

City of London Corporation Committee Report

Committee(s): Police Pensions Board	Dated: 4 June 2025
Subject: CoL Police Pension 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 Police 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 Board meeting on 10 February 2025. Members are asked to note the report and provide feedback.

Item	Update
Annual schedule of events for the Pensions Scheme	Update provided (Appendix 1).
Information of Scheme Record Keeping	No amendments since the last Board meeting.
Any recent Police Pension Scheme breaches of the law	There has been 1 breach of the law.
Any audit reports relating to the administration of the Scheme	None to report.
Data Protection Act 2018 (DPA18) – Data Retention Policy	No amendments since last Board meeting.
General Data Protection Regulation (GDPR) /	No amendments since the last Board meeting.

Data Protection Act 2018 (DPA18) – Privacy Notice	
Procurement of Pension Administration System	See Pensions Dashboards Section.
Legal Challenge 1	<p><u>Lord Chancellor and Secretary of State for Justice v McCloud and others</u></p> <p>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 implement the ‘McCloud Remedy’ in the public service pension schemes and it is to be implemented in two phases.</p> <p>Phase one was to move all remaining active members of the ‘legacy’ schemes (Police Pension Schemes 1987 and 2006) into the new scheme (Police Pension Scheme 2015) with effect from 1 April 2022.</p> <p>Phase two was implemented with effect from 1 October 2023. This second phase provides the deferred choice underpin which gives eligible members the choice between legacy scheme or new scheme membership for the period 1 April 2015 to 31 March 2022.</p> <p>The Pensions Office has implemented the Remedy in respect of active scheme members and all retirements that have occurred since this date (i.e. 1 October 2023) have been processed on this basis.</p> <p>For eligible members, the 2024 Annual Benefit Statement included a ‘Remediable Service Statement’ (RSS) that provided comparative figures showing the benefits if the member accepted the Remedy together with those if they choose to reject it.</p> <p>In addition, a Remediable Pension Savings Statement was sent to all members whose pension growth exceeded the Annual Allowance during the Remedy Period as a result of the Remedy implementation.</p> <p>For the majority of officers whose legacy scheme was the 2006 Scheme, a refund of overpaid contributions was due if they elected to accept the terms of the Remedy. Where a valid election to accept the Remedy was received, the ‘contribution adjustment’ has been paid to officers in their next available salary payment with the interest applied adjusted accordingly.</p> <p>For those officers whose legacy scheme was the 1987 Scheme, in many cases if the officer elected to accept the terms of the Remedy they owed underpaid contributions to the scheme.</p> <p>Where a valid election to accept the Remedy was received before December 2024, the ‘contribution adjustment’ in respect of the outstanding contributions was collected in 3 equal instalments starting in January 2025 with the</p>

	<p>contributions being collected from officer's pay to ensure the tax relief was made via PAYE.</p> <p>Unfortunately an error was made in February 2025 that caused the Salaries Payrolls to fail to collect the contribution adjustment in this month. However, once identified, the error was corrected, and the Payroll Office made the necessary arrangements to complete the collection of underpaid contributions.</p> <p>Any elections to accept the Remedy received after December 2024 still had the contribution adjustment collected in 3 equal instalments, but these did not start until May 2025 to ensure that the deductions and associated tax relief were all made within the same financial year.</p> <p>The deadline for issuing the outstanding RSS's (i.e. to the eligible deferred and pensioner members) was 31 March 2025.</p> <p>In total, 97.5% of the outstanding RSSs were issued before this deadline. In most cases the reason that the statement could not be produced was because information was still yet to be provided by a previous force.</p> <p>The Pensions Office continues to receive a significant number of queries in respect of the Remedy. Many are simply asking for clarification of the details provided, others query the details held and others ask for further information/calculations to help the member make a decision.</p> <p>While the initial deadlines with regards to implementing the McCloud Remedy have now been met, this does not mean that the issues it has caused have ended.</p> <p>McCloud will continue to provide a significant level of demand upon the Pensions Office and CoLP which is in addition to the already high demands of 'Business as Usual'. While the levels of demand may drop over the next 18 months, the effects of implementing the Remedy will continue to be felt for many years.</p> <p>Updates regarding the implementation of the McCloud Remedy will continue to be brought to each Board meeting.</p>
Legal Challenge 2	<p><u>Evans & Ashcroft vs Chief Constable of South Wales</u></p> <p>This is a court of appeal case in respect of the Police (Injury Benefit) Regulations 2006.</p> <p>Guidance from the Home Office / Police Pensions Technical Group is awaited. Once received, a communication that can be sent to officers that make enquiries will be prepared.</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</p>

place. The intention is to support better planning for retirement, and help individuals reconnect with any pension pots they may have lost over time.

The staging timetable has been set out in guidance with all schemes in scope given a single connection deadline of 31 October 2026, by which time they are legally required to be connected to the pensions dashboard ecosystem and be ready to respond to requests for pensions information.

However, the guidance also sets out a staging timetable which provides a recommended connection date based upon scheme size and type – the connection date for public sector pension schemes is 31 October 2025.

The Pensions Regulator (TPR) updated its 'Failing to comply with dashboards duties' guidance in June 2023: (<https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance/failing-to-comply-with-pensions-dashboards-duties>). The purpose of the guidance is to outline what schemes will need to do to demonstrate that they have had regard to the staging timetable that will be set out in the connection guidance.

TPR expectations of schemes to show they 'have regards to the connection guidance' includes:

- Connect to dashboards by the connection deadline of 31 October 2026 that is set out in legislation. Failure to do so could result in regulatory action by TPR.
- A revised staging timetable is set out in guidance which indicates when schemes are scheduled to connect. All trustees and scheme managers must have regard to this guidance. Failure to do so will be a breach.
- Although the timelines in the guidance are not mandatory, schemes will be expected to demonstrate how they have had regard to the guidance.
- A phased approach to staging enables a controlled and well-planned connection, reduces the risk of provider capacity constraints and means savers can realise the benefits of dashboards as early as possible.
- Continuing to prepare for dashboards by engaging with those who will support them and their dashboard duties.

The Pensions Dashboards Programme (PDP) has updated their FAQs to reflect the new connection deadline announcement

<https://www.pensionsdashboardsprogramme.org.uk/faqs/>

The National LGPS Framework was set up to provide procurement facilities for all LGPS Funds to allow for an efficient route for sourcing external services by a compliant route.

There are several Integrated Service Providers (ISPs) listed on the National LGPS Framework and the Pensions Office has started the process of making contact with these

	<p>providers as a first step towards ensuring compliance with the staging deadline.</p> <p>The Pensions Office is currently in discussions with an ISP with regards to appointing them to provide this service for both the Local Government and Police Pension Schemes as administered by the City of London.</p> <p>While the discussions are still taking place, the City has a notional implementation date agreed with the provider for later in June. Implementation is expected to take approximately 10 weeks and it is therefore expected that the service will be in place by early September.</p> <p>While the City of London is expected to connect to the Pensions Dashboard by the end of October 2025, the service will not be released to the general public until a later date. Schemes will be given at least 6 months notice before the public go-live date.</p> <p>An update with regards to the Pensions Dashboard programme will be delivered within the Training session at the end of the meeting.</p>
Task Statistics	Update provided (Appendix 2).
Pension Board Training	<p>Board Members are asked to consider any topics of training they would like to cover in the coming year ahead.</p> <p>Details in respect of tPR training modules completed by each Member are included on the Non-Public agenda. (Appendix 3).</p>

Recommendation

Members are requested to review the information and provide any comments.

Appendices:

Appendix 1 – Annual Schedule of events

Appendix 2 – Key Performance Indicators

Appendix 3 – Member Training (NON-PUBLIC)

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