



## Report of the Section 151 Officer

Local Pension Board – 12 January 2023

### Pension Administration Resources

<b>Purpose:</b>	For the Local Pension Board to be informed of the changes required to the current staffing levels to recognise the scheme administration and investment monitoring challenges and Regulatory changes to ensure that the structure is fit for purpose to meet the objectives of the fund
<b>Policy framework</b>	To comply with Regulatory requirements
<b>Consultation:</b>	Legal, Finance and Pension Section.
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#### 1. Introduction

- 1.1 Pension administration is a complex subject matter with constant changes to both public and private pension legislation. The pension administration function of a local government pension scheme (LGPS) has been and is currently facing an unprecedented volume of scheme administration challenges and changes, some of which had been planned and regulatory (GMP reconciliation) and others have come arisen as a result of legal challenge and High Court decision making (McCloud, Sargeant and on the horizon Goodwin.). The impact of these changes/challenges are pervasive in all areas of pension administration as this impact's historical calculations and member records. This is proving to be resource intensive during the implementation of the remedies.
- 1.2 Likewise, governance requirements have also changed creating more stringent reporting and higher levels of accountability with an increase in the presentation of statistical reporting on a national basis on matters such as Key

Performance Indicators (KPI) and data quality reporting covering common and scheme specific data results.

- 1.3 There has been an increase in pressures from various departments such as the Department for Levelling Up, Housing & Communities (DLHC), Local Government Association (LGA) and Government Actuaries etc. to maintain/receive accurate member data in a timely manner with penalties issued for non-compliance.
- 1.4 The level of scrutiny on the LGPS has never been greater both from internal and external sources such as the Audit Wales, The Scheme Advisory Board (SAB) The Local Pension Board, The Pensions Regulator (TPR), Ombudsman and moreover, the national press.
- 1.5 The competence and skills requirements of the Pension Section Staff has become enshrined in a code of practice which has led to job roles within the Section having to evolve to cater for the additional complexities of the Scheme and the real need for specialist knowledge. There has been a significant shift in stakeholder expectation as the LGPS has evolved with the added scrutiny from TPR following the implementation of the Code of Practice.
- 1.6 The pension fund investment management arrangements of the fund have changed enormously over the course of the last 15 years, not least because of the growth in assets under management from under a £bn to nearly £3bn in that time.
- 1.7 As the scheme has matured so the investment management strategy has developed, with an increasing allocation to real yielding assets such as private equity, property, infrastructure and private debt, with the additional investment monitoring, governance and management responsibilities which accompany those investments. The formation of the WPP has created efficiencies in economies of scale and collective bargaining and implementing common interests but does not devolve responsibility for investment accounting and management and monitoring which still remains an Administering Authority responsibility.
- 1.8 In 2007, the fund had 3 investment manage relationships in 3 funds, and assets under management (aum) of £840m. In 2022, the fund now has 57 funds invested through 38 investment management relationships with aum of £2.9bn. The increase of private market allocations has led to the increase of active cashflow management to meet capital call demands which requires more finesse as the fund matures.
- 1.9 Reporting and disclosure requirements have increased with the additional asset classes invested in with pending additional burden of Taskforce for Climate Related Financial Disclosures (TCFD) requirements due in 2022/23 for LGPS funds.

## **2. Scheme Complexity, Current and Past Challenges**

- 2.1 The LGPS is in actuality 3 distinct schemes :
  - Pre'97 -2008 scheme
  - 2008 scheme

- 2014 CARE scheme

- 2.2 The CARE Scheme was launched on 01/04/2014 and during this time there has been a noticeable increase in the number of caseloads and complex queries this has resulted in several caseloads not being processed in accordance with the Fund's documented KPI's published within the Pension Administration Strategy. Member queries are now proving to be far more complex, time consuming to investigate and address than previously; there is also the added burden of member expectations of an immediate query response.
- 2.3 Tasks are monitored by senior staff members on a regular basis via the task management user listings. Due to an increase of backlog caseloads tasks are being reassigned to the McCloud Team and Senior Staff to action. This is mainly due to the high volume of aggregation cases as regulations require automatic aggregation of all records in the CARE scheme, (the 2013 Regulations restricted aggregation of benefits to receipt of a written positive election from the member), transfers in and termination caseloads. It has been very much the case of 'taking from Peter to give to Paul' hoping to alleviate workload pressures. Evaluation of the situation is constant and various methods have been implemented to remedy the problem; job descriptions have been reviewed/updated across all tiers and processes have been reassigned based on the skills set and knowledge of each tier. However, a backlog of caseloads is still very much prevalent, and we can no longer afford to provide a service to our stakeholders that is no longer fit for purpose. Caseloads being addressed are what is current and not historical it is a case of the here and now and things are getting missed.
- 2.4 On the 06 April 2015, the Government introduced greater flexibility (Freedom and Choice) in the way individuals aged 55 and over can access any defined benefit pension savings arrangement. Pension Funds did not envisage the impact this would have on the day-to-day processes; the Fund has seen an increase in the number of members/Independent Financial Advisors requesting cash equivalent transfer values (CETV) which has impacted the service delivery of the Section. The responsibility on the Fund to ensure that any transfer out of accrued benefits that is in the offering does not expose the member to a potential scam / fraudulent activity has increased extensively. With a significant increase in the number of pension scams during the Covid-19 pandemic, TPR have issued updated guidance / added a further layer of legislation to enable pension funds to apply a traffic light review process during the transfer out procedure. There is an expectation that Funds undertake lengthy due diligence checks whilst processing a transfer out of a members accrued pension benefits and these checks must be completed again as at the date of transfer. This includes recording evidence sourced during the full process; the Fund has in place a checklist which is in accordance with TPR direction. The checklist includes confirmation of the type of pension scheme / arrangement that the CETV is to be paid too i.e., Club / non-club and checking the TPR published Master Trust List / Clean List as drafted by the Section. In the event of the CETV being paid to an occupational pension arrangement evidence of the individual being an earner and actively paying contributions into the new pension arrangement, appropriate checks concerning the validity of the Independent Financial Advisor, registration with Companies House, HMRC & FCA. If it is

considered that the transfer might lend to a possible scam/red flag warning and concerns are raised over the legality of the receiving pension scheme the Fund can refuse to proceed with a transfer.

- 2.5 The means of calculating a cash transfer sum (CTS) (applicable when payment is in respect of accrued benefits where the vesting period is less than 2-years and the member has opted to transfer the benefits to an alternative pension plan/arrangement) as opposed to a cash equivalent transfer value whereby the vesting period is two years or more and the member has not reached their normal pension age differs and this can be confusing and time consuming if the data input to calculate a CTS is incorrect and warrants a recalculation. Of late, there has been several claims received from the Financial Conduct Authority / Pension Ombudsman and other claims organisations acting on behalf of exited members. The catalyst behind these requests is believed to stem from press releases / cold callers pointing out possible misappropriation of pension funds at date of transfer.
- 2.6 With the aim of avoiding / reducing a potential pension scam occurring the Fund has introduced a Transfer Out Panel. The responsibility of the panel is to review any transfer that takes place under the umbrella of F & C to a SIPPS pension arrangement / occupation pension arrangement whereby the member is deemed to be an earner in the new pension (this process does not apply to any transfer to a club / public sector pension scheme). The practice taken to undertake such a review/investigation at the start of the transfer and actual date of transfer is time consuming but important
- 2.7 Further to the introduction of the LGPS (Transitional Provisions, Savings and Amendment) Regulations 2014 which impacted those members who left prior to 01/04/2014 and whose earliest retirement age to access their deferred benefits without their employer's consent was historically age 60; was aligned with LGPS Regulations 2013. From 14<sup>th</sup> May 2018, members have been given the opportunity of accessing their reduced deferred benefits from age 55. This has led to an increase in the number of members with retained deferred benefits with the Fund being presented with their pension options calculated on their 55<sup>th</sup> birthday; due to a significant reduction to their benefits due to early access most members opt not to access this at that time. For information purpose only we have identified that within the next 2-years approximately 4,000 deferred members who meet the above criteria will be presented with the option of early access to pension benefits; that is a smidgin short of nearly half of the Funds deferred benefit membership.
- 2.8 The General Data Protection Regulation (GDPR) came into effect from 25<sup>th</sup> May 2018 to ensure greater protection and rights to individuals and was accompanied by a set of main principals. To ensure compliance the Fund has published a Privacy Policy on the website and drafted a Memorandum of Understanding highlighting the key principles of GDPR. This has been issued to all employers and if in agreement returned signed. Both policies are subject to review. Staff are subject to regular training and are reminded of the possible consequence of a data breach which could lead to the Fund being reported to the ICO with a potential fine being issued
- 2.9 Member Self-service (MSS): the Fund has worked tirelessly with the members to promote MSS and does so at every opportunity. The main objective is to

reduce the number of membership queries, pension estimates, and changes to basic details such as address updates, death grant nomination etc. Automation continues to move forward with technical development and further upgrades. However, with more personal information available to members and the availability of pension forecasts being calculated by the member this has led to increased queries due to the complexity of the Scheme and the lack of knowledge/understanding of the Regulations.

- 2.10 The Fund continues to work alongside the employer authorities and currently has 3 of the largest employers using i-Connect with the remaining employers opting for the completion of monthly on-line scheme returns or provision of data annually via spreadsheet, requiring manual intervention at year-end. The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 which came into effect from 23 September 2020; stipulates that a public sector body must publish an accessibility statement. The Fund has engaged with Swansea Council Web Development Team to ensure compliance and a statement has been published on the website which will be subject to regular review

### **3. Current and Ongoing Challenges**

- 3.1 With the introduction of the career average scheme and application of the LGPS Regulations 2013, which was originally considered a far easier scheme to administer, the LGPS has been met with several challenges.

#### **3.2 Member Aggregation :**

Caseloads are proving to be far more technical than first anticipated as the process involves: Identification of any other LGPS pension rights: Identification of periods of membership i.e., any pre 01/04/2014 memberships the member must elect to combine both periods of memberships and if there is more than a 5-year break between public sector memberships the transferring benefit buys an additional care credit. Where a member has pre and post 01/04/2014 memberships a member must elect to keep the benefits separate; if no election has been received within the 12-month period from date of re-entry the memberships will be automatically combined. Point of note is if the members final salary pay is less in the active post to that of the revalued pensionable pay figure used in the calculation of the deferred benefit this will impact the value of the transferring final salary membership inasmuch as this element of membership will be devalued. Where a member has a deferred CARE benefit upon re-entry into the scheme the benefits are automatically combined however when presented with multiple members records the process is complex and time consuming as CARE pensionable pays, service history records, contribution bands differ as indeed so does membership dates. Formerly, aggregation only took place with a member's election. When reviewing a member's service history consideration must be given to the differing contractual hours worked for example full-time, part-time, variable time and casual employments. Several employers still have not signed up to i-Connect therefore some member records must be set-up manually. Varying employer auto-enrolment dates has seen a marked increase in the number of new scheme members which in turn leads to higher number of individuals querying membership, transfer quotes and requesting opt out forms. Automatic aggregation takes place internally as well as externally with other LGPS funds known as an Inter Fund Adjustment (IFA).

### 3.3 McCloud/Sargeant :

Final salary pay protections already in place i.e. best of the last 3 years and three-year average within the last 13-years continue as long as the final salary link was not broken, now included member protections for older members i.e. the underpin protection. (Members who were aged 55 or over as at 31/03/2012 who automatically moved into the CARE scheme upon retirement would have their benefits calculated on both final salary and CARE methodology with the better outcome presented). Other public sector schemes offer a similar protection. Members of the Fire Service (McCloud) and Judges (Sargeant) applied to The Court of Appeal stating that the newly introduced protection was discriminatory towards younger members. The Court ruled in favour of the claimants and the Government stated that Regulatory changes to remove age discrimination would be made to all main public sector schemes including the LGPS. The case is often referenced as the 'McCloud Judgement'. What this means in terms of administrative impact is revisiting all casework whereby a member who was in the final salary scheme as at 31/03/2012 and whose status was active as at 01/04/2014 and has since left for reasons such as:

- Retirement
- Transfer of benefits out
- Transfer of benefits in (inclusive of IFA)
- Club transfers
- Deferred member status
- Death in service – survivor benefits
- Aggregation cases
- Final Salary concurrent membership

Members whose status is currently active, and their membership falls within the above dates; 80% of additional member data has been received from employers and 70% of memberships held have already been investigated i.e., contractual hours and service breaks and amended forthwith. All final salary aggregation cases whereby the member has failed to respond / opt not to aggregate will need to be revisited and the member provided with a further 12-month election period to allow for an informed decision to be made based on the change. For members it is considered that the McCloud remedy is neutral, and it is not expected to be financially significant however for the Fund this will affect the administration processes and systems greatly, not forgetting the additional requirement to undertake a robust employer/member communication exercise.

The Fund aims to undertake as much of the modifications/recalculations in-house. Support/advice/guidance has already been sought and will continue going forward from the Funds Actuary Aon. Aon has already undertaken an impact assessment of all data held regardless of membership status and findings are listed below based on the following qualifying criteria:

- Active membership in the LGPS on 31 March 2012
- Active membership in the 2014 Scheme
- No disqualifying break in service after 31 March 2012

68,700 member records were investigated and there are approximately 12,500 member records that meet the above qualification criteria.

Current membership status	Number of McCloud cases
Active	7,400
Undecided leavers	100
Exit – no liability	600
Deferred	1,700
Pensioner	2,500
Death	200
Tier 3 ill-health	0
Total	12,500

The data does not include the following case numbers:

Aggregation	590
Final Salary concurrent	361

The fund is still awaiting an update from the software provider Heywood concerning a possible McCloud remedy. Concerning the total number of aggregation cases that will need to be revisited and this is likely to be significant

#### 3.4 GMP Reconciliation

The Fund is awaiting the results of the GMP Reconciliation exercise, which has been undertaken by JLT/Mercer. Depending on the findings of the reconciliation exercise, it is our understanding that affected pensioner/deferred and active member GMP records will be subject to redress in accordance with the data obtained from HMRC. This will add an additional burden to our day-to-day working practices in so much as records will need to be updated, and where a member has received an underpayment of pension benefits arrears inclusive of adjustments for payments already made/pension increase will require calculating. Again, a robust member communication exercise will be required

#### 3.5 Membership Numbers

As of 31/03/2014 the last day before the CARE scheme was introduced total membership for the fund stood at 36,072. The following years have seen the membership of the fund increase year on year and the most recent membership statistic recorded for the annual report had total membership 47,981. This represents a total membership increase of 11,909 which has had a dramatic effect on the workload of the section. It is deemed that the substantial increase in membership is due to auto enrolment and the requirement to maintain multiple records for members with more than one job role.

#### 3.6 Member Communication and Engagement

There is little doubt that the attitude and culture towards their pension from members has changed dramatically in recent years with “don’t worry about it till you’re a year out from retirement” being very much a thing of the past. Increased media coverage of the importance of a workplace pension along with the ease of access to the member self-service site has led to far

greater engagement with the fund's membership. While this should in no way be seen as a negative it is undeniable that this has again increased the workload of the section. More time is being spent on a greater number of complex enquiries and member instruction about the key benefits of the pension scheme that they are contributing to and the contrast between a public sector pension and a defined contribution pension

#### **4. On The Horizon**

- 4.1 The introduction of the National Pensions Dashboard, which is likely to have a considerable impact on day-to-day administration and result in a significant work development plan over the next few years. In readiness the Fund has appointed Target Professional Services to undertake a mortality check of pensioner and deferred pensioner memberships along with a member trace of those members who we do not hold accurate address details on our database
- 4.2 It is envisaged that the Fund will undertake a sweep of the database to identify those members who have not completed a death grant expression of wish nomination form; the aim is to undertake a member engagement exercise highlighted the importance of the completion of the said form.
- 4.3 The question of the current benefits structure of the scheme has been presented and the matter of age discrimination and Regulations 40(1) & 46(1) which imposes an upper age limit of age 75. It determined to be age discriminatory this would involve the redress of all death grant payments made where the member has retired late, and their death grant beneficiaries have not had 10-year pension guarantee applied to the death grant calculation. Cllr Roger Phillips – SAB chair wrote to Paul Scully (Minister of State for DLH&C)
- 4.4 In addition to this a request concerning an update on the Government's commitment to consult on proposed amendments to the Regulations considering the Goodwin V Secretary of State for Education discrimination case which could lead to possible amendments to the award of survivor benefits. (An employment tribunal ruled in favour of the claimant inasmuch as it was deemed that direct discrimination had taken place where male survivors of a female scheme member are entitled to a lower survivor benefit than a comparable same-sex survivor. If it is determined that the LGPS Regulations need to be amended and all widower pensions in payment recalculated from 2005, based on the current membership this would mean 536 pensions in payment subject to redress. (The figure quoted does not include mortality numbers))
- 4.5 There are the pending TCFD reporting requirements in addition to supporting the reporting for engagement and stewardship requirements of the fund. As the levelling up agenda for local infrastructure assets has been deployed there shall be the accompanying additional reporting requirements. In addition on the agenda of this meeting is the Audit Wales Report recommending additional governance and oversight responsibilities.



## 5. Resourcing Proposal

5.1 Traditionally the Section has been blessed with a wealth of pension knowledge and job satisfaction. This has led to a very low turnover of staff. Recent years have witnessed the implementation of new work processes, technological improvements supported by improved training tools which has in turn improved processes. However, with the ever-changing complexities of the Scheme, additional pressures have manifested themselves which has seen staff members struggle to accommodate the developments; evidence suggests that case numbers and case complexity is impacting on performance.

5.2 Based on the evidence sourced, with an aim of ensuring the administration team can meet the immediate challenges it faces, then the additional resource identified is required. If the work is to be completed in a satisfactory period, the likelihood of incorporating project-based work into the current day-to-day working practices of the benefit teams is not feasible given the additional burden it will place and the impact on business-as-usual caseloads. The consequence of non-compliance is considerable for the Fund.

### 5.3 Current Structure:

Job Title	Permanent Staffing numbers (FTE posts)	Temporary staffing numbers (FTE posts)	Cost
Assistant Pension Officers	3 (1 post job-share)	2	
Pension Officers	6 (1 post job-share)	2.5	
Senior Pension Officers	3 (1 post job-share)	0	
Technical Officer	1		
Communication/Training Officer	1		
Deputy Pension Manager	1		
Pension Manager	1		
<b><i>Pension Administration totals</i></b>	<b>16</b>	<b>4.5</b>	<b>£408,780.50</b>

### 5.4 Proposed additional resource:

Job Title	New Posts	Cost
Assistant Pension Officer (APO) grade 4	1	£30,096
Pension Officer (PO) grade 6	2	£73,555
Senior Pension Officer (SPO) grade 7	1	£42,605
<b><i>Total</i></b>	<b>4</b>	<b>£146,256</b>

5.5 The above outlines that the 4.5 temporary staff identified above in 5.4 are made permanent and shall be deployed in the newly formed Benefits Team outlined below.

5.6 The Net new additions to the current structure and budget are the creation of:

1. 1 senior pension officer grade 7
2. 2 pension officers grade 6
3. 1 assistant pension officer grade 4

At 22/23 pay scales (before pay award) and assuming top of scale and oncosts gives a budget requirement of £146k. The resulting new Pension Administration Section shall be 24.5 FTE which is comparable with peers in the rest of the WPP.

5.7 A newly formed Benefits Team will comprise of those staff members who have been employed on a temporary basis within the McCloud / Benefits Team. With the introduction of the new Team this will alleviate the pressures / demands that the Section is under and allow for a Stakeholder service delivery that is fit for purpose. The McCloud Team will continue with data cleansing in readiness of the implementation of the Pension Dashboard, McCloud remedy, GMP Reconciliation, and any other projects to be undertaken on a nationwide basis as instructed. The proposals above are subject to review as the workload progresses, develops, and as technological remedies become available and helpful to the process or not as the case may be.

5.8 The recruitment and selection of the above proposals shall be co-ordinated and timed in line with the pending resource review by Swansea Council, and shall consider redeployees in the first instance as a priority.

## 6. Comparable Resourcing in Partner WPP LGPS Funds

6.1 The following are comparable Administration team resource in the 8 WPP LGPS funds:

Fund	Membership numbers	Staffing numbers
City & County of Swansea Pension Fund	47,981	20.5 (inclusive of 4.5 temp staff)
Cardiff & Vale Pension Fund	46,821	24 (plus 7 vacancies)
Clwyd Pension Fund	50,000	35.5
Dyfed Pension Fund	52,735	22.2 (looking to recruit x no. of FTE additional resourcing)
Gwynedd Pension Fund	42,726	19.16
Powys Pension Fund	19,200	13
RCT Pension fund	75,288	31 (plus 5 vacancies)
Greater Gwent Pension Fund	64,008	26

Anecdotally it has been reported that across all LGPS Funds, recruitment and retention is proving to be a problem; the attraction of private industry being hard to resist with LGPS experience / knowledge being lost.

- 6.2 The current investment management and accounting is wholly undertaken by the current 1 FTE Investment and Accounting Manager ( who currently has 139 hrs of unused accrued flexi time) with supervisory oversight by the Deputy S151 Officer
- 6.3 In recognition of the additional pressures identified in 1.6-1.9 and the current resource in 6.2, it is recommended to appoint 1 FTE Accountancy Assistant ( grade 7) to support the Investment and Accounting Manager in delivering business as usual and the additional pressures identified in the report. At 22/23 pay scales (before pay award) and assuming top of scale and oncosts gives a budget requirement of £42,605.

## **7. Risks to Not Implementing the Resources**

- 7.1
- Normal day-to-day work set as a lower priority; delay in payment of benefits which will cause a direct impact;
  - Incorrect record keeping;
  - Increased errors due to high volumes of work; rush of process (resulting in duplication of work);
  - Staff morale low;
  - Increased time and effort in addressing errors;
  - Failure to comply with KPI's which could lead to a TPR breach and potential fines;
  - Reduced employers / member engagement and allotted time to ensure the Fund's website is up-to-date;
  - Faced with the ever-changing goalposts of the pension world there would be a failure to comply / deliver appropriate staff training as and when required in-line with LGPS specific legislative / Regulatory changes;
  - Failure to monitor / update policies / publish new policies and processes in line with LGPS requirement / best practice;
  - Diminished data quality scores
  - Audit qualification
  - Non-compliance with SORP and accounting disclosures
  - Incorrect Cashflow management

This could result in

- Member / employer complaints, which could lead to Internal Dispute Resolution Procedure appeals or worst-case scenario the reporting of the Fund to The Pension Ombudsman and the issue of a fine;
- The issue of formal improvement notices or financial penalties by the TPR for non-compliance;
- Experienced staff members leaving causing a loss of knowledge/competencies;
- Media attention;
- Staff members feeling under pressure / stressed resulting in high level sickness absence;
- Staff retention / experienced staff members leaving the Section; comparison of job roles within other sectors more money / less responsibilities;

## **8. Legal Implications**

- 8.1 There are no direct legal implications arising from this report; other than potential failure to comply with statutory changes to the Regulations due to resource constraints

## **9. Financial Implications**

- 9.1 The financial implications are outlined in 5.5 and 6.3 resulting in an addition of £188,861 to the 21/22 budget which shall be funded as a direct addition to the pension fund administration budget.

## **10. Equality and engagement Implications**

- 10.1 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.

- 10.2 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'.

- 10.3 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.

- 10.4 An integrated impact assessment screening has been undertaken and it concludes that there are no equality impact implications arising from this report.

**Background Papers:** None.

**Appendices:** None.