City of London Corporation Committee Report

Committee(s): Pensions Committee	**Dated:** 7 July 2025
Subject: Pensions Scheme – Administrator's Update	**Public report:** For Discussion
This proposal: • **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 13 February 2025.

Recommendation

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

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. 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.
Complaints or disputes under the Scheme's Internal Disputes Resolution Process (IDRP)	Since the last Committee meeting, there have been 2 Stage Two and 1 Stage One IDRP applications received. A breakdown of the IDRP applications is included at Appendix B on the non-public agenda.
Public Service Pensions - Reporting Breaches of Pension Law	None to report
Any audit reports relating to the administration of the Scheme	None to report.
Any reports relating to the administration of the Pension Scheme which have been considered by other Committees	None to report.
Pension Administration System	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. The portal was used for providing the 2024 annual benefit statements and provides a potential platform for future bulk mailings. The system has been rolled out to all active scheme members and is now also available to retired and deferred members so that access to the portal can continue as active members leave the organisation. However, the availability of the portal has not yet been advertised to those that had already retired or left the organisation. It was hoped that this service would have already been advertised to existing City Pensioners, but developments regarding the City's new payroll provider and the options that may be made available to pensioners have caused a pause in this process.

	One of the main facilities that was expected to be added to the portal was the ability to upload pensioner payslips and P60s and make these available to the scheme members. This facility would require an additional cost to be added to the Online Member Portal. However the new payroll system that is being created and is due to go live in December may be able to provide this facility as standard. The Pensions Office is awaiting further information before beginning the advertising campaign to pensioner members as we are aware that this facility will be of great interest.
Pensions Office Communications	The City of London Pensions Fund Communications Policy statement is included as a separate item on the agenda.
Public Sector Pensions Legal Challenge	<u>Lord Chancellor and Secretary of State for Justice v McCloud and others</u> 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. 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'. 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. 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. 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. For active scheme members retiring after the implementation date, their McCloud eligibility will be assessed by the Pensions Office and if appropriate their benefits will be based upon the terms of the Remedy. In addition, from September 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. 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, their benefits in payment will need to be recalculated under the terms of the Remedy and any appropriate adjustments 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. 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. The Pensions Office, is currently working on the 2025 Annual Benefit Statements (ABS), which for eligible active and deferred scheme members must be provided by 31 August 2025 and reflect the estimated underpin protection as provided for by the McCloud Remedy. Updates regarding the implementation of the McCloud Remedy will continue to be brought to each Committee meeting.
Pension Committee Training	All Members of the Committee are expected to register for tPR online training and complete the modules in respect of **public sector pension schemes**. 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 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. Details in respect of training modules completed by each Member are included on the non-public agenda (**Appendix C**). Members are expected to re-do the tPR training modules every 3-5 years.
Pensions Office Key Performance Indicators	As requested at the Committee meeting of 29 November 2022, **Appendix D** provides statistics in relation to the performance of the Pension Scheme Administration. The working processes followed by the Pensions Team are regularly reviewed to ensure the statistics accurately reflect the work involved.

Pensions Dashboards	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. In respect of Public Sector Pension Schemes, the initial expectation was that schemes would be required to connect to the online dashboard infrastructure by 30 September 2024. However, a written Ministerial Statement made on 2 March 2023 stated that delays setting up the dashboard programme has meant that the original timetables have been re-considered. A revised 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. 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 Scheme as administered by the City of London. At the point of writing discussions were ongoing, but the City has a notional implementation date agreed with the provider of late June. Implementation is expected to take approximately 10 weeks and it is therefore expected that the service will be in place in September. While the City of London is expected to connect to the Pensions Dashboard staging date of 31 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. Updates regarding the progress being made in respect of the Dashboards project will be brought to each Committee meeting.

Appendices:

Appendix A – Annual Schedule of Events (Administration
Appendix B – IDRP cases received by the Pensions Office (NON PUBLIC)
Appendix C – Member Training (NON PUBLIC)
Appendix D – KPI Details

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