP or Pensions Board will need to be “onboarded” and provided with sufficient training and access to required information. WYPF is aware of the requirement in TPR’s draft new code of practice that new members undertake required training to carry out the role as soon as possible and within 6 months of appointment.</p> <p>It is expected that these tasks can be managed out of existing budget and with no additional resource requirement.</p>				

G3. Review against the Pensions Regulator's new Single Code of Practice

2024/25	2025/26	2026/27	2027/28	2028/29
✓				
<p>The Pensions Regulator's (TPR) new General Code was laid in parliament 10th January 2024 and comes into effect on 27th March 2024.</p> <p>It aims to improve pension scheme governance, consolidating ten of the regulator's existing codes and updating them but also introducing some new requirements. This will result in some changes placed on the Fund for example, maintenance of IT systems and further areas of governance.</p> <p>Work is underway to review whether the Fund complies with the requirements within the new Code. After the initial review, ongoing compliance checks will be carried out on a regular basis.</p> <p>Additional resource/budget may be required but the initial intention is to carry out the review internally and seek external assurance.</p>				

G4. Review / development of Risk Register

2024/25	2025/26	2026/27	2027/28	2028/29
✓				
<p>The risk register will be reviewed to try and make it more concise and user-friendly for JAG, IAP and Pension Board members.</p> <p>The review will consider the following possible developments:</p> <ul style="list-style-type: none"> • A 'top-down' approach focussing on the Fund's primary objectives and the risks that could lead to these not being achieved • Better alignment of the risk register with the Business Plan • Seeking to quantify the impact of the risk mitigations in place <p>No additional resource or budget required.</p>				

G5. Business Continuity

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓	✓	✓	✓
<p>The Pension Regulator’s General Code of Practice, outlines “Governing bodies should develop and implement continuity plans to ensure that their scheme operations can be maintained, in the event of a disruption to scheme activities.”</p> <p>A new Business Continuity Plan was created in 2023 and was signed off by parties in WYPF and Bradford Council. During 2023 a new back up solution of last resort was implemented, an external cold site solution with ability to host up to 250 staff brought in and WYPF ran its operation from its secondary technology site for a week to test resilience. Again, in 2023 we brought back a secondary source of power supply for our main building.</p> <p>WYPF will continue to maintain, dynamically adapt and add to the Business Continuity plan in real time throughout the year, with a formal review of the plan being made annually.</p>				

G6. Diversity, Equity and Inclusion

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓	✓	✓	✓
<p>Review engagement with stakeholders, communications, approach to recruitment and feedback from WYPF officers and committee members to ensure sufficient attention is given to diversity and inclusion.</p> <p>Ensure DE&I appropriately considered as part of review of the communication policy and reflected in all media, including the Fund’s website.</p> <p>Initially this is expected to be managed within the existing team and with no additional budget.</p>				

G7. Enhance Cyber Security

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓	✓	✓	✓
<p>The Pension Regulator's General Code of Practice, outlines "Cyber security measures and procedures should be in place and functioning."</p> <p>WYPF and City of Bradford Metropolitan District Council undertook a mock ransomware attack simulation in 2023 to practice responses to a number of recent cyber hacks whilst being externally observed and evaluated. The simulations were highly successful. WYPF and Bradford Council are documenting each organisation's respective roles in a cyber incident.</p> <p>WYPF are undertaking further mock cyber simulations during 2024.</p> <p>In 2022 WYPF updated and upgraded its technology stack which has greatly strengthen its cyber resilience. Three further improvements are due in 2024, 2025 and 2026.</p> <p>Pensions Dashboards will identify significant amounts of money over the internet for the first time. The Pensions Dashboard Programme have identified the cyber security arrangements for all pensions providers to adopt and these will be externally audited prior to live operation.</p> <p>WYPF will also need to consider how the required assurance in relation to cyber risk can be provided to other funds/schemes to which we provide shared service administration whilst maintaining appropriate security around its actual operation.</p> <p>We also note that Regulator recognises that funds may need to access specialist advice in some areas e.g. forensic investigators. This type of specialist activity will require budget.</p> <p>Our budget includes an allowance of £50k per annum in the short term to improve our cyber resilience. We will also add resource of suitable seniority to take ownership of our cyber related activities.</p> <p>WYPF is signed up to both the UK and US daily cyber and malware alerts.</p>				

G8. Launch and develop new WYPF website

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓			
<p>WYPF's current website has been in place for a number of years and needs to be upgraded. Over the past 12 months WYPF has run member focus groups to establish members' views on the current website, their wants and needs from the new website, and developed an online panel of circa 3,000 members where we can test concepts and content.</p> <p>We have developed a member first website which has been tested with 350 members and some WYPF contact centre staff. The new website does have a discreet corporate area that shows WYPF's third party services.</p> <p>During Spring 2024 we are looking to put this new website live.</p> <p>It is not anticipated that any further resource or budget will be required.</p>				

G9. Improve stakeholder engagement

2024/25	2025/26	2026/27	2027/28	2028/29
✓				
<p>Improved stakeholder engagement can benefit WYPF in a number of ways, including:</p> <ul style="list-style-type: none"> raising scheme members' awareness of their pension benefits; a higher proportion of employers carrying out the employer role to a satisfactory standard; making it easier to recruit high quality team members; increasing opportunity for collaborative working with others; greater levels of feedback being received allowing for further improvements to WYPF service. <p>Whilst it is difficult to measure, indications are that particular areas in which engagement could be improved include how we engage some groups of employers (for example increasing attendance at the Employer AGM) and how we communicate positive developments relating to responsible investment to members, employers and the wider public.</p> <p>We will explore different communication methods with employers to increase awareness and employers' understanding of the Fund's aims and requirements.</p> <p>We will look to enhance the content of the responsible investment section of the WYPF website, be more proactive in announcing positive news in relation to responsible investment activity and will explore ways of presenting the WYPF investment portfolio to better highlight the significant levels of 'green' investment such as renewable energy infrastructure.</p> <p>It is not expected that this work will require additional resource requirements or budget for external support.</p>				

G10. Procurement/Tenders

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓	✓	✓	✓
<p>Several contracts are due to be retendered in the next 5 years covered by the business plan.</p> <ul style="list-style-type: none"> A list of these is provided in the previous section (Business Plan key priorities) The procurement process will be managed within internal teams and with support from Bradford Council and no additional resource or budget is required to be set aside for these exercises. 				

G11. Succession planning

2024/25

2025/26

2026/27

2027/28

2028/29

✓

✓

✓

✓

✓

There are a number of key individuals in the WYPF Management Team who will be retiring in the next five years, in both the investment, and member services teams.

A comprehensive plan for the recruitment of new individuals and/ or providing sufficient mentoring, training and shadowing to those individuals who will take on the roles will be needed to avoid the consequences of the loss of the significant levels of experience and knowledge of those individuals.

This should not involve any additional budget or resource, but to recruit and/or develop for the required roles may incur some additional costs, so this will be kept under review.

Funding and investment key priorities

Key Action/Task	2024/25	2025/26	2026/27	2027/28	2028/29
F1. Investment Strategy review / implementation	✓	✓			
F2. Local and impact investment	✓	✓	✓	✓	✓
F3. Developing Northern LGPS Pool	✓	✓	✓	✓	✓
F4. Develop improved cash flow monitoring	✓	✓			
F5. Investment governance best practice	✓	✓			
F6. Investment administration	✓	✓			
F7. Investment compliance	✓	✓	✓		
F8. Responsible Investment, TCFD Reporting and achieving Net Zero	✓	✓	✓	✓	✓
F9. Review requirements for cost transparency collation/reporting	✓	✓			
F10. 2025 actuarial valuation and review of funding strategy	✓	✓			

F1. Investment Strategy review / implementation

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓			
<p>The Strategic Asset Allocation (SAA) review took place in Q2 2023 following the completion of 2022 actuarial valuation in Q1 2023. The main parts of an updated SAA benchmark were agreed at the IAP in July 2023 and this will be incorporated into an updated Investment Strategy Statement (ISS), which will be consulted on with stakeholders in early 2024. Impacts on requirements for investment office organisation flow from SAA Review.</p> <p>The Review included a meaningful reduction in the proportion of UK listed equities in the SAA benchmark and this has consequential effects on portfolio construction and team resourcing, both of which are underway.</p> <p>The Review also included a larger allocation in the benchmark to a new and wider Alternatives programme, to include opportunities in the UK with impact and levelling up effects, as well as climate transition solutions. Some of these opportunities will be privately originated and/or negotiated, and this will necessitate increasing the number of officers focussing on these areas. This has been allowed for in the budget and recruitment is underway.</p>				

F2. Local and impact investment

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓	✓	✓	✓
<p>There are a number of drivers for WYPF to invest more in place-based investments in the West Yorkshire area as well as the UK more broadly.</p> <p>(a) Strategic Asset Allocation review in Q2/Q3 2023 and Investment Beliefs review in Q423 supporting the view that there is an opportunity within a well-diversified Total Fund to support the 'levelling-up' agenda. This also aligns with the recent DLUHC consultation that encourages LGPS funds to do more in this space. These local investments could include, for example; investment in sustainable and affordable transport, funding the building of affordable and energy efficient homes, and investment in climate solutions.</p> <p>(b) Many of the opportunities in this space will be private rather than public in nature and will involve greater liaison with relevant entities, including e.g West Yorkshire Combined Authority, British Business Bank and UK Infrastructure Bank. Given the reduction in UK listed equity allocations, capital can be recycled into UK private market opportunities.</p> <p>Investments must meet the twin aims of delivering a positive local impact and generating an appropriate return for WYPF given the risks involved.</p> <p>These investments are often relatively resource intensive and additional officers and specialist advice will be required. However, it is envisaged that many of these investments would be made in conjunction with Northern LGPS Pooling partners, who have considerable experience and resource in this field, which will help reduce cost and risk.</p>				

F3. Developing Northern LGPS Pool

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓	✓	✓	✓

DLUHC consulted during 2013 on proposed changes to the LGPS Investment Regulations and guidance. Several of the proposals were intended to speed up the progress of pooling of assets across the LGPS in England and Wales.

WYPF will be working with our partners in the Northern LGPS Pool to consider regulation changes and associated guidance (when released) and to create a Pool Business Plan summarising the intended development of the Northern LGPS Pool. At the time of writing it is not expected that there will need to be significant levels of additional resource or budget to deliver this.

F4. Develop improved cash flow modelling

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓			

Over time, the Fund's investment programme has become a little less concentrated in regular dividend-paying stocks and a little more concentrated in private market and alternative opportunities, with more lumpy and non-contractual cashflows. The changes being made to investment strategy following 2023 review reinforce this trend. Whilst this is acceptable given we remain Total Return focused for now, it is essential to assess the longer term impacts of any maturing of the liabilities of the Fund.

A review of how cashflows (pension contributions, pension payments, and asset related cashflows) are forecast and monitored, and available for regular management review and oversight, should be carried out to ensure this is clear and robust, and is integrated into day to day management of the Fund. As part of this, we will also look for an updated projection of expected future benefit payments to be provided by the Actuary following the 2022 valuation.

This review is expected to be carried out within the existing teams and without the need for additional budget or resources. The cost of any additional support from the Actuary will depend on our precise needs but is expected to be of the order of £3K-£10K.

F5. Investment governance best practice

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓			

The Regulator’s new Code of Practice has a number of best practice modules which public sector schemes such as the LGPS are encouraged to follow. This includes a module on Investment monitoring. It is expected that WYPF is already compliant with the majority of the recommendations but a review against the Regulator’s suggestions will be carried out.

The review of compliance will consider content within the following best practice investment - related modules:

- Investment governance
- Investment monitoring
- Climate change
- Investment Strategy Statement

The “best practice” compliance review will be carried out by the existing investment team – no additional resource or budget required.

F6. Investment administration

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓			

The investment administration function plays an important part both in (a) supporting day-to-day investment management activities, as well as (b) supporting the overall governance of the Fund.

In relation to (a), investment administration has become more complex given the addition of asset classes, including private markets, and therefore the capacity for investment administration to support investment management efficiently is potentially under strain. There have been moves towards easing the burden here in 2023, including looking to delegate more activities to our custodian, but there may be further headwinds ahead, including the introduction of T+1 settlement for equities and bonds in the US at end of May 2024.

A review of whether further delegation to our custodian and/or any order management system might be needed is important. This will be done from existing resources.

F7. Investment compliance				
2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓	✓		
<p>A compliance function within a traditional asset manager would ensure that the business adheres to (a) external rules including to protect investors and ensure that markets are fair, efficient and transparent and (b) internal controls. WYPF does not currently have a dedicated compliance function given that its investors (its c450 employers and c.300k members) are in a different position to investors in for example an open-ended mutual fund managed by an external manager. However, WYPF does have to play its part in ensuring markets are operating appropriately and as stated in the ISS, WYPF seeks to follow best practice wherever possible.</p> <p>A review of what that should mean for WYPF, is merited and may include recommending centralising compliance controls within a small internal Legal & Compliance team. This can be done from existing resources.</p>				

F8. Responsible Investment, TCFD Reporting and achieving Net Zero				
2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓	✓	✓	✓
<p>Responsible Investment</p> <p>Through its Investment Strategy Statement, WYPF has made a public pledge to integrate Environmental, Social and Governance considerations into its investment decisions. The Fund is also a signatory to the Stewardship code reflecting its ambition to be an active, engaged, and responsible investor.</p> <p>We recognise that Responsible Investment protocols and guidelines are evolving rapidly and commit to review our approach regularly and to adopt and integrate best practise wherever possible. We closely monitor the approaches of other LGPS and Pools, the LGPS Scheme Advisory Board and its Responsible Investment sub-committee, regulatory bodies and other pertinent organisations.</p> <p>We believe that our corporate engagements are most effective when conducted in collaboration with other like-minded investors. We will continue seek out such partnerships to maximise our engagement influence.</p> <p>We will report on our Responsible Investment approaches and outcomes in our annual Stewardship Report and aim to introduce a ESG scorecard to provide a relatively simple snapshot of progress.</p> <p>Climate</p> <p>We have recognised that climate change is the single greatest ESG challenge facing the Fund. In January 2022 the Fund prepared a TCFD statement explaining how we identify, measure and mitigate climate change risk. We intend to update this document on a bi-annual basis to report on the progress that the Fund has made. Any update will incorporate the pending recommendations and guidance expected from DLUHC following their Autumn 2022 consultation.</p> <p>Achieving net zero</p> <p>In conjunction with our partners in the Northern LGPS Pool; in March 2021 WYPF made a Paris Aligned net zero commitment to decarbonise the fund by 2050. We will review the progress made toward this commitment in our next TCFD statement.</p> <p>WYPF will be reviewing its engagement with the oil and gas sector during 2024 and is seeking to commission some external specialist support for this work. This has been allowed for in the budget.</p>				

F9. Review requirements for cost transparency collation/reporting

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓			

WYPF is not FCA regulated but is looking to broadly follow the requirements of MiFID II and the SAB Code of Transparency and new standardised disclosure templates. The information and data provided should be ‘fair, clear and not misleading’. We have investment management costs as well as related execution costs.

Investment management costs

The challenge arises for WYPF from the fact that c.75% of the assets are managed directly in-house with costs clearly able to be identified and included in the official accounts. Of the remaining 25% of assets that are managed through funds and/or other private vehicles, it is not as straightforward to establish the look-through costs of engaging external managers. There is now an online system (Byhiras) put in place by SAB for submission of manager information, including a check against the MiFID II total cost. This works well for listed assets, where we already understand a majority of the costs. But not for private market assets. We have engaged our private market managers to submit ILPA cost templates for the money we have invested with them.

So in aggregate and on a look through basis, our investment management costs comprise:

- Direct listed assets (costs known and go through official WYPF accounts)
- Listed assets managed by external managers (WYPF has asked managers to submit on Byhiras)
- Private markets assets managed by external managers (WYPF has asked managers to submit their ILPA templates)

We are looking in 2024 to consolidate our understanding of all of the above costs through an external vendor CEM. If successful, this will allow Finance to consider what costs can be incorporated into official accounts and/or notes to the accounts, taking into account CIPFA guidance.

Execution costs

There are a number of other costs, including brokerage, research, FX and similar and whilst WYPF is not FCA regulated, we should review whether we are getting best execution, albeit we should recognise that sometimes these costs cannot easily be disentangled from the broader relationship added value of our suppliers. It is not currently expected that this work will result in additional budget requirements or resources.

F10. 2025 actuarial valuation and review of funding strategy

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓			

A formal actuarial valuation of the Fund detailing the solvency position and other financial metrics must be carried out as at 31st March 2025. It is a legal requirement of the LGPS Regulations. It determines the contribution rates payable by the employers to fund the cost of benefits and make good any existing shortfalls as set out in the Funding Strategy Statement.

This is considered in conjunction with the strength of covenant for each employer participating in the Fund. The deadline for completion of the work is 31 March 2026.

Reviews of the Funding Strategy Statement may also be required outside of the actuarial valuation cycle; for example in order to make changes to the methodology for calculating exit payments/credits when employers exit the fund, or to reflect regulatory changes.

As part of the actuarial valuation process IAP and JAG may wish to consider whether to create alternative investment strategies for certain employers or groups of employers, recognising the increasing divergence of employer funding targets and objectives.

Administration key priorities

Key Action/Task	2024/25	2025/26	2026/27	2027/28	2028/29
Administration					
A1. Implement McCloud / Sargeant / Matthew remedies	✓	✓			
A2. Implement employer self-service on-line functionality to all employers	✓	✓			
A3. Omni-channel member self-service	✓	✓	✓	✓	✓
A4. Trivial Commutation / small pots options exercise	✓	✓			
A5. Frozen refund clearance exercise	✓	✓			
A6. Automation and analytics	✓	✓	✓	✓	✓
A7. Oracle transition to SQL	✓	✓	✓		
A8. GMP Reconciliation & Equalisation	✓	✓	✓		
A9. Implement changes required for national pensions dashboards	✓	✓			
A10. Further develop key performance indicators	✓	✓	✓	✓	✓
A11. Administration shared service	✓	✓			

A1. Implement McCloud / Sargeant / Matthews remedies

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓			

Court of Appeal judgements (McCloud and Sargeant) in 2018 found that transitional provisions in the CARE schemes for Firefighters and Judges in April 2015 gave rise to unlawful age discrimination. This impacts the LGPS as the new CARE scheme from April 2014 included a statutory underpin for older members. Remedies have recently been issued by Government to remove the inequality in the schemes, which will result in changes to scheme benefits, some of which will be retrospective.

WYPF has established a project team for the LGPS funds we administer to identify the affected members so their benefits can be amended.

Changes for the Fire scheme are potentially more material given members are to be given the choice over what scheme will apply over the remedy period. In addition, a separate rectification exercise is also taking place (Matthews) relating to retained firefighters' eligibility to join the Scheme prior to 2006, which then interacts with the Sargeant remedy. A project team has been set up to manage the changes for the Fire authorities we administer.

These works areas have been allowed for in the 2024/25 budget (see Appendix B). A significant proportion of the spend is in relation to amendments to the pensions administration software. It is possible that spend against budget and the timing of spend may be materially different to projections due to the timing of release and implications of guidance and the timing of pensions administration software changes.

A2. Implement employer self-service on-line functionality to all employers

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓			

WYPF has been working on new on-line functionality for all employers participating in the Fund. This will ultimately require all employers to upload pension information on a monthly basis to the Fund's on-line employer self-service facility to ensure the Fund's pension records are up to date. As well as improving the integrity of the Fund's data, this will introduce increased efficiencies for all parties.

WYPF is in the process of moving to a new version of the software which can better manage online submission of forms as currently around half of the forms are still submitted outside of the online self service approach. The new system will include functionality which moves data straight from these systems onto member records without individual staff member intervention, reducing the risk of errors.

This project is in its latter stages so is expected to be completed in 2024

A3. Omni-channel member self-service

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓	✓	✓	✓

WYPF's online member self-service needs development to optimise the member experience and enable more functionality to be undertaken online, – for example on-line retirement, CETV calculations.

It is intended to bring the online system in house, allowing WYPF to be platform neutral i.e. it can implement the best in class software at any point or change suppliers without this affecting clients or scheme members. Development work has started and it is not expected that this work will require additional budget.

A4. Trivial commutation / small pots options exercise

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓			

Trivial commutation is where a member who is entitled to a small pension can elect to give up the entirety of that pension and instead receive their benefit as a single lump sum payment. A project will be carried out to identify any pensioners and dependants who may be eligible for trivial commutation and to offer it to them. This will reduce the administrative burden on the Fund paying a large number of very small pensions over a number of years as well as providing greater clarity from a funding perspective. The government has a limit for members to trivially commute their pension in relation to a single pension (£10,000 value – called a "small pot") and total benefits (£30,000 – called "trivial commutation").

As well as reducing the number of pensioner payments that require ongoing payment this could also reduce a fund's liabilities. It will also be welcomed by a number of pensioners who would prefer a one-off lump sum payment rather than ongoing smaller payments of little value.

This option is already offered to members at retirement but the shared service administration team will continue to carry out trivial commutation projects over the next 5 years. This will also involve a review of existing procedures to ensure that trivial commutation is offered in appropriate cases. No additional resource or budget will be required.

A5. Frozen refund clearance exercise

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓			

Members who leave the scheme without meeting the 'vesting period' (the minimum period to qualify for benefits) are only entitled to a refund of their own contributions. Since 1 April 2014 the regulations have required that this must be paid within five years of the member leaving the scheme, but before that many members did not claim their refunds in case they rejoined the scheme in the future and could then count that service.

This has meant that the Fund has built up a number of "frozen refunds" i.e. refunds that have not yet been claimed. WYPF has carried out a review of these cases and is in the process of paying as many as possible. This will help the Fund meet legal requirements that all benefits must be paid before the member's 75th birthday and will also reduce the Fund's liabilities.

This is being resourced through existing teams and with no additional budget required.

A6. Automation and Analytics

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓	✓	✓	✓

After initial positive results in relation to linking deferred benefit records, we will continue to deploy automation into both administration and finance processes in an agile way driving down the number of administration and finance tasks that need human intervention, alleviating cost and error. The simpler tasks will continue to be automated first, with a move up in complexity as we learn. In this way software will be released as early as possible in order to benefit the organisation as early as possible.

Data analytics will be used to further develop our advancing online and client Management Information needs.

A7. Transition from Oracle to SQL

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓	✓		

All Local Government Pensions Administration Software systems now run from SQL. WYPF's technology teams need to complete the task of converting our administration operation to SQL by Jan 2026. This is a significant piece of work and there will be implications for resourcing, reprogramming, training and licences as well as procurement etc .

Work has commenced to identify elements requiring conversion and whether this needs internal resource to build or can be passed to external developers. Conservatively 116 months development time is required to convert to SQL; this excludes conversion of client take on frameworks which would require a further 2 year re-development. areas have been identified and these are being progressed i.e. Payroll. Code developed in the UPM teams also requires conversation and is a further 8/10 months.

Additional resource/budget will be required but the intention is to carry out substantial part of the work internally,

A8. GMP reconciliation and equalisation

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓	✓		

GMP Reconciliation

Prior to the removal of “contracted-out” status in April 2016, pension schemes including the LGPS had to ensure the benefits they paid met a minimum level, one element of which was a Guaranteed Minimum Pension (GMP) figure that accrued individually for each scheme member up to April 1997. Following the end of contracting out HMRC is no longer maintaining GMP and other contracting out member records so individual pension schemes must ensure that the contracting out and GMP data they hold matches that held by HMRC.

The WYPF data has been extracted from HMRC ahead of the facility being discontinued and the number of cases that it will be required to look at has been identified. The high level stages to complete the project are as follows:

- Active members - Stage 1 (identify data mismatches)
- Active members - Stage 2 (finalise data reconciliation)
- Deferred and Pensioner reconciliation completion (all data reconciled)
- Stage 3 GMP Rectification

This reconciliation project will inevitably result in identifying some pensioners and dependents whose pension has been overpaid or underpaid (albeit some by very small amounts). Some of these under or overpayments will have been in place for several years and back payments made or collected in accordance with industry guidance. Stage 1 and 2 have been completed with work due to start on stage 3.

GMP Equalisation

The courts have determined that it is necessary to revisit pension benefits for members who accrued a GMP to ensure equal treatment between men and women. In March 2021 the Government confirmed that the solution for LGPS funds was to apply full indexation on all GMP (i.e. all pension) for those members who reached state pension age after 5 April 2016. This has been implemented by WYPF but we are likely to have to revisit transfers-out over a number of years to ensure the correct amount was paid in respect of the GMP element. It is not expected that this work will require additional staff or budget.

A9. Implement changes required for national pensions dashboards

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓			
<p>Pension dashboards are a Government initiative first announced in the Budget 2016 with the legal framework contained in the Pension Schemes Act 2021. The idea is to allow pension savers in the UK access to view the values of all of their pension pots, including the State Pension, through one central platform. Public service pension schemes are expected to connect to the dashboard ecosystem in September 2025 and we will need to ensure that WYPF and the other schemes we administer are ready for implementation. This is a significant piece of work which will have significant ongoing impacts for both administration and technology.</p> <p>WYPF has made good progress in this area to date with a procurement already completed for a Integrated Service Provider (ISP) to connect WYPF to the dashboard system's central digital architecture.</p> <p>Additional resource/budget will be required but the intention is to carry out substantial part of the work internally,</p>				

A10. Further develop key performance indicators

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓	✓	✓	✓
<p>The WYPF Administration Section currently sets performance targets for delivering 22 common administration tasks within a set timeframe and tabulates the number of outstanding and completed tasks. This provides a reasonable indication of the performance of the Administration Section and is useful in terms of allocating resources and strategic planning. However, it is unlikely to provide a complete picture of administration workloads and performance. Weaknesses include:</p> <ul style="list-style-type: none"> • The age of outstanding tasks is not clear on the management information • Where the target timeframe is not met for a task, no indication is provided of how close to the deadline the task was completed • The source of delays to completing a task is not always clear (i.e. delays caused by inaccurate information supplied by member/employer) <p>It is proposed that WYPF work with its shared service administration partners to further develop its key performance indicators to try and address any weaknesses such as those highlighted above. This improvement in Management Information should ultimately result in a more efficient administration service.</p> <p>It is not envisaged that any additional resource of budget is required.</p>				

A11. Administration Shared Service

2024/25	2025/26	2026/27	2027/28	2028/29
✓	✓			

WYPF currently provides an administration shared service to three other LGPS funds and over half of the Fire Authorities in England. All costs are shared equally on a per-member basis.

During 2024 we will look to work with the shared service partners to carry out a strategic review of the shared service arrangements to ensure partners' and WYPF's interests are aligned and risks to WYPF of hosting the service are appropriately managed. One of the matters to consider is whether the shared service would benefit from a 'brand', in a similar manner to several other LGPS shared service arrangements (Local Pensions Partnership, Peninsula Pensions etc...)

Appendix B - Business Plan Budget

Operating Cost Budget and forecast 2022/23 to 2028/2029

WYPF TOTAL SERVICE COST	22/3 BUDGET	22/3 OUTTURN	23/4 BUDGET	23/4 FORECAST	24/5 FORECAST YR1	25/26 FORECAST YR2	26/27 FORECAST YR3	27/28 FORECAST YR4	28/29 FORECAST YR5
	£000	£000	£000	£000	£000	£000	£000	£000	£000
01 PENSION ADMINISTRATION	5,250	5,270	6,265	5,970	7,307	7,550	7,625	7,701	7,779
03 OVERSIGHT	1,004	1,009	998	942	1,017	1,029	1,039	1,050	1,060
PENSION ADMIN & OVERSIGHT	6,254	6,284	7,263	6,912	8,324	8,579	8,665	8,751	8,839
02 INVESTMENT MANAGEMENT	8,496	7,322	9,346	7,669	10,174	10,510	10,615	10,721	10,829
TOTAL WYPF NET EXP	14,750	13,601	16,609	14,581	18,498	19,089	19,280	19,473	19,667
PER MBR		£42.68	£51.01		£57.34	£59.18	£59.77	£60.37	£60.97
MBR NUMBER		319,489	325,630		322,581	322,581	322,581	322,581	322,581

WYPF TOTAL SERVICE COST	22/3 BUDGET	22/3 OUTTURN	23/4 BUDGET	23/4 FORECAST	24/5 FORECAST YR1	25/26 FORECAST YR2	26/27 FORECAST YR3	27/28 FORECAST YR4	28/29 FORECAST YR5
	£000	£000	£000	£000	£000	£000	£000	£000	£000
Accommodation	261	345	371	398	424	432	437	441	445
Actuary	350	317	301	200	200	202	204	206	208
CBMDC Support Services	463	559	567	604	851	860	868	877	886
Computer	1,216	1,902	1,893	2,298	2,328	2,426	2,450	2,475	2,500
Contingency - Invest to save	1,000	0	750	0	750	758	765	773	780
Employees	10,643	9,842	12,240	11,303	13,253	13,743	13,881	14,019	14,159
Other Running Costs	1,027	1,179	1,060	1,220	1,244	1,257	1,270	1,283	1,296
Printing & stationery	299	402	350	376	376	380	384	387	391
Transaction Costs	2,500	2,320	2,500	1,861	2,750	2,745	2,773	2,800	2,828
WYPF TOTAL SERVICE EXP	17,759	16,866	20,032	18,260	22,176	22,803	23,031	23,261	23,494
Other Income	-179	-237	-200	-271	-271	-274	-276	-279	-282
Shared Service Income	-2,830	-3,024	-3,222	-3,408	-3,408	-3,442	-3,477	-3,511	-3,546
WYPF TOTAL SERVICE NET EXP	14,750	13,605	16,610	14,581	18,497	19,087	19,278	19,471	19,665
PER MBR sf3		£42.68							
PER MBR		£42.58	£51.01		57.34	£59.17	£59.76	£60.36	£60.96
MBR NUMBER		319,489	325,630		322,581	322,581	322,581	322,581	322,581

Appendix C – Communications plan

The aim of the Fund's communications strategy is to make sure that all stakeholders are engaged with and kept informed of developments within the Fund. We want to ensure transparency and an effective communication process will help to maintain the efficient running of the scheme. An outline communications plan for 2024 to 2025 is set out below.

Communications events 2024/25 – Local Government Pension Scheme (LGPS)

Communication	Format	Frequency	Method of distribution
LGPS active members (including representatives of active members and prospective members)			
	Newsletter	2/3 per year becoming more frequent and modular as electronic communications increase	Bulk email and mail if members have opted out of electronic communications
	Annual meeting	1 per year	Meeting (WYPF/HPF)
	Annual Pension Statement	1 per year	E-mail and mail if members opted out of electronic communications
	www.wypf.org.uk	Constant	Web
	Member fact card	On request/constant	Print and web
	Member fact sheets	Constant	Web
	Introduction to WYPF	On employer request	Virtual or in person
	Presentation – Your pension explained	On employer request	Virtual or in person
	Presentation – Pre retirement	On employer request	Virtual or in person
	Pension surgeries/drop in's	On employer request	Virtual
	Engage with your LGPS pension	Monthly	Virtual events held online
	Pension Awareness Week	Once per year (Sept)	Virtual events held online
	Planning for a successful retirement	At least monthly	Held by Affinity Connect
	WYPF Contact centre and LPF satellite office	8.45 to 4.30 Monday to Friday	Face-to-face/ phone/email
	Scheme booklet	Constant	Web
	New member pack	On joining	Mail
	Social media	Constant	Web
	YouTube channel	Constant	Web

**LGPS deferred members
(including
representatives of
deferred members)**

Newsletter	1 per year becoming more frequent and modular as electronic communications increase	Bulk email and mail if members opted out of electronic communications
Deferred Benefit Statement	1 per year	Email
Annual meeting	1 per year	Meeting (WYPF/HPF)
www.wypf.org.uk	Constant	Web
WYPF Contact centre and LPF satellite office	8.45 to 4.30 Monday to Friday	Face-to-face/ phone/email
Social media	Constant	Web
YouTube channel	Constant	Web

**LGPS pensioner
members (including
representatives of retired
members)**

Newsletter	1 per year becoming more frequent and modular as electronic communications increase	Bulk email and mail if members opted out of electronic communications
Annual meeting	1 per year	Meeting (WYPF/HPF)
www.wypf.org.uk	Constant	Web
WYPF Contact centre and LPF satellite office	8.45 to 4.30 Monday to Friday	Face-to-face/ phone/email
Pension advice	As and when net pension changes by £5.00 or more	Mail if not registered with My Pension
P60	1 per year	Web unless opted out of electronic communications
Social media	Constant	Web
YouTube channel	Constant	Web

Communications events 2024 – firefighters

Communication	Format	Frequency	Method of distribution
Firefighter active members (including representatives of active members and prospective members)			
Newsletter		At least 1 per year becoming more frequent and modular as electronic communications increase	Bulk email and mail if members opted out of electronic communications

Annual Benefit Statement	1 per year	E-mail and mail if members opted out of electronic communications
www.wypf.org.uk	Constant	Web
New recruit presentation	On employer request	Virtual or in person
Presentation – Your pension explained	On employer request	Virtual or in person
Presentation – Pre retirement	On employer request	Virtual or in person
Pension surgeries/drop in's	On employer request	Virtual or in person
Planning for a successful retirement	2 to 4 per year	Held by Affinity Connect
WYPF Contact centre and LPF satellite office	8.45 to 4.30 Monday to Friday	Face-to-face/ phone/email
Scheme booklet	Constant	Web

Firefighter deferred members (including representatives of deferred members)

Annual Benefit Statement	1 per year	E-mail and mail if members opted out of electronic communications
www.wypf.org.uk	Constant	Web
WYPF Contact centre and LPF satellite office	8.45 to 4.30 Monday to Friday	Face-to-face/ phone/email

Firefighter – pensioner members (including representatives of pensioner members)

www.wypf.org.uk	Constant	Web
WYPF Contact centre and LPF satellite office	8.45 to 4.30 Monday to Friday	Face-to-face/ phone/email
Pension advice	As and when net pension changes by £5.00 or more	Mail if not registered with My Pension
P60	1 per year	Web unless opted out of electronic communications

Communications events 2024 – councillors

Communication	Format	Frequency	Method of distribution
Councillor members (including representatives of members)			

Newsletter	1 per year	Bulk email and mail if members opted out of electronic communications
Annual meeting	1 per year	Meeting (WYPF/HPF)
Deferred Benefit Statement	1 per year	E-mail and mail if members opted out of electronic communications
www.wypf.org.uk	Constant	Web
Ad hoc meetings	When required	Virtual/meeting/face-to-face
WYPF Contact centre and LPF satellite office	8.45 to 4.30 Monday to Friday	Face-to-face/phone/email
Social media	Constant	Web

Communications events 2024 – employing authorities

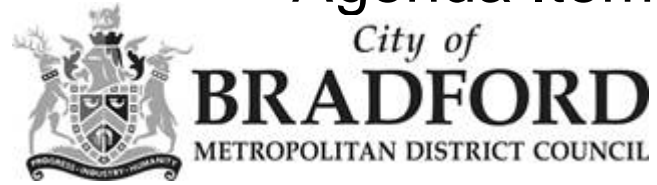
Communication	Format	Frequency	Method of distribution
Employing authorities			
Employer Pension Fund Representatives		8.30 to 4.30 Monday to Friday	Virtual / face-to-face / email / phone
Website		Constant	Web
Fact card		1 per year	Web
Fact sheets		Constant	Web
Employer guide		Constant	Web/electronic document
Employer webcasts		Weekly	Held on-line with recordings made available
Ad hoc training		When required	Face-to-face/virtual
Update sessions		Up to 2 per year	Meeting
Annual meeting		1 per year	Meeting
Manuals/toolkits		Constant	Web/electronic document
Pension Matters and round-up		12 per year and when required	Wordpress blog and gov. delivery bulk email
Social media		Constant	Web
Ad hoc meetings		When required	Face-to-face

Appendix D - Business Plan activities for LGPS and Fire Authority shared service partners

Key Action/Task	2022/23	2023/24	2024/25	2025/26	2026/27
Governance and communications					
G3. Review against new TPR Single Modular Code	✓				
G4. Review/development of risk register	✓				
G5. Business Continuity	✓	✓	✓	✓	✓
G6. Diversity, equality and Inclusion	✓	✓	✓	✓	✓
G7. Enhance cybersecurity	✓	✓			
G8. Launch and develop new WYPF website	✓	✓			
G10. Procurement/Tenders	✓	✓	✓	✓	✓
G11. Succession Planning	✓	✓	✓	✓	✓

Key Action/Task	2024/25	2025/26	2026/27	2027/28	2028/29
Administration					
A1. Implement McCloud / Sargeant / Matthew remedies	✓	✓			
A2. Implement employer self-service on-line functionality to all employers	✓	✓			
A3. Omni-channel member self-service	✓	✓	✓	✓	✓
A4. Trivial Commutation / small pots options exercise	✓	✓			
A5. Frozen refund clearance exercise	✓	✓			
A6. Automation and analytics	✓	✓	✓	✓	✓
A7. Oracle transition to SQL	✓	✓	✓		
A8. GMP Reconciliation & Equalisation	✓	✓	✓		
A9. Implement changes required for national pensions dashboards	✓	✓			
A10. Further develop key performance indicators	✓	✓	✓	✓	✓
A11. Administration shared service	✓	✓			

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Report of the Managing Director, West Yorkshire Pension Fund, to the meeting of West Yorkshire Pension Fund Pension Board to be held on 20 March 2024.

AT

Subject: Minutes of West Yorkshire Pension Fund (WYPF) Investment Advisory Panel held on 25 January 2024.

Summary statement:

The role of The Pension Board, as defined by sections 5(1) and (2) of the Public Service Pensions Act 2013 is to assist the Council as Scheme Manager in ensuring the effective and efficient governance and administration of the Local Government Pension Scheme (LGPS) including securing compliance with the LGPS regulations and any other legislation relating to the governance and administration of the LGPS; securing compliance with the requirements imposed in relation to the LGPS by the Pensions Regulator; and any other such matters as the LGPS regulations may specify.

The Minutes of meeting of WYPF Investment Advisory Panel are submitted to the Pension Board to enable the Board to ensure effective and efficient governance and administration of the LGPS.

EQUALITY & DIVERSITY:

Euan Miller
Managing Director

Portfolio:

Phone: (01274) 43 4517
E-mail: euan.miller@bradford.gov.uk

Overview & Scrutiny Area:

1. SUMMARY

- The Minutes of meeting of WYPF Investment Advisory Panel are submitted to the Pension Board to enable the Board to ensure effective and efficient governance and administration of the LGPS.

2. BACKGROUND

- The role of The Pension Board, as defined by sections 5(1) and (2) of the Public Service Pensions Act 2013 is to assist the Council as Scheme Manager in ensuring the effective and efficient governance and administration of the Local Government Pension Scheme (LGPS) including securing compliance with the LGPS regulations and any other legislation relating to the governance and administration of the LGPS; securing compliance with the requirements imposed in relation to the LGPS by the Pensions Regulator; and any other such matters as the LGPS regulations may specify.

3. OTHER CONSIDERATIONS

- None

4. FINANCIAL & RESOURCE APPRAISAL

- None

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

- None

6. LEGAL APPRAISAL

- None

7. OTHER IMPLICATIONS

7.1 SUSTAINABILITY IMPLICATIONS

- None

7.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

- None

7.3 COMMUNITY SAFETY IMPLICATIONS

- None

7.4 HUMAN RIGHTS ACT

- None

7.5 TRADE UNION

- None

7.6 WARD IMPLICATIONS

- None

7.7 AREA COMMITTEE LOCALITY PLAN IMPLICATIONS

- None

7.8 IMPLICATIONS FOR CHILDREN AND YOUNG PEOPLE

- None

7.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

- None

8. NOT FOR PUBLICATION DOCUMENTS

Appendix A – NFP Minutes of Investment Advisory Panel held on 25 January 2024 is a 'NOT FOR PUBLICATION' item as it falls within information relating to the financial and business affairs of the West Yorkshire Pension Fund as defined by Schedule 12A of the Local Government Act 1972 as amended.

9. OPTIONS

- None

10. RECOMMENDATIONS

- It is recommended that the Board review the minutes from the meeting.

11. APPENDICES

Appendix A – NFP Minutes of Investment Advisory Panel held on 25 January 2024 is a 'NOT FOR PUBLICATION' item as it falls within information relating to the financial and business affairs of the West Yorkshire Pension Fund as defined by Schedule 12A of the Local Government Act 1972 as amended.

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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