

BOARD : LOCAL PENSIONS BOARD
DATE : 15 August 2025
TIME : 10am
VENUE : Online – Microsoft Teams

LOCAL PENSION BOARD MEETING
10.00 – 12.30
AGENDA

1. PROCEDURAL MATTERS (Pages 3 - 15)

The Board will:

- a) Consider any Declarations of interest
- b) Receive the minutes of the meeting on 13 May 2025
- c) Receive the minutes of the meeting on 20 May 2025
- d) Review the minutes of the Pensions Employer Forum meeting on 23 May 2025
- e) Review the Actions Tracker

2. REVIEW OF PENSION FUND COMMITTEE MINUTES

To receive the minutes from the Pension Fund Committee meeting which took place on 30 May 2025 and the Investment Sub-Committee minutes from 16 May 2025.

3. SERVICE DELIVERY PLAN UPDATE

The Board will receive a verbal update on progress with the Service Delivery Plan which replaces the Pensions Programme.

4. PERFORMANCE MANAGEMENT FRAMEWORK QUARTER 1 – 2025-26 (Page 16)

The Board will receive the Performance Management Framework covering the period 1 April to June 2025 (along with the quarter 4 comparator – January to March 2025).

5. UPDATE FROM THE SCHEME ADVISORY BOARD (Pages 17 - 26)

The Board will receive an update following the Scheme Advisory Board meetings outlined below:

Committee	Meeting Date
Scheme Advisory Board	21 July 25
Cost Management, Benefit Design and Administration Committee	30 June 25
Investment, Governance and Engagement Committee	7 July 25
Compliance and Reporting Committee	23 June 25

The Board will receive an overview of recent regulatory changes and events, along with an update on expected future consultations which will impact the Local Government Pension Scheme (LGPS).



The Board will also receive an update on the McCloud remedy and the Pensions Dashboards Programme which were presented to the Pension Fund Committee in March 2025.

6. THE PENSIONS REGULATOR’S GENERAL CODE OF PRACTICE (Pages 27 - 29)

The Board will receive a report providing an update on the Fund's self-assessment against the requirements of The Pension Regulator's General Code of Practice.

7. CONTRIBUTION RATES REVIEW POLICY (Pages 30 -36)

The Board will receive a copy of a report setting out a revised policy for reviewing employers’ contribution rates between triennial valuations.

8. REGISTER OF INTERESTS (Pages 37 -38)

The Board will undertake a review of their register of interests and identify any required amendments.

9. DATA QUALITY (Page 39)

The Board will receive an update on the data scores for common and scheme specific data.

10. COMPLIANCE UPDATE (Pages 40 -42)

The paper also provides a summary of the Breaches Log for the period to 31 December 2024.

11. FEEDBACK FROM EVENTS

Board members/officers will feedback from recent conferences and seminars attended, including:

- Pensions UK (PLSA) Webinar – Mega-May – 4 June
- Hymans Webinar – Effective Decision Making - 13 June
- Joint Board and Committee Training – 18 July 2025

12. REVIEW AND DEVELOP THE WORK PLAN (Page 43)

The Board will review the plan.

13. AOB

Dates for future meetings are included in the table below:

Date	Meeting
21 October 2025	Online
17 February 2026	Online

MINUTES OF LOCAL PENSION BOARD – 13 May 2025

PRESENT

Board Members: Amanda Stott (Chair),
Cllr Robert Bisset (Employer Representative, CW&C)
Geoff Wright (Member representative, Unison),
Kay Lennon (Employer Representative, CW&C)
Jason Lambert (Member Representative, CW&C)

CW&C Officers: Heidi Catherall and Aaron Thomas

1. PROCEDURAL MATTERS

- 1.1 No declarations of interest were received.
- 1.2 The Board reviewed the minutes from the meeting which took place on 18 February 2025 having previously approved them by email.
- 1.3 The action tracker was reviewed, and the contents noted. The action for officers to develop a programme to deliver training to Board members on administration processes will remain on the tracker so the training is organised for early 2026.

2. REVIEW OF PENSION FUND AND INVESTMENT SUB COMMITTEE MINUTES

- 2.1 The Board reviewed the minutes from the Pension Fund Committee meeting held on 7 March 2025.
- 2.2 The Board also reviewed the minutes from the Investment Sub Committee meeting held on 14 February 2025.

RESOLVED that the Board: Noted the minutes of the Pension Fund Committee and Investment Sub Committee meetings.

3. SERVICE DELIVERY PLAN

- 3.1 The Board received a verbal update on the Service Delivery Plan (SDP), which replaces the pension transformation programme. The SDP includes all key objectives for the Fund for the year ahead.
- 3.2 Both the Board and Pension Fund Committee will receive regular updates on the Fund's progress with the SDP.

4. PERFORMANCE MANAGEMENT FRAMEWORK Qtr 4 – 2024-25

- 4.1 The Board reviewed the Performance Management Framework (PMF) for quarter 4 (January to March 2025), which contained updates on key areas of performance and comparator information from previous quarters.
- 4.2 Board members again noted that the rating on administration casework remains red due to casework backlogs exceeding 10% of membership.
- 4.3 The rating for the business plan was classed as amber. The amber rating on the business plan simply denotes some actions which will be realigned to the next quarter. All other areas of the PMF were rated as Green.
- 4.4 The Board received one direct submission during the quarter relating to LGPS Central Joint Committee.
- 4.5 The Board received an update on delivering the 2024-25 Cyber Risk Action Plan, including progress updates on recommendations arising from previous external reviews and the outcomes of a data and asset mapping exercise.

5. UPDATE FROM THE SCHEME ADVISORY BOARD

- 5.1 The Board noted the agendas from the recent Scheme Advisory Board meeting, and those from the sub committees.
- 5.2 The Board received a report setting out the regulatory changes that the Fund will need to address during 2025 and beyond.
- 5.3 The Board also received copies of the latest two reports which were presented to the Pension Fund Committee on 7 March 2025 regarding the McCloud remedy and the Pensions Dashboards programme.
- 5.4 The Board were advised of further delays in receiving the required functionality for McCloud from the Fund's administration system provider and the implications for meeting statutory deadlines.
- 5.5 Both the Board and the Committee will continue to receive regular updates on both McCloud and the Pensions Dashboards Programme at each meeting.

RESOLVED that the Board:

- a) Noted the regulatory changes that the Fund will need to address during 2025.
- b) Noted the position with regards to the McCloud remedy and the Pensions Dashboards programme.

6. THE PENSION REGULATOR'S GENERAL CODE OF PRACTICE

- 6.1 Board members received a report providing an update on the Fund's self-assessment against the requirements of the Pension Regulator's General Code of Practice.
- 6.2 Board members discussed the expected requirements which may arise from the Good Governance review and the Fit for the Future consultation, in particular the proposed requirement for a biennial review of the Fund and what this might entail.
- 6.3 Board members were concerned about the impact of further compliance work on the Fund. Fund officers noted that the Local Government Association are developing an approach which it is hoped will provide the necessary information to satisfy the reviews whilst limiting the impact upon Funds. Officers will confirm details to the Board once they become available.

RESOLVED that the Board: Noted the outcome of the General Code of Practice 2024-25 self-assessment and the resulting improvement action plan for 2025-26.

7. LOCAL PENSION BOARD ANNUAL REPORT 2024-25

- 7.1 As agreed at the meeting which took place on 18 February, Board members received a draft of the 2024-25 Annual Report by email for final review prior to the May meeting.
- 7.2 The Chair of the Board requested that a statement be added to the report to express the Board's appreciation for the support provided by officers in what has been another busy year. Officers will suggest some wording for the Board to approve.
- 7.3 Other than the change requested in paragraph 7.2, the final version of the LPB Annual Report was approved by the Board. The report will be included within the Fund's Annual Report which will be published on the website later this year.
- 7.4 The report included the outturn of £2,870 spend against the budget of £5,000.

RESOLVED that: the Board approved the final version of the 2024-25 Annual Report subject to the amendment requested.

8. RISK REGISTER

- 8.1 The Board reviewed their risk register and noted that no changes were required at this time.
- 8.2 Board members also reviewed the Fund's risk register which had been updated by officers and presented to the Pension Fund Committee on 7 March.

- 8.3 Officers advised that a further risk will be added to the ‘register to capture the risk of geopolitical instability. Further planned mitigation actions will be added to the risk relating to the McCloud remedy to recognise the challenges of meeting statutory deadlines.
- 8.4 Board members questioned whether the devolution agenda would have any impact upon the Fund. Officers confirmed that there is no expected impact on the Fund as Cheshire will not be affected by local government reorganisation proposals, as some other Funds will be, having gone through a similar process in 2009.
- 8.5 The Board did not identify any other changes required to the Fund’s risk register.

RESOLVED that the Board:

- a) Undertook a review of the Local Pension Board’s Risk Register and did not identify any required amendments.
- b) Undertook a review of the Pension Fund’s Risk Register which was updated in March 2025 and did not identify any required amendments.

9. DATA QUALITY

- 9.1 The Board received a summary of the data scores which have been provided to the Pensions Regulator as part of the annual Scheme Return for the past three years, along with the scores as at 7 January and 1 April 2025.

	TPR Scheme Return				
	9-Oct-23	2-Jan-24	1-Nov-24	7-Jan-25	1-Apr-25
Common Data	99.17%	99.74%	96.00%	99.74%	96.46%
Scheme Specific Data	74.04%	85.62%	84.00%	85.62%	74.62%

- 9.2 There was a slight reduction in common data scores between January and April. This is expected to improve as the Fund processes year-end updates from employers.
- 9.3 There is also a reduction in scheme specific data scores over the same period, reflecting the ongoing work with employers on data cleansing following the March 2025 year-end.

RESOLVED that the Board: noted the position on the common and scheme specific data scores.

10. COMPLIANCE UPDATE

- 10.1 The Board were presented with a summary of the breaches log for the period to 31 December 2024, noting that forty-five breaches had been logged over the period, forty-two of which required no further action following investigation.
- 10.2 The Board noted the red breaches, two of which related to late payment of contributions from employers and one related to the Annual Benefit Statements.

RESOLVED that: Board members noted the summary breaches log covering the period to 31 December 2024.

11. FEEDBACK FROM EVENTS

- 11.1 AS and RB attended the Joint Committee and Board training which took place on 21 February 2025. This included training on pensions legislation and guidance, the valuation, development of the 2025-29 Business Plan and cyber security.
- 11.2 AS also undertook a training module within the Current Issues section of the online LOLA system and also attended a specific webinar covering the subject of conflicts of interest. Board members were reminded that webinars provided by the Fund's actuary, Hymans Robertson, can be watched at any time once the registration to attend is complete.

RESOLVED that: Board members will circulate copies of event slides.

12. REVIEW OF THE WORK PLAN

- 12.1 The Board reviewed the work plan.
- 12.2 The risk register will be moved to October as the Board had conducted a full review at this meeting.

13. AOB

- 13.1 Dates for future meetings in 2025-26 are set out in the table below.
- 13.2 Board members requested that the August meeting be moved online, and the October meeting be switched to a hybrid meeting with the in-person venue to be Wyvern House in Winsford.

Date	Meeting
20 May 2025 – Statement of Accounts and Annual Report	Online
12 August 2025	Online
21 October 2025	Hybrid - In person - Winsford
17 February 2026	Online

MINUTES OF LOCAL PENSION BOARD - 20 May 2025

PRESENT

Board Members: Amanda Stott (Chair)
Cllr Robert Bisset (Employer Representative, CW&C)
Geoff Wright (Member Representative, Unison),
Jason Lambert (Member Representative, CW&C)
Kay Lennon (Employer Representative, CW&C)

CW&C Officers: Simon Riley, Claire Jones and Debbie Darlington

1. PROCEDURAL MATTERS

1.1 No declarations were received.

2. DRAFT STATEMENT OF ACCOUNTS 2024-25

2.1 The Local Pension Board has an important role in the governance process for the Statement of Accounts to ensure that:

- The accounts have been produced in compliance with statutory and best practice guidance, and;
- That the Pension Fund Committee discharges its duty of reviewing the accounts and recommending they are presented to Audit and Governance Committee.

2.2 To satisfy the first requirement, the Board received a presentation from Officers confirming the detailed steps taken in order to produce the statement of accounts.

2.3 Board members were advised that the statement of accounts are produced in accordance with the CIPFA Example accounts guidance. This guidance includes a checklist which allows Funds to ensure they have met all of the requirements.

2.4 The Board were reminded of the timetable for the accounts which is set out in the table below.

Date	Action
20 May	The draft accounts will be reviewed by the LPB prior to review by the Pension Fund Committee
30 May	The Pension Fund Committee will review the draft accounts and provide comments
July- Sept	Grant Thornton audit testing of the accounts
5 Sep	A substantial amount of the audit will be completed by this date and Grant Thornton will produce their Draft Audit Findings Report
5 Sep	The Draft Audit Findings Report and Annual Report, including the Statement of Accounts, will be presented to the Pension Fund Committee with the recommendation that the accounts are presented to Audit and Governance Committee for approval following the completion of the audit
1 Dec*	Annual Report including the Audited Statement of Accounts to be published on the Fund's website
TBC	The Final Audit Findings Report and audited Statement of Accounts will be presented to the Audit and Governance Committee (A&GC).
27 Feb 2026*	Audited Statement of Accounts to be published on Cheshire West and Chester Council's website

*The Cheshire West and Chester Council Audit must be signed off before the Pension Fund Audited Accounts can be published. In the event that they are not signed off the Annual Report will still be published by the above deadline with the exception of the audit report.

2.5 To satisfy themselves that the Committee discharges its duty of reviewing the accounts and Annual Report, Board members were invited to attend the Committee meeting on the 30 May or 5 September in an observer capacity.

2.6 Members of the Board were happy with the process that officers have undertaken to complete the draft statement of accounts.

3. DRAFT ANNUAL REPORT

3.1 The preparation and publication of the pension fund annual report is required by regulation 57 of the Local Government Pension Scheme Regulations 2013.

3.2 New guidance on preparing the Pension Fund Annual Report was issued in April 2024. The new guidance applies to 2023-24 annual reports and later years; for 2023-24 compliance was expected on a best endeavours basis, whereas for 2024-25 funds are expected to be fully compliant with the guidance.



- 3.3 The Board has an important role in the governance process for the Annual Report and should undertake a review of how the Annual Report is produced in order to ensure that:
- The Annual Report has been produced in compliance with statutory and best practice guidance, and;
 - That the Pension Fund Committee discharges its duty of reviewing the Annual Report.

3.4 To satisfy the first requirement, members of the Board received a presentation from Officers providing an overview of the production of the Annual Report to demonstrate how the Fund was compliant with the Annual Report guidance.

3.5 In order for the Board to satisfy themselves that the Committee discharges its duty of reviewing the Annual Report, Board members are invited to attend the Committee meeting on the 5 September in an observer capacity.

4. BOARD DECISION

4.1 The Board resolved that in their opinion the draft Statement of Accounts and the draft Annual Report for the year ending 31 March 2025 have been produced in accordance with statutory and best practice guidance.

4.2 The Board noted that Board members are invited to attend either the Pension Fund Committee meeting on the 30 May or 5 September to observe the discussion on the item on the draft Statement of Accounts and Annual Report.

5. AOB

5.1 No matters were raised.

GROUP : PENSIONS EMPLOYER FORUM MINUTES
DATE : 23/05/2025
TIME : 10am
VENUE : Virtual Meeting via Microsoft Teams

Present:

Chair	Heidi Catherall (HC)
Cheshire West Council	Rosemary Hodgson (RH)
Warrington BC	Helen Barr (HB)
Police and Crime Commissioner	Jude West (JuW) and Kirsty Farquharson (KF)
CHALC	Jackie Weaver (JaW)
Reaseheath College	Samantha Straker (SS)
Everybody Health and Leisure	Ruth Hind (RuH)
Local Pension Board	Amanda Stott (Chair)
Cheshire Pension Fund	Andy Jones (AJ), Jenny Brien (JB), Matt Phoenix (MP), Rob Bryan (RB), Johannes Eagling (JE) and Ian Fullerton (IF)

Item	Minute
1	<p>Minutes of the Last Meeting</p> <p>The minutes of the 7 February 2025 meeting were reviewed and approved, having previously been circulated via email.</p> <p>Items brough forward from the previous meeting:</p> <p style="padding-left: 40px;">Action: ND will recirculate the links to employer training videos.</p> <ul style="list-style-type: none"> • JS said she is aware the Fund does attend retirement seminars for some of the larger employers but could there be something for smaller employers. This could take the form of a video and/or guidance. • JuW asked if there could be some guidance on ‘how to boost your pension’ which is easier to digest than some of the materials produced by AVC providers. This needs to be more understandable for members <p style="padding-left: 40px;">Action: ND will issue the 2025-26 engagement calendar and request feedback from Forum members.</p>
2	2025 Valuation and Data



Item	Minute
	<p>HC delivered a presentation on the data cleansing work that the Fund has been undertaken ahead of the 2025 valuation.</p> <p>The Fund needs to provide data to the actuary in July for use in the valuation. In order to meet this deadline, the Fund will need to commence the process from the end of June and so must have all 2024-25 data up to date as soon as possible. This includes having all Monthly Interfacing (MI) files loaded up to and including March 2025.</p> <p>Employers are requested to load all MI as soon as possible and to contact the Fund if there are any issues. Employers are also requested to respond promptly to any requests for information made by the Fund, as we attempt to cleanse data ahead of the valuation and the production of the Annual Benefit Statements.</p> <p>In the autumn of 2024, the Fund undertook an interim valuation with the actuary and provided a copy of the membership data. The actuary identified a number of issues with the data quality and the Fund has been working to address these issues.</p> <p>The Fund has made good progress with reducing the number of data queries but will require information from employers to resolve some of the outstanding cases. Again, prompt responses to these requests would be appreciated.</p> <p>The Forum received an update on the 2024 Annual Benefit Statement (ABS) position. The Fund was able to issue an ABS to just over 85% of active members by the deadline of 31 August 2024.</p> <p>Since then, the Fund has been working to resolve data issues and produce the statements. As the Fund has now introduced the digital ABS it means that regular processes can be run to produce statements once data issues have been resolved. The Fund has completed regular updates since 31 August 2024 and by 12 May almost 96% of members had received their statement.</p>
3	<p>McCloud and Pensions Dashboards Programme Update</p> <p><u>McCloud</u></p> <p>HC provided an update on the McCloud remedy.</p> <p>In order to apply the remedy, the Fund requires changes to our administration system to allow the underpin to be applied to all eligible members, to potentially rectify the benefits of any members who had already received a benefit since 1 April 2014 and to include the underpin position in Annual Benefit Statements.</p>



Item	Minute
	<p>The Fund has been working with our administration system provider, Civica, to develop this functionality.</p> <p>There have been severe delays in the system provider being able to introduce the necessary changes, which has delayed the Fund’s ability to introduce the necessary changes to benefit calculations.</p> <p>As such the Fund has not yet been able to implement this functionality and does not expect to be able to do so until the autumn of 2025. This will be reported to the Pensions Regulator.</p> <p>The Fund is developing a detailed implementation plan, so that when the required functionality is available, we will be able to apply the remedy and rectify any previous benefits where required.</p> <p>The 2025 Annual Benefit Statements will include a note to confirm that the McCloud underpin position has not been included and that we aim to include this in the 2026 statements.</p> <p><u>Pensions Dashboards Programme</u></p> <p>Forum Members also received an update on the pension’s dashboards programme.</p> <p>The Fund has appointed its administration system provider, Civica, as its Integrated Service Provider (“ISP”). Our ISP sits between the Fund and the national pensions dashboards infrastructure and will create their own connection to the dashboards. They will take a regular extract of the Fund’s data, and make that available to the dashboards, so that members can be matched to records held by the Fund, and they can then view their own relevant data.</p> <p>Before becoming an approved ISP, all such providers are required to be officially signed off by the national programme. Civica are nearing the end of this process, and the Fund expects to be able to start the onboarding phase with Civica during the summer of 2025.</p> <p>In the meantime, the Fund is focussing on cleansing data and working with Civica to complete all necessary steps required to register for the national dashboards.</p>
4	Communications Update HC gave a verbal update on a couple of communications related areas.



Item	Minute
	<p><u>Branding</u></p> <p>The Fund has started to rollout the new branding and Forum members should start to see the new logo on documents from now on. It will take time to update all documents with the new branding.</p> <p><u>Website</u></p> <p>The new website is largely constructed. Work is being finalised on some technical aspects of the site and once completed the new website can be launched. It is expected to be launched in the autumn of 2025.</p> <p><u>Feedback</u></p> <p>Forum members were asked to provide any feedback on any aspect of the Fund’s communication strategy and offer any suggestions.</p> <p>JuW asked whether the Fund could provide some wording that employers could use to make their employees aware that they may not all receive an Annual Benefit Statement if there are issues with their record.</p> <p>JuW also asked whether employers could receive some detail on the number/percentage of their members who had not received an ABS, so they can manage that message.</p> <p>Action: HC will draft some generic wording for employers to use Action: HC will liaise with the team to see what information can be provided to employers on the number/percentage of members not receiving an ABS.</p>
6	<p>Round Table Briefing</p> <p>No issues were raised.</p>
7	<p>AOB</p> <p>A Forum member had asked whether Forum meetings could take place on a different day of the week to ensure they could attend. Employers are happy for meetings to take place on a different day and putting meeting dates in diaries early will help.</p> <p>The next two meetings will take place as follows: Friday 10 October 2025 10am Wednesday 4 February 2026 11am (moved from Friday 6 February at 10am)</p>

Cheshire Local Pension Board – Actions Tracker

August 2025

Item Number / Date Raised	Topic	Action	Latest Position
Item 1 – Minutes of the Last Meeting 27 October 2020	Attendance of interested parties at future meetings	At the Board meeting in October 2020, members discussed whether there was an opportunity to invite interested parties to observe future meetings with a view to joining when a vacancy arises. The Board requested that this be included within the action tracker.	Board members will invite interested parties to attend future meetings.
Item 1 – Minutes of the Last Meeting 22 October 2024	Training on administration processes	<p>Board members had previously attended the Pension Fund offices to see how administrators process casework. This was a useful learning experience for members which would be beneficial to repeat.</p> <p>Officers were asked to review the original agenda for the training and suggest a programme for the Board to review at the next meeting.</p>	<p>Officers provided an overview of previous training that had been delivered at the Board meeting on 18 February 2025.</p> <p>Officers will develop a programme to deliver training to Board members on administration processes. Recognising the challenging agenda facing the Fund this year, and the resources required to meet them, the training will be organised for early 2026.</p>

<p>This is the quarterly pack of Pension Fund performance information which is based on the period 1 April to 30 June 2025 and includes a comparison to the previous quarter - 1 January to 31 March 2025.</p> <p>The overall assessment for Quarter 1 is Red.</p> <p>A summary of performance for each area is shown below including a RAG status. There is also a detailed worksheet for each of the subjects which contains more detailed information.</p>	Qtr 1 (Apr-Jun 25)
	Summary position:
	This Quarter - 1 Apr to 30 Jun 25
	RED
	Previous Quarter - 1 Jan to 31 Mar 25
	RED

Subject	Comment	RAG Status
Administration Casework	<p>Overall administrators have completed 18,201 cases during the 3 month period to June 2025, compared to 19,033 cases during the 3 month period to April 2024.</p> <p>The status is RED because the number of pieces of casework outstanding exceeds more than 10% of the membership.</p>	RED
Breaches	<p>The Fund updates the Breaches Log on a monthly basis.</p> <p>All Breaches are reviewed by the LPB, with approval also provided by the Director of Governance where necessary, in accordance with the Breaches Policy.</p> <p>The PFC and LPB also receive a summary of all breaches (since inception), including identified trends, on a quarterly basis.</p> <p>There were 30 new breaches in quarter 1 of 2025/26 (compared to 25 in quarter 4 of 2024/25). 27 of the breaches related to the collection of contributions income and 3 in relation to administration breaches.</p> <p>During quarter 1 and 4, all breaches were recorded as Green (Closed) with the exception of 5 breaches which were Amber (Monitor) breaches. The Amber breaches were in relation to two employers</p>	GREEN
Compliance	The Fund did not identify any material compliance issues during the quarter.	GREEN
Contributions Monitoring	<p>In accordance with regulations contributions should be received by the Fund by the 22nd of the month (if paid electronically) after they have been deducted from pay.</p> <p>The Fund also has an internal KPI to receive at least 98% of contributions income on time each month. The Fund collected over 99% of contributions income in each of the last six months.</p>	GREEN
Financial Performance	<p>The Fund's 2025-26 budget for Administration/Oversight and Governance Costs is c£6.2m.</p> <p>The outturn for Quarter 1 2025-26 is currently net nil.</p>	GREEN
HR (absence)	<p>The service lost 165 days through sickness during quarter 1 (Apr-Jun 2025) of 2025-26 which equates to an annual average of 7%. This compares to 34 days lost in quarter 4 (Jan-Mar 2025) which is an annual average of 3%.</p> <p>There were no sickness days lost in the quarter relating to work related stress.</p>	GREEN
Debt Recovery	<p>The Pension Fund has £722k of debt outstanding at the end of Quarter 1 of 2025/26, £170k of which relates to prior years.</p> <p>The RAG status is GREEN to reflect the fact that the value of debt outstanding over 90 days is 4%, Many of the invoices in the over 6 month period are being paid in monthly installments.</p>	GREEN
Business Plan Progress	<p>The 2025-29 Business Plan was approved by the Committee in March 2025.</p> <p>A Service Delivery Plan has been produced for the 2025-26 year and sets out the objectives to be achieved during that year.</p> <p>A reporting framework summarises progress on each action and highlight issues on an exception basis.</p> <p>The reporting framework has an overall RAG rating of Amber for Qtr 1 denoting that progress with some objectives will be delayed.</p>	AMBER
Feedback from External Sources	Board members receive feedback from external sources. This includes submissions to the Board which are received via the website.	GREEN
Investment Manager Qualitative and Quantitative Performance	The Fund monitors its overall investment performance over periods of at least 3 years. It believes that this is a reasonable period of time over which it can begin to meaningfully assess performance. Performance is monitored against the Fund's tailored benchmark, CPI and asset performance assumptions from the most recent valuation. This allows the Fund to monitor its investment performance both on a standalone basis, and relative to the long term funding plan. As shown by the accompanying chart, rolling 3 year investment performance is ahead of benchmark, CPI and the valuation assumption.	GREEN

Scheme Advisory Board

HYBRID MEETING – 21 July 2025

1.30pm – 3.30pm

Beecham Room, 7th Floor, 18 Smith Square and MS Teams

AGENDA

Item		Paper	Timings
1	Welcome, apologies and introductions		1.30
2	Meeting protocol and declarations of conflicts of interest		1.35
3	Actions and Agreements from meeting of 24 March 2025	Paper A	1.40
4	LGPC update	Paper B	1.45
5	Access and Fairness consultation: proposed SAB response	Paper C	1.55
6	Fit for the Future consultation outcome	Paper D	2.05
7	Website upgrade project and communications update	Paper E	2.15
8	Risk Register	Paper F	2.25
9	Board and Committee Membership	Paper G	2.35
10	Compliance & Reporting Committee report	Paper H	2.45
11	Cost Management, Benefit Design and Administration Committee report	Paper I	2.55
12	Investment Committee report	Paper J	3.05
13	Board Budget 2026/27 and Medium Term Financial Strategy	Paper K - CONFIDENTIAL	3.15
14	AOB and date of next meeting		3.25

Scheme Advisory Board Secretariat

18 Smith Square, London SW1P 3HZ

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Cost Management, Benefit Design and Administration Committee (CMBDA)

DATE:	30 June 2025
VENUE:	Hybrid meeting (MS Teams and 18 Smith Square)
TIME:	11:00am to 1:00pm

AGENDA

Item		Paper	Timings
1	Welcome, introductions, apologies and declaration of interests		11:00
2	Meeting protocol		11:05
3	Actions and Agreements from 24 February 2025 meeting	Paper A	11:10
4	Ministry of Housing, Communities and Local Government (MHCLG) update	Verbal	11:15
5	Access and fairness consultation – LGPC and SAB responses	Verbal	11:30
6	LGPC Update	Paper B	11:50
7	Normal Minimum Pension Age	Verbal	12:00
8	Update from Gender Pensions Gap working group	Paper C	12:15
9	Actuarial Valuation 2025 and SAB basis	Paper D	12:25
10	Association of Consulting Actuaries letter on exit valuations	Verbal	12:45
11	Workplan update	Paper E	12.50
12	AOB and date of next meeting		12:55

Investment Committee

DATE:	7 July 2025
VENUE:	Hybrid Meeting (MS Teams and 18 Smith Square)
TIME:	11:00 – 12:45

AGENDA

Item		Paper	Timings
1	Welcome, introductions, apologies and declaration of interests		11:05
2	Meeting protocol		11:10
3	Actions and Agreements from 3 March 2025	Paper A	11:15
4	Ministry of Housing, Communities and Local Government (MHCLG) Update	Verbal	11:20
5	Fit for the Future: pooling governance guidance	Paper B Annex A (CONFIDENTIAL)	11:35
6	Code of Transparency Compliance Update	Paper C	12:05
7	Code of Transparency Framework Project	Paper D Annex A Annex B Annex C (CONFIDENTIAL)	12:15
8	Responsible Investment Advisory Group (RIAG) Report	Paper E	12:30
9	Date of next meeting		12:40

Compliance and Reporting Committee (CRC)

DATE:	23 June 2025
VENUE:	Hybrid meeting – MS Teams & 18 Smith Square
TIME:	11.00am – 12.30pm

AGENDA

Item		Paper	Timings
1	Welcome, introductions, apologies and declaration of interests		11:00
2	Hybrid meeting protocol		11:05
3	Actions and Agreements from 17 February 2025 meeting	Paper A	11:10
4	Ministry of Housing Communities and Local Government (MHCLG) update	Verbal	11.15
5	Fit for the Future Response - Governance Proposals	Paper B	11:30
6	Peer Support Offer	Paper C	12:00
7	Workplan update	Paper D	12.20
8	AOB and date of next meeting		12:30

Pension Fund Committee – 30 May 2025
REGULATORY UPDATE

Introduction

1. This report provides an overview of recent regulatory changes and events, along with an update on expected future consultations which will impact the Local Government Pension Scheme (LGPS).
2. The report also provides an update on any significant changes in guidance which the Fund must have regard to.

Recommendation

3. The Committee is asked to:
 - a) Note the update on the consultation: “LGPS: Access and Fairness”; and
 - b) Delegate the submission of the response to Fund officers

Reasons for the decisions

4. The Fund’s response to the Government consultation is due on 7 August 2025. Delegating the response will ensure that officers can respond to the technical questions set out in the consultation and that the submission deadline will be met.

Local Government Pension Scheme: Access and Fairness - Consultation

5. On 15 May 2025 the Ministry for Housing, Communities and Local Government (MHCLG) launched a consultation to the Local Government Pension Scheme (LGPS) in England and Wales. The consultation has a closing date of 7 August 2025.
6. The proposed changes are intended to improve fairness in and access to the LGPS. The proposals include:
 - addressing survivor pensions and deaths grants;
 - addressing the Gender Pension Gap in the LGPS;
 - collecting data on how many members opt out of the scheme and why;
 - changes to forfeiture, aiming to tackle long-standing issues with forfeiture in the LGPS;
 - several technical changes to how the McCloud remedy operates; and
 - a number of other miscellaneous changes, including changes to five-year refunds, pre-2014 AVCs, and small pot payments.
7. There are 52 questions contained within the consultation and, given the technical nature of the subject matter, the Committee are requested to delegate the final submission of the response to Fund officers.



8. The consultation also includes a question on the potential administrative burden of enacting these changes, recognising the existing workload relating to McCloud and the Pensions Dashboards Programme.
9. Officers will develop the responses in line with other Administering Authorities to ensure that key messages are consistent.

Pension Fund Committee – 30 May 2025
McCLOUD REMEDY

Introduction

1. This report provides the Committee with an update on the Fund's progress with implementing the changes required because of the McCloud remedy.

Recommendation

2. The Committee is asked to:
 - a) Note the position on the McCloud remedy; and
 - b) Endorse the decision to report a breach of the law to the Pensions Regulator.

Reason for the decision

3. The Ministry for Housing, Communities and Local Government (MHCLG) issued statutory guidance for the implementation of the McCloud remedy in June 2024. The guidance requires Funds to include details of member's underpin position in their Annual Benefit Statements (ABS). Where the underpin position is not included within the ABS, this is classed as a breach of the law and should be reported to The Pensions Regulator (TPR).

Current Position

4. MHCLG issued statutory guidance for the implementation of the McCloud remedy in June 2024.
5. The guidance states that by 31 August 2025 the new underpin should be applied to all leavers, all retrospective changes to benefits for most members (who left since 1 April 2014) should have been made, and ABSs for 2025 should reflect the McCloud remedy.
6. The guidance does allow for the implementation phase to be extended to 31 August 2026 for specific members or classes of members. Such cases are not defined in the guidance.
7. At the last meeting in March 2025 the Committee were advised that, due to considerable delays with implementing the changes to functionality required to the administration software, the Fund may not be able to meet the 31 August 2025 deadlines.
8. The changes required to the administration software are expected to be available from the end of May 2025. The Fund would need to conduct thorough testing of the functionality before applying it to the live system, which usually takes 3-4 weeks to complete.



9. As this is a valuation year the Fund has dedicated considerable resource to cleansing as much data as possible before the valuation data needs to be extracted and sent to the actuary by the end of July. The Fund also needs to issue ABSs to members by 31 August.
10. Given the timetable to receive the functionality for testing and the need to focus on data cleansing for the valuation and ABSs, the Fund will not be in a position to meet these deadlines and will need to report a breach of the law to TPR.
11. The Fund has contacted TPR to confirm this position. Although the Fund will not technically have breached regulations until after 31 August, given that we are aware the deadlines will not be met, we can report a breach ahead of the deadline.
12. A breach report will be sent to the Local Pension Board and to the Director of Governance, as the Council's Monitoring Officer, in line with the Breaches Policy before being reported to TPR.
13. When ABSs are issued in August, they will confirm the position and advise members that we will aim to report their underpin position in the 2026 statement.

Implementation and Rectification Plan

14. In order to comply with the McCloud, remedy the Fund needs to develop a detailed implementation and rectification plan.
15. A procurement process to commission the services of a third-party provider to assist with the production of the plan concluded in March, and Aon have been appointed to assist the Fund.
16. Workshops have been organised for September and October to develop the plan, which will allow time for the Fund to obtain a clearer position on the software functionality.
17. In addition, the Fund had purchased a "McCloud Handbook" which has been produced by Hymans Robertson. The handbook is an interactive tool which is designed to be a 'one-stop shop' for the McCloud remedy. It is described as a tool that can be used both now and, in the future, as administrators continue to carry out underpin calculations.
18. The Committee will continue to receive update reports setting out progress on this matter at future meetings.

Pension Fund Committee – 30 May 2025
PENSIONS DASHBOARDS PROGRAMME

Introduction

1. This report provides an update on the Fund's progress in preparing for the implementation of the national Pensions Dashboards Programme.

Recommendation

2. The Committee is asked to note the position on the Fund's preparation for the Pensions Dashboard Programme (PDP).

Integrated Service Provider – Volunteer Phase

3. The Fund previously appointed its administration software provider, Civica UK Limited, as their Integrated Service Provider (ISP).
4. As previously reported to the Committee, before becoming an approved ISP, all such providers are required to go through a sign off process known as the "volunteer" phase.
5. Civica commenced their volunteer phase in December 2024 and have completed a number of the required stages. Civica are waiting to be invited into the subsequent "integration testing" phase by the PDP once a slot becomes available.
6. PDP are carefully managing the number of participants who are in the integration testing phase at the same time. This allows PDP to test and refine the process for connection.
7. The Fund cannot commence the onboarding process until Civica are signed off as an ISP. In the meantime, the Fund is holding a "preparation day" with Civica on 29 May 2025 to discuss the steps required for onboarding to the dashboard.
8. As a reminder, the deadline for all LGPS Funds, including Cheshire, to connect to the national dashboards service is 31 October 2025.
9. The PDP recognise delays in the ISP sign-off are beyond the Fund's control and have stated that provided an ISP is in the 'volunteer' phase, Funds working with the ISP will not need to find an alternative way to connect to the dashboards by the October 2025 deadline.
10. In the meantime, the Fund is working with our ISP on preparatory work, drafting policies required for dashboards and focussing on data cleansing.

Data Cleansing

11. The Fund have appointed Intellica, via our existing Civica contract, to complete data baselining and cleansing work using their Pyxis tool.



12. The Fund has completed a baseline assessment of data quality and is working through the results to both resolve any data issues, and to design out recurrence where possible.

GENERAL CODE OF PRACTICE – SELF ASSESSMENT 2024-25

Introduction

1. This report provides the Board with an update on the Fund's self-assessment against the requirements of The Pension Regulator's General Code of Practice.

Recommendation

2. The Board are requested to note the update on progress in delivering the Fund's first General Code of Practice 2024-25 self-assessment.

Background

3. At the last meeting of the Board, members received a report providing the outcome of the Fund's first self-assessment against The Pension Regulator's (TPR) General Code of Practice (GCoP), which came into force on 27 March 2024.
4. Members were informed that 12% of the GCoP requirements deemed applicable to the LGPS had not been fully assessed at the time of reporting, with 80% of those requirements assessed as "fully compliant" and the remaining 8% of requirements having some compliance gaps which required action.

Progress update

5. Of the 12% of requirements for which the self-assessment was in progress at the time of the last report, 8% relate to the themes of contribution refunds, transfers out, and the risk of scams. These requirements have now been fully self-assessed. Fund officers have been aware for some time of weaknesses in the processes relating to these areas of activity as currently built in our pensions administration system UPM. These weaknesses have meant that some aspects of these processes rely on manual intervention rather than system-driven delivery. While Fund officers are confident that these manual processes are operating effectively, it has not been possible to adequately evidence this in relation to every requirement of the GCoP, as the manual processes are not always documented. A project has been underway for some time to rebuild the relevant processes in UPM, which once complete will ensure the Fund can adequately evidence our compliance with the GCoP requirements as we move forward. This project is expected to be complete by the end of the calendar year 2025. Compliance with these GCoP requirements will be re-assessed once these new processes have been operating for a suitable period of time.
6. The remaining 4% of the requirements for which the self-assessment was in progress at the time of the last report relate to the themes of member communications and the annual benefits statement, and compliance with the requirements of the GCoP itself and also the Disclosure Regulations 2013. This self-assessment remains in progress. Many of the requirements of these GCoP modules will be addressed with reference to information provided by the Fund on our website. As our website is in the process of being relaunched (the go-live date has been delayed but is expected during the second half of 2025), the process of matching the GCoP requirements to the content of our website will therefore be carried out once the new website is live.

7. In the meantime, the Administering Authority's Internal Audit team have begun an independent review of the Fund's self-assessment against the GCoP requirements. The terms of reference for this review are attached at Appendix A to this report. At the time of reporting this review has not yet concluded. However, verbal feedback from the internal audit team based on their preliminary review has been positive.

Next steps

8. The previous report to the Board on this subject included a series of next steps. Progress against this plan is set out below.

Action	Progress
Work will continue to finalise the self-assessment for those areas currently not completed, with any additional action plan items in these areas being included in the overall action plan and reported accordingly	As set out in the report above
The findings in this report will also be presented to the meeting of the Pension Fund Committee in May 2025	Complete
Regular updates will be brought to the Board and to the Pension Fund Committee on delivery of the action plan arising from this self-assessment, through regular business plan progress reports	Ongoing
Fund officers have engaged with the Administering Authority's Internal Audit team to schedule a first independent review during 2025 of the Fund's self-assessment findings and supporting evidence, to provide assurance that the findings in this report are supported appropriately with sufficient narrative and evidence – the outcome of this review will be reported to the Board upon completion	Internal audit review nearing completion
Fund officers await updates from the Government following the recent "Fit for the Future" consultation, which included proposals for a potential independent biennial governance review – the conclusions on this aspect of the consultation will inform the Fund's approach to future independent reviews of our GCoP compliance position	Pension Schemes Bill includes provision mandating regulator / ad-hoc independent governance reviews Consultation on detailed regulations / statutory guidance expected late 2025 Requirement expected to come into force from April 2026
If necessary, Fund officers will also investigate the option of commissioning our own independent compliance review, to be carried out by a third party specialist – this option to be progressed if conclusions on the Government's proposals are not finalised in a timely manner	No longer considered necessary in light of the outcome of the Government consultation
As capacity allows, Fund officers will extend this self-assessment approach to those GCoP expectations which are deemed "good practice" rather than "requirements", with the potential for the resulting action plan to be extended accordingly in order to meet this extended target	To consider as capacity allows

Appendix A

General Code of Practice – Internal Audit review terms of reference

The General Code of Practice, which came into force on 27 March 2024, consolidates ten previous codes - including Public Service Code 14, which CPF has historically reported compliance against - into a single framework for pension scheme governance. It introduces a requirement for schemes to conduct a self-assessment and, where applicable, an Own Risk Assessment (ORA). The Code is structured into four categories: requirements, good practice, explanatory content, and areas not applicable to Local Authorities.

CPF has completed its self-assessment against the majority (approximately 88%) of the “requirements” section. According to their submission, they report full compliance with 406 items (80%), non-compliance with 4 items (1%), partial compliance with 30 items (6%), and have marked 5 items (1%) as not applicable. The remaining 59 items (12%) are yet to be assessed.

In addition, Cheshire Pension Fund has developed a structured action plan to address the gaps identified during their initial self-assessment. This plan includes:

- Finalising assessments for the 12% of requirements that were not yet fully evaluated, particularly in areas such as transfers out, contribution refunds, scam prevention, member communications, and annual benefit statements.
- Addressing the 8% of requirements assessed as “partially compliant” or “not compliant” by identifying improvement actions and incorporating them into the broader governance work programme.
- Providing regular updates to the Pension Committee and Local Pension Board through business plan progress reports, ensuring transparency and oversight.
- Engaging Internal Audit to conduct an independent review in 2025 of the self-assessment findings and supporting evidence, to provide assurance over the robustness of the process.
- Monitoring outcomes from the government’s “Fit for the Future” consultation, which may introduce a requirement for biennial independent governance reviews. CPF’s future review strategy will be informed by these developments.
- Exploring third-party review options if government guidance is delayed, to ensure timely independent validation of compliance.
- Extending the self-assessment to include “good practice” expectations (beyond mandatory requirements), as capacity allows, with the potential to expand the action plan accordingly.

The objective of this engagement is to review and evaluate the work completed by CPF to date by selecting a sample of 100 responses and:

- Assessing the completeness and accuracy of the self-assessment in reflecting the scheme’s governance, risk management, and compliance arrangements.
- Evaluating the methodology used in conducting the self-assessment.
- Determining the adequacy of supporting evidence.
- Identifying any gaps, inconsistencies, or misinterpretations.
- Reviewing the action plan established by CPF.
- Providing recommendations to enhance governance and compliance.

CONTRIBUTION RATES REVIEW POLICY

Introduction

1. This report sets out a policy for reviewing contribution rates between triennial valuations.

Recommendation

2. The Board are asked to note and comment on the policy for reviewing contribution rates between triennial valuations as set out in Appendix A.

Introduction

3. The Board has previously agreed that any changes to Fund policy or strategy documents should be presented to the Board after they have been endorsed by the Pension Fund Committee. Board members can then satisfy themselves that they agree with any changes to the documents.
4. The Contribution Rates Review Policy was presented to the Pension Fund Committee at its meeting on 30 May 2025.
5. The Committee endorsed the introduction of the policy which came into force with immediate effect.
6. The remainder of this report is the detail that was presented to the Committee on 30 May 2025.

Reasons for decision

3. To provide employers with clarity around the circumstances where contribution rates may be reviewed between valuations.
4. To outline specific circumstances where contribution rates will not be reviewed.
5. Reflect the Administering Authority's interpretation of statutory guidance from the Ministry for Housing, Communities and Local Government (MHCLG) on preparing and maintaining policies relating to the review of employer contributions.
6. Endorse as a stand-alone policy to allow implementation immediately without waiting for the formal wider Funding Strategy Statement consultation later in the valuation cycle.



Policy on Contribution Reviews

May 2025



1 Introduction

The purpose of this policy is to set out the administering authority's approach to reviewing contribution rates between triennial valuations.

It should be noted that this statement is not exhaustive and individual circumstances may be taken into consideration where appropriate.

1.1 Aims and objectives

The administering authority's aims and objectives related to this policy are as follows:

- To provide employers with clarity around the circumstances where contribution rates may be reviewed between valuations.
- To outline specific circumstances where contribution rates will not be reviewed.

1.2 Background

The Fund may amend contribution rates between valuations for 'significant change' to the liabilities or covenant of an employer.

Such reviews may be instigated by the Fund or at the request of a participating employer.

Any review may lead to a change in the required contributions from the employer.

1.3 Guidance and regulatory framework

Regulation 64 of the Local Government Pension Scheme Regulations 2013 (as amended) sets out the circumstances under which LGPS contribution rates can be reviewed, including the following;

- Regulation 64 (4) – allows the administering authority to review the contribution rate if it becomes likely that an employer will cease participation in the fund, with a view to ensuring that the employer is fully funded at the expected exit date.
- Regulation 64A - sets out specific circumstances where the administering authority may revise contributions between valuations (including where a review is requested by one or more employers).

This policy also reflects the Fund's interpretation of statutory guidance from the Ministry of Housing, Communities and Local Government (MHCLG) on preparing and maintaining policies relating to the review of employer contributions. Interested parties may want to refer to an accompanying guide that has been produced by the Scheme Advisory Board as well as the letter from MHCLG to all Administering Authorities regarding Government's intention to consult on changes to the Regulations as they apply to revision of contribution rates.

2 Statement of principles

This statement of principles covers review of contributions between valuations. Each case will be treated on its own merits, but in general:

- The administering authority reserves the right to review contributions in line with the provisions set out in the LGPS Regulations. It will also consider requests from employers to do so.
- The decision to make a change to contribution rates rests with the administering authority, subject to consultation with relevant employers during the review period.
- Full justification for any change in contribution rates will be provided to relevant employers.
- Advice will be taken from the fund actuary in respect of any review of contribution rates.
- Any revision to contribution rates will be reflected in the Rates & Adjustment certificate.

3 Policy

3.1 Circumstances for review

The fund would consider the following circumstances as a potential trigger for review:

- in the opinion of an administering authority there are circumstances which make it likely that an employer (including an admission body) will become an exiting employer sooner or later than anticipated at the last valuation;
- an employer is approaching exit from the fund before completion of the next triennial valuation;
- there are changes to the benefit structure set out in the LGPS Regulations which have not been allowed for at the last valuation;
- it appears likely to the administering authority that the amount of the liabilities arising or likely to arise for an employer or employers has changed significantly since the last valuation;
- it appears likely to the administering authority that there has been a significant change in the ability of an employer or employers to meet their obligations (e.g. a material change in employer covenant, or provision of additional security);
- it appears to the administering authority that the membership of the employer has changed materially such as bulk transfers, significant reductions to payroll or large-scale restructuring; or
- where an employer has failed to pay contributions or has not arranged appropriate security as required by the administering authority.

3.2 Employer requests

The administering authority will also consider a request from any employer to review contributions where the employer has undertaken to meet the costs of that review and sets out the reasoning for the review. The administering authority would expect the reason for the review to fall into one of the above categories, such as a belief that their covenant has changed materially, or they are going through a significant restructuring impacting their membership. If the reason does not explicitly meet the criteria a contribution review will not take place.

The administering authority will require additional information to support a contribution review made at the employer's request. The specific requirements will be confirmed following any request and this is likely to include the following as a minimum:

- a copy of the latest accounts;
- details of any additional security being offered (which may include insurance certificates);
- budget forecasts; and/or
- information relating to sources of funding.

The costs incurred by the administering authority in carrying out a contribution review (at the employer's request) will be met by the employer. These will be confirmed upfront to the employer prior to the review taking place.

3.3 Other employers

When undertaking any review of contributions, the administering authority will also consider the impact of a change to contribution rates on other fund employers. This will include the following factors:

- The existence of a guarantor.
- The amount of any other security held.
- The size of the employer's liabilities relative to the whole fund.

The administering authority will consult with other fund employers as necessary.

3.4 Effect of market volatility

Except in circumstances such as an employer nearing cessation, the administering authority will not consider market volatility or changes to asset values as a basis for a change in contributions outside a formal valuation. In particular, a contribution rate review will not be considered for local authority employers in order to manage surpluses in between formal triennial actuarial valuations. However, if a contribution change is proposed by the Fund, this may take account of changes in markets and asset values since the last formal valuation.

3.5 Documentation

Where revisions to contribution rates are necessary, the fund will provide the employer with a note of the information used to determine these, including:

- Explanation of the key factors leading to the need for a review of the contribution rates, including, if appropriate, the updated funding position.
- A note of the new contribution rates and effective date of these.
- Date of next review.
- Details of any processes in place to monitor any change in the employer's circumstances (if appropriate), including information required by the administering authority to carry out this monitoring.

The Rates & Adjustments certificate will be updated to reflect the revised contribution rates.

4 Related Policies

The fund's approach to setting employer contribution rates is set out in the Funding Strategy Statement, specifically "Section 2 – How does the fund calculate employer contributions?".



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REGISTER OF INTERESTS

Introduction

1. The Board's register of interests is published on the Fund's website and an annual review is undertaken to ensure it contains up to date information.
2. This report provides the Board with a summary of the current register of interests for review by board.

Recommendation

3. Board members are requested to review the register of interests and advise if any amendments are required.

Register of Interests

4. The Local Pension Board maintains a register of interests to proactively identify, manage, and mitigate potential conflicts of interest among its members. This register helps ensure that Board members' decisions are made objectively and in the best interests of the Fund and its members, rather than being influenced by personal interests.
5. The register of interests helps to achieve the following:

Transparency and Accountability:

The register promotes transparency by making Board members' potential conflicts of interest publicly known.

Preventing Conflicts:

By recording potential conflicts, the Board can take steps to manage or avoid them, ensuring that decisions are made fairly.

Maintaining Public Trust:

A transparent process helps maintain public trust in the pension fund and its administration.

Legal and Regulatory Compliance:

The LGPS has legal and regulatory requirements for managing conflicts of interest, and the register is a key tool for demonstrating compliance with these requirements.

6. By maintaining a register of interests, Local Pension Boards can demonstrate their commitment to good governance and safeguard the interests of their Fund members.

Cheshire Pension Fund - Local Pension Board - Register of Interest - 2024-25							
Board Member	Role	Appointed	Term end date	Details of employment, office, trade, profession or vocation	Organisational relationship with Cheshire Pension Fund	Details of any directorships and indicate whether there is any association with the scheme	Board Member is a shareholder in the following associated companies.
Amanda Stott	Chair	26/09/2024	25/09/2027	Retired	Local Pension Board Chair		Amanda is a director/shareholder of small private limited companies (Bollington Movie Ltd, Silkonia.co.uk Ltd, Online VFR Ltd) and secretary of TLC PR Ltd.
James Lambert	Member Representative	26/06/2023	25/06/2026	Cheshire West & Chester Council employee	Contributing employee to the scheme.		
Geoff Wright	Member Representative	26/06/2024	25/06/2027	Cheshire West & Chester Council employee Unison Union	Contributing employee to the scheme Union Assistant Branch Secretary Local Pension Board Member Representative		
Councillor Robert Bissett	Employer Representative	26/06/2024	25/06/2027	Cheshire West & Chester Councillor Labour Party Member Chief Executive Officer - Chester Aid to the Homeless (CATH)	Local Pension Board Employer Representative		
Kay Lennon	Employer Representative	26/06/2023	25/06/2026	Cheshire West & Chester Council employee	Contributing employee to the scheme.		

DATA QUALITY

Introduction

1. This report provides the Board with the quarterly update on the Pensions Regulators (TPR) data quality scores for common and scheme specific data.

Recommendation

2. The Board are requested to note the position on the common and scheme specific scores.

Data Scores

3. As Board members are aware, each year the Fund is required to report data quality scores to the Pensions Regulator (TPR) as part of the Scheme Return.
4. The scores submitted for the TPR Scheme Return submitted for the last 3 years are included within the table below along with the scores as at 1 April and 25 July 2025.

	TPR Scheme Return				
	9-Oct-23	2-Jan-24	1-Nov-24	1-Apr-25	25-Jul-25
Common Data	99.17%	99.74%	96.00%	96.46%	96.46%
Scheme Specific Data	74.04%	85.62%	84.00%	74.62%	79.84%

5. The common data scores have remained consistent between April and July.
6. There is also an improvement in scheme specific data scores between April and July reflecting the ongoing work with employers on data cleansing following the March 2025 year-end.
7. Work is ongoing to improve both common and scheme specific data scores, aligned with the data cleansing work required to prepare for the Pensions Dashboards Programme.

COMPLIANCE UPDATE

Introduction

1. This report provides the Board with a summary of the Breaches Log for 1 April 2024 to 31 March 2025.

Recommendation

2. The Board are requested to note and comment on the summary of the Breaches Log for 1 April 2024 to 31 March 2025.

Breaches Log

3. Breaches are categorised as either “closed”, “report” or “monitor”. “Report” breaches are those which require reporting to The Pensions Regulator (TPR). “Monitor” breaches are where the Fund has highlighted an issue with the employer which requires further monitoring but are not material enough to require reporting to the Pensions Regulator. “Closed” breaches are those where, following investigation, no further action is deemed necessary.
4. A summary of the breaches included on the log between 1 April 2024 and 31 March 2025 are listed below in Table 1. For comparison purposes the total numbers of breaches for the prior year have also been included.

Table 1: Summary of the Breaches Log

	Total 2023-24	Total 2024-25	Status 2024-25		
			Report	Monitor	Closed
Contributions	44	47	2	9	36
ABS	1	1	1	0	0
Administration	4	7	0	0	7
AVC	1	0	0	0	0
Total	50	55	3	9	43

Contribution Breaches – 47

5. The thirty-six closed contribution breaches mainly relate to employers who have small numbers of staff and so are easily affected by unexpected staff absences. All these breaches have been quickly rectified by the employer.
6. The Report and Monitor breaches relate to two small employers in the Fund who have both now been reported to the Pensions Regulator.

Employer 1

7. This is a small employer with one active member, and has been subject to Monitor breaches in the past. Due to cash flow difficulties, the employer failed to pay both employee and employer pension contributions to the Fund for the period November 2022 to November 2023 totalling £14,387.38. In July 2024 the employer agreed to pay the outstanding debt in monthly instalments of £500. The first three instalments were received, along with the current monthly contributions for the active member each month.
8. Since the the end of October 2024 the employer has made no further payments to the Fund, therefore £12,887.38 remains outstanding in relation to the period November 2022 to November 2023. In addition to this, the monthly contributions for October to March 2025 have not been paid totalling £4,159.26, giving a total overdue debt of £17,046.64.

Employer 2

9. This is a small employer with one active member. The Fund was notified that the member had joined the pension fund as an active member in February 2024. It was requested that the member's contributions were backdated to February 2021, when the member started their employment.
10. The employer had been late with a number of months contribution payments but has now paid all contributions for the period April 2024 to 31 March 2025.
11. However, contributions are still outstanding for the backdated period of employment February 2021 to March 2024, the Fund is awaiting information from the employer as to the amount of contributions owed for this period. The Fund will continue to chase the employer for this information so the missing contributions can be paid to the Fund.

Administration Breaches - 7

12. The Board were briefed at the May meeting about one administration breach, which was identified as part of a process review, where 2,420 members who left the Fund within the period June 2022 to May 2024 were not notified of their rights and options when leaving the Fund, in the form of a Deferred Holding Letter, within two months of leaving the Fund.
13. Following the retirement of a member of staff in pensions, the usual process to identify these members had been missed, resulting in the affected members not receiving the letter notifying them of their rights and options. By September 2024, all affected members had received a letter advising them of the position. The impact on the affected members was assessed as minimal, as the majority were not within 12 months of their Normal Pension Age (NPA) or are ineligible to transfer for other reasons, so their pension rights are unaffected.

14. The remaining six administration breaches relate to ongoing activity to progress legacy administration casework. In these cases this legacy processing has triggered breaches, as scheme members are now receiving notification of their benefits who were not notified at the time within the specified limits.

Annual Benefit Statements - 1

15. Full details of this breach were previously presented to the Board.
16. The Board will recall the Fund delivered 85% of Annual Benefit Statements (ABSs) to active members on time (compared to 81% in 2023). For deferred members 99% (compared to 98% in 2023) received their ABS on time.
17. As at-mid February the Fund has been able to increase the percentage of active ABSs issued from 85% to 94%.
18. As the Fund introduced digital ABS for active members in 2024 this has allowed the Fund to resolve data issues and then publish ABS at a far faster rate than in previous years when statements would have to have been sent via the post. The Fund has been steadily reducing the number of members who didn't receive their ABS with regular processes since the end of August 2024.
19. Work has continued on data cleansing in order to maximise the number of members who can receive an ABS in 2025.

Standard Meetings			
February	May	July	October
Review of Pension Fund Committee, Investment Sub Committee and Pensions Employer Forum Minutes	Review of Pension Fund Committee, Investment Sub Committee and Pensions Employer Forum Minutes	Review of Pension Fund Committee, Investment Sub Committee and Pensions Employer Forum Minutes	Review of Pension Fund Committee, Investment Sub Committee and Pensions Employer Forum Minutes
Review Scheme Advisory Board and Sub Committee meetings Review the Performance Management Framework Review the Fund Compliance /Breaches Log	Review Scheme Advisory Board and Sub Committee meetings Review the Performance Management Framework Review the Fund Compliance /Breaches Log	Review Scheme Advisory Board and Sub Committee meetings Review the Performance Management Framework Review the Fund Compliance /Breaches Log	Review Scheme Advisory Board and Sub Committee meetings Review the Performance Management Framework Review the Fund Compliance /Breaches Log
Draft Annual Report	Sign off LPB Annual Report		
Review the TPR Data Scores and associated actions	Review the TPR Data Scored and associated actions	Review the TPR Data Scored and associated actions	Review the TPR Data Scored and associated actions
Review policies are kept up to date and produced in accordance with legislation and guidance	Review policies are kept up to date and produced in accordance with legislation and guidance	Review policies are kept up to date and produced in accordance with legislation and guidance	Review the progress made by the Fund including the detail of any ongoing actions
Review the process for IA in assessing internal controls of the fund and external audit process for reviewing the Accounts and Annual Report.	Review LPB and Fund Risks Registers	Update the Register of Interests/update website Review LPB Register of Interests	Review Fund's Conflict of Interest Policy and LPB Terms of Reference Review LPB Risk Register