



Pensions Committee

Date: WEDNESDAY, 3 DECEMBER 2025
Time: 2.00 pm
Venue: COMMITTEE ROOM - 2ND FLOOR WEST WING, GUILDHALL

Members: Deputy Timothy Butcher (Chairman)
David Sales (Deputy Chair)
Deputy Christopher Boden
Clare James
Alderman Gregory Jones KC
Alderman Simon Pryke

Enquiries: Molly Carvill
molly.carvill@cityoflondon.gov.uk

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

1. APOLOGIES

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

3. MINUTES

To agree the public minutes and non-public summary of the Pensions Committee meeting held on the 22 September 2025.

For Decision
(Pages 5 - 10)

4. ANNUAL REVIEW OF THE COMMITTEE'S TERMS OF REFERENCE

Report of the Town Clerk.

For Decision
(Pages 11 - 14)

5. WORK PROGRAMME

Report of the Chamberlain.

For Information
(Pages 15 - 16)

6. PENSIONS SCHEME – ADMINISTRATOR'S UPDATE

Report of the Chamberlain.

For Information
(Pages 17 - 26)

7. LOCAL GOVERNMENT PENSION SCHEME – TRANSFERS-OUT OF THE SCHEME: PROCESSES AND PRECAUTIONS

Report of the Chamberlain.

For Decision
(Pages 27 - 32)

8. LOCAL GOVERNMENT PENSION SCHEME 'FAIR ACCESS' CONSULTATION

Report of the Chamberlain.

For Information
(Pages 33 - 36)

9. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

10. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT

11. EXCLUSION OF THE PUBLIC

MOTION - That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

For Decision

12. MINUTES

To agree the non-public minutes of the Pensions Committee meeting held on the 22 September 2025.

For Decision
(Pages 37 - 46)

13. TRIENNIAL VALUATION DRAFT RESULTS

Verbal Presentation from Barnett Waddingham.

For Discussion

14. INVESTMENT STRATEGY REVIEW AND TRAINING

Report of the Chamberlain.

For Decision
(Pages 47 - 82)

15. DRAFT FUNDING STRATEGY STATEMENT (FSS)

Report of the Chamberlain.

For Discussion
(Pages 83 - 140)

16. PERFORMANCE MONITORING

a) Performance Monitoring: Report to 30 September 2025

Report of the Chamberlain.

For Information

(Pages 141 - 164)

b) **Performance Monitoring: Quarterly Report to 30 September 2025**

Report of Mercer.

For Information
(Pages 165 - 188)

17. LONDON COLLECTIVE INVESTMENT VEHICLE (LCIV) UPDATE

Report of the Chamberlain.

For Decision
(Pages 189 - 202)

18. TRANSITION OF ASSETS TO THE LONDON CIV

Report of the Chamberlain.

For Decision
(Pages 203 - 230)

19. ADMITTANCE TO THE LONDON CIV – REQUEST FOR DELEGATED AUTHORITY

Report of the Chamberlain.

For Decision
(Pages 231 - 238)

20. ADMITTED BODY STATUS (CITY ACADEMIES TRUST) - REQUEST FOR DELEGATED AUTHORITY

Report of the Chamberlain.

For Decision
(Pages 239 - 240)

21. PENSIONS SCHEME ADMINISTRATOR'S UPDATE - NON-PUBLIC APPENDICES

Non-Public Appendices B and D to be read in conjunction with item 6.

For Information
(Pages 241 - 246)

22. NON PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

23. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND THAT THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

PENSIONS COMMITTEE **Monday, 22 September 2025**

Minutes of the meeting of the Pensions Committee held at Committee Room - 2nd Floor West Wing, Guildhall on Monday, 22 September 2025 at 2.00 pm

Present

Members:

Deputy Timothy Butcher (Chairman)
David Sales (Deputy Chair)
Deputy Christopher Boden
Clare James
Alderman Simon Pryke

Officers:

Kate Limna	- Chamberlain's Department
Graham Newman	- Chamberlain's Department
Amanda Luk	- Chamberlain's Department
Sarah Port	- Chamberlain's Department
Ben Dunleavy	- Town Clerk's Department

In attendance:

Steve Turner	- Mercer
Gregory Hall	- Mercer

1. APOLOGIES

Apologies were received from Tim McNally. Alderman and Sheriff Gregory Jones KC observed the meeting virtually.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

There were no declarations of interest.

3. MINUTES

The Chairman congratulated Peter Lisley and Mark Wheatley on their election as Chair and Deputy Chair of the Local Government Pensions Board.

3.1 To agree the public minutes and non-public summary of the Pensions Committee meeting on 7 July 2025

RESOLVED – That,

- the public minutes and non-public summary of the Pensions Committee meeting held on 7 July 2025 were approved as an accurate record.

3.2 **To note the public minutes and non-public summary of the Local Government Pensions Board meeting on 21 July 2025**

RESOLVED – That,

- the public minutes and non-public summary of the Local Government Pensions Board meeting held on 21 July 2025 were received.

4. **WORK PROGRAMME**

The Committee received a report of the Chamberlain concerning a forward-looking Pensions Committee work programme.

RESOLVED - That Members,

- received the report and noted its content.

5. **RISK REGISTER**

The Committee received a report of the Chamberlain concerning the Risk Register for the Pensions Committee.

The Chairman suggested that the risk score for CHB Pensions 001 (Insufficient Assets – Pension Fund) which had a current risk score of 8, was too high and asked if Officers could review the scoring.

Members agreed that the score should be reviewed and were content to approve the Risk Register, subject to review.

RESOLVED - That Members,

- reviewed the existing risks and actions present on the Pensions Committee's Risk Register,
- agreed that Officers review the risk score for CHB Pensions 001 (Insufficient Assets – Pension Fund).

6. **PENSION SCHEME - ADMINISTRATOR'S UPDATE**

The Committee received a report of the Chamberlain concerning the standing update on pension administration activities.

Members were informed that the Pensions Regulator is expected to formally request the 2025 scheme return in October, which will include data scores.

A Member noted the lack of response from Aptia regarding the Guaranteed Minimum Pension (GMP) update that was requested previously and offered their assistance. Officers provided assurance that contact with Aptia had resumed but welcomed the offer of assistance. They also highlighted the complexity and importance of the dashboard project and requested that the Committee have more visibility on the following:

- The matching criteria used for dashboard data
- The status of the Data Protection Impact Assessment (DPIA)
- How final salary and CARE benefits are displayed, whether separately or blended and
- The implications for member benefit statements.

Officers replied to say that the matching criteria were being developed with an initial strict approach, which could potentially be relaxed during testing. A DPIA was being drafted and would be brought to the next meeting, and more detail on the dashboard display would be provided once the system was live.

RESOLVED – That Members,

- received the report and noted its content.

7. PENSIONS ADMINISTRATION - GUIDANCE ON TRANSFERS OUT

The Committee received a report of the Chamberlain regarding the City of London Pension Fund Transfers-out guidance document.

The Chamberlain presented the formal document outlining procedures and precautions for transfers out of the scheme. The document was developed in response to Barnett Waddingham's recommendations from the compliance review with the Pensions Regulator's General Code of Practice.

A Member asked who makes the decision to proceed when red or amber flags are raised during a transfer-out process. At the request of a Member, Officers confirmed that the Chamberlain and Corporate Treasurer were responsible for making the initial decision to proceed with a transfer-out if red or amber flags were raised. This decision could be escalated if this was deemed necessary. Officers undertook to return with an expanded section 3.2, clarifying the escalation process, to the next meeting.

RESOLVED - That Members,

- agreed to the recommendation of expanding section 3.2,
- received the report and noted its content.

8. CITY FUND AND PENSION FUND STATEMENT OF ACCOUNTS UPDATE 2024/25

The Committee received a report of the Chamberlain concerning an update on the publication and audit of the 2024/25 Draft Statement of Accounts for the City Fund and Pension Fund.

A Member queried the increase in net assets on the City Fund balance sheet which appeared to be due to a reduction in the pension liabilities.

The Corporate Treasurer explained that the reduction was due to the standardised Government IAS19 accounting treatment, not the actuarial valuation which was not reflected in the accounts.

RESOLVED – That Members,

- received the report and noted its content.

9. CITY FUND AND PENSION FUND - STATEMENT OF ACCOUNTS, AUDIT FINDINGS AND EXTERNAL AUDITOR'S ANNUAL AUDIT REPORT 2024/25

The Committee received a report of the Chamberlain concerning an update on the publication and audit of the 2024/25 Draft Statement of Accounts for the City Fund and Pension Fund.

Members were advised that the External Auditors had been complimentary about the Pension Fund audit and that only a few recommendations had been made, including for an internal audit to be conducted as there hadn't been one for some time. It was noted that this would be addressed over the next 12 months.

The Chairman commended Officers for producing a complex document under tight timelines.

RESOLVED - That Members,

- considered the Audit Findings Report for the Pension Fund 2024-25 as set out in Appendix 10.

10. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

There were no questions.

11. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT

There were no items of urgent business.

12. EXCLUSION OF THE PUBLIC

RESOLVED - That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

13. NON-PUBLIC MINUTES

Members considered the non-public minutes of the Pensions Committee meeting on the 7 July 2025 and received the Non-Public Minutes of the Local Government Pensions Board Meeting on 21 July 2025.

13.1 To agree the non-public minutes of the Pensions Committee meeting held on 7 July 2025

RESOLVED – That,

- the non-public minutes of the Pensions Committee meeting on the 7 July 2025 were approved as an accurate record.

13.2 To Note the Non-Public Minutes of the Local Government Pensions Board Meeting on 21 July 2025

RESOLVED – That Members,

- received and noted the Non-Public Minutes of the Local Government Pensions Board Meeting on 21 July 2025.

14. CITY FUND AND CITY'S ESTATE AUDITOR PROCUREMENT PROCESS

The Committee received a report of the Chamberlain detailing the City Fund and City's Estate auditor procurement process

15. **DRAFT PENSION FUND ANNUAL REPORT**
The Committee received a report of the Chamberlain concerning the Pension Fund's Draft Annual report for the year ended 31 March 2025.
16. **PERFORMANCE MONITORING**
The Committee received a joint report of the Chamberlain and a representative from Mercer.
17. **LONDON COLLECTIVE INVESTMENT VEHICLE (LCIV) UPDATE**
The committee received a report of the Chamberlain who provided several updates regarding the London CIV (LCIV), the asset pool operator for London LGPS Funds and in which the Pension Fund is invested in.
18. **INVESTMENT STRATEGY REVIEW AND TRANSFERRING OF ASSETS TO LCIV**
The committee received a report of the Chamberlain, providing an update on the ongoing investment strategy review and status of asset transfers to the London CIV.
19. **REVIEW OF INFLATION LINKED BENCHMARKS**
The Committee considered a report of the Chamberlain detailing Mercer's review of inflation-linked benchmarks.
20. **CASHFLOW FORECAST**
The committee received a report of the Chamberlain concerning the cashflow for the Pension Fund for the four-year period 2025/26 to 2028/29.
21. **PENSIONS INVESTMENT LETTER**
The Committee received a report of the Chamberlain regarding a Pension Investment Letter.
22. **DECISIONS TAKEN UNDER DELEGATED AUTHORITY OR URGENCY POWERS**
The Committee received a report of the Town Clerk which informed Members of the decision taken under the delegated authority.
23. **PENSION SCHEME - ADMINISTRATOR'S UPDATE NON-PUBLIC APPENDICES**
The Committee received a report of the Chamberlain concerning the non-public appendices for Agenda Item 6.
24. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
No questions were raised.
25. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND THAT THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
No other business was raised.

The meeting ended at 3.41 pm

Chairman

Contact Officer: Molly Carvill
molly.carvill@cityoflondon.gov.uk

Committee(s): Pensions Committee	Dated: 03/12/2025
Subject: Annual Review of the Pensions Committee Terms of Reference	Public: For Decision
This proposal: <ul style="list-style-type: none"> • provides statutory duties • provides business enabling functions 	N/A
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Town Clerk
Report author:	Molly Carvill, Governance Officer

Summary

The annual review of the Pensions Committee Terms of Reference enables any proposed changes to be considered in time for the annual reappointment of Committees and Boards by the Court of Common Council. The Terms of Reference for the Pensions Committee are attached at Appendix 1 for Members' consideration.

Recommendation(s)

Members are asked to:

- Agree that the terms of reference of the Pensions Committee, subject to any comments, be approved for submission to the Court of Common Council in April 2026, and that any further changes required in the lead up to the Court's appointment of Committees be delegated to the Town Clerk in consultation with the Chairman and Deputy Chairman;
- Members consider whether any change is required to the frequency of the Committee's meetings.

Appendices

- Appendix 1 – Court Order 2024/25 – Pensions Committee

Molly Carvill

Governance Officer

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KING, Mayor	RESOLVED: That the Court of Common Council holden in the Guildhall of the City of London on Friday 25 th April 2025, doth hereby appoint the following Committee until the first meeting of the Court in April, 2026.
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PENSIONS COMMITTEE

1. **Constitution**

A non-Ward committee consisting of:

- Up to seven Members elected by the Court of Common Council, at least one of whom shall have fewer than five years' service on the Court at the time of their appointment
- Up to three independent members (i.e., non-Members of the Court of Common Council) co-opted to the Committee on the advice of the Chamberlain, with voting rights.

The Chairman and/or Deputy Chairman of the Local Government Pensions Board shall be permitted to attend the Committee in an observing capacity.

N.B. - No Member of the Pension Committee shall be a Member of the Local Government Pensions Board, or be the Chair or Deputy Chair of the Corporate Services Committee, the Finance Committee, or the Policy & Resources Committee simultaneously.

2. **Quorum**

The quorum consists of any three elected Members.

3. **Membership 2025/26**

- 4 (4) David James Sales
- 3 (3) Christopher Paul Boden, Deputy
- 3 (3) Timothy James McNally
- 4 (2) Timothy Richard Butcher, Deputy
- 2 (2) Gregory Jones KC, Alderman and Sheriff
- Vacancy
- Vacancy

Together with two Members to be appointed this day and the following independent Members referred to in paragraph 1 above:-

Independent Members

Clare James

4. **Terms of Reference**

To undertake statutory functions on behalf of the Local Government Pension Scheme (LGPS) and ensure compliance with the Local Government Pensions Scheme Regulations ("the Regulations"), relevant legislation, and best practice as advised by the Pensions Regulator.

To be responsible for: -

- a) formulating, publishing and periodically review strategies and policies around the Pension Fund, for example (but not limited to) investments, responsible investment, funding, and administration.
- b) selecting and appointing suitability qualified external service providers, such as investment managers and advisors as required.
- c) monitoring the Pension Fund's investment arrangements including asset allocation, the performance of investment managers and advisors, and asset pooling arrangements (noting that the Pension Fund is a shareholder of the London CIV pool).
- d) monitoring liabilities, making arrangements for the triennial actuarial valuation of the Pension Fund, and considering and approving the required employer contribution levels for each employer within the Fund.
- e) dealing with the admission and cessation of employers as and when necessary and to review the ability of admitted bodies to meet their obligations to the Pension Fund.
- f) ensuring the Corporation effectively discharges its obligations to scheme members and employers as an administering authority.
- g) considering and approving the Pension Fund's Annual Report as well as all other statutory statements required under the Regulations.
- h) working with, receiving and considering comments from the Local Government Pensions Board (a scrutiny and non-decision-making body established under the Regulations) in pursuit of good governance of the LGPS.
- i) ensuring that arrangements are in place for consultation with stakeholders as necessary.
- j) developing and maintaining the appropriate level of knowledge and understanding to carry out their duties effectively (including completion of the Pensions Regulator's Public Service toolkit).

NOTE: whilst it is the expectation and intention that corporate policies are applied in respect of the Pension Committee's activities, such matters must always be considered in light of the specific regulatory requirements that apply to the administration of the LGPS. Therefore, where relevant and insofar as such policies impact the Pension Fund, they will need to be reviewed by the Pension Committee.

PENSION COMMITTEE WORK PROGRAMME 2025/26

Timescale	Funding	Investment	Governance	Administration & Communication	Training Items #
Standing items		<ul style="list-style-type: none"> Investment Monitoring (inc. CAS update) LCIV/Pooling Update 	<ul style="list-style-type: none"> Work programme 	<ul style="list-style-type: none"> Administration Update 	
2025/26					
Q3 2025/26 (December)	<ul style="list-style-type: none"> Triennial Valuation Initial Results Draft Funding Strategy Statement 	<ul style="list-style-type: none"> Initial Investment Strategy Review Transition of assets to the LCIV 	<ul style="list-style-type: none"> LGPS Fair Access Consultation Delegated Authority: Admittance to the LCIV Delegated Authority: City Academies 	<ul style="list-style-type: none"> Revised Guidance on Transfers out 	
Q4 2025/26 (February)	<ul style="list-style-type: none"> Cashflow forecast 	<ul style="list-style-type: none"> Refined Investment Strategy Review Principles of Responsible Investment TCFD report 2025 Responsible Investment Policy Review* 	<ul style="list-style-type: none"> Risk Register Investment Consultant Strategic Objectives Training Policy Review (inc. conflicts of interest) 	<ul style="list-style-type: none"> Updates to member communication letters (if required) 	<ul style="list-style-type: none"> Responsible investment/climate action (in house)
Q4 2025/26 (March)	<ul style="list-style-type: none"> Triennial Valuation Final Results Final Funding Strategy Statement 	<ul style="list-style-type: none"> Final Investment Strategy Review 	<ul style="list-style-type: none"> Inheritance Tax Changes 	<ul style="list-style-type: none"> Data Protection Impact Assessment 	<ul style="list-style-type: none"> Pensions Portal training
2026/27					
Q1 2026/27 (July)	<ul style="list-style-type: none"> Funding Update 2025/26 		<ul style="list-style-type: none"> City Fund and Pension Fund Accounts 2025/26 		

In addition to training provided either in house or by third party organisations, all Members will be expected to register for tPR online training and complete the modules in respect of **public sector pension schemes** within 12 months of joining the Committee. Members are also required to complete the Barnett Waddingham ‘Enlighten!’ online training within 12 months.

*Responsible investment activities are undertaken in conjunction with Investment Committee.

Notes

Triennial Review to be taken at same time as Investment Strategy review (2025).
Cashflow forecast and Risk Register are reviewed every 6 months.

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City of London Corporation Committee Report

Committee(s): Pensions Committee	Dated: 3 December 2025
Subject: Pensions Scheme – Administrator’s Update	Public report: For Information
This proposal: <ul style="list-style-type: none"> • provides statutory duties • provides business enabling functions 	
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain’s Department?	n/a
Report of:	The Chamberlain
Report author:	Graham Newman – Chamberlain’s Department

Summary

The administration of the City of London Local Government Pension Scheme (the Scheme) is undertaken by the Pensions Team within the Chamberlain’s Department.

The table below provides a summary of general information around a range of topics in relation to the administration of the Scheme since the last Committee meeting on 22 September 2025. Members are asked to note the report and provide feedback.

Item	Update
Annual schedule of events for the administration of the Pensions Scheme	Appendix A provides details of the events / dates that form the main diary of the Scheme administration.
Information of Scheme Record Keeping	As the Scheme’s administrating authority, the City is responsible for making sure the scheme has good records. The City is required to ensure it has accurate, complete and up-to-date records and should have controls and processes in place to maintain these standards. Failure to maintain complete and accurate records can risk not meeting legal obligations as set by the Pensions Regulator which could lead to fines and/or enforcement action being taken.

	<p>The City's scheme data is measured once a year and the data scores are submitted to the Pensions Regulator (tPR) in the annual scheme return.</p> <p>The Pensions Office received the 2025 scheme return on 23 October 2025 and at the point of writing, was preparing to complete the return. There is a 6 week timeframe within which the return must be submitted, meaning the deadline is 3 December 2025.</p>
Complaints or disputes under the Scheme's Internal Disputes Resolution Process (IDRP)	None to report.
Public Service Pensions - Reporting Breaches of Pension Law	None to report
Any audit reports relating to the administration of the Scheme	The City of London Internal Audit team will be undertaking a review of the Pension Fund Administration function. It is expected that the review will start in January 2026.
Any reports relating to the administration of the Pension Scheme which have been considered by other Committees	None to report.
Pension Administration System	<p>The Pensions Office has rolled-out the Online Member Portal which allows members to access their pension record, make amendments to selected personal data (i.e. name and death grant nominees) and to run their own retirement estimates.</p> <p>The portal was used for providing the 2024 and 2025 annual benefit statements and provides a potential platform for future bulk mailings.</p> <p>The system has been rolled out to all active and retired scheme members and is now also available to deferred scheme members so that access to the portal can continue as active scheme members leave the organisation.</p> <p>One of the main facilities that will be expected to be added to the portal is the ability to upload pensioner payslips and P60s and make these available to pensioner scheme members.</p> <p>This facility requires some add-on software to the existing pensions portal (which will incur a cost) as well as the ability</p>

	<p>to extract the necessary data from the payroll system and upload it into the pensions online portal..</p> <p>The Pensions Office is in discussion with the Payroll Office to determine whether the new payroll system that is being developed will be able provide the required data in the necessary format.</p> <p>Once this has been confirmed it will be possible to move to the next step in the process of obtaining the add-on software.</p>
Transfers-out of Pension Benefits	<p>A revised version of the City of London Pensions Fund Transfer Communications Policy statement is included as a separate item on the agenda.</p>
Public Sector Pensions Legal Challenge	<p><u>Lord Chancellor and Secretary of State for Justice v McCloud and others</u></p> <p>With effect from April 2015 (April 2014 for the LGPS) all public sector pension schemes were subjected to reforms that changed the way benefits were accrued and the date from which they would become payable.</p> <p>However, the legality of these reforms was successfully challenged and they were found to be discriminatory on the grounds of age. This challenge came to be referred to as 'McCloud'.</p> <p>The government consulted on what method of 'Remedy' should be used to remove the discrimination and on 10 March 2022 the Public Service Pensions and Judicial Offices Act 2022 received Royal Assent.</p> <p>The main purpose of the Act was to set out the intention of the 'McCloud Remedy' and implement it in the public service pension schemes.</p> <p>Further consultation determined the form the Remedy would take in respect of the LGPS and the regulations were formally laid and then implemented with effect from 1 October 2023.</p> <p>For active scheme members retiring after the implementation date, their McCloud eligibility is assessed by the Pensions Office and if appropriate their benefits are based upon the terms of the Remedy. In addition, from 2025 onwards, all Annual Benefit Statements issued to active and deferred members must include details in respect of the Remedy and how it affects their individual benefits.</p> <p>With regards to retired members, all retirements since the introduction of the career average scheme in April 2014 will need to be assessed for eligibility for the McCloud Remedy. For those deemed to be eligible, the process of</p>

	<p>recalculating benefits already in payment under the terms of the Remedy is underway. Any appropriate adjustments are being made and arrears paid. This process will also apply for the pensions being paid to the survivors/dependants of an eligible member who passed away before the Remedy was implemented.</p> <p>The Pensions Office has implemented the Remedy in respect of active scheme members and all retirements that have occurred since the implementation date (i.e. 1 October 2023) have been processed on this basis.</p> <p>The 2025 Annual Benefit Statements (ABS) for eligible scheme members were issued by the 31 August 2025 deadline and included the estimated underpin protection as provided for by the McCloud Remedy.</p> <p>Updates regarding the implementation of the McCloud Remedy will continue to be brought to each Committee meeting.</p>
Pension Committee Training	<p>All Members of the Committee are expected to register for tPR online training and complete the modules in respect of <u>public sector pension schemes</u>.</p> <p>The link for the online training is: https://www.thepensionsregulator.gov.uk/en/public-service-pension-schemes/understanding-your-role/learn-about-managing-public-service-schemes</p> <p>Following a trial period by officers, Members of the Committee have agreed to complete the online LGPS training that has been created by our actuary Barnett Waddingham. The training module is called 'Enlighten' and is specifically directed at LGPS Committees, Boards and officers. There are currently four courses available; each consisting of several bitesize videos and followed by a quiz.</p> <p>Details in respect of training modules completed by each Member are included on the non-public agenda (Appendix B).</p> <p>Members are expected to re-do the tPR training modules every 3-5 years.</p>
Pensions Office Key Performance Indicators	<p>Appendix C provides statistics in relation to the performance of the Pension Scheme Administration.</p> <p>The working processes followed by the Pensions Team are regularly reviewed to ensure the statistics accurately reflect the work involved.</p>
Guaranteed Minimum Pension (GMP) Reconciliation	<p>An update of the status of this project has been requested from the company commissioned to provide this piece of work (Aptia, previously Mercer). Aptia have confirmed that</p>

	<p>the data is currently being collated and that they expect to provide it to the Pensions Office shortly.</p> <p>Once the data has been received, the Pensions Office will be able establish whether any of the GMPs already in payment are greater or lower than they should be and make any necessary adjustments.</p>
Pensions Dashboards	<p>Introduced by the Department for Work and Pensions (DWP), Pensions Dashboards have been designed to provide an online platform that will allow individuals to access details of their accrued pension benefits from multiple sources in one place. The intention is to support better planning for retirement, and help individuals reconnect with any pension pots they may have lost over time.</p> <p>Following revisions to the original staging dates, the deadline for public sector pension schemes to connect to the national infrastructure was 31 October 2025. The City of London met this deadline.</p> <p>The service scheduled to be released to the general public by 31 October 2026. Schemes will be given at least 6 months notice before the public go-live date.</p> <p>One crucial aspect of the Dashboard is the matching criteria used by individual funds to match queries made by customers via the dashboard ecosystem with the data held on file by the pension provider.</p> <p>Details of the matching criteria chosen by the City of London are shown at Appendix D.</p> <p>Updates regarding the progress being made in respect of the Dashboards project will be brought to each Committee meeting.</p>

Recommendation

The Committee is asked to note the report and provide any feedback in relation to this information.

Appendices:

Appendix A – Annual Schedule of Events (Administration

Appendix B – Member Training (NON PUBLIC)

Appendix C – KPI Details

Appendix D – Pensions Dashboards Matching Criteria (NON PUBLIC)

Graham Newman

Pensions Manager | Chamberlain's Department

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Local Government Pension Administration - Schedule of Events 2025/26

Date Due	Event	Completed
1 April 2025	Employee Contribution band review/implementation.	1 April 2025
6 April 2025	Revaluation of CARE benefits.	6 April 2025
1 Monday in April following Tax Year End	Pensions Increase (PI) – Annual Inflation increase.	7 April 2025
May 2025	Tax return for Quarter 4 (to 31/3/2025)	19 May 2025
31 May 2025	Pensioner P60s distributed	31 May 2025
30 June 2025	Publish draft City Fund Accounts 2024/25 (including the Pension Fund Accounts)	
June/July 2025	Year-end data to the pension fund's actuary	14 July 2025
August 2025	Tax return for Quarter 1 (to 30/06/2025)	6 August 2025
31 August 2025	Issue of Annual Benefit Statements deadline.	31 August 2025
31 August 2025	Deadline for providing McCloud Remedy information to the active and deferred membership.	31 August 2025
30 September 2025	Employee Contribution Band review	September 2025
5 October 2025	Issue of Annual Allowance (AA) Saving Statements deadline	1 October 2025
31 October 2025	Pensions Dashboard staging deadline	31 October 2025
November 2025	Tax return for Quarter 2 (to 30/09/2024)	
1 December 2025	Publication of 2024/25 Pension Fund Accounts and Annual Report	
3 December 2025	Scheme Return to the Pensions Regulator	
February 2026	Tax Return for Quarter 3 (to 31/12/2025)	
1 April 2026	Employee Contribution band review/implementation.	
6 April 2026	Revaluation of CARE benefits.	
1 Monday in April following Tax Year End	Pensions Increase (PI) – Annual Inflation increase.	
May 2026	Tax return for Quarter 4 (to 31/3/2026)	
31 May 2026	Pensioner P60s distributed	
30 June 2026	Publish draft City Fund Accounts 2025/26 (including the Pension Fund Accounts)	

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City of London Local Government Pension Scheme - Administration Key Performance Indicators

Task	Target (Working Days)	Result 2024/25	Number of cases in 2024/25	Result 2023/24	Number of cases in 2023/24	Result 2022/23	Number of cases in 2022/23
Initial payment of retirement benefits	10 days*	96.32%	190	94.32%	264	97.35 %	279
Process refund and make payment	5 days	90.57%	53	95.79%	95	94.85 %	97
Statement notifying estimate of retirement benefits	20 days	96.69%	151	96.57%	175	97.04 %	103
Statement detailing transfer-in credit	20 days	98.46%	130	100.00%	24	100.00 %	31
Transfers-out payments	20 days	100%	56	100.00%	34	100.00 %	156
Answering general correspondence:	10 days	97.73%	573	94.99%	579	96.50 %	501
Payment of lump sum death grants:	14 days	100%	18	100.00%	13	92.59 %	27
Letters to dependants in respect of benefits due:	5 days	97.14%	70	94.74%	57	98.36 %	61

Task	Target (Working days)	Quarter 1 01/04/2025 – 30/06/2025	Quarter 2 01/07/2025 – 30/09/2025	Number of cases in Quarter 2	Running total for the year 01/04/2025 – 31/03/2026	Running total number of cases for the year 01/04/2025 – 31/03/2026
Initial payment of retirement benefits	10 days*	95.35%	95.45%	66	95.41%	109
Process refunds and make payments	5 days	100.00%	75.00%	4	91.67%	12
Statement notifying estimate of retirement benefits	20 days	95.83%	87.50%	8	93.75%	32
Statement detailing transfer-in credit	20 days	100.00%	95.83%	24	97.96%	49
Transfers-out payments	20 days	90.48%	88.89%	9	90.00%	30
Answering general correspondence	10 days	97.26%	97.76%	134	97.50%	280
Payment of lump sum death grants	14 days	100.00%	80.00%	5	90.91%	11
Letters to dependant's in respect of benefits due	5 days	90.00%	100.00%	9	94.74%	19

* At the June 2024 Committee meeting, Members agreed to change the target for the initial payment of retirement benefits from 5 to 10 working days. Statistics shown for 2023/24 and earlier are based upon the 5 working days target. Statistics from April 2024 onwards have been collated based upon the revised timeframe.

City of London Corporation Committee Report

Committee(s): Pensions Committee – For Decision Local Government Pensions Board – For Information	Dated: 3 December 2025 12 January 2026
Subject: Local Government Pension Scheme – Transfers-out of the scheme: processes and precautions	Public report: For Decision
This proposal: <ul style="list-style-type: none"> • provides statutory duties • provides business enabling functions 	
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain’s Department?	n/a
Report of:	The Chamberlain
Report author:	Graham Newman

Summary

In December 2024, the Pensions Committee received a report on Barnett Waddingham’s General Code of Practice Compliance Review which checked the City of London Pension Fund’s compliance with the Pension Regulators General Code of Practice. That report recommended that a document be created to cover the steps taken around Transfers Out including ensuring as much as possible that scheme members are made aware of potential scams and take the necessary steps to protect themselves and the process and transfer of contributions.

The document was originally brought to the Committee on 22 September 2025, however Members asked for Section 3.2 of the document (‘Due Diligence and Scam Prevention’) to be expanded with further details added in respect of escalation procedures, should the Pensions Office believe the transfer cannot proceed.

The revised document is at Appendix A, with the changes underlined. It should be noted that this is a working document, and all sections will be expanded or amended, as required

Recommendation

Members are asked to approve the City of London Pension Fund Transfers-out document.

Appendices:

Appendix A: City of London Pension Fund Transfers-out document.

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The City of London Pension Fund

Transfers-out of the scheme: processes and precautions

September 2025

Actions and precautions when transferring benefits out of the pension scheme

1. Introduction

The Local Government Pension Scheme (LGPS) is a defined benefit public sector pension scheme governed by the LGPS Regulations 2013. Transfers out of the scheme are permitted under specific conditions and require careful administration to ensure compliance, scheme member protection, and scheme integrity.

The Pensions Office plays a critical role in safeguarding scheme members' pension rights during transfers. By adhering to regulatory requirements, conducting thorough due diligence, and prioritising scheme member protection, administrators ensure the integrity of the scheme and the financial security of its scheme members

2. Eligibility and Conditions for Transfer

The Pensions Office must confirm that the scheme member meets the statutory conditions for transfer:

- The scheme member must be deferred (no longer contributing to the LGPS).
- Transfers must be made to an HMRC-registered pension scheme or a Qualifying Recognised Overseas Pension Scheme (QROPS).
- Transfers are only allowed if the scheme member is at least one year away from their Normal Pension Age.
- Scheme members cannot transfer their benefits if they are already receiving LGPS pension benefits or have retired due to ill health and received Tier 3 benefits.

3. Required Actions by the Pensions Office

3.1. Provide Transfer Quotations

- Calculate and issue a transfer value quotation, guaranteed for three months from the calculation date.
- Include a written option form and relevant documentation for the receiving scheme

3.2. Due Diligence and Scam Prevention

- Conduct due diligence checks on the receiving scheme.
- Assess for signs of pension scams, including how the scheme member was contacted and advised.
- If risks are identified, the Pensions Office must pause or refuse the transfer. Risks are divided into Red and Amber Flags
 - Red flags: Indicators of high scam risk. If a red flag is identified the transfer **must be refused**. Examples include:

- Member pressured to transfer quickly;
- Receiving scheme offers incentives or loans;
- Evidence of scam activity.
- Amber flags: Indicators of potential risk. If an amber flag is identified, the scheme member **must obtain guidance from MoneyHelper before the transfer can proceed.** Examples include:
 - Complex investment structures;
 - Overseas investments;
 - Unclear or inconsistent information from the receiving scheme.

3.3. Escalation Procedures

- Step 1: Initial Due Diligence
 - Collect all required information from the member and the receiving scheme.
 - Check statutory conditions for transfer and identify any amber or red flags.
- Step 2: If Amber Flags Are Found
 - Inform the member in writing that they must obtain MoneyHelper guidance.
 - Do not proceed until confirmation of guidance is received.
 - Document all communications and decisions.
- Step 3: If Red Flags Are Found
 - Refuse the transfer under statutory rules.
 - Notify the member in writing, explaining the reason for refusal and their right to complain.
 - Record the decision and rationale for audit purposes.
 - Consider reporting to Action Fraud if scam activity is suspected.
- Step 4: Reporting Obligations
 - Apply the traffic light framework for breaches:
 - Red breach: Must report to The Pensions Regulator.
 - Amber breach: Use judgment; may need to report.

3.4. Financial Advice Requirement

- If the transfer value exceeds £30,000, the Pensions Office must ensure the scheme member has received independent financial advice from an FCA-authorised adviser

Maintain records of the advice confirmation before proceeding.3.4. Scheme member Communication

- Clearly explain the implications of transferring from a defined benefit to a defined contribution scheme, including loss of guaranteed benefits and survivor pensions
- Encourage scheme members to consult **MoneyHelper** or **Pension Wise** for guidance.

4. Precautions and Safeguards

4.1. Scam Protection Measures

- Follow the Pensions Regulator's guidance on scam prevention <https://www.thepensionsregulator.gov.uk/en/pension-scams> .
- Invite scheme members to attend a meeting to discuss the concerns if risks are suspected

4.2. Regulatory Compliance

- Ensure all actions comply with LGPS Regulations 2013, particularly Part 2 (Administration) <https://www.legislation.gov.uk/ukxi/2013/2356/part/2> and Part 2 Chapter 7 (Transfers) <https://www.legislation.gov.uk/ukxi/2013/2356/part/2/chapter/7>
- Maintain accurate records of all communications, calculations, and decisions.

4.3. Club Transfers (generally transfers between public sector pension schemes)

- If transferring to another public service pension scheme, apply Club transfer rules for equivalent benefit treatment.
- Ensure the transfer is initiated within 12 months of joining the new scheme and there is no break exceeding five years

5. Additional Considerations

- AVCs (Additional Voluntary Contributions) may be transferred separately, subject to specific conditions
- Transfers related to the McCloud remedy must be handled with care, as protections vary across the different pension schemes to which the Remedy may apply.

City of London Corporation Committee Report

Committee(s): Pensions Committee (For Information) Local Government Pensions Board (For Information)	Dated: 3 December 2025 12 January 2026
Subject: Local Government Pension Scheme 'Fair Access' Consultation	Public report: For Information
This proposal: <ul style="list-style-type: none"> • provides statutory duties • provides business enabling functions 	
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	n/a
Report of:	The Chamberlain
Report author:	Graham Newman

Summary

On 13 October 2025 the UK Government launched a consultation entitled 'Local Government Pension Scheme in England and Wales: Scheme Improvements (Access and Protections)', commonly referred to as the LGPS Fair Access Consultation.

Alongside the consultation, the Government also released draft regulations in respect of two of the four proposals: 'LGPS Access for Elected Mayors and Councillors' and the 'New Fair Deal'. Draft regulations in respect of the remaining two proposals (increases to the 'Normal Minimum Pension Age' and 'Academies and Employer Consolidation') are expected later in 2025.

This report summarises the key proposals and protections outlined in the consultation, which aims to enhance fairness, accessibility, and consistency within the Local Government Pension Scheme (LGPS).

Recommendation

The Committee is asked to note the report and provide any feedback in relation to this information.

Main Report

Purpose of the Consultation

1. The consultation seeks to address key administrative and benefits-related issues, including proposals that have been anticipated for some time, such as Fair Deal, and newer initiatives such as the re-admission of councillors into the scheme. The consultation closes on 22 December 2025 and can be found [here](#).
2. The City of London does not currently intend to respond to the consultation.
3. The consultation covered four key proposals which are summarised below.

Normal Minimum Pension Age (NMPA)

4. The government proposes implementing the increase in the Normal Minimum Pension Age from 55 to 57 from 6 April 2028, except for ill-health retirements. This change will affect when members can access their benefits, but protections will apply for certain members under the Protected Pension Age (PPA) provisions outlined in the Finance Act 2022.
5. Key points of the proposal include:
 - All scheme members (active and deferred) in the LGPS immediately before 4 November 2021 will retain a PPA, allowing access from age 55 after 2028.
 - Scheme members joining on or after 4 November 2021 will not have a PPA and will only be able to access benefits from age 57.
 - Transfers from non-LGPS schemes where there was an actual or prospective right to retire at 55 will not confer a PPA in the LGPS.
 - The protections will be complex to administer, and administrators will need to be able to verify scheme member status as of 4 November 2021.
 - Draft regulations for this change are expected later in the year.
6. The main elements of PPA are shown in the table below:

Feature	Before 6 April 2028	After 6 April 2028	Notes
NMPA	55	57	Applies to all unless PPA applies
PPA eligibility	Based on rights before 4 Nov 2021	Retained if eligible	Must meet qualifying conditions
Access to benefits	From 55 (if scheme allows)	From 57 (unless PPA applies)	Depends on scheme rules
Transfers	PPA may apply to transferred-in benefits only	Yes, but limited to transferred rights	Bulk transfers may preserve PPA

LGPS Access for Elected Mayors and Councillors

7. The government proposes extending LGPS access to councillors and mayors in England, recognising their vital public service roles. This includes all English

mayors, deputy mayors, and councillors of principal English local authorities, including the Common Council of the City of London. Councillors remunerated for roles such as combined authorities or audit committees will also be eligible for pension benefits.

8. Elected Members will participate as scheme members of the LGPS 2014, with the estimated national employer cost estimated to be £40–50 million annually, with no additional funding provided.
9. The Government has published draft regulations covering this issue alongside the consultation. Whilst the consultation does not say when this change would be effective from, the draft regulations have an indicative coming into force date of 1 April 2026, potentially indicating the government's plans

Academies and Employer Consolidation

10. The consultation proposes changes to LGPS employer consolidation rules, particularly for multi-academy trusts (MATs), which now account for over half of English schools. Consolidation aims to simplify administration and improve efficiency for MATs. Four criteria for consolidation without Secretary of State consent include:
 - Clear value-for-money assessment in favour of consolidation.
 - Pre-existing relationship with the receiving fund.
 - Agreement from all administering authorities involved.
 - The receiving fund's ability to manage the transfer effectively.
11. Draft regulations for this change are expected later in the year.

New Fair Deal

12. The government seeks to implement New Fair Deal in local government, ensuring continuity of LGPS membership for staff outsourced to contractors. The broadly comparable scheme option will be removed except in exceptional cases. Contractors will participate via the 'deemed employer' route, with pass-through contribution arrangements. The admission body route will end for new contracts, while existing agreements will remain until expiry. All LGPS employers will be Fair Deal employers, except higher education corporations and admission bodies.
13. The Government has published draft regulations covering this issue alongside the consultation, however, there is no indication of when this proposal is expected to take effect from.

Conclusion

14. These proposals introduce significant administrative and financial considerations, including complexity in verifying PPA eligibility, cost impact for councils and employers due to expanded access for elected officials, governance changes for MAT consolidations, and contractual adjustments for outsourcing under Fair Deal.

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