



**Dinas a Sir Abertawe**

**Hysbysiad o Gyfarfod**

Fe'ch gwahoddir i gyfarfod

## **Pwyllgor Cronfa Bensiwn**

**Lleoliad:** Cyfarfod Aml-Leoliad - Ystafell Gloucester, Neuadd y Ddinas / MS Teams

**Dyddiad:** Dydd Iau, 13 Gorffennaf 2023

**Amser:** 11.00 am

**Aelodaeth:**

Cynghorwyr: P N Bentu, J P Curtice, P Downing, M B Lewis, M W Locke a/ac W G Thomas

Aelod Cyfetholedig o Gyngor Castell-nedd Port Talbot: Philip Rogers

Ymgynghorwyr: Nick Jellema, Philip Pearson a/ac Andre Ranchin

**Gwyllo ar-lein:** <https://bit.ly/3NdYJmD>

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### **Agenda**

**Rhif y Dudalen.**

- 1 Ethol Cadeirydd Pwyllgor y Gronfa Bensiwn ar gyfer blwyddyn ddinesig 2023-2024.**
- 2 Ethol Is-gadeirydd Pwyllgor y Gronfa Bensiwn ar gyfer blwyddyn ddinesig 2023-2024.**
- 3 Ymddiheuriadau am absenoldeb.**
- 4 Datgeliadau o fuddiannau personol a rhagfarnol.**  
[www.abertawe.gov.uk/DatgeliadauBuddiannau](http://www.abertawe.gov.uk/DatgeliadauBuddiannau)
- 5 Cofnodion.** **1 - 5**  
Cymeradwyo a llofnodi, fel cofnod cywir, gofnodion y cyfarfod(ydd) blaenorol.
- 6 Adroddiad(au) Swyddfa Archwilio Cymru.** **6 - 15**  
a Cynllun Archwilio 2023 - Cronfa Bensiwn Dinas a Sir Abertawe.
- 7 Adroddiad(au) Swyddog Adran 151.** **16 - 43**  
a Adroddiad am doriadau. (Er gwybodaeth) **16 - 43**  
b Cynllun Busnes Partneriaeth Pensiwn Cymru (PPC) 2022-2026. **44 - 70**  
c Statws Corff Derbyn. **71 - 98**  
d Adnoddau i fod yn barod ar gyfer y Dangosfwrdd Pensiynau. **99 - 102**

<b>8</b>	<b>Gwahardd y cyhoedd.</b>	<b>103 - 106</b>
<b>9</b>	<b>Adroddiad(au) Swyddog Adran 151.</b>	
a	Diweddariad ar Bartneriaeth Pensiwn Cymru (PPC)	<b>107 - 121</b>
b	Diweddariad ar y Cynllun Busnes/Strategaeth Buddsoddi.	<b>122 - 133</b>
<b>10</b>	<b>Adroddiad yr Ymgynghorydd Buddsoddi. (Er gwybodaeth)</b>	<b>134 - 159</b>
<b>11</b>	<b>Crynodeb Buddsoddi. (Er gwybodaeth)</b>	<b>160 - 161</b>
<b>12</b>	<b>Cyflwyniad(au) Rheolwr y Gronfa:</b>	
	<ul style="list-style-type: none"><li>• Russell Investments.</li></ul>	

**Cyfarfod nesaf:** Dydd Mercher, 6 Medi 2023 am 10.00 am

*Huw Evans*

**Huw Evans**  
**Pennaeth y Gwasanaethau Democrataidd**  
**Dydd Iau, 6 Gorffennaf 2023**

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**Cyswllt: Gwasanaethau Democrataidd: - 636923**

# Agenda Item 5



City and County of Swansea

## Minutes of the Pension Fund Committee

Multi-Location Meeting - Gloucester Room, Guildhall / MS

Teams

Wednesday, 15 March 2023 at 10.00 am

**Present:** Councillor M B Lewis (Chair) Presided

**Councillor(s)**

P N Bentu  
W G Thomas

**Councillor(s)**

P Downing

**Councillor(s)**

M W Locke

**Neath Port Talbot Council Co-opted Member**

Philip Rogers

**Advisors**

Philip Pearson  
Andre Ranchin

Advisor - Hymans Robertson  
Advisor - Hymans Robertson

**Officer(s)**

Karen Cobb  
Jeremy Parkhouse  
Jeffrey Dong

Senior Accountant  
Democratic Services Officer  
Deputy Chief Finance Officer / Deputy Section 151  
Officer  
Principal Lawyer

Stephanie Williams

**Also present**

Ian Guy

Chair of the Local Pension Board

**Apologies for Absence**

None.

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**40 Winner of the Best Climate Change Strategy Award.**

The Chair announced that the City and County of Swansea Pension Fund had recently won the Best Climate Change Strategy award at the Local Authority Pension Fund (LAPF) Investments Awards.

He added that the Fund was also shortlisted by LAPF for Pension Fund of the Year and Best Investment Strategy.

**41 Disclosures of Personal and Prejudicial Interests.**

In accordance with the Code of Conduct adopted by the City & County of Swansea, the following interests were disclosed:

Councillors P N Bentu, J P Curtice, P Downing, M B Lewis, P Rogers and W G Thomas declared personal interests in the agenda as a whole.

Officers:

K Cobb, J Dong, J Parkhouse and S Williams declared personal interests in the agenda as a whole.

**42 Minutes.**

**Resolved** that the Minutes of the Pension Fund Committee meeting held on 16 November 2022 be signed and approved as a correct record.

**43 City & County of Swansea Pension Fund - Draft Funding Strategy Statement.**

The Deputy Chief Finance Officer / Deputy S151 Officer presented a report which sought approval to ensure compliance with the Local Government Pension Scheme Regulations, which require a funding strategy statement.

Appendix 1 provided the Draft Funding Strategy Statement.

It was added that the main purpose of the Funding Strategy Statement was to set out the processes by which the Administering Authority:

- established a clear and transparent funding strategy, specific to the Fund, which would identify how employer's pension liabilities were best met going forward.
- supported the regulatory requirement in relation to the desirability of maintaining as nearly constant a primary rate of contributions as possible.
- ensured that the regulatory requirements to set contributions as to ensure the solvency and long-term cost efficiency of the Fund were met.
- takes a prudent longer-term view of funding the Fund's liabilities.

It was noted that, whilst the funding strategy applicable to individual employers, it must be reflected in the Funding Strategy Statement / Investment Strategy Statement, its focus should at all times be on those actions which were in the best long term interests of the Fund.

**Resolved** that the funding strategy statement is approved.

**44 AON Presentation - City & County of Swansea Pension Fund Actuarial Valuation as at 31 March 2022.**

Laura Caudwell and Arkady Gibas of AON provided the Committee with a detailed valuation results presentation on the City and County of Swansea Pension Fund Actuarial Valuation as at 31 March 2022.

The presentation outlined the 2022 valuation results, the valuation process and assumptions. These results would be forwarded to DLHUC as required and would become in force from 1 April 2023.

The Chair thanked the AON representatives for the presentation.

**Resolved** that: -

- 1) The contents of the presentation be noted.
- 2) The triennial actuarial valuation / certification be approved.

#### **45 City & County of Swansea Pension Fund Business Plan 2023/24.**

The Deputy Chief Finance Officer / Deputy S151 Officer presented a report which sought approval to provide a working framework for the Pension Fund's programme of work for 2023/24.

It was outlined that in line with best practice, the Pension Fund produced a business plan, risk register, budget and asset allocation to inform its work programme for the forthcoming 12 month period. The business plan, budget, risk register, asset allocation for 2023/24 were attached at Appendices 1,2,3 and 4 of the report.

The Pension Fund Committee were asked to approve the business plan, budget, risk register and asset allocation for the year 2023/24, noting the timescale and responsibility for key action points throughout the year. The document was a dynamic document and would be revised and amended throughout the year as necessary.

**Resolved** that the following be noted and approved: -

- 1) The City & County of Swansea Pension Fund Annual Business Plan 2023/24.
- 2) Risk Register 2023/24.
- 3) Asset Allocation.
- 4) Budget 2023/24.

#### **46 Breaches Report.**

The Deputy Chief Finance Officer / Deputy S151 Officer presented a 'for information' report which presented any breaches which had occurred in the period in accordance with the Reporting Breaches Policy.

Appendix A provided the details of breaches that had occurred since the previous Pension Fund Committee in November 2022. The details of the breaches and the actions taken by Management were noted.

#### **47 Trustee Training.**

The Deputy Chief Finance Officer / Deputy S151 Officer presented a report which sought to determine an annual training programme for Pension Fund Committee and Local Pension Board members and officers of the Pension Fund.

**Resolved** that the assessment and outline training plan in 3.7, 3.8 and 3.9 be approved and further opportunities which are identified during the year be delegated to the Deputy Section 151 Officer for approval.

**48 Exclusion of the Public.**

The Committee was requested to exclude the public from the meeting during consideration of the item(s) of business identified in the recommendation(s) to the report on the grounds that it / they involved the likely disclosure of exempt information as set out in the exclusion paragraph of Schedule 12A of the Local Government Act 1972, as amended by the Local Government (Access to Information) (Variation) (Wales) Order 2007 relevant to the item(s) of business set out in the report.

The Committee considered the Public Interest Test in deciding whether to exclude the public from the meeting for the items of business where the Public Interest Test was relevant as set out in the report.

**Resolved** that the public be excluded for the following items of business.

**(Closed Session)**

**49 Wales Pension Partnership Update.**

The Deputy Chief Finance Officer / Deputy S151 Officer presented a 'for information' report to update the Pension Fund Committee on the progress and work of the Wales Pension Partnership (WPP).

**Resolved** that: -

- 1) The WPP Progress Report be noted.
- 2) Approval be delegated to the Deputy 151 Officer in consultation with the Chair of the Pension Fund Committee to progress Levelling Up / Local Investment Opportunities and report back to Committee.

**50 Report of the investment Consultant.**

Philip Pearson and Andre Ranchin, Investment Consultants, Hymans Robertson presented 'for information' the Quarter 4 2022 Investment Monitoring Report.

The content of the report was noted by the Committee and various questions were asked, which were responded to accordingly. The Investment Consultant was thanked for the report.

**51 Investment Summary.**

The Deputy Chief Finance Officer / Deputy S151 Officer presented a 'for information' report which presented the asset valuation and investment performance for the quarter, year and 3 years ended 31 December 2022.

**52 Fund Manager's Presentation(s):**

A presentation was made by and Aidan Quinn, Paddy Bortoli, Gerald Fitzpatrick and Lewis Forman of Russell Investments.

Questions in relation to the content of the presentation were asked by the Committee and responses were provided accordingly.

The content of the presentation was noted and the Chair thanked the Fund Managers for attending the meeting.

The meeting ended at 12.27 pm

**Chair**

# Cronfa Bensiwn Dinas a Sir Abertawe

Cynllun Archwilio Amlinellol 2023

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Blwyddyn archwilio: 2022-23

Dyddiad cyhoeddi: Mai 2023



Agenda Item 6a



Paratowyd y ddogfen hon yn rhan o waith a berformiwyd yn unol â swyddogaethau statudol. Ceir rhagor o wybodaeth yn ein [Datganiad o Gyfrifoldebau](#).

Archwilio Cymru yw'r enw cyfunol anstatudol ar gyfer Archwilydd Cyffredinol Cymru a Swyddfa Archwilio Cymru, sy'n endidau cyfreithiol ar wahân y mae gan bob un ohonynt eu swyddogaethau cyfreithiol eu hunain. Nid yw Archwilio Cymru yn endid cyfreithiol ac nid oes ganddi unrhyw swyddogaethau.

Ni dderbynnir unrhyw gyfrifoldeb gan yr Archwilydd Cyffredinol, staff Swyddfa Archwilio Cymru na, pan fo hynny'n gymwys, yr archwilydd penodedig mewn cysylltiad ag unrhyw aelod, cyfarwyddwr, swyddog neu weithiwr arall yn eu rhinwedd unigol nac i unrhyw drydydd parti.

Os gwneir cais am wybodaeth y gallai'r ddogfen hon fod yn berthnasol iddi, tynnir sylw at y Cod Ymarfer a gyhoeddwyd o dan adran 45 o Ddeddf Rhyddid Gwybodaeth 2000. Mae Cod adran 45 yn nodi'r arfer a ddisgwylir gan awdurdodau cyhoeddus wrth ymdrin â cheisiadau, gan gynnwys ymgynghori â thrydydd partiön perthnasol. Mewn cysylltiad â'r ddogfen hon, mae Archwilydd Cyffredinol Cymru, Swyddfa Archwilio Cymru a, pan fo hynny'n berthnasol, yr archwilydd penodedig yn drydydd partiön perthnasol. Dylid anfon unrhyw ymholiadau ynglŷn â datgelu neu aildefnyddio'r ddogfen hon i Swyddfa Archwilio Cymru yn [swyddog.gwybodaeth@archwilio.cymru](mailto:swyddog.gwybodaeth@archwilio.cymru).

Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg. Ni fydd gohebu yn Gymraeg yn arwain at oedi. We welcome correspondence and telephone calls in Welsh and English. Corresponding in Welsh will not lead to delay.

This document is also available in English.

# Ynglŷn ag Archwilio Cymru

Ein nodau:

## Sicrhau



pobl Cymru bod  
arian cyhoeddus yn  
cael ei reoli'n dda

## Egluro



sut mae arian  
cyhoeddus yn cael  
ei ddefnyddio i  
ddiwallu

## Ysbrydo



a grymuso'r sector  
cyhoeddus yng  
Nghymru i wella

Ein huchelgeisiau:



Manteisio'n  
llawn ar ein  
persbectif  
unigryw, ein  
harbenigedd a



Cryfhau ein safle  
fel llais  
awdurdodol,  
dibynadwy  
ac annibynnol



Cynyddu ein  
hamlygrwydd,  
ein dylanwad  
a'n perthnasedd



Bod yn sefydliad  
enghreiffiol i'r  
sector cyhoeddus  
yng Nghymru a thu  
hwnt

# Cynnwys

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# Cyflwyniad

Mae'r Cynllun Archwilio Amlinellol yn nodi fy nghyfrifoldebau statudol fel eich archwilydd allanol ac i gyflawni fy rhwymedigaethau o dan y Cod Ymarfer Archwilio. Mae hefyd yn nodi manylion fy nhîm archwilio a dyddiadau allweddol ar gyfer cyflawni gweithgareddau ac allbynnau arfaethedig fy nhîm archwilio. Rwyf yn bwriadu rhannu Cynllun Archwilio Manwl yn ddiweddarach eleni ar ôl imi gwblhau fy ngwaith cynllunio. Bydd yn nodi fy ffi archwilio amcangyfrifedig a'r gwaith y mae fy nhîm yn bwriadu ei wneud.

## Fy nghyfrifoldebau archwilio

Mae'n ofynnol imi ardystio a yw datganiadau ariannol Cronfa Bensiwn Dinas a Sir Abertawe yn 'wir ac yn deg'. Mae'r gwaith archwilio yr wyf yn ei wneud i gyflawni fy nghyfrifoldebau yn ymateb i'm hasesiad o risgiau. Mae hyn yn caniatáu inni ddatblygu dull archwilio sy'n canolbwyntio ar fynd i'r afael â risgiau penodol wrth ddarparu sicrwydd ar gyfer datganiadau ariannol y Gronfa Bensiwn yn gyffredinol.

Mae gen i gyfrifoldeb hefyd i dderbyn cwestiynau a gwrthwynebiadau i'r datganiadau ariannol gan etholwyr lleol.

Nid wyf yn ceisio cael sicrwydd llwyr ynghylch gwirionedd a thegwch y datganiadau ariannol a'r nodiadau cysylltiedig ond rwy'n mabwysiadu cysyniad perthnasedd. Fy mwriad yw nodi camddatganiadau sylweddol, hynny yw, y rhai hynny a all gamarwain darlennydd y cyfrifon. Bydd y lefelau yr wyf i'n barnu bod y camddatganiadau yn berthnasol yn cael eu hadrodd ichi yn fy Nghynllun Archwilio Manwl.



**Adrian Crompton**  
Archwilydd  
Cyffredinol Cymru

Byddaf yn cyflwyno adroddiad drwy eithriad ar nifer o faterion a nodir yn fanylach yn ein [Datganiad o Gyfrifoldebau](#).

# Ffioedd a'r tîm archwilio

Ym mis Ionawr 2023, cyhoeddais y [cynllun ffioedd](#) am y flwyddyn, a gymeradwywyd gan Bwyllgor Cyllid y Senedd. Mae'n nodi fy nghyfraddau ffioedd ac mae hefyd yn tynnu sylw at effaith safon archwilio ddiwygiedig Safon Ryngwladol ar Archwilio 315 ar fy null archwilio ariannol. Nodir rhagor o fanylion am y safon archwilio ddiwygiedig a'r hyn y mae'n ei olygu i'r archwiliad yr ymgymeraf ag ef yn **Atodiad 1**.

Byddaf yn rhoi amcangyfrif o'ch ffi yn fy Nghynllun Archwilio Manwl yn ystod yr haf, ar ôl imi gwblhau fy asesiad risg manwl.

## Eich tîm ymgysylltu:

Derwyn Owen  
Gillian Gillett  
Leanne Malough

Cyfarwyddwr Ymgysylltu  
Rheolwr Archwilio  
Arweinydd Archwilio

Gallwn gadarnhau bod pob aelod o'n tîm archwilio yn annibynnol, heb fod yn gysylltiedig â'r Awdurdod na'ch swyddogion.

# Llinell amser archwilio

Nodwn isod ddyddiadau allweddol ar gyfer cyflawni ein gwaith archwilio a'n hallbynnau arfaethedig.

Allbwn arfaethedig	Gwaith a wnaed	Cwblhau'r adroddiad
Cynllun Archwilio Amlinellol 2023	Mawrth 2023	Ebrill 2023
Cynllun Archwilio Manwl 2023	Mai – Gorffennaf 2023	Gorffennaf 2023
Gwaith archwilio datganiadau ariannol: <ul style="list-style-type: none"><li>• Archwiliad o'r Adroddiad Datganiadau Ariannol</li><li>• Barn ar y Datganiadau Ariannol</li></ul>	Hydref – Tachwedd 2023	Tachwedd 2023

# Ansawdd archwilio

Mae fy ymrwymiad i ansawdd archwilio yn Archwilio Cymru yn absoliwt.

Credaf fod ansawdd archwilio yn ymwneud â gwneud pethau'n iawn y tro cyntaf.

Defnyddiwn fodel tair llinell sicrwydd i ddangos sut yr ydym yn cyflawni hyn.

Rydym wedi sefydlu Pwyllgor Ansawdd Archwilio i gydgyssylltu a goruchwyllo'r trefniadau hynny. Gwnawn ein gwaith yn ddarostyngedig i graffu annibynnol gan yr Adran Sicrhau Ansawdd<sup>1</sup> ac mae ein Cadeirydd yn gweithredu fel cyswllt ar ansawdd archwilio i'n Bwrdd. Am fwy o wybodaeth gweler ein [Hadroddiad Ansawdd Archwilio 2022](#).



## Ein Pobl

Ffurir y llinell sicrwydd gyntaf gan ein staff a'n rheolwyr sy'n gyfrifol yn unigol ac ar y cyd am gyflawni'r safonau o ansawdd archwilio yr ydym yn dyheu amdanynt.

- Dewis y tîm cywir
- Defnyddio arbenigwyr
- Goruchwyllo ac adolygu



## Trefniadau ar gyfer sicrhau ansawdd archwilio

Ffurir yr ail linell sicrwydd gan y polisïau, yr offer, y ddysg a'r datblygiad, y canllawiau, a'r arweinyddiaeth a ddarparwn i'n staff i'w cefnogi i gyrraedd y safonau ansawdd archwilio hynny.

- Rhaglen archwilio
- Moeseg
- Canllawiau
- Diwylliant
- Dysgu a datblygu
- Arweinyddiaeth
- Cymorth technegol



## Sicrwydd annibynnol

Ffurir y drydedd linell sicrwydd gan y gweithgareddau hynny sy'n rhoi sicrwydd annibynnol dros effeithiolrwydd y ddwy linell sicrwydd gyntaf.

- Adolygiadau Rheoli Ansawdd Ymgysylltu
- Adolygiadau â thema
- Adolygiadau oer
- Dadansoddi'r achos sylfaenol
- Adolygiad gan gymheiriaid
- Y Pwyllgor Ansawdd Archwilio
- Monitro allanol

<sup>1</sup> Yr Adran Sicrhau Ansawdd yw Adran Sicrhau Ansawdd Sefydliad Cyfrifwyr Siartredig Cymru a Lloegr.

# Atodiad 1—y newidiadau allweddol i ISA315 a'r effaith bosibl ar y Gronfa Bensiwn

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Newid allweddol	Effaith bosibl ar y Gronfa Bensiwn
<p><b>Gweithdrefnau adnabod ac asesu risg manylach a mwy helaeth</b></p>	<p>Efallai y bydd eich tîm cyllid ac eraill yn y Gronfa Bensiwn yn cael nifer fwy o ymholiadau gan ein timau archwilio yn ystod y broses o gynllunio'r archwiliad. Gallai ceisiadau am wybodaeth gynnwys:</p> <ul style="list-style-type: none"> <li>• gwybodaeth am fodel busnes y Gronfa Bensiwn a sut y mae'n integreiddio'r defnydd o dechnoleg gwybodaeth (TG);</li> <li>• gwybodaeth am broses asesu risgiau y Gronfa Bensiwn a sut mae y Gronfa Bensiwn yn monitro'r system rheoli mewnol;</li> <li>• gwybodaeth fanylach am sut y caiff trafodiadau eu dechrau, eu cofnodi, eu prosesu, a'u hadrodd. Gallai hyn gynnwys y gallu i gael gafael ar ddogfennaeth ategol fel llawlyfrau polisïau a gweithdrefnau;</li> <li>• trafodaethau manylach â'r Gronfa Bensiwn i gefnogi asesiad o risg cynhenid y tîm archwilio.</li> </ul>
<p><b>Cael gwell dealltwriaeth o amgylchedd y Gronfa Bensiwn, yn enwedig mewn cysylltiad â TG</b></p>	<p>Efallai y byddwch yn cael mwy o ymholiadau i gynorthwyo'r tîm archwilio i ddeall yr amgylchedd TG. Gallai hyn gynnwys gwybodaeth am:</p> <ul style="list-style-type: none"> <li>• Aphiau TG sy'n berthnasol i adrodd ariannol;</li> <li>• y seilwaith TG ategol (ee y rhwydwaith, cronfeydd data);</li> <li>• Prosesau TG (ee rheoli newidiadau i raglenni, gweithrediadau TG);</li> <li>• y personél TG sy'n ymwneud â'r prosesau TG.</li> </ul>



Newid allweddol	Effaith bosibl ar y Gronfa Bensiwn
	<p>Efallai y bydd angen i dimau archwilio brofi'r rheolaethau TG cyffredinol a gallai hyn ei gwneud yn ofynnol cael tystiolaeth archwilio fanylach ar weithredu rheolaethau TG yn y Gronfa Bensiwn.</p> <p>Ar rai archwiliadau, gallai ein timau archwilio gynnwys arbenigwyr archwilio TG i'w cynorthwyo i wneud eu gwaith. Efallai y bydd angen i'n harchwilwyr TG ymgysylltu ag aelodau o'ch tîm TG nad ydynt wedi bod yn rhan o'r broses archwilio o'r blaen.</p>
<p><b>Gofynion uwch yn ymwneud ag arfer amheuaeth broffesiynol</b></p>	<p>Gallai ein timau archwilio wneud ymholiadau ychwanegol os ydynt yn nodi gwybodaeth yr ymddengys i wrth-ddweud yr hyn y maent eisoes wedi ei ddysgu yn yr archwiliad.</p>
<p><b>Gellir cyflwyno asesiadau risg ar raddfa fwy, gan ddibynnu ar natur a chymhlethdod y corff a archwilir</b></p>	<p>Bydd disgwyliadau'r tîm archwilio ynghylch ffurfioldeb polisïau, gweithdrefnau, prosesau, a systemau eich sefydliad yn dibynnu ar gymhlethdod eich Cronfa Bensiwn.</p>
<p><b>Gallai timau archwilio wneud mwy o ddefnydd o dechnoleg wrth gynnal eu harchwiliad</b></p>	<p>Gallai ein timau archwilio wneud defnydd o offer awtomataidd a thechnegau megis dadansoddi data wrth gynnal eu harchwiliad. Gallai ein timau ofyn am wybodaeth wahanol neu wybodaeth mewn fformat gwahanol i'r archwiliadau blaenorol fel y gallant gyflawni eu gweithdrefnau archwilio.</p>

# Agenda Item 7a



## Report of the Section 151 Officer

Pension Fund Committee – 13 July 2023

### Breaches Report

<b>Purpose:</b>	The report presents any breaches which have occurred in the period in accordance with the Reporting Breaches Policy.
<b>Report Author:</b>	Claire Elliott, Pension Manager
<b>Finance Officer:</b>	Jeff Dong – Deputy S 151 Officer
<b>Legal Officer:</b>	Stephanie Williams – Principal Lawyer
<b>Access to Services Officer:</b>	N/A
<b>For Information</b>	

#### 1. Introduction

1.1 The Reporting Breaches policy was adopted with effect from 9 March 2017.

1.2 The policy requires a report to be presented to the Pension Board and Pension Fund Committee on a quarterly basis, highlighting any new breaches which have arisen since the previous meeting and setting out:

- all breaches, including those reported to The Pensions Regulator and those unreported, with the associated dates
- in relation to each breach, details of what action was taken and the result of any action (where not confidential)
- any future actions for the prevention of the breach in question being repeated

1.3 Following the introduction of GDPR requirements and the requirements to report any breaches to the Information Officer and ICO, if required, it has been determined good practice and transparent to also include GDPR breaches also within this report.

#### 2. Breaches

2.1 Under the policy, breaches of the law are required to be reported to the Pensions Regulator where there is reasonable cause to believe that:

- A legal duty which is relevant to the administration of the scheme has not been, or is not being, complied with.
  - The failure to comply is likely to be of material significance to the regulator in the exercise of any of its functions.
- 2.2 The Breaches Report is attached at Appendix A and the following further information is provided.
- 2.3 Under the LGPS regulations, interest is paid on retirement lump sum payments if the payment is made more than one month after retirement and calculated at one per cent above the base rate on a day to day basis from the due date of payment and compounded with three-monthly rests.
- 2.4 Since the last report in March 2023, 17.7% of retirement lumps sums have not been paid within the benchmark (it should be noted that 100% of payments were made within 1 month when all documentation was received). The % of non-payment of retirement lump sums within the specified benchmark was due to the members not returning completed pension election forms within a timely manner. Communication sent to members at time of retirement has been reviewed to ensure that the importance of timely return of required documents is highlighted and reminder triggers put in place.
- 2.5 The basic objective of the General Data Protection Regulation (GDPR) is to enforce stronger data security and privacy rules among organisations when it comes to protecting an individual's personal data. The UK legislation is the Data Protection Act 2018 and mirrors many key principles of the Data Protection Act 1998. Where a breach of a member's personal data happens (a breach of personal data means that a security breach has taken place leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data, transmitted, stored or otherwise processed. [GDPR Article 4(12)]), the Pension Fund (who complies with Swansea Council GDPR Principles) has an obligation to undertake a full investigation within the initial 72-hours of acknowledging a data breach. When the Fund becomes aware of a breach, the appropriate investigation takes place within the stipulated timeframe and the findings presented to the Data Breach Panel for review. The requirements presented for improved working practices by the Data Breach Panel the Fund has incorporated within the day-to-day working practices. There has been no GDPR breach since last reporting date.
- 2.6 The Fund requires that employers pay employee and employer contributions to the Fund on a monthly basis and no later than the 19<sup>th</sup> of the month after which the contributions have been deducted. There have been a single instance during the reporting period where breaches have occurred. In this case, Treasury Management staff have written to the employers to request payment and provide a reminder of the responsibilities to submit on time.
- 2.7 With regards to performance data in respect of processing refunds, in most cases, the sums are quite small and the problem is locating the member/former member to process the refund, quite often they may have moved address or even passed away.

### **3. Integrated Impact Assessment Implications**

The Council is subject to the Equality Act (Public Sector Equality Duty and the socio-economic duty), the Well-being of Future Generations (Wales) Act 2015 and the Welsh Language (Wales) Measure, and must in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Acts.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.
- Deliver better outcomes for those people who experience socio-economic disadvantage.
- Consider opportunities for people to use the Welsh language.
- Treat the Welsh language no less favourably than English.
- Ensure that the needs of the present are met without compromising the ability of future generations to their own needs.

The Well-being of Future Generations (Wales) Act 2015 mandates that public bodies in Wales must carry out sustainable development. Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the 'well-being goals'.

Our Integrated Impact Assessment (IIA) process ensures we have paid due regard to the above. It also takes into account other key issues and priorities, such as poverty and social exclusion, community cohesion, carers, the United Nations Convention on the Rights of the Child (UNCRC) and Welsh language.

There are no equality impact implications arising from this report.

### **4 Legal Implications**

- 4.1 Where breaches have occurred, the legal implications are outlined in Code of Practice no.14 and GDPR legislation.

### **5. Financial Implications**

- 5.1 Minimal loss of investment income and a possible penalty charge from TPR.

**Background papers:** None.

**Appendices:** Appendix A: Breaches Register.

## Appendix A - City and County of Swansea Breaches Register

Date	Category (e.g. administration, contributions, funding)	Description and cause of breach	Possible effect of breach and wider implications	Reaction of relevant parties to breach	Reported / Not reported (with justification if not reported and dates)	Outcome of report and/or investigations	New Breach (since last report)
Nov 20 – Feb 2021	Administration	19.23% of retirement lump sums not paid within 1 month of normal retirement or 2 months of early retirement; 96.84% of member option forms returned were paid within 1 month of date of return	The administering authority has accrued interest payments on retirement lump sums, paid more than one month after their due date, under the 2013 LGPS regulations .	% due to members retiring from age 55 but before normal pension age and late return of options confirming early access of retirement benefits. % due to a delay in the return of member pension options/completed in full for the month of December.		Communication to members regarding retirement options are constantly reviewed to ensure the importance of returning completed documents in a timely manner is highlighted.	
Nov 20 – Feb 21	Administration	Frozen refunds unclaimed for this period equates to 86% .... This equates to a monetary value of £7,488.70.	Regulations, no further interest will accrue on or after 5-year anniversary. Should the member enter re-employment membership cannot be aggregated, the member will not	High % due to member not making a positive election to claim refund	Information has been recorded within the breach register	Members are written to 3 months prior to the date of the 5-year anniversary of date of leaving	

			<p>be able to transfer the benefit out and if a refund is claimed there will be tax implications as this is deemed to be an unauthorised payment. The above is subject to change and we are waiting for confirmation that the above Regulation has been amended to support this.</p> <p><b>Awaiting confirmation of Regulatory change; going forward there will be no further requirement to report non-payment of refunds as the 5 year anniversary ruling will be removed</b></p>				
Nov 20 – Feb 21	GDPR Breaches	No breaches to report during this quarter					

Nov 20 – Feb 21	Contributions	1 Employer has not paid contributions within required timescale	Loss of investment returns	Employers are contacted once breach has occurred		Employers are contacted as soon as the deadline for submission of contributions has passed	
Mar 2021	Administration	30.55% of retirement lump sums not paid within 1 month of normal retirement or 2 months of early retirement; 91.89% was paid within 1 month of receipt of member option return	The administering authority has accrued interest payments on retirement lump sums, paid more than one month after their due date, under the 2013 LGPS regulations	A % of late payments was in main due to the Pru failing to disinvest AVC monies and forward payments in a timely manner. The Pru have migrated to a new system and are experiencing ongoing problems. Members failed to return pension election forms in a timely manner/completed in full and late issue of pensionable pay information from the member's employers payroll section, which has led to the late provision of pension options to the member.		The Fund has maintained regular contact with the Purchasing payments of monies / requesting updates to communicate to members. Communication to members regarding retirement options are subject to review on a regular basis. Members are made aware of the importance of returning completed documents in a timely manner. The Pension Section provide member employer payroll sections with a listing of outstanding termination forms and are reminded of the importance of providing accurate information on a timely basis.	

Mar 2021	Administration	Frozen refunds unclaimed for this period equates to 94.3% .... This equates to a monetary value of £3,189	Regulations state, no further interest will accrue on or after 5-year anniversary. Should the member enter re-employment membership cannot be aggregated, the member will not be able to transfer the benefit out and if a refund is claimed there will be tax implications as this is deemed to be an unauthorised payment. The above is subject to change and we are waiting for confirmation that the above Regulation has been amended to support this. <b>Awaiting confirmation of Regulatory change; going forward there</b>	High % due to member not making a positive election to claim refund	Information has been recorded within the breach register	Members are written to 3 months prior to the date of their 5-year anniversary from date of leaving	
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			<b>will be no further requirement to report non-payment of refunds as the 5 year anniversary ruling will be removed.</b>				
Mar 2021	GDPR Breaches	No breaches to report					
Apr - Jun 2021	Administration	15.91% of retirement lump sums not paid within 1 month of normal retirement or 2 months of early retirement; 97.78% was paid within 1 month of receipt of member option return	The administering authority has accrued interest payments on retirement lump sums, paid more than one month after their due date, under the 2013 LGPS regulations	A % of late payments was in main due to the Pru failing to disinvest AVC monies and forward payments in a timely manner. The Pru have migrated to a new system and are experiencing ongoing problems. Members failed to return pension election forms in a timely manner/completed in full and late issue of pensionable pay information from the member's employers payroll section, which has		The Fund has maintained regular contact with the Pru chasing payments of monies / requesting updates to communicate to members. Communication to members regarding retirement options are subject to review on a regular basis. Members are made aware of the importance of returning completed documents in a timely manner. The Pension Section provide member employer payroll sections with a listing of outstanding	

				led to the late provision of pension options to the member		termination forms and are reminded of the importance of providing accurate information on a timely basis.	
Apr - Jun 2021	Administration	Frozen refunds unclaimed for this period equates to 84.6% .... This equates to a monetary value of £4,770.17	Regulations state, no further interest will accrue on or after 5-year anniversary. Should the member enter re-employment membership cannot be aggregated, the member will not be able to transfer the benefit out and if a refund is claimed there will be tax implications as this is deemed to be an unauthorised payment. The above is subject to change and we are waiting for confirmation that the above Regulation has been amended	High % due to member not making a positive election to claim refund	Information has been recorded within the breach register	Members are written to 3 months prior to the date of their 5-year anniversary from date of leaving	

			to support this. <b>Awaiting confirmation of Regulatory change; going forward there will be no further requirement to report non-payment of refunds as the 5 year anniversary ruling will be removed.</b>				
Apr - Jun 2021	GDPR Breaches	No breaches to report					
Apr 21 – May 21	Contributions	2 Employers have not paid contributions within required timescale	Loss of investment returns	Employers are contacted once breach has occurred		Employers are contacted as soon as the deadline for submission of contributions has passed	
July – August 2021	Administration	7% of retirement lump sums not paid within 1 month of normal retirement or 2 months of early retirement; 100% was paid within 1 month of receipt of member option return	The administering authority has accrued interest payments on retirement lump sums, paid more than one month after their due date, under the 2013 LGPS regulations	A % of late payments was in main due to the Pru failing to disinvest AVC monies and forward payments in a timely manner. The Pru have continued to experience problems with the new system		The Fund has maintained regular contact with the Pru chasing payments of monies / requesting updates to communicate to members. Communication to members regarding retirement options are subject to review on a regular	

				<p>however going forward it is anticipated that these issues should now be resolved. Members failed to return pension election forms in a timely manner</p>		<p>basis. Members are made aware of the importance of returning completed documents in a timely manner. The Pension Section provide member employer payroll sections with a listing of outstanding termination forms and are reminded of the importance of providing accurate information on a timely basis.</p>	
<p>July – August 2021</p>	Administration	<p>Frozen refunds unclaimed for this period equates to 94% .... This equates to a monetary value of £16,808.32</p>	<p>Regulations state, no further interest will accrue on or after 5-year anniversary. Should the member enter re-employment membership cannot be aggregated, the member will not be able to transfer the benefit out and if a refund is claimed there will be tax</p>	<p>High % due to member not making a positive election to claim refund</p>	<p>Information has been recorded within the breach register</p>	<p>Members are written to 3 months prior to the date of their 5-year anniversary from date of leaving</p>	

			implications as this is deemed to be an unauthorised payment. The above is subject to change and we are waiting for confirmation that the above Regulation has been amended to support this. <b>Awaiting confirmation of Regulatory change; going forward there will be no further requirement to report non-payment of refunds as the 5 year anniversary ruling will be removed.</b>				
July – August 2021	GDPR Breaches	No breaches to report					
June – July 21	Contributions	1 Employer has not paid contributions within required timescale	Loss of investment returns	Employers are contacted once breach has occurred		Employers are contacted as soon as the deadline for submission of contributions has passed	

Sept – Oct 2021	Administration	14% of retirement lump sums not paid within 1 month of normal retirement or 2 months of early retirement; 100% was paid within 1 month of receipt of member option return	The administering authority has accrued interest payments on retirement lump sums, paid more than one month after their due date, under the 2013 LGPS regulations	% (3 in total) due to late receipt of confirmation of retirement from the members employer / members failing to return pension options in a timely manner		Member coms highlight the importance of returning the completed forms / certificates in a timely manner. Payroll sections are issued with a monthly spreadsheet listing all outstanding termination forms and are reminded of the importance of providing accurate information on a timely basis.	
Sept – Oct 2021	Administration	Frozen refunds unclaimed for this period is 80% .... This equates to a monetary value of £4,826.52	Regulations state, no further interest will accrue on or after 5-year anniversary. Should the member enter re-employment membership cannot be aggregated, the member will not be able to transfer the benefit out and if a refund is	% due to member not making a positive election to claim refund	Information has been recorded within the breach register	Members are written to 3 months prior to the date of their 5-year anniversary from date of leaving	

			<p>claimed there will be tax implications as this is deemed to be an unauthorised payment. The above is subject to change and we are waiting for confirmation that the above Regulation has been amended to support this.</p> <p><b>Awaiting confirmation of Regulatory change; going forward there will be no further requirement to report non-payment of refunds as the 5 year anniversary ruling will be removed.</b></p>				
Sept – Oct 2021	GDPR breaches	No breaches to report					
August – Sept 21	Contributions	3 Employer have not paid contributions within required timescale	Loss of investment returns	Employers are contacted once breach has occurred		Employers are contacted as soon as the deadline for submission of contributions has	

						passed	
Nov 21 – Feb 2022	Administration	20.6% of retirement lump sums not paid within 1 month of normal retirement or 2 months of early retirement; 97.06% of member option forms returned were paid within 1 month of date of return	The administering authority has accrued interest payments on retirement lump sums, paid more than one month after their due date, under the 2013 LGPS regulations	% due to the late provision of final pensionable pay figures from members employer payroll section / late return of completed option forms by member.		Communications to employers HR / Payroll Section and members regarding the provision of termination forms, final pensionable pay figures is subject to ongoing review and the importance of returning completed forms in a timely manner and the consequences of failure to comply is highlighted	
Nov 21 – Feb 2022	Administration	Frozen refunds unclaimed for this period equates to 75% .... This equates to a monetary value of £7,579.74	Regulations, no further interest will accrue on or after 5-year anniversary. Should the member enter re-employment membership cannot be aggregated, the member will not be able to transfer the benefit out and if a refund is claimed there	High % due to member not making a positive election to claim refund or transfer a cash transfer sum (CTS) to an alternative pension arrangement	Information has been recorded within the breach register	Members are written to 3 months prior to the date of the 5-year anniversary of date of leaving	



			will be tax implications as this is deemed to be an unauthorised payment. The above is subject to change and we are waiting for confirmation that the above Regulation has been amended to support this. <b>Awaiting confirmation of Regulatory change; going forward there will be no further requirement to report non-payment of refunds as the 5 year anniversary ruling will be removed</b>				
Nov 21 – Feb 2022	GDPR Breaches	No breaches to report during this quarter					
Nov 21 – Feb 2022	Contributions	5 Employer have not paid contributions within required	Loss of investment returns	Employers are contacted once breach has occurred		Employers are contacted as soon as the deadline for submission of	

		timescale – see below for detail				contributions has passed	
Mar 2022	Administration	12.50% of retirement lump sums not paid within 1 month of normal retirement or 2 months of early retirement; 100% was paid within 1 month of receipt of member option return	The administering authority has accrued interest payments on retirement lump sums, paid more than one month after their due date, under the 2013 LGPS regulations	Members failed to return pension election forms in a timely manner/completed in full and late issue of pensionable pay information from the member's employers payroll section, which has led to the late provision of pension options to the member.		The Fund continues to remind its members of the importance of returning pension option forms in a timely manner. The Pension Section provide member employer payroll sections with a listing of outstanding termination forms on a monthly basis. All communications are subject to review.	
Mar 2022	Administration	Frozen refunds unclaimed for this period equates to 82.36% .... This equates to a monetary value of £1,862.60	Regulations state, no further interest will accrue on or after 5-year anniversary. Should the member enter re-employment membership cannot be aggregated, the member will not be able to transfer the benefit out and if a refund is	High % due to member not making a positive election to claim refund	Information has been recorded within the breach register	Members are written to 3 months prior to the date of their 5-year anniversary from date of leaving	

			<p>claimed there will be tax implications as this is deemed to be an unauthorised payment. The above is subject to change and we are waiting for confirmation that the above Regulation has been amended to support this.</p> <p><b>Awaiting confirmation of Regulatory change; going forward there will be no further requirement to report non-payment of refunds as the 5 year anniversary ruling will be removed.</b></p>				
Mar 2022	GDPR Breaches	No breaches to report					
Apr – Jun 2022	Administration	16.28% of retirement lump sums not paid within 1 month of normal	The administering authority has accrued interest payments on	% due to a delay with the return of the completed pension options		The Fund continues to remind its members of the importance of returning pension	

		retirement or 2 months of early retirement; 100% was paid within 1 month of receipt of member option return	retirement lump sums, paid more than one month after their due date, under the 2013 LGPS regulations			option forms in a timely manner	
Apr – Jun 2022	Administration	Frozen refunds unclaimed for this period equates to 94.12% .... This equates to a monetary value of £2581.94	Regulations state, no further interest will accrue on or after 5-year anniversary. Should the member enter re-employment membership cannot be aggregated, the member will not be able to transfer the benefit out and if a refund is claimed there will be tax implications as this is deemed to be an unauthorised payment. The above is subject to change and we are waiting for confirmation that the above	High % due to member not making a positive election to claim refund	Information has been recorded within the breach register	Members are written to 3 months prior to the date of their 5-year anniversary from date of leaving	

			Regulation has been amended to support this. <b>Awaiting confirmation of Regulatory change; going forward there will be no further requirement to report non-payment of refunds as the 5 year anniversary ruling will be removed</b>				
Apr – Jun 2022	GDPR Breaches	No breaches to report					
March – May 22	Contributions	3 Employer have not paid contributions within required timescale – see below for detail	Loss of investment returns	Employers are contacted once breach has occurred		Employers are contacted as soon as the deadline for submission of contributions has passed	
July – August 2022	Administration	5% of retirement lump sums not paid within 1 month of normal retirement or 2 months of early retirement; 100% was paid within 1 month of receipt of	The administering authority has accrued interest payments on retirement lump sums, paid more than one month after their due date, under the 2013 LGPS	% due to a delay with the return of the completed pension options		The Fund continues to remind its members of the importance of returning pension option forms in a timely manner	

		member option return	regulations				
July – August 2022	Administration	Frozen refunds unclaimed for this period equates to 84.37% .... This equates to a monetary value of £12,043.54	Regulations state, no further interest will accrue on or after 5-year anniversary. Should the member enter re-employment membership cannot be aggregated, the member will not be able to transfer the benefit out and if a refund is claimed there will be tax implications as this is deemed to be an unauthorised payment. The above is subject to change and we are waiting for confirmation that the above Regulation has been amended to support this. <b>Awaiting confirmation of Regulatory</b>	High % due to member not making a positive election to claim refund	Information has been recorded within the breach register	Members are written to 3 months prior to the date of their 5-year anniversary from date of leaving	

			<b>change; going forward there will be no further requirement to report non-payment of refunds as the 5-year anniversary ruling will be removed</b>				
July – August 2022	GDPR	No breaches to report					
July – August 2022	Contributions		Loss of investment returns	Employers are contacted once breach has occurred		Employers are contacted as soon as the deadline for submission of contributions has passed	
September – October 2022	Administration	14.29% of retirement lump sums not paid within 1 month of normal retirement or 2 months of early retirement; 100% was paid within 1 month of receipt of member option return	The administering authority has accrued interest payments on retirement lump sums, paid more than one month after their due date, under the 2013 LGPS regulations	% due to a delay with the return of the completed pension options (total number 3)		The Fund continues to remind its members of the importance of returning pension option forms in a timely manner	
September – October 2022	Administration	Frozen refunds unclaimed for this period is	Regulations state, no further interest will	High % due to member not making a positive	Information has been recorded within the	Members are written to 3 months prior to the date of	

		89.19% .... This equates to a monetary value of £14,786.48	accrue on or after 5-year anniversary. Should the member enter re-employment membership cannot be aggregated, the member will not be able to transfer the benefit out and if a refund is claimed there will be tax implications as this is deemed to be an unauthorised payment. The above is subject to change and we are waiting for confirmation that the above Regulation has been amended to support this. <b>Awaiting confirmation of Regulatory change; going forward there will be no further requirement to</b>	election to claim refund	breach register	their 5-year anniversary from date of leaving	
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			<b>report non-payment of refunds as the 5-year anniversary ruling will be removed</b>				
September – October 2022	GDPR	No breaches to report					
September – October 2022	Contributions	2 Employers have not paid contributions within required timescale – see below for detail	Loss of investment returns	Employers are contacted once breach has occurred		Employers are contacted as soon as the deadline for submission of contributions has passed	
November 2022 – February 2023	Administration	28.17% of retirement lump sums not paid within 1 month of normal retirement or 2 months of early retirement; 100% was paid within 1 month of receipt of member option return	The administering authority has accrued interest payments on retirement lump sums, paid more than one month after their due date, under the 2013 LGPS regulations	% due to a delay with the return of the completed pension options/late provision of pensionable pay figures by the members employer		The Fund continues to remind its members/employers of the importance of returning pension option forms/final pensionable pay figures in a timely manner	✓
November 2022 – February 2023	Administration	Frozen refunds unclaimed for this period is 37.10% .... This equates to a monetary value of £11,337.43	Regulations state, no further interest will accrue on or after 5-year anniversary. Should the member enter	High % due to member not making a positive election to claim refund	Information has been recorded within the breach register	Members are written to 3 months prior to the date of their 5-year anniversary from date of leaving	✓

			<p>re-employment membership cannot be aggregated, the member will not be able to transfer the benefit out and if a refund is claimed there will be tax implications as this is deemed to be an unauthorised payment. The above is subject to change and we are waiting for confirmation that the above Regulation has been amended to support this.</p> <p><b>Awaiting confirmation of Regulatory change; going forward there will be no further requirement to report non-payment of refunds as the 5-year anniversary</b></p>				
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			<b>ruling will be removed</b>				
November 2022 – February 2023	GDPR	No breaches to report					
November 2022 – February 2023	Contributions	2	2 Employers have not paid contributions within required timescale – see below for detail	Loss of investment returns		Employers are contacted as soon as the deadline for submission of contributions has passed	
March 2023 – June 2023	Administration	17.77% of retirement lump sums not paid within 1 month of normal retirement or 2 months of early retirement; 100% was paid within 1 month of receipt of member option return	The administering authority has accrued interest payments on retirement lump sums, paid more than one month after their due date, under the 2013 LGPS regulations	% due to a delay with the return of the completed pension options/late provision of pensionable pay figures by the members employer		The Fund continues to remind its members/employers of the importance of returning pension option forms/final pensionable pay figures in a timely manner	✓
March 2023 – June 2023	Administration	Frozen refunds unclaimed for this period is 91.03% .... This equates to a monetary value of £20,258	Regulations state, no further interest will accrue on or after 5-year anniversary. Should the member enter re-employment membership cannot be aggregated, the	High % due to member not making a positive election to claim refund	Information has been recorded within the breach register	Members are written to 3 months prior to the date of their 5-year anniversary from date of leaving	✓

			<p>member will not be able to transfer the benefit out and if a refund is claimed there will be tax implications as this is deemed to be an unauthorised payment. The above is subject to change and we are waiting for confirmation that the above Regulation has been amended to support this.</p> <p><b>Awaiting confirmation of Regulatory change; going forward there will be no further requirement to report non-payment of refunds as the 5-year anniversary ruling will be removed</b></p>				
March 2023 –	GDPR	No breaches to report					✓

June 2023							
March 2023 – June 2023	Contributions	3	3 Employers have not paid contributions within required timescale – see below for detail	Loss of investment returns		Employers are contacted as soon as the deadline for submission of contributions has passed	✓

✓ New breaches since the previous meeting

The details of the late Contributors :

No. of Contributors	Due Date	Date Paid	No of Months	Amount £	Organisation Type	Reason
Page 43 4	19 <sup>th</sup> March	21 <sup>st</sup> March	3	2,738.43	Community Council	Problem accessing bank account after death of clerk.
	19 <sup>th</sup> May	27 <sup>th</sup> June				
	19 <sup>th</sup> June	27 <sup>th</sup> June				
2	19 <sup>th</sup> March	17 <sup>th</sup> April	3	372.89	Community Council	Paid by cheque now paying by transfer, delay in receipting.
	19 <sup>th</sup> April	27 <sup>th</sup> April		375.18		
	19 <sup>th</sup> June	20 <sup>th</sup> June		398.87		
244	19 <sup>th</sup> May	23 <sup>rd</sup> May	1	162,427.39	Housing Association	Payment set up but not sent in error



## Report of the Section 151 Officer

Pension Fund Committee – 13 July 2023

### Wales Pension Partnership Business Plan 2023- 2026

<b>Purpose:</b>	To provide a framework for the Wales Pension Partnership programme of work for 2023 -2026
<b>Reason for Decision:</b>	To approve the outlined business plan and note progress of current year business plan
<b>Consultation:</b>	Legal, Finance and Access to Services.
<b>Recommendation:</b>	It is recommended that the Wales Pension Partnership Business Plan 2023- 26 is approved and progress of the in-year plan is noted.
<b>Report Author:</b>	Jeff Dong
<b>Finance Officer:</b>	Jeff Dong
<b>Legal Officer:</b>	Stephanie Williams
<b>Access to Services Officer:</b>	Rhian Millar

### Wales Pension Partnership Business Plan 2023- 2026

#### 1 Background

1.1 In line with best practice, the Wales Pension Partnership produces a business plan to inform its work programme for the forthcoming 36 month period. The business plan for 2023- 2026 is attached.at Appendix 1.

#### 2 Recommendation

2.1 The Pension Fund Committee is asked to note and approve the attached business plan for the years 2023-2026, noting the timescale and responsibility for key action points throughout the year. The document is a dynamic document and shall be revised and amended throughout the year as necessary.

### **3 Legal Implications**

- 3.1 The current legislative framework for the pension fund investments carried out by Administering Authorities is set by the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009. The law governing pensions is a complex and specialist area. National Government guidance indicates that the pooling of LGPS assets is permissible under current law.
- 3.2 The Inter-Authority Agreement has been approved and signed by all 8 Local Authorities.
- 3.3 The Pension Fund Committee Terms of Reference and Scheme of Delegation sets out the Committee's responsibility for the strategic governance of the Pension Fund.

### **4 Financial Implications**

- 4.1 There are no financial implications arising from this report.

### **5 Integrated Impact Assessment Implications**

- 5.1 The Council is subject to the Equality Act (Public Sector Equality Duty and the socio-economic duty), the Well-being of Future Generations (Wales) Act 2015 and the Welsh Language (Wales) Measure, and must in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Acts.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.
- Deliver better outcomes for those people who experience socio-economic disadvantage.
- Consider opportunities for people to use the Welsh language.
- Treat the Welsh language no less favourably than English.
- Ensure that the needs of the present are met without compromising the ability of future generations to their own needs.

The Well-being of Future Generations (Wales) Act 2015 mandates that public bodies in Wales must carry out sustainable development. Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the 'well-being goals'.

Our Integrated Impact Assessment (IIA) process ensures we have paid due regard to the above. It also takes into account other key issues and priorities, such as poverty and social exclusion, community cohesion, carers, the United Nations Convention on the Rights of the Child

(UNCRC) and Welsh language.

There are no equality impact implications arising from this report.

**Background Papers:** None.

**Appendices:**

Appendix 1- Business Plan 2023-2026

Appendix 2 – Business Plan Progress Report 2022-23





# Wales Pension Partnership Business Plan 2023-2026



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# Introduction

This is the business plan for the Wales Pension Partnership ('WPP'), the business plan details the WPP's priorities and areas of focus for 2023/24, 2024/25 and 2025/26. The business plan is constantly monitored and will be formally reviewed and agreed every year. The purpose of the business plan is to:

- Explain the background and governance structure of the WPP
- Outline the priorities and objectives of the WPP over the next three years
- Outline the financial budget for the relevant Business Plan period
- Summarise the WPP's Investments & Performance Objectives

# About the Wales Pension Partnership

Established in 2017, the WPP is a collaboration of the eight LGPS funds (Constituent Authorities) covering the whole of Wales and is one of eight national Local Government Pension pools. We have a long, successful history of collaboration, including examples that pre-date the Government's pooling initiative. We are proud of our unique identity as a Pool – our Constituent Authorities represent and span the entirety of Wales. Being democratically accountable means, we provide the best of strong public sector governance and transparency.

Our operating model is designed to be flexible and deliver value for money. We appointed an external fund Operator and make use of external advisers to bring best of breed expertise to support the running of the Pool, this includes Hymans Robertson who have been appointed as the WPP's Oversight Advisor. The Operator is Link Fund Solutions and they have partnered with Russell Investments to deliver effective investment management solutions with the aim of achieving strong net of fee performance for all the Constituent Authorities. We have a shared vision and agreement on the means and pace at which this vision will be achieved. The eight LGPS Funds (Constituent Authorities) of the Wales Pension Partnership are:



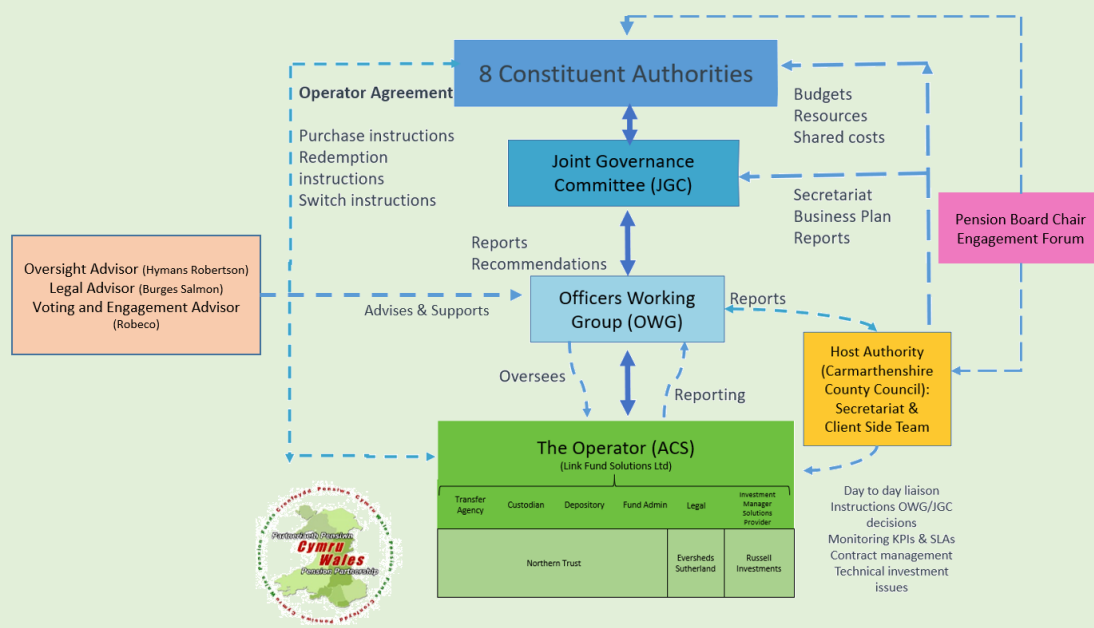
# Governance

The WPP is responsible for ensuring that its business is conducted in accordance with regulation and guidance. We must also ensure that: public money is safeguarded and properly accounted for, used economically, efficiently and effectively to ensure value for money. We also strive for continuous improvement and to conform with industry best practice.

The WPP details how it deals with all aspects of Governance through its Inter Authority Agreement (IAA), which defines the standards, roles and responsibilities of the Constituent Authorities, its Members, Committees and Officers. The IAA includes a Scheme of Delegation outlining the decision-making process, taking into account the relevant legislation. In line with its belief that good governance should lead to superior outcomes for stakeholders, the WPP has put in place a robust governance structure, which has been designed to:



The diagram below shows WPP’s governance structure:



The Constituent Authorities sit at the top of the WPP’s governance structure. They retain control of all activity carried out by the WPP and remain responsible for approving this Business Plan, which outlines the WPP’s budget and workplan, as well as its beliefs and objectives. The Constituent Authorities are heavily involved in all aspects of the WPP’s governance structure, while the WPP’s Joint Governance Committee and Officers Working Group are comprised respectively of elected councillors, scheme member representative and officer representatives from the Constituent Authorities.

The WPP believes in being open and transparent as well as regularly engaging with its key stakeholders. As such the WPP ensures the meetings of the Joint Governance Committee are accessible to the public via a live webcast stream. Meeting papers are also made publicly available. Local Pension Board engagement days are also held regularly as a means of fostering stakeholder engagement. The WPP recognises the importance of all of its stakeholders to reflect this the WPP has put in place an Engagement Protocol Framework, this is carried out via the following engagement mechanisms:

Engagement mechanisms and Frequency:

- Strategic Relationship Review meeting Bi-Annual
- JGC Engagement Quarterly
- Manager Performance Meetings/ Calls Quarterly
- Training Events Quarterly
- OWG Engagement Quarterly
- Bi-weekly meetings Every 2 weeks
- Pension Fund Committees Annual
- Manager Engagement Days Annual
- Member Communications Annual
- Pension Board Engagement Every 6 months
- Engagement via the website & LinkedIn Continuous
- Constituent Authority Annual Requirements & Ambitions Questionnaire Annual

# Risk Management

The Wales Pension Partnership ('WPP') recognises that it faces numerous risks which, if left unmanaged, can limit the WPP's ability to meet its objectives and to act in the best interest of its stakeholders and beneficiaries. However, the WPP also understands that some risks cannot be fully mitigated and that in these instances' risks need to be embraced through active and effective management.

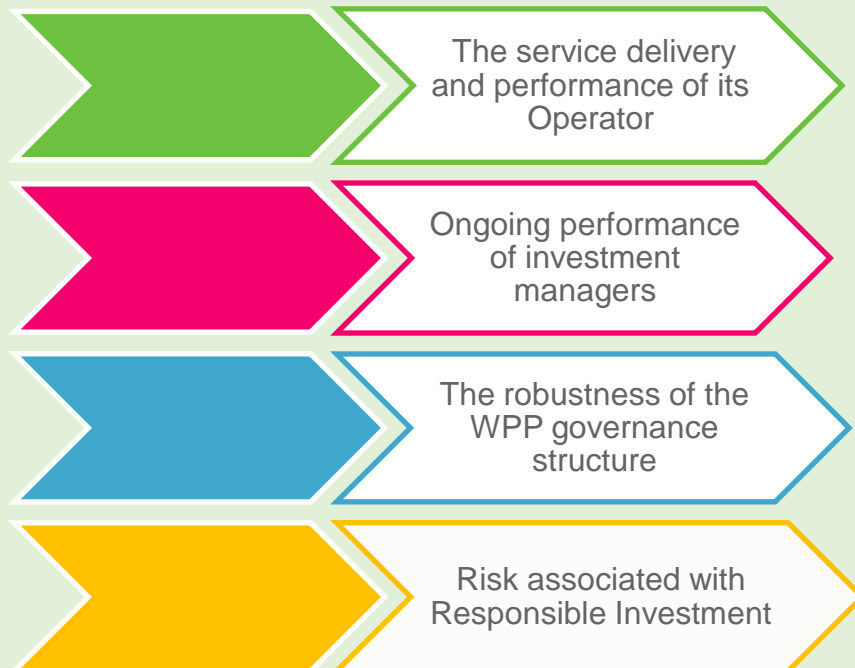
Risk management is a critical element of WPP's commitment to good governance, the WPP has developed a structured, extensive and robust risk strategy. This strategy will be embedded into the WPP's governance framework to ensure better decision-making, improved outcomes for stakeholders and greater efficiency.

The WPP's risk strategy seeks to identify and measure key risks and ensure that suitable controls and governance procedures are in place to manage these risks. The WPP believes that risks are fluid in nature and that the severity and probability of risks can change rapidly and without warning. To reflect this belief, the WPP's Risk Policy has been developed in such a way that risks can be anticipated and dealt with in a swift, effective manner to minimise potential loss or harm to the WPP and its stakeholders.

To deliver on its objectives, the WPP needs to carry out activities or seize opportunities that subject it to risk. The extent to which the WPP is able to effectively balance risk and return will depend on the success of its Risk Policy. It is critical that prior to making decisions the WPP understands the associated risks and considers the means by which these risks could be managed.

The greatest risk to the WPP's continued operation is its ability to deliver on its primary objectives. The WPP's Business Plan is an additional means through which the WPP will give special recognition to risks that pose a material threat to the delivery of its objectives and the actions required to manage these risks.

During the course of this business plan the WPP will seek to develop mechanisms, frameworks and process for managing the following key risks:



# Objectives

The WPP is proud to represent the eight Constituent Authorities and recognises its duty to ensure the needs and requirements of all stakeholders are met. The WPP, through consultation with all eight Constituent Authorities, has formulated a list of primary objectives these can be summarised as follows:

- To provide pooling arrangements which allow individual funds to implement their own investment strategies (where practical)
- To achieve material cost savings for participating funds while improving or maintaining investment performance after fees
- To put in place robust governance arrangements to oversee the Pool's activities.
- To work closely with other pools in order to explore the benefits that all stakeholders in Wales might obtain from wider pooling solutions or potential direct investments
- To deliver an investment framework that achieves the best outcomes for its key stakeholders; the Constituent Authorities. The Constituent Authorities will be able to use this framework to deliver the best outcomes for their Scheme Members & Employers
- To embed the delivery of long-term, sustainable investment outcomes into decision making, through capital allocation, the ongoing scrutiny of asset managers, and the exercise of the rights and responsibilities that arise as asset owners.

The eight Constituent Authorities recognise that their strength derives from their shared beliefs and their ability to work together to deliver on their unified objectives for the benefit of all WPP stakeholders.

# Beliefs

The WPP's Beliefs reflect the collaborative nature and shared values of the Constituent Authorities, they are as follows:

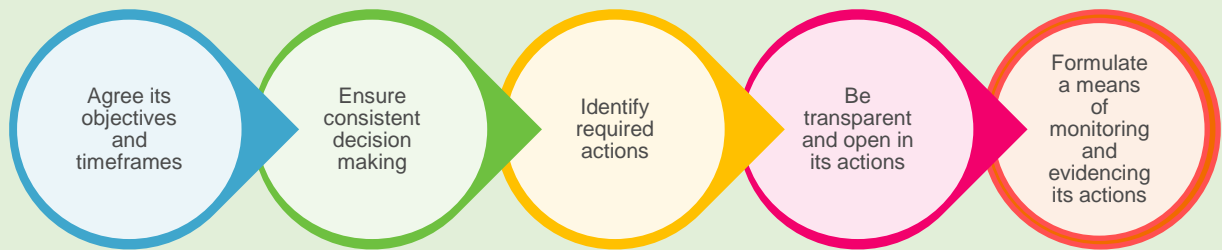
- The WPP's role is to facilitate and provide an investment pooling platform through which the interests of the Constituent Authorities can be implemented
- Good governance should lead to superior outcomes for the WPP's stakeholders
- Internal collaboration between the Host and Constituent Authorities is critical to achieving the WPP's objectives. External collaboration may also be beneficial in delivering cost savings and better outcomes for stakeholders
- Responsible Investment and effective Climate Risk mitigation strategies, alongside consideration and evidential management of broader Environmental, Social and Governance issues, should result in better outcomes for the WPP's stakeholders
- Effective internal and external communication is vital to achieving the WPP's objectives
- External suppliers can be a cost-effective means of enhancing the WPP's resources, capabilities and expertise
- Fee and cost transparency will aid decision making and improve stakeholder outcomes
- Continuous learning, innovation and development will help the WPP and its Constituent Authorities to evolve
- flexible approach to the WPP pool structure and implementation methods will enable the WPP pool to adapt in future and continue to meet the needs of its stakeholders.

The WPP's beliefs are the foundation for WPP's governance framework and have been used to guide all of the WPP's activities and decision making, including its objectives and policies.

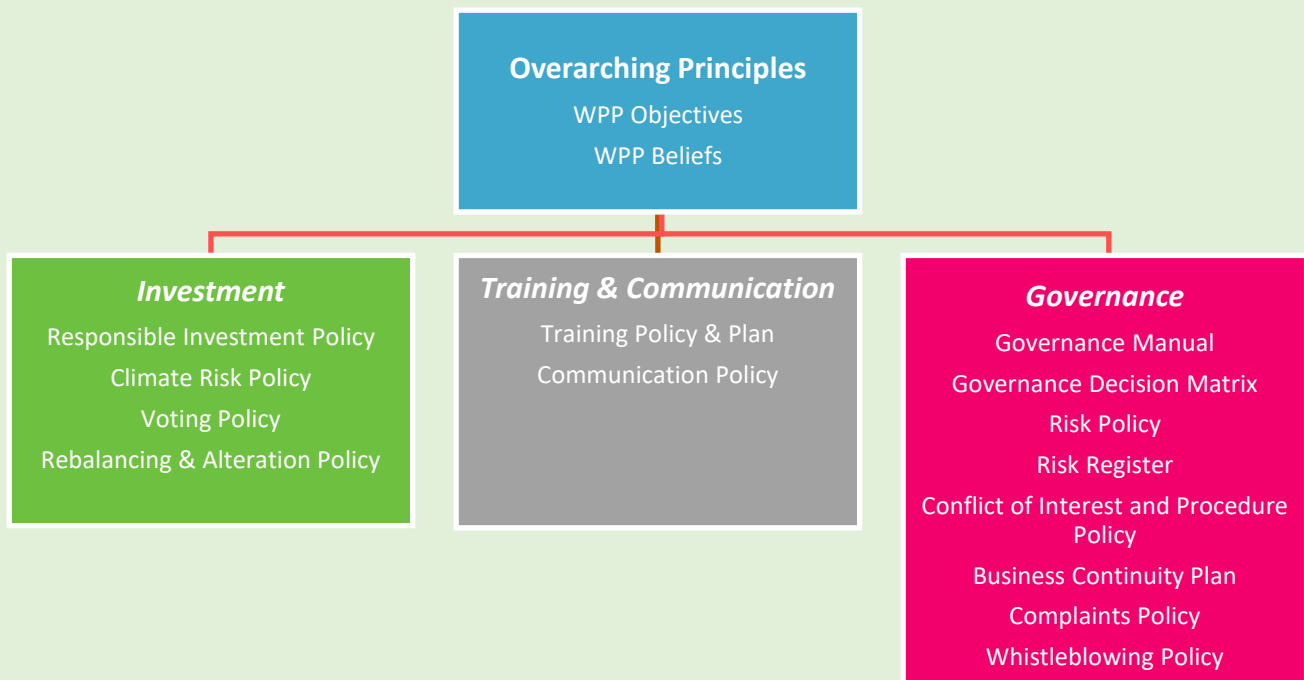


# Policies

The WPP believes that good governance should lead to superior outcomes for the WPP’s stakeholders. In recognition of this belief, the WPP, in consultation with the Constituent Authorities, has developed a robust governance structure and framework and a set of governing policies. In all instances the WPP’s policies and procedures have been developed to either complement or supplement the existing procedures and policies of the Constituent Authorities. The WPP understands the importance of formulating and codifying its policies and procedures. This process allows the WPP and the Constituent Authorities, to:



The WPP’s key policies, registers and plans are listed below and can be found on the WPP website.



The WPP’s policies are reviewed on a regular basis and the WPP will continually assess whether any additional policies, registers or plans are required. The WPP workplan includes a number of additional governance documents that will be developed, these will be made available on the WPP website once completed. The policies play a vital role in the WPP’s governance arrangements and have been formulated with the sole purpose of providing a codified framework which will ensure that the WPP achieves its objectives in an effective and transparent means.

# Work Plan

The tables below shows key priorities and objectives that the WPP aims to complete over the next three years. The workplan has been broken down into a number of key sections which are all vital to the continued success of the WPP

- **Governance** - The WPP believes that good governance leads to better outcomes for its stakeholders, as such it will further develop its governance framework by developing additional policies, registers, plans and carry out ongoing reviews of its existing governance documents and structure.
- **Ongoing Sub-Fund development** – To date the WPP has pooled c72% of its assets and a number of other sub funds are in the process of being developed. The WPP will continue to consult with the Constituent Authorities to ensure that all suitable assets are pooled.
- **Operator Services** - The Operator, alongside the third parties that it employs on behalf of the WPP, are critical to the ongoing activities of the WPP, therefore service delivery of the Operator and third-party suppliers are crucial. The current operator contract comes to an end in December 2024.
- **Investments and Reporting** - The WPP recognises the importance of ensuring that existing investment solutions remain optimal and aligned to Constituent Authority requirements, while also delivering the investment return expectations of the Constituent Authorities. The WPP will continue to deliver on its reporting requirements and will develop further reporting, as and when required.
- **Communication and Training** - The WPP wants to ensure that internal stakeholders and external parties are aware of the WPP's progress and publishes numerous report and updates to ensure that it proactively communicates its progress to stakeholders. These can all be found on the WPP website.
- **Resources, Budget and Fees** - The WPP recognises that insufficient resources poses a significant risk to its ability to deliver an investment framework that achieves the best outcomes for its key stakeholders, the WPP carries out a number of reviews to guarantee that it has suitable resources to deliver on this commitment.

Work to be completed	2023 - 2024	2024 - 2025	2025 - 2026
<b>Governance</b>			
Development of a WPP Breaches and Errors Policy	✓		
Legal Services provider contract (initial 3 year review)	✓		
Oversight Advisor procurement process		✓	
Voting & Engagement Service provider procurement process		✓	
Ongoing review of Inter Authority Agreement	✓	✓	✓
Annual review of WPP's policies and plans	✓	✓	✓
Quarterly reviews of the Risk Register	✓	✓	✓
Respond to any pooling related consultations and carry out any necessary changes as a result of consultation outcomes	✓	✓	✓
<b>Ongoing Sub-Fund development</b>			

Launch of Private Debt & Infrastructure Sub-Funds	✓		
Launch Sustainable Equities Sub-Fund	✓		
Launch of Private Equity Sub-Fund	✓		
Formulate the WPP's Property requirements and optimal means of implementation & launch the property Sub-funds	✓	✓	
Consideration of WPP's Levelling up / impact requirements	✓	✓	
Launch of other Private Market sub-funds (TBC)	✓	✓	✓
Consultation with CAs on need for further sub-funds, review and develop a mechanism to pool any suitable non-pooled assets	✓	✓	✓
Consideration of Local Investment opportunities	✓	✓	✓
<b>Operator Services</b>			
Operator contract / procurement process	✓	✓	
New Operator Contract		✓	
Operator Oversight	✓	✓	✓
<b>Investments and Reporting</b>			
Review Sub-Fund mandates to ensure compatibility with WPP's Responsible Investment and Climate Risk Beliefs	✓	✓	✓
Task Force on Climate-related Financial Disclosures (TCFD) reporting	✓	✓	✓
Stewardship Code reporting	✓	✓	✓
Consider additional reporting that demonstrates WPP's commitment to Responsible Investment	✓	✓	✓
On-going Investment Manager performance reporting, scrutiny and challenge	✓	✓	✓
Annual review of WPP's Cost Transparency Requirements	✓	✓	✓
Annual performance review of WPP Sub Funds (Equity and Fixed Income)	✓	✓	✓
On-going engagement with Constituent Authorities regarding minimum ESG / RI standards and their climate ambitions	✓	✓	✓
<b>Communication and Training</b>			
Formulation of WPP's Annual Responsible Investment Progress Report	✓	✓	✓
Formulation of the WPP's Annual Training Plan	✓	✓	✓
Formulation of the WPP's Annual Update	✓	✓	✓
Formulation of the WPP's Annual Report	✓	✓	✓
<b>Resources, Budget and Fees</b>			
Annual review of resources and capacity	✓	✓	✓
Formulation of Annual WPP Budget	✓	✓	✓
Review and Monitoring of Operator / external provider fees	✓	✓	✓

# Training Plan

It is best practice for WPP personnel to have appropriate knowledge and understanding of:

- the regulations and markets relating to pensions;
- the pooling of Local Authority Pension Schemes; and
- relevant investment opportunities.

The WPP's training plan is designed to supplement existing Constituent Authority training plans. Local level training needs will continue to be addressed by Constituent Authorities while the WPP training plan will offer training that is relevant to the WPP's pooling activities.

WPP personnel should obtain a degree of knowledge and understanding that ensures they are able to carry out their duties associated with the WPP. WPP personnel should also be aware of the WPP's framework, beliefs, policies, governance matrix, the decision-making process and decision logging process.

To aid WPP personnel, the Host Authority will arrange quarterly training sessions which will cover major areas such as investments, administration, regulation requirements, government guidance and market developments. The WPP's training events will primarily focus on meeting the training needs of members of the OWG and JGC, however Constituent Authorities are encouraged to invite Pension Committee Members, as well as Pension Board Representatives if they believe that the training would be beneficial to these individuals.

We have set out below a list of training topics which the Host Authority will arrange training for during the 2022/2023 financial year. WPP's training topics are based on current WPP topical priorities and from an analysis of the WPP training requirements questionnaire/ assessment responses, completed by members of the Joint Governance Committee ('JGC') and Officers Working Group ('OWG').

## Product Knowledge

- o Private Market Asset Classes – Private Equity / Property
- o Levelling up / development opportunities

## Reporting

- o TCFD reporting
- o Performance reporting

## Responsible Investment

- o Voting & Engagement
- o RI within the WPP sub funds

## Market Understanding & Regulatory Requirements

- o Progress of other LGPS pools & Collaboration Opportunities
- o Pooling Guidance

# Budget

The table below outlines the WPP's budget for the next three years.

	2023-24	2024-25	2025-26
	£'000	£'000	£'000
Host Authority *	200	205	209
External Advisors *	1,448	1,130	1,040
<b>TOTAL to be recharged</b>	<b>1,648</b>	<b>1,335</b>	<b>1,249</b>
Operator / Allocator Services **	37,257	40,982	45,080
<b>TOTAL to be deducted from the NAV</b>	<b>37,257</b>	<b>40,982</b>	<b>45,080</b>

*\*Host Authority and External Advisor costs are to be funded equally by all eight of the WPP's Constituent Authorities and these will be recharged on an annual basis.*

*\*\*Operator / Allocator Services costs are based on each Constituent Authority's percentage share of WPP assets and are deducted directly from the Net Asset Value (NAV) of the Constituent Authority's assets.*

# Investments & Performance

The WPP's Constituent Authorities have total assets of circa £23bn (as at 31 March 2022). The Constituent Authorities' passive investments are effectively within the Pool but are held by the respective WPP authorities in the form of insurance policies.

The Officers Working Group receives quarterly, six monthly and annual performance reports, the group reviews and challenges the performance of Investment Managers on behalf of the WPP. The WPP hosts annual manager engagement days, which are used to challenge managers and to facilitate engagement with Constituent Authority Pension Committee and Board Members and the WPP's Investment Managers. The Constituent Authorities also carry out their own analysis of WPP's investment performance at local level, this will include manager attendance at Pension Committees. Below we outline the WPP's existing Sub-Funds.

## Equity Sub-Funds



\* Portfolio Values as at launch date

Sub Fund	Performance Benchmark	Participating Funds	Underlying Investment Managers	Launch Date
Global Growth	MSCI ACWI ND	RCT, Dyfed, Gwynedd, Cardiff and Powys	Baillie Gifford, Veritas and Pzena	Feb 19
Global Opportunities	MSCI ACWI ND	Swansea, Torfaen, Gwynedd, RCT, Cardiff and Clwyd	Morgan Stanley, Numeric, Sanders, Jacobs Levy, SW Mitchell, Nissay, Intermede and Oaktree	Feb 19
UK Opportunities	FTSE All Share	Cardiff and Torfaen	Liontrust (Majedie), Lazard, Baillie Gifford, Ninety-One, J O Hambro and Liontrust	Sept 19
Emerging Markets	MSCI Emerging Markets Index	Cardiff, Clwyd, Gwynedd and Torfaen	Artisan, Bin Yuan, Barrow Hanley, Axiom, Numeric and Oaktree	Oct 21

## Fixed Income Sub-Funds



\* Portfolio Values as at launch date

Sub Fund	Performance Benchmark	Participating Funds	Underlying Investment Managers	Launch Date
Global Credit	Bloomberg Barclays Global Aggregate Credit Index (GBP Hedged)	Cardiff, Dyfed, Powys and Torfaen	Western, Metlife, Fidelity and T Rowe Price	July 20
Global Government	FTSE WGBI Index	Cardiff and Torfaen	Bluebay and Colchester	July 20
Multi-Asset Credit	3 Month GBP SONIA plus 4%	Cardiff, Clwyd, Gwynedd, Powys, and Swansea	ICG, Man GLG, BlueBay, Barings and Voya	July 20
Absolute Return Bond Fund	3 Month GBP SONIA plus 2%	Gwynedd, Powys and Swansea	Wellington, Putnam, Aegon and Insight	Sept 20
UK Credit Fund	ICE BofA ML Eur-Stg plus 0.65%	RCT	Fidelity	July 20

# Contact Details

If you require further information about anything in or related to this business plan, please contact the Wales Pension Partnership:

Postal Address - Wales Pension Partnership

Carmarthenshire County Council

Treasury & Pension Investments Section

County Hall

Carmarthen

SA31 1JP

E-mail - [WalesPensionPartnership@carmarthenshire.gov.uk](mailto:WalesPensionPartnership@carmarthenshire.gov.uk)

Telephone - (01267) 224136

Further information on the WPP and ongoing updates on the WPP's progress can be found on the website and LinkedIn page.

The website can be found here:

<https://www.walespensionpartnership.org/>







# Wales Pension Partnership Business Plan 2022-2023 Q3 Review

## Appendix 2

### Governance

Work to be completed	Completed	Comments
<ul style="list-style-type: none"><li>Development of a WPP Whistleblowing Policy</li></ul>	Yes	Approved at the July 2022 JGC
<ul style="list-style-type: none"><li>Development of a WPP Business Continuity Plan (including Cyber)</li></ul>	Yes	Approved at the July 2022 JGC
<ul style="list-style-type: none"><li>Development of a WPP Complaints Policy</li></ul>	Yes	Approved at the December 2022 JGC
<ul style="list-style-type: none"><li>Development of a WPP Breaches and Errors Policy</li></ul>	In progress	To be finalised in Q2 (April to June) 2023
<ul style="list-style-type: none"><li>Ongoing review of the Inter Authority Agreement</li></ul>	Ongoing	
<ul style="list-style-type: none"><li>Annual/biennial review of WPP's policies and plans</li></ul>	Ongoing	
<ul style="list-style-type: none"><li>Quarterly reviews of the Risk Register</li></ul>	Ongoing	

### Ongoing Establishment

Work to be completed	Completed	Comments
<ul style="list-style-type: none"><li>Appoint Private Market Allocators</li></ul>	In progress	Private Debt and Infrastructure Allocators appointed in April 2022. Private Equity Allocator appointed in December 2022.
<ul style="list-style-type: none"><li>Launch of Private Debt &amp; Infrastructure Sub-Funds</li></ul>		Launch delayed to Q2 (April to June) 2023
<ul style="list-style-type: none"><li>Launch of Private Equity Sub-Fund</li></ul>		Launch due Q2 (April to June) 2023
<ul style="list-style-type: none"><li>Launch Sustainable Equities Sub-Fund</li></ul>		Launch due Q2 (April to June) 2023
<ul style="list-style-type: none"><li>Formulate the WPP's Property requirements and optimal means of implementation</li></ul>	In progress	Initial discussions have taken place and work is progressing

## Appendix 2

<ul style="list-style-type: none"> <li>• Consultation with CAs on need for further sub-funds</li> </ul>	Ongoing	
<ul style="list-style-type: none"> <li>• Consideration of Local Investment opportunities</li> </ul>	Ongoing	

### Operator Services

Work to be completed	Completed	Comments
<ul style="list-style-type: none"> <li>• Operator contract / procurement process</li> </ul>	In progress	Procurement work has commenced
<ul style="list-style-type: none"> <li>• Operator oversight</li> </ul>	Ongoing	

### Investments and Reporting

Work to be completed	Completed	Comments
<ul style="list-style-type: none"> <li>• Finalise Voting &amp; Engagement Reporting Requirements</li> </ul>	Completed	
<ul style="list-style-type: none"> <li>• Formulate WPP Engagement Priorities and Implementation Framework</li> </ul>	Completed	
<ul style="list-style-type: none"> <li>• Review Sub-Fund mandates to ensure compatibility with WPP's Responsible Investment and Climate Risk Beliefs</li> </ul>	Ongoing	
<ul style="list-style-type: none"> <li>• Task Force on Climate-related Financial Disclosures (TCFD) reporting</li> </ul>		TCFD consultation in process
<ul style="list-style-type: none"> <li>• Stewardship Code reporting</li> </ul>	Yes	2021/22 report submitted on 31 October 2022
<ul style="list-style-type: none"> <li>• Consider additional reporting that demonstrates WPP's commitment to Responsible Investment</li> </ul>	Ongoing	
<ul style="list-style-type: none"> <li>• On-going Investment Manager performance reporting, scrutiny and challenge</li> </ul>	Ongoing	

## Appendix 2

<ul style="list-style-type: none"> <li>Annual review of WPP's Cost Transparency Requirements</li> </ul>	In progress	To be completed by the end of March 2023
<ul style="list-style-type: none"> <li>Annual performance review of WPP Sub Funds (Equity and Fixed Income)</li> </ul>	In progress	To be completed by the end of March 2023
<ul style="list-style-type: none"> <li>On-going engagement with Constituent Authorities regarding minimum ESG / RI standards and their climate ambitions</li> </ul>	Ongoing	

### Communication, Training and Reporting

Work to be completed	Completed	Comments
<ul style="list-style-type: none"> <li>Formulation of the WPP's Annual Responsible Investment Progress Report</li> </ul>	Yes	Report presented at the July 2022 JGC and published on website
<ul style="list-style-type: none"> <li>Formulation of the WPP's annual training plan</li> </ul>	Yes	2023/24 training plan being taken to the March JGC for approval
<ul style="list-style-type: none"> <li>Formulation of the WPP's Annual Update</li> </ul>	Yes	2021/22 Annual Update published in September 2022
<ul style="list-style-type: none"> <li>Formulation of the WPP's Annual Report</li> </ul>	Yes	2021/22 Annual Report published in October 2022

### Resources, budget and fees

Work to be completed	Completed	Comments
<ul style="list-style-type: none"> <li>Annual review of resources and capacity</li> </ul>	Yes	Reviewed when formulating the 2023/24 budget
<ul style="list-style-type: none"> <li>Formulation of Annual WPP Budget</li> </ul>	Yes	Formulated and included in the 2023-26 Business Plan
<ul style="list-style-type: none"> <li>Review and Monitoring of Fees (including Link &amp; Russell)</li> </ul>	Ongoing	

## Appendix 2

### Training Plan

Training topics to be completed during 2022–2023 as per approved 2022-2023 Training Plan and progress to date:

	Completed	Comments
• Private Market Asset Classes & the role of the Allocator	Yes – September 2022	
• Active Sustainable Equities	Yes – September 2022	
• Governance and Administration	Yes – October 2022	
• Roles and Responsibilities	Yes – October 2022	
• What RI means for the WPP	Yes – December 2022	
• Stewardship Code and TCFD Reporting	Yes – December 2022	
• Progress of other LGPS Pools	Yes – February 2023	
• Collaboration Opportunities	Yes – February 2023	

An introductory training session was also held in September 2022 for new JGC members

## Appendix 2

### Budget

2022-2023 Budget Monitoring Report:

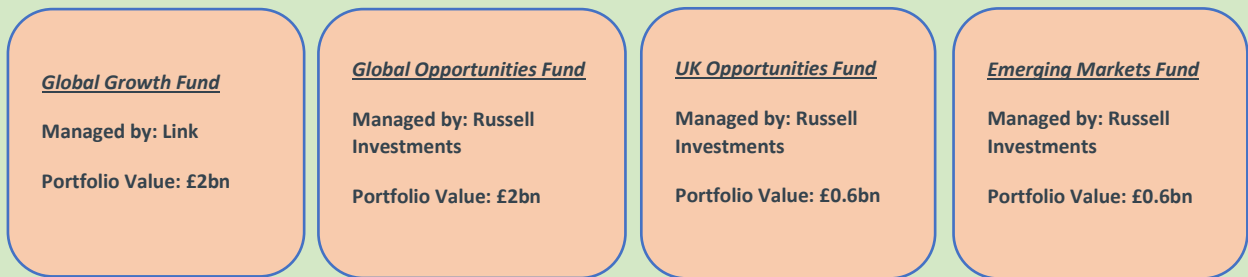
	<b>Budget 2022 – 2023 £000</b>	<b>Forecast 2022 – 2023 £000</b>	<b>Variances 2022 – 2023 £000</b>
Host Authority *	191	170	21
External Advisors *	1,206	1,163	43
<b>TOTAL to be recharged</b>	<b>1,397</b>	<b>1,333</b>	<b>64</b>
Operator Services **	33,319	34,080	(761)
<b>TOTAL to be deducted from the NAV</b>	<b>33,319</b>	<b>34,080</b>	<b>(761)</b>

*\*Host Authority and External Advisor costs are to be funded equally by all eight of the WPP's Constituent Authorities and these will be recharged on an annual basis.*

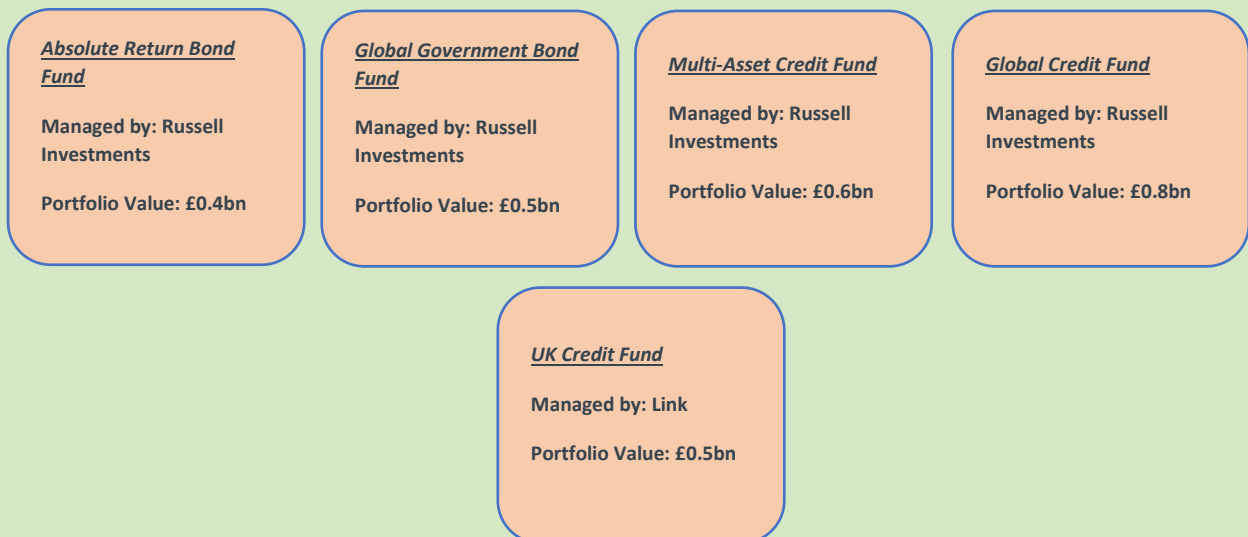
*\*\*Operator Services costs are based on each Constituent Authority's percentage share of WPP assets (held with the Operator) and are deducted directly from the Net Asset Value (NAV) of the Constituent Authority's assets (held with the Operator).*

Investments \*

### Equity Sub-Funds



### Fixed Income Sub-Funds



\* Portfolio Values as at launch date



Wales Pension Partnership

<https://www.walespensionpartnership.org/>



# Agenda Item 7c



## Report of the Section 151 Officer

### Pension Fund Committee – 13 July 2023

#### Admission Body Status

<b>Purpose:</b>	To approve the admission body application for Mrs Bucket
<b>Reason for Decision:</b>	To ensure compliance with the Local Government Pension Scheme Regulations 2013 (as amended).
<b>Consultation:</b>	Legal, Finance and Access to Services.
<b>Recommendation:</b>	It is recommended that:  1) The Pension Fund Committee approves the Admission Body Application of Mrs Bucket, subject to completion of a satisfactory Admission Agreement (which recognises the start date of the contract).  2) The Deputy Chief Finance Officer is given delegated authority to finalise the Admission Agreement with appointed legal advisors as outlined in this report.
<b>Report Author:</b>	J Dong
<b>Finance Officer:</b>	J Dong
<b>Legal Officer:</b>	S Williams
<b>Access to Services Officer:</b>	R Millar

## 1 Background

- 1.1 The Local Government Pension Regulations 2013 permit an Administering Authority to make an admission agreement with :

### PART 1

*“ d) a body that is providing or will provide a service or assets in connection with the exercise of a function of a scheme employer as a result of:*

- i) The transfer of the service or assets by means of a contract or other arrangement”*

- 1.2 The City & County of Swansea Pension Fund already has a number of such employers admitted into the scheme e.g. Tai Tarian, Celtic Leisure. All of these employers have completed Admission Agreements with associated sponsoring employer guarantee.

## **2 Mrs Bucket ( Professional Commercial Cleaning Services)**

- 2.1 Secondary Schools within the Swansea LEA are autonomous bodies with the discretion to commission certain services as they see fit. Following a service review exercise by YGG Tirdeunaw into school cleaning services, have determined to appoint Mrs Bucket (Commercial Cleaning Services) (Mrs Bucket factsheet attached) to undertake the cleaning services at the school. These cleaning services were previously provided by Swansea Council under service level agreement.
- 2.2 The contract for services commenced on the 1<sup>st</sup> June 2023 to run for 5 years.

## **3 Admission Agreement**

- 3.1 Under the contract conditions, the current eligible worker was transferred under TUPE arrangements from the current employer, Swansea Council to Mrs Bucket. In order to preserve the pension rights of the transferred member of staff, it is proposed that Mrs Bucket are granted Admitted Body status to the City & County of Swansea Pension Fund. Mrs Bucket currently undertake similar services for schools in the Rhondda Cynon Taf (RCT) and Cardiff Council areas and have entered into admission agreements with RCT Council and Cardiff Council as the requisite LGPS Administering Authorities. It is proposed that the admission agreement is granted on a closed scheme basis, to include only the named staff in schedule 1 of the admission agreement.
- 3.2 The admission agreement shall require the requisite indemnity bond or sponsoring employer guarantee is secured from the sponsoring employer, Swansea Council. The Administering Authority shall also undertake the appropriate risk assessment of the admitted body Mrs Bucket as part of the Admission Body Agreement.

## **4 Legal Implications**

- 4.1 An Admission Agreement will need to be prepared as outlined in this report with the appropriate indemnity included.

## **5 Financial Implications**

- 5.1 Employer Contributions as outlined by the Actuary shall be required to be paid by Mrs Bucket commensurate with date of transfer and for the duration of length of contract/employment.

## **6 Integrated Impact Assessment**

- 6.1 The Council is subject to the Equality Act (Public Sector Equality Duty and the socio-economic duty), the Well-being of Future Generations (Wales) Act 2015 and the Welsh Language (Wales) Measure, and must in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Acts.

- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.
- Deliver better outcomes for those people who experience socio-economic disadvantage.
- Consider opportunities for people to use the Welsh language.
- Treat the Welsh language no less favourably than English.
- Ensure that the needs of the present are met without compromising the ability of future generations to their own needs.

The Well-being of Future Generations (Wales) Act 2015 mandates that public bodies in Wales must carry out sustainable development. Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the 'well-being goals'.

Our Integrated Impact Assessment (IIA) process ensures we have paid due regard to the above. It also takes into account other key issues and priorities, such as poverty and social exclusion, community cohesion, carers, the United Nations Convention on the Rights of the Child (UNCRC) and Welsh language.

There are no equality impact implications arising from this report.

**Background Papers:** None.

**Appendices:** Appendix 1 - Mrs Bucket factsheet.



 **Mrs Bucket**  
(<https://www.mrs-bucket.co.uk>)

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We have the power to make a lasting and measurable impact on your business.

Our business cleaning services in Bristol, Cardiff, South Wales and the rest of the UK help you to increase productivity, reduce costs and sickness rates, and raise your standards.

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## Services by sector

Our expertise in commercial cleaning extends to a broad range of businesses and organisations in both public and private sectors. We offer professional commercial cleaning services including industrial cleaners such as factory cleaning along with office and school cleaning services. Find out more.

Get a Quote (<https://www.mrs-bucket.co.uk/commercial-cleaning-quote/>)

### **Showroom & dealership cleaning**

(<https://www.mrs-bucket.co.uk/services/sectors/showroom-and-dealership-cleaning/>) →

### **Healthcare cleaning**

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### **Call centre cleaning**

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### **Public sector cleaning**

(<https://www.mrs-bucket.co.uk/services/sectors/public-sector-cleaning/>)



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[bucket.co.uk](https://www.mrs-bucket.co.uk))

(<https://www.mrs-bucket.co.uk/services/sectors/office-cleaning/>) →

## Sectors We Cover

As a thought leader in providing **commercial cleaning services** (<https://www.mrs-bucket.co.uk/commercial-cleaning-services/>) and **facilities** (<https://www.mrs-bucket.co.uk/service/facilities/>), we've made our mark in a number of sectors. We have contracts with thousands of businesses and organisations in both **public** (<https://www.mrs-bucket.co.uk/service/sectors/public-sector-cleaning/>) and private sectors across the UK, including **commercial** (<https://www.mrs-bucket.co.uk/service/sectors/showroom-and-dealership-cleaning/>), **manufacturing** (<https://www.mrs-bucket.co.uk/service/sectors/manufacturing-and-factory-cleaning/>), **education** (<https://www.mrs-bucket.co.uk/service/sectors/school-cleaning/>) and **healthcare** (<https://www.mrs-bucket.co.uk/service/sectors/healthcare-cleaning/>).

## We enable businesses to thrive in their industry sectors

Our wealth of experience in providing cleaning support to different sectors means that we understand the unique challenges each sector faces, and have the tools and skills to support them efficiently and effectively so they overcome them.

We invest in our **people** (<https://www.mrs-bucket.co.uk/team/>) and technology so that they're well versed to meet your sector's expectations. Whether that's maintaining a high level of hygiene in **schools** (<https://www.mrs-bucket.co.uk/service/sectors/school-cleaning/>) and **medical centres** (<https://www.mrs-bucket.co.uk/service/sectors/healthcare-cleaning/>), or making a great first impression in your **office** (<https://www.mrs-bucket.co.uk/service/sectors/office-cleaning/>) or **car showroom** (<https://www.mrs-bucket.co.uk/client-stories/car-showroom-cleaning-for-audi/>), we have the power to make an impact.

Take a look at just some of the sectors our commercial cleaning team is committed to.



## Manufacturing and factory cleaning

Safeguarding your employees is of utmost important in a factory or manufacturing site. Our experience and knowledge in this sector mean we deliver commercial cleaning services and facilities with maximum impact. We're and compliant and efficient without causing disruption to the quality of your production.

Explore manufacturing & factory cleaning services (<https://www.mrs-bucket.co.uk/services/sectors/manufacturing-and-factory-cleaning/>)



## Public sector cleaning

Businesses and organisations in the public sector are faced with the challenge of maintaining high standards on a shoestring budget. Our **[tailored cleaning schedules \(https://www.mrs-bucket.co.uk/services/cleaning/tailored-commercial-cleaning/\)](https://www.mrs-bucket.co.uk/services/cleaning/tailored-commercial-cleaning/)** are based on your requirements, suit your budget, and don't compromise on standards.

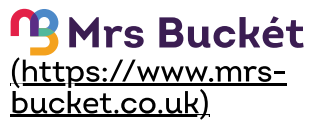
Explore our public sector cleaning services (<https://www.mrs-bucket.co.uk/services/sectors/public-sector-cleaning/>)

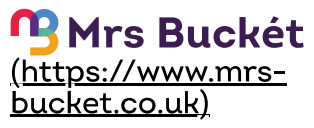
## Call centre cleaning

With a large footfall and the rotation of staff, call centres demand a clean, hygienic environment. Our team is equipped with the right tools and expertise to ensure a high level of hygiene is maintained to support a happy and healthy work environment.

Explore our call centre cleaning services (<https://www.mrs-bucket.co.uk/services/sectors/call-centre-cleaning/>)









## Tailored cleaning schedules

(<https://www.mrs-bucket.co.uk>)

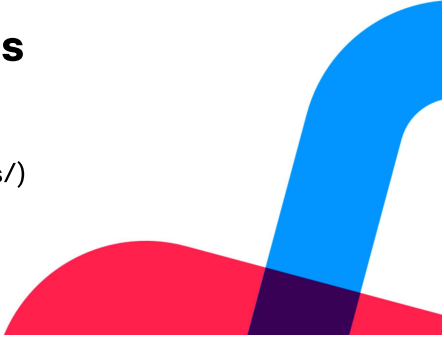
We also know that no two organisations are the same, which is why we offer a bespoke approach when it comes to offering our **commercial cleaning services** (<https://www.mrs-bucket.co.uk/services/cleaning/tailored-commercial-cleaning/>) and tailor our plan to your needs.

Create a tailored cleaning schedule to suit you (<https://www.mrs-bucket.co.uk/services/cleaning/tailored-commercial-cleaning/>)



## Learn more about our services

Click here (<https://www.mrs-bucket.co.uk/services/>)





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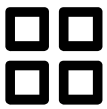
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# Public Sector Commercial Cleaning Services

Our team provides a professional and reliable commercial cleaning services to help public sector organisations to maintain high standards of hygiene. Find out how we can support you.



## Interested in commercial cleaning services?

Complete our Get a Quote form and one of our experts will be in touch to discuss your options

(<https://www.mrs-bucket.com/cleaning-quote/>)

We provide high-quality commercial cleaning, hygiene and facilities services with people who value a clean environment at a tailored price. Our excellent cleaning and customer services give organisations in a range of sectors a platform to impress and the power to grow their business with happier, healthier teams.

## Public Sector Cleaning Services

Businesses and organisations in the public sector are faced with the challenge of maintaining high standards on a shoestring budget.

At Mrs Buckét, we welcome the challenge. We play a vital role in keeping your staff and the public safe by delivering reliable and professional public sector cleaning services.



(<https://www.mrsbucket.co.uk>) We're the leading commercial cleaning company in the UK, but we also have a reputation in facilities management. We have a dedicated team who specialise in security and keeping your premises safe around the clock.

## Our public sector services

We deliver a range of public sector-focussed services, including:

- **Consulting** (<http://localhost/bucket/services/cleaning/consulting/>)
- **Tailored commercial cleaning** (<http://localhost/bucket/services/cleaning/tailored-commercial-cleaning/>)
- **Preventative decontamination services** (<http://localhost/bucket/services/cleaning/preventative-decontamination/>)
- **Reactive deep clean and disinfection** (<http://localhost/bucket/services/cleaning/deep-cleaning-and-disinfection/>)
- **Keyholding services** (<http://localhost/bucket/services/facilities/keyholding-and-site-supervision/>)
- **Site supervision** (/)
- **Refurbishment** (/)
- **Janitor services** (<http://localhost/bucket/services/facilities/daytime-janitor-services/>)
- **Car park attending** (<http://localhost/bucket/services/facilities/car-park-attending/>)
- **Security** (<http://localhost/bucket/services/facilities/security/>)
- **24/7 services.** (<http://localhost/bucket/services/>)

## Why choose Mrs Buckét with your cleaning

There are a few reasons why we're one of the UK's leading commercial cleaning company in the public sector.

---

**We have high standards**



---

**We're health and safety compliant**





## Where we provide Public sector cleaning ([www.mrs-bucket.co.uk](https://www.mrs-bucket.co.uk))

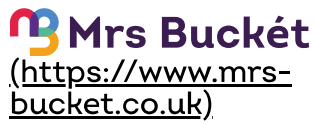
We deliver the 'wow factor' when you need it the most. Our team are experts in delivering reliable, high-quality public sector cleaning services that suit your hours. We provide our public cleaning services in the following sectors:

### Office Cleaning

A clean office is not only a crucial part in making a lasting impression, but it's also essential for keeping staff and visitors safe. As part of our public cleaning services, we deliver deep cleaning and disinfection cleaning to offices and premises of all sizes, to help them maintain high standards of hygiene.

Find out more about our office cleaning services (<https://www.mrs-bucket.co.uk/services/sectors/office-cleaning/>)

 **Mrs Bucket**  
(<https://www.mrs-bucket.co.uk>)



## Complete Application Form

Whether your workplace is a school, office or healthcare facility, we can help. Fill in your details below and one of our team will call you to discuss our public sector cleaning services.

**First name \***

**Last name \***

**Email \***

**Phone \***

**Company \***

Submit



## Ready to learn more about us?

Learn more about our commercial cleaning services and facilities management, and how we can support you.

Explore our services (<https://www.mrs-bucket.co.uk/services/>)

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# Mrs Buckét Wins Three New Comprehensive Schools

## Key accounts form part of commitment to the education sector

South Wales: Mrs Buckét, the innovative commercial cleaning company, has recently announced that they have added three new comprehensive schools to their list of clients. Stanwell School in Penarth, Archbishop McGrath School in Bridgend, and Cowbridge Comprehensive School in Cowbridge have all chosen Mrs Buckét to provide their cleaning services.

This news marks a significant milestone for Mrs Buckét, who have been driving innovation and change in the cleaning industry since their inception. Their approach to cleaning goes beyond simply providing a clean environment; they focus on creating high-performing working environments that improve workplace productivity and employee morale.

By using cutting-edge technology such as automated robotics and battery-operated, quiet-running backpack hoovers, Mrs Buckét's cleaning teams are now able to operate throughout the day, rather than the traditional standard of out of hours. This means that they can provide a more proactive service to their customers, becoming part of their day-to-day operation.

Rachael Flanagan, CEO and founder of Mrs Buckét, commented on the new school contracts: "We're delighted to welcome Stanwell School, Archbishop McGrath School, and Cowbridge Comprehensive School to the Mrs Buckét fold. Our team is passionate about creating high-performing working environments that improve productivity and morale, and

## Mrs Bucket

With their focus on innovation and change, Mrs Bucket is quickly becoming the go-to cleaning company for schools and businesses that want more than just a clean environment. (<https://www.mrs-bucket.co.uk>) Their approach to cleaning is a breath of fresh air in an industry that has traditionally been seen as unglamorous, and they are quickly making a name for themselves as leaders in the field.

Mrs Bucket is a high-quality commercial cleaning and facilities management company. Established by Rachael Flanagan in 2005, the business has grown to have 360 members of the cleaning team, operating across South Wales and Southwest England.

Mrs Bucket is committed to being a fair employer and is an accredited real living wage employer, offering their staff a fair day's pay for a fair day's work. This approach is a significant departure from the traditional commercial cleaning industry, which tends to focus solely on the bottom line.

Contact:

Name: Siwan Morgan

Phone: 0800 157 7181

Email: [info@mrs-bucket.co.uk](mailto:info@mrs-bucket.co.uk) (<mailto:info@mrs-bucket.co.uk>)

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## Report of the Section 151 Officer

Pension Fund Committee – 13 July 2023

### Pension Dashboard Preparedness Resourcing

<b>Purpose:</b>	To ensure the Pension Fund Administration Section is appropriately resourced to deliver Pension Dashboard Preparedness.
<b>Consultation:</b>	Legal, Finance and Access to Services.
<b>Recommendation:</b>	It is recommended that:  1) The resourcing identified in 4.1 be approved.  2) The Deputy S 151 Officer be delegated to recruit and appoint the same.
<b>Report Author:</b>	J Dong
<b>Finance Officer:</b>	J Dong
<b>Legal Officer:</b>	S Williams
<b>Access to Services Officer:</b>	R Millar

## 1 Background

1.1 Following on from the announcement in March that there would be delays to the delivery of Pensions Dashboards, the Pensions Minister issued a written statement on the 8th June 2023. The key headline details from the statement included:

- Legislation will be updated to set an overall connection deadline for all schemes, which will be 31 October 2026.
- The individual connection deadlines for schemes will be set out in guidance, and will be before the final deadline of 31 October 2026. DWP is planning to collaborate with the industry this year before publishing this guidance.
- The date that Dashboards will go live to the public (Dashboards Available Point) has not been announced yet, but the Minister said that this could be earlier than 31 October 2026. This indicates that Public Sector Schemes will have an earlier staging date than 31 October 2026.

## 2 **Pensions Dashboard**

### 2.1 What are pensions dashboards?

Pensions dashboards are intended to provide a secure and single port of call for individuals to access all of their pension history in one place, including eventually their State Pension. The intention is to support better planning for retirement, and help individuals reconnect with any pension pots they may have lost over time.

### 2.2 How will pensions dashboards work?

Multiple dashboard providers are expected in the marketplace. Individuals will navigate to a dashboard of their choice and submit a request to view their pensions information. The dashboards will then issue electronic requests to all pension schemes to search for the individual's pension. Where a match is found, the scheme returns the location to the dashboard, allowing the individual to view their pension details online. Where partial matches are made, schemes will have a short timeframe to investigate and confirm whether it is an exact match, and then provide details as required.

### 2.3 What will pensions dashboards mean for administering authorities and scheme employers?

Broadly, administering authorities will have to meet registration requirements with the Money and Pensions Service (MAPS). This means ensuring connection to the dashboards ecosystem (expected to be all year round), the provision of scheme specific and individual pensions information as part of "find requests", and maintaining records on a range of management information for at least six years. All of this must be provided to MAPS, the Pensions Regulator and the FCA on request.

## 3 **Action required to get 'dashboards ready'**

3.1 Much of the technical infrastructure will be handled by our software provider Heywoods / Altair and processing of day-to-day "find requests" from individuals will be automated. This is being handled nationally by the national LGPS Pension Officers Technical group working alongside the software providers, Heywoods, Civica etc. There is, though, still plenty of preparation for LGPS administering authorities and their scheme employers. There are also likely to be day-to-day member enquires once dashboards are up and running. So, what should we be thinking about and when? It's all about data, data, data. Scheme member data is used for different purposes and the cleanliness of that data is measured in a multitude of ways. Historically this has focused on the existence of data (TPR common and scheme specific data scores), rather than the accuracy of that data. For dashboards we will have to conform to a new standard, which is currently being developed, but should focus on accuracy. So, while we might be broadly happy with the data held on our records, we need to be confident that the member data we hold is accurate and complete, particularly in relation to data items we expect to perform data matches against – i.e. surname, initials, NI number, date of birth.

3.2 Any issues or concerns could lead to increased enquiries once connected to the dashboards. We have recently undertaken a comprehensive data cleanse exercise as part of the Triennial Valuation 2022 exercise comparing core member data with our scheme employers' payroll for example, which

stands us in good stead, however this work needs to be continued until implementation of the Dashboard.

3.3 We shall need to consider introducing monthly employer returns in order to produce future projections for new joiners. Experience suggests we should not underestimate the effort required in getting this new regime in place. It's particularly important to clear any unprocessed leavers/backlogs ahead of connection to the dashboards' ecosystem. Otherwise, these will need to be processed on a case-by-case basis each time they correspond to a full match, following a "find request". There are also a number of other considerations that shouldn't be overlooked. These include engagement with our software provider to understand the changes they're required to make and the expected timescales. We must also agree our data matching criteria used to process "find requests" (e.g. surname, forename, NI number, date of birth), and consider what processes we need in place to deal with and process "find requests".

3.4 And finally, we need to ensure we are appropriately resourced to deal with pensions dashboard traffic. While not official research, PLSA enquiries indicate experience from similar dashboards across Europe suggest member engagement could be in the region of 25% to 33% of scheme members across all schemes. If replicated across the UK this would equate to every scheme receiving between 16,000 and 35,000 "find requests" a day. While not every request will impact our Fund, this does highlight the increased engagement we might expect to deal with. While there is much that still remains to be resolved, it is important to act now so that we are 'dashboards ready'. With so much else on the go, not least valuation implementation and McCloud remedy, it is important that we are resourced appropriately to cope with the traffic flow from members and employers.

## 4 **Resourcing Proposal**

4.1 In order to meet the preparedness and integration requirements demanded by the implementation of Pensions Dashboard for LGPS for the City & County of Swansea Pension Fund, it is recommended to appoint: -

1x Assistant Communications & Training Officer

Total costs (including on costs)

£34,093

With a remit to assist and input re. :

- Data cleanse programme with employers.
- Implement monthly data collection with employers.
- Data validation cycle.
- Develop Pension Dashboard Communications for employers.
- Communication and training with employers re. Dashboard Preparedness.
- Develop Training and operational protocols.
- Dashboard request for information resolution.
- Assist with the implementation of the dashboard go-live.

## **5 Financial Implications**

- 5.1 The financial implications outlined in 4.1 can be supported via an appropriate charge to the pension fund.

## **6 Legal Implications**

- 6.1 The proposals in 4.1 support the ability of the Administering Authority to comply with DWP/DHLUC Pension Dashboard Legislation.

## **7 Integrated Impact Assessment Implications**

- 7.1 The Council is subject to the Equality Act (Public Sector Equality Duty and the socio-economic duty), the Well-being of Future Generations (Wales) Act 2015 and the Welsh Language (Wales) Measure, and must in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Acts.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.
- Deliver better outcomes for those people who experience socio-economic disadvantage.
- Consider opportunities for people to use the Welsh language.
- Treat the Welsh language no less favourably than English.
- Ensure that the needs of the present are met without compromising the ability of future generations to their own needs.

- 6.2 The Well-being of Future Generations (Wales) Act 2015 mandates that public bodies in Wales must carry out sustainable development. Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the 'well-being goals'.

- 6.3 Our Integrated Impact Assessment (IIA) process ensures we have paid due regard to the above. It also takes into account other key issues and priorities, such as poverty and social exclusion, community cohesion, carers, the United Nations Convention on the Rights of the Child (UNCRC) and Welsh language.

- 6.4 There are no equality impact implications arising from this report.

**Background Papers:** None.

**Appendices:** None.



# Agenda Item 8



## Report of the Chief Legal Officer

Pension Fund Committee – 13 July 2023

### Exclusion of the Public

<b>Purpose:</b>	To consider whether the Public should be excluded from the following items of business.	
<b>Policy Framework:</b>	None.	
<b>Consultation:</b>	Legal.	
<b>Recommendation(s):</b>	It is recommended that:	
<b>1)</b>	The public be excluded from the meeting during consideration of the following item(s) of business on the grounds that it / they involve(s) the likely disclosure of exempt information as set out in the Paragraphs listed below of Schedule 12A of the Local Government Act 1972 as amended by the Local Government (Access to Information) (Variation) (Wales) Order 2007 subject to the Public Interest Test (where appropriate) being applied.	
	<b>Item No's.</b>	<b>Relevant Paragraphs in Schedule 12A</b>
	9, 9a, 9b, 10, 11 & 12	14
<b>Report Author:</b>	Democratic Services	
<b>Finance Officer:</b>	Not Applicable	
<b>Legal Officer:</b>	Tracey Meredith – Chief Legal Officer (Monitoring Officer)	

#### 1. Introduction

- 1.1 Section 100A (4) of the Local Government Act 1972 as amended by the Local Government (Access to Information) (Variation) (Wales) Order 2007, allows a Principal Council to pass a resolution excluding the public from a meeting during an item of business.
- 1.2 Such a resolution is dependant on whether it is likely, in view of the nature of the business to be transacted or the nature of the proceedings that if members of the public were present during that item there would be disclosure to them of exempt information, as defined in section 100I of the Local Government Act 1972.

## **2. Exclusion of the Public / Public Interest Test**

- 2.1 In order to comply with the above mentioned legislation, Cabinet will be requested to exclude the public from the meeting during consideration of the item(s) of business identified in the recommendation(s) to the report on the grounds that it / they involve(s) the likely disclosure of exempt information as set out in the Exclusion Paragraphs of Schedule 12A of the Local Government Act 1972 as amended by the Local Government (Access to Information) (Variation) (Wales) Order 2007.
- 2.2 Information which falls within paragraphs 12 to 15, 17 and 18 of Schedule 12A of the Local Government Act 1972 as amended is exempt information if and so long as in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.
- 2.3 The specific Exclusion Paragraphs and the Public Interest Tests to be applied are listed in **Appendix A**.
- 2.4 Where paragraph 16 of the Schedule 12A applies there is no public interest test. Councillors are able to consider whether they wish to waive their legal privilege in the information, however, given that this may place the Council in a position of risk, it is not something that should be done as a matter of routine.

## **3. Financial Implications**

- 3.1 There are no financial implications associated with this report.

## **4. Legal Implications**

- 4.1 The legislative provisions are set out in the report.
- 4.2 Councillors must consider with regard to each item of business set out in paragraph 2 of this report the following matters:
  - 4.2.1 Whether in relation to that item of business the information is capable of being exempt information, because it falls into one of the paragraphs set out in Schedule 12A of the Local Government Act 1972 as amended and reproduced in Appendix A to this report.
  - 4.2.2 If the information does fall within one or more of paragraphs 12 to 15, 17 and 18 of Schedule 12A of the Local Government Act 1972 as amended, the public interest test as set out in paragraph 2.2 of this report.
  - 4.2.3 If the information falls within paragraph 16 of Schedule 12A of the Local Government Act 1972 in considering whether to exclude the public members are not required to apply the public interest test but must consider whether they wish to waive their privilege in relation to that item for any reason.

**Background Papers:** None.

**Appendices:** Appendix A – Public Interest Test.

## Public Interest Test

No.	Relevant Paragraphs in Schedule 12A
<b>12</b>	<b>Information relating to a particular individual.</b>
	<p>The Proper Officer (Monitoring Officer) has determined in preparing this report that paragraph 12 should apply. Their view on the public interest test was that to make this information public would disclose personal data relating to an individual in contravention of the principles of the Data Protection Act. Because of this and since there did not appear to be an overwhelming public interest in requiring the disclosure of personal data they felt that the public interest in maintaining the exemption outweighs the public interest in disclosing the information. Members are asked to consider this factor when determining the public interest test, which they must decide when considering excluding the public from this part of the meeting.</p>
<b>13</b>	<b>Information which is likely to reveal the identity of an individual.</b>
	<p>The Proper Officer (Monitoring Officer) has determined in preparing this report that paragraph 13 should apply. Their view on the public interest test was that the individual involved was entitled to privacy and that there was no overriding public interest which required the disclosure of the individual's identity. On that basis they felt that the public interest in maintaining the exemption outweighs the public interest in disclosing the information. Members are asked to consider this factor when determining the public interest test, which they must decide when considering excluding the public from this part of the meeting.</p>
<b>14</b>	<b>Information relating to the financial or business affairs of any particular person (including the authority holding that information).</b>
	<p>The Proper Officer (Monitoring Officer) has determined in preparing this report that paragraph 14 should apply. Their view on the public interest test was that:</p> <p><b>a)</b> Whilst they were mindful of the need to ensure the transparency and accountability of public authority for decisions taken by them in relation to the spending of public money, the right of a third party to the privacy of their financial / business affairs outweighed the need for that information to be made public; or</p> <p><b>b)</b> Disclosure of the information would give an unfair advantage to tenderers for commercial contracts.</p> <p>This information is not affected by any other statutory provision which requires the information to be publicly registered.</p> <p>On that basis they felt that the public interest in maintaining the exemption outweighs the public interest in disclosing the information. Members are asked to consider this factor when determining the public interest test, which they must decide when considering excluding the public from this part of the meeting.</p>

No.	Relevant Paragraphs in Schedule 12A
15	<p><b>Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.</b></p>
	<p>The Proper Officer (Monitoring Officer) has determined in preparing this report that paragraph 15 should apply. Their view on the public interest test was that whilst they are mindful of the need to ensure that transparency and accountability of public authority for decisions taken by them they were satisfied that in this case disclosure of the information would prejudice the discussion in relation to labour relations to the disadvantage of the authority and inhabitants of its area. On that basis they felt that the public interest in maintaining the exemption outweighs the public interest in disclosing the information. Members are asked to consider this factor when determining the public interest test, which they must decide when considering excluding the public from this part of the meeting.</p>
16	<p><b>Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.</b></p>
	<p>No public interest test.</p>
17	<p><b>Information which reveals that the authority proposes:</b>  <b>(a) To give under any enactment a notice under or by virtue of which requirements are imposed on a person; or</b>  <b>(b) To make an order or direction under any enactment.</b></p>
	<p>The Proper Officer (Monitoring Officer) has determined in preparing this report that paragraph 17 should apply. Their view on the public interest test was that the authority's statutory powers could be rendered ineffective or less effective were there to be advanced knowledge of its intention/the proper exercise of the Council's statutory power could be prejudiced by the public discussion or speculation on the matter to the detriment of the authority and the inhabitants of its area. On that basis they felt that the public interest in maintaining the exemption outweighs the public interest in disclosing the information. Members are asked to consider this factor when determining the public interest test, which they must decide when considering excluding the public from this part of the meeting.</p>
18	<p><b>Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime</b></p>
	<p>The Proper Officer (Monitoring Officer) has determined in preparing this report that paragraph 18 should apply. Their view on the public interest test was that the authority's statutory powers could be rendered ineffective or less effective were there to be advanced knowledge of its intention/the proper exercise of the Council's statutory power could be prejudiced by public discussion or speculation on the matter to the detriment of the authority and the inhabitants of its area. On that basis they felt that the public interest in maintaining the exemption outweighs the public interest in disclosing the information. Members are asked to consider this factor when determining the public interest test, which they must decide when considering excluding the public from this part of the meeting.</p>

# Agenda Item 9a

Yn rhinwedd paragraff(au) 14 Atodlen 12A  
o Ddeddf Llywodraeth Leol 1972  
fel y'i diwygiwyd gan Orchymyn Llywodraeth Leol (Mynediad at  
Wybodaeth) (Amrywiad) (Cymru) 2007.

Document is Restricted

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fel y'i diwygiwyd gan Orchymyn Llywodraeth Leol (Mynediad at  
Wybodaeth) (Amrywiad) (Cymru) 2007.

Document is Restricted

# Agenda Item 9b

Yn rhinwedd paragraff(au) 14 Atodlen 12A  
o Ddeddf Llywodraeth Leol 1972  
fel y'i diwygiwyd gan Orchymyn Llywodraeth Leol (Mynediad at  
Wybodaeth) (Amrywiad) (Cymru) 2007.

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fel y'i diwygiwyd gan Orchymyn Llywodraeth Leol (Mynediad at  
Wybodaeth) (Amrywiad) (Cymru) 2007.

Document is Restricted

# Agenda Item 10

Yn rhinwedd paragraff(au) 14 Atodlen 12A  
o Ddeddf Llywodraeth Leol 1972  
fel y'i diwygiwyd gan Orchymyn Llywodraeth Leol (Mynediad at  
Wybodaeth) (Amrywiad) (Cymru) 2007.

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o Ddeddf Llywodraeth Leol 1972  
fel y'i diwygiwyd gan Orchymyn Llywodraeth Leol (Mynediad at  
Wybodaeth) (Amrywiad) (Cymru) 2007.

Document is Restricted

# Agenda Item 11

Yn rhinwedd paragraff(au) 14 Atodlen 12A  
o Ddeddf Llywodraeth Leol 1972  
fel y'i diwygiwyd gan Orchymyn Llywodraeth Leol (Mynediad at  
Wybodaeth) (Amrywiad) (Cymru) 2007.

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o Ddeddf Llywodraeth Leol 1972  
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