



# PENSION BOARD

THURSDAY, 11 SEPTEMBER 2025

10.00 AM COUNCIL CHAMBER, COUNTY HALL, LEWES

MEMBERSHIP - Ray Martin (Chair)  
Zoe O'Sullivan, Trevor Redmond, Neil Simpson, Philippa Buckingham,  
Linda Hughes and Councillor Andrew Wilson

## A G E N D A

1. Minutes of the meeting held on 5 June 2025 *(Pages 3 - 14)*
2. Apologies for absence
3. Disclosure of interests
4. Urgent items  
Notification of any items which the Chair considers urgent and proposes to take at the appropriate part of the agenda.
5. Pension Committee Agenda and Summary of Previous Minutes *(Pages 15 - 22)*
6. Pension Reform Agenda *(Pages 23 - 24)*
7. Governance Report *(Pages 25 - 72)*
8. Employer Engagement and Communications Report *(Pages 73 - 80)*
9. Pension Administration - updates *(Pages 81 - 96)*
10. Internal Audit Report *(Pages 97 - 106)*
11. Pension Fund Risk Register *(Pages 107 - 118)*
12. Work Programme *(Pages 119 - 136)*
13. Any other non-exempt items previously notified under agenda item 4
14. Exclusion of the public and press  
To consider excluding the public and press from the meeting for the remaining agenda item on the grounds that if the public and press were present there would be disclosure to them of exempt information as specified in paragraph 3 of Part 1 of the Local Government Act 1972 (as amended), namely information relating to the financial or business affairs of any particular person (including the authority holding that information).
15. Governance Report - Exempt Information *(Pages 137 - 142)*
16. Pension Fund Breaches Log and Internal Dispute Resolution Procedure case report *(Pages 143 - 148)*
17. Employer Admissions and Cessations Report *(Pages 149 - 154)*

18. Any other exempt items previously notified under agenda item 4

PHILIP BAKER  
Deputy Chief Executive  
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3 September 2025

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## PENSION BOARD

MINUTES of a meeting of the Pension Board held at Council Chamber, County Hall, Lewes on 5 June 2025.

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PRESENT Ray Martin (Chair), Zoe O'Sullivan, Neil Simpson, Linda Hughes and Councillor Andrew Wilson

ALSO PRESENT

Ian Gutsell, Chief Finance Officer  
Susan Greenwood, Head of Pensions  
George Norval, Interim Deputy Head of Pensions  
Paul Punter, Head of Pensions Administration  
Russell Wood, Pensions Manager: Investments and Accounting  
Paul Linfield, Pensions Communications Manager  
Dave Kellond, Compliance and Local Improvement Partner  
Danny Simpson, Principal Auditor  
Matthew Hunt, Pensions Employer Engagement Officer  
Sophie Webb, Governance and Democracy Manager  
Councillor Gerard Fox  
Councillor Ian Hollidge  
Councillor Paul Redstone

1. MINUTES OF THE MEETING HELD ON 13 FEBRUARY 2025

1.1 The Board approved the minutes of the meeting held on 13 February 2025 as a correct record.

2. APOLOGIES FOR ABSENCE

2.1 Apologies for absence were received from Trevor Redmond.

2.2 It was noted that Neil Simpson was appointed as Vice Chair for the meeting.

3. DISCLOSURE OF INTERESTS

3.1 There were no disclosures of interest.

4. URGENT ITEMS

4.1 There were no urgent items.

## 5. REPORTS

5.1 Reports referred to in the minutes below are contained in the minute book.

## 6. PENSION COMMITTEE AGENDA

6.1 The Board considered the draft agenda for the Pension Committee meeting due to be held on 19 June 2025 together with a summary of the minutes of the previous Pension Committee meeting held on 27 February 2025.

6.2 The Board noted that:

- In addition to the reports considered by the Board, the Committee will receive an Investment Report.
- The Committee will consider additional exempt information regarding the Pension Reform Agenda in relation to challenges faced for the future of ACCESS and pooling.

6.3 The Board RESOLVED to note the Pension Committee agenda and summary of previous minutes.

## 7. PENSION REFORM AGENDA

7.1 The Board considered a report by the Chief Finance Officer introduced by Susan Greenwood, Head of Pension Fund.

7.2 The following points were highlighted to the Board:

- 1) On 10 April 2025 both the ACCESS Pool and the Fund received a letter from Ministers advising that government did not support the proposal put forward by ACCESS.
- 2) ACCESS subsequently responded to the letter from Ministers requesting further clarity in relation to the decision, particularly in relation to the consistency with regard to the decisions made in relation to other LGPS Pools.
- 3) Government has outlined that it wishes to meet with officers from the Fund at the end of June to receive an update on the work done to assess the likely direction of travel for the Fund with regard to pooling. A further written letter is required by the end of September 2025, formally setting out the Fund's intentions.
- 4) Government has requested that each member authority of the ACCESS pool looks to merge with another investment pool whose plans have been supported by government.
- 5) A formal response to the consultation was received following publication of the Pension Board agenda and will be broadly outlined as part of the exempt Governance Report later in the agenda.
- 6) Officers will report back to the Pension Board and Pension Committee in September setting out how the Fund will comply with requirements in relation to investment pooling and governance.
- 7) It is expected that a governance framework will be drafted for consideration by September 2025 to ensure compliance by March 2026.



7.3 The Board discussed the resources required to support the work to meet government's expectations and timelines and noted the approach in terms of the different workstreams to carry out evaluation at the pool level and at the Fund level.

7.4 The Board RESOLVED to note the report.

## 8. GOVERNANCE REPORT

8.1 The Board considered a report by the Chief Finance Officer introduced by Dave Kellond (DK), Compliance and Local Improvement Partner, together with exempt information contained in a later agenda item.

8.2 The following points were highlighted to the Board:

- 1) A letter issued by Ministry of Housing, Communities and Local Government (MHCLG) on 10 March 2025, addressing the issue of mid-valuation assessment of contribution rates in light of apparent surpluses.
- 2) Government makes clear it was not intended for use in order to manage surpluses or deficits and there will be a consultation that will follow later in the year.
- 3) The SAB Secretariat published a summary note of Nigel Giffin's opinion noting that the summary has not been drafted or endorsed by Nigel Giffin KC.
- 4) Government launched a consultation regarding Access and Fairness. The consultation relates to a range of proposals including survivor benefits, death benefits, gender pensions gap and opt-outs.
- 5) A draft response will be presented to the Pension Board and Pension Committee ahead of submission to government.
- 6) Following Nigel Manvell's retirement, there is now an employer representative vacancy on the Pension Board. Communications were sent to all Fund employers rather than targeted communications. Two expressions of interest have been submitted, and both will have an interview discussion on 30 June with a view to appointment by the Governance Committee in July ahead of the next Pension Board meeting.
- 7) Members of the Board will shortly receive an annual request to review their register of interests for publication.
- 8) An updated full privacy notice and summary privacy notice will be reported to Pension Committee to account for changes in respect to McCloud.
- 9) A revised version of the Fund's Governance and Compliance statement was due to be considered by the Pension Board and Pension Committee in June however in light of the significant upcoming changes, approval has been deferred to September 2025.

8.3 The Board discussed the Full Privacy Notice at Appendix 3 of the report and requested the notice be updated to reflect the following:

- 1) Clarification of the statement "the Administering Authority may provide information about your pension benefits to your employer and to potential bidders for that contract when it ends or is renewed" be considered in terms of personal / anonymised data.

- 2) Clarification around the statement “If this occurs, additional safeguards must be implemented with a view to protecting your personal data in accordance with applicable laws” in terms of wording to relay what will happen rather than what must happen.

8.4 The Board RESOLVED to note the report.

## 9. EMPLOYER ENGAGEMENT AND COMMUNICATIONS REPORT

9.1 The Board considered a report by the Chief Finance Officer introduced by Matthew Hunt, Pensions Employer Engagement Officer and Paul Linfield, Pensions Communications Manager.

9.2 The following points were highlighted to the Board:

- 1) The March 2025 data as set out in the table at paragraph 2.1 of the report is not finalised due to the migration of data to Oracle.
- 2) There is an upward trend of employers in the Fund in terms of payments due.
- 3) From May 2024 until March 2025 there were 33 late payments of contributions out of 1,665 expected payments. Some of these were due to confusion of the dates therefore the issue is being addressed through rewriting the forms to make the dates clearer.
- 4) Booking levels of Scheme Member Training noting that the dropout rate on average was 25% for each session and 98% of attendee feedback said that they had learnt something from the session.
- 5) The revised communications strategy including proposed updates to reflect changes over the last 3 years such as the use of electronic systems, rebranding and training. The updated strategy sets out the gradual move to a digitally focused approach which fits with the available resources and budget.
- 6) Benchmarking has been undertaken with other local authority pension fund communications strategies when drafting the updated strategy for East Sussex.
- 7) The website continues to be updated with relevant and engaging information for members and employers including brand new content for members who are looking to increase their pension via Additional Pension Contributions or AVCs providing a far more detailed summary of this subject.
- 8) New material has also been produced to support employers and work continues on ‘My Pension’, the online self-service website for scheme members whereby 43.5% of contributing members have registered.
- 9) It is anticipated, registration with ‘My Pension’ will increase upon receipt of the Annual Benefit Statements which will require log-in to view.

9.3 The Board discussed the effect of Oracle implementation on reporting of late payments, the effectiveness of and response rate for the scheme member training sessions, the focus of the communications strategy in relation to those who are eligible but have opted out.

9.4 The Board requested that in light of new legislation regarding fairness, targeted communication is considered for those eligible but have opted out of being a scheme member and work is undertaken to achieve a greater understanding of the reasons why those who have opted out have chosen to do so. This work could also help identify any employers who have a significantly higher number of opt outs and therefore could benefit from more targeted communication.

9.5 The Board discussed the Heywood's Standard used for some Annual Benefit Statements nationally and how the communication of the Annual Benefit Statement can ensure clear and concise wording when presented to scheme members. It was noted that there are still challenges with McCloud in terms of the Annual Benefit Statements which will need to be resolved.

9.6 The Board RESOLVED to note the report.

## 10. PENSION ADMINISTRATION REPORT

10.1 The Board considered a report by the Chief Finance Officer introduced by Paul Punter, Head of Pensions Administration.

10.2 The following points were highlighted to the Board:

- 1) The performance for quarter 1 has improved slightly from quarter 4 however most tasks are rated red for the quarter which is likely due to the bulk upload from Brighton & Hove City Council in January which has taken a number of months to process.
- 2) The performance figures for April 2025 and forecast May 2025 show improvement to the figures shown within the report for quarter 1.
- 3) Turnover in staff within pension administration team has slowed the rate of recovery in terms of performance.
- 4) Resource allocated to i-Connect onboarding has seen recent change seeing a decrease in one member of staff from the i-Connect administration team.
- 5) The administration team are aware of potential spikes in workload which will be brought about by backdated pay awards meaning adjustment of annual benefit statements, work around McCloud and work following legislation updates.
- 6) The bulk i-Connect data file for the period June to December 2024 was successfully uploaded on 9 January 2025 with a small number of omitted members.
- 7) More work is ongoing to combine data from McCloud with employer data to be able produce the Annual Benefit Statements. As this is a valuation year, data from McCloud will need to be sent to the actuaries as soon as possible.

10.3 The Board discussed the risk relating to turnover of pension administration staff and its potential inclusion on the Pension Risk Register. It was noted that should there be challenges to appoint to vacancies in the administration team arise, it would be considered for inclusion in the Risk Register however the Board were reassured that recruitment to administration vacancies continues to be successful.

10.4 The Board RESOLVED to note the updates within the report.

## 11. EAST SUSSEX PENSION FUND FINANCIAL OUTTURN REPORT 2024/25

11.1 The Board considered a report by the Chief Finance Officer introduced by Russell Wood, Pensions Manager: Investments and Accounting.

11.2 The following points were highlighted to the Board:

- 1) The final outturn position of 2024/25 is £4.3m which is a decrease from the last projected position of £38,000.
- 2) The outturn for improvement projects was reduced due to the slippage of the Integrated Service Provider (ISP) Dashboard project that officers budgeted for in 2024/25 now taking place in the 2025/26 financial year.
- 3) The outturn for Communication costs was reduced as a planned activity was not taken forward, rendering this provision unnecessary.
- 4) The Admin Operational Costs have offset these reductions slightly as clarification has been provided around East Sussex County Council Charges for printing and posting increasing the cost of these services.
- 5) The Actuarial Fund work was slightly higher than the previous forecast due to additional work on cessations taking place.
- 6) ACCESS costs for work in preparing the response to the Fit for the Future consultation increased the Investment Advice costs.

11.3 The Board discussed the charging framework for actuarial costs for cessations in terms of costs to the Employers' account or the Fund account.

11.4 The Board RESOLVED to note the report.

## 12. INTERNAL AUDIT REPORT

12.1 The Board considered a report by the Chief Internal Auditor introduced by Danny Simpson, Principal Auditor.

12.2 The following points were highlighted to the Board:

- 1) Substantial assurance opinion was provided for both Administration of Pension Benefits and Investments and Accounting.
- 2) Reasonable assurance opinion was provided for Compliance with Regulatory Requirements.

12.3 The Board discussed the Service Level Agreement between East Sussex County Council and the Fund to provide corporate services including internal audit services to the Fund and the importance of recognising the separate entities and the requirements of the Fund for East Sussex County Council as administering authority, to deliver those services.

12.4 The Board RESOLVED to note the Pension Fund audit reports as set out at Appendices 1 to 3 of the report.

## 13. EXTERNAL AUDIT PLAN FOR THE EAST SUSSEX PENSION FUND 2024/25

13.1 The Board considered a report by the Chief Finance Officer introduced by Ian Gutsell, the Chief Finance Officer.

13.2 The following points were highlighted to the Board:

- 1) The external audit of the Pension Fund is due to commence next week and has been reviewed by the County Council's Audit Committee.
- 2) The fees for the external audit have been through a national procurement exercise. The fees for the external audit of the East Sussex Pension Fund are £101,515.

13.3 The Board RESOLVED to note the report.

#### 14. PENSION FUND RISK REGISTER

14.1 The Board considered a report by the Chief Finance Officer introduced by George Norval, Interim Deputy Head of Pensions.

14.2 The following points were highlighted to the Board:

- 1) A workshop was held on 31 March to review and reinforce the Fund's risk management approach. Updates from the workshop have been incorporated within the risk register including clearer risk triggers and consistency in terms of formatting.
- 2) Officers will shortly be exploring external advice in relation to business continuity planning ("BCP") and cyber risk. A procurement exercise will be initiated, with a view to appointing a provider over the summer. Outputs will be used to support a joint officer and Pension Board/Pension Committee session, with learning incorporated into the Fund's updated Business Continuity Plan, expected to be brought forward later in the year.

14.3 The Board discussed the following points:

- 1) The risk rating for Risk I4 Investment Pooling and whether the recent changes to pooling will increase the risk rating within the risk register.
- 2) Concern around the developing Business Continuity Plan's robustness in the face of cyberattack and business disruption arising from other risks on the risk register.

14.4 The Board RESOLVED to note the Pension Fund Risk Register.

#### 15. WORK PROGRAMME

15.1 The Board considered a report by the Chief Finance Officer introduced by Susan Greenwood, Head of Pensions.

15.2 The following points were highlighted to the Board:

- 1) The Governance and Compliance statement was originally due to be reviewed in June however will be deferred to September given the outcome of the Fit for the Future consultation.
- 2) The valuation timetable will be a busy period especially around changes to pooling.
- 3) Training opportunities available to Board members and the importance of training and development of members.

15.3 The Board RESOLVED to note the work programme.

16. EXCLUSION OF THE PUBLIC AND PRESS

16.1 It was RESOLVED to exclude the public and press for the remaining agenda items on the grounds that if the public and press were present there would be disclosure to them of exempt information as specified in paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972 (as amended), namely information relating to the financial or business affairs of any particular person (including the authority holding that information).

17. GOVERNANCE REPORT - EXEMPT INFORMATION

17.1 The Board considered a report by the Chief Finance Officer introduced by Susan Greenwood, Head of Pensions which contained exempt information in relation to an earlier item on the agenda regarding the Governance Report.

17.2 A summary of the discussion is set out in an exempt minute.

17.3 The Board RESOLVED to note the exempt information within the report.

18. PENSION FUND BREACHES LOG AND INTERNAL DISPUTE RESOLUTION PROCEDURE CASE REPORT

18.1 The Board considered an exempt report by the Chief Finance Officer introduced by Dave Kellond, Compliance and Local Improvement Partner regarding the Breaches Log and update on outstanding or new Internal Dispute Resolution Procedure (IDRP) cases.

18.2 A summary of the discussion is set out in an exempt minute.

18.3 The Board RESOLVED to note the report.

19. EMPLOYER ADMISSIONS AND CESSATIONS REPORT

19.1 The Board considered an exempt report by the Chief Finance Officer introduced by Susan Greenwood, Head of Pensions regarding an update on the latest admission and cessations of employers within the Fund.

19.2 A summary of the discussion is set out in an exempt minute.

19.3 The Board RESOLVED to note the report.

(The meeting ended at 1.03 pm)

CHAIRMAN

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**Report to:** Pension Board

**Date of meeting:** 11 September 2025

**By:** Chief Finance Officer

**Title:** Pension Committee Agenda and Summary of Previous Minutes

**Purpose:** To consider and comment on the draft agenda of the next Pension Committee meeting together with a summary of the previous minutes of the Pension Committee meeting.

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## **RECOMMENDATION**

The Board is recommended to:

- 1) consider and comment on the draft agenda for the next Pension Committee meeting; and**
  - 2) note the summary of the minutes for the previous Pension Committee meetings.**
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### **1. Background**

1.1 The draft agenda for the next Pension Committee meeting is presented to the Pension Board for information at Appendix 1.

1.2 A summary of the minutes of the previous two Pension Committee meetings is presented to the Pension Board for information at Appendix 2.

1.3 If Board members have any specific comments about the agenda that they wish to be communicated to the Pension Committee, then they can do so. In any case, the draft Pension Board minutes will be circulated to Pension Committee members at or in advance of the forthcoming committee meeting.

### **2. Conclusion and recommendation**

2.1 The Board is recommended to consider and comment on the draft agenda for the next Pension Committee meeting and note the summary of the minutes for the previous Pension Committee meetings.

**IAN GUTSELL**  
**Chief Finance Officer**

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# PENSION COMMITTEE

THURSDAY, 25 SEPTEMBER 2025

10.00 AM COUNCIL CHAMBER, COUNTY HALL, LEWES

MEMBERSHIP - Councillor Gerard Fox (Chair)  
Councillors Ian Hollidge, Paul Redstone, Georgia Taylor and David Tutt

## A G E N D A

1. Minutes of the last meeting held on 24 July 2025
2. Apologies for absence
3. Disclosure of Interests  
Disclosures by all Members present of personal interests in matters on the agenda, the nature of any interest and whether the Members regard the interest as prejudicial under the terms of the Code of Conduct.
4. Urgent items  
Notification of items which the Chair considers to be urgent and proposes to take at the appropriate part of the agenda.
5. Pension Board Minutes
6. Pension Reform Agenda
7. Governance Report
8. Pensions Administration report
9. Communications Report
10. Internal Audit reports
11. External Audit Draft Audit Findings Report
12. Risk Register
13. Investment Report
14. Work programme
15. Any non-exempt items previously notified under agenda item 4
16. Exclusion of the public and press  
To consider excluding the public and press from the meeting for the remaining agenda item on the grounds that if the public and press were present there would be disclosure to them of exempt information as specified in paragraph 3 of Part 1 of the Local Government Act 1972 (as amended), namely information relating to the financial or

business affairs of any particular person (including the authority holding that information).

17. Pension Reform Agenda - Exempt Information
18. 2025 Triennial Valuation Report
19. External Audit Draft Audit Finding Report - Exempt Information
20. Investment Report - Exempt Information
21. Governance Report - Exempt Information
22. Pension Fund Breaches Log and Internal Dispute Resolution Procedure Case Report
23. Employer Admissions and Cessations
24. Any other exempt items previously notified under agenda item 4

PHILIP BAKER  
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17 September 2025

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## PENSION COMMITTEE

### SUMMARY OF THE MINUTES: 19 JUNE 2025

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All members of the Committee were present.

The following Pension Board Members were in attendance: Trevor Redmond, Neil Simpson and Councillor Andrew Wilson

## PENSION REFORM

The Committee considered a report introduced by Susan Greenwood and resolved to:

(1) note the current position in relation to the ACCESS pool's submission in respect of the Government's 'Fit for the Future' consultation; and

(2) delegate authority to the Chief Finance Officer, in consultation with the Chair of the Pension Committee, to continue work to assess the options available to the Fund regarding investment pooling.

The Committee also noted that there will be costs incurred in relation to reorganisation of assets however this cost is unknown due to the uncertainty of the current position and noted the potential effect on existing pools supported by the Government in terms of potentially having to join with the 21 Funds currently seeking alternative options for pooling and the effect of the consultation on the entire sector. The Committee requested that Pension Board and Pension Committee Members are updated in terms of progress before a final proposal is considered by the Pension Committee in September.

## GOVERNANCE

The Committee considered a report introduced by Dave Kellond and resolved to:

(1) Delegate authority to the Chief Finance Officer in consultation with the Chair of the Pension Committee to finalise and submit on behalf of the East Sussex Pension Fund a response to the Government Consultation 'Local Government Pension Scheme in England and Wales: Access and fairness'; and

(2) Agree the revised full privacy notice (as set out in Appendix 3 of the report) and the template summary privacy notice (as set out in Appendix 4 of the report) be adopted and used by the East Sussex Pension Fund.

The Committee also requested clarity regarding the SAB commissioned summary note of Nigel Giffin's opinion in terms of whether endorsement was actively sought.

## COMMUNICATIONS

The Committee considered a report introduced by Paul Linfield and resolved to approve the updated Communications Strategy for 2025, as detailed in Appendix 1 of the report.

## REPORT OF THE PENSION BOARD

The Committee considered the report and resolved to note the report covering the work completed in year by the Pension Board.

## PENSIONS ADMINISTRATION

The Committee considered a report introduced by Paul Punter and resolved to note the report following discussion on contact centre statistics and McCloud project resource.

### EAST SUSSEX PENSION FUND FINANCIAL OUTTURN REPORT 2024/25

The Committee considered the report and resolved to note the report.

## QUARTERLY BUDGET MONITORING AND 2025/26 BUSINESS PLAN AND BUDGET

The Committee considered a report introduced by Russell Wood and resolved to note the Q3 forecast financial outturn position and approved the business plan and budget for 2025/26

## INTERNAL AUDIT REPORT

The Committee considered a report introduced by Danny Simpson and resolved to note the Pension Fund audit reports as set out in Appendices 1 to 3 of the report.

## EXTERNAL AUDIT PLAN FOR THE EAST SUSSEX PENSION FUND 2024/25

The Committee considered the report and resolved to note the report.

## PENSION FUND RISK REGISTER

The Committee considered a report introduced by Susan Greenwood and resolved to:

- (1) review and note the Pension Fund Risk Register; and
- (2) delegate authority to the Chief Finance Officer to take all actions necessary to procure and appoint an external adviser to provide support in relation to business continuity planning and cyber risk, including the provision of training to Officers and members of the Pension Committee and Board.

The Committee discussed the value of the procurement of external advice in terms of supporting the development of a more robust Business Continuity Plan. The Committee also discussed the risk ratings for I4 Investment Pooling and I7 Climate Change and requested that these risk ratings are reviewed with consideration to the potential cost to the Fund regarding pensions reform and the effect of climate change on the global economy in terms of predicted loss of GDP (Gross Domestic Product) and predicted fall in pension fund returns.

## INVESTMENT REPORT

The Committee considered a report introduced by Russell Wood and Iain Campbell of Hymans Robertson and resolved to:

- (1) note the report;
- (2) Agree in principle for the Fund to enter into 'Beneficial Owner' Power of Attorney arrangements, managed by Broadbridge on behalf of the Fund's custodian, with sub-custodian organisations for proxy voting service purposes; and
- (3) Delegate authority to the Chief Finance Officer to authorise entering into such arrangements on behalf of the Fund with individual sub-custodian organisations.

The Committee discussed the underperformance of index bonds Storebrand and Osmosis and whether the underperformance compared to the benchmark is due to tracking errors or due to the general market and requested that the Storebrand tracking error is reported to the Committee in future investment reports.

### WORK PROGRAM

The Committee considered the Work Programme and resolved to note the Work Programme.

### EXEMPT ITEMS

A number of items were discussed under the Exempt part of the meeting which Board Members can have access to on request. These included the Pension Fund Breaches Log and Internal Dispute Resolution Procedure Case Report, Employer Admissions and Cessations Report and additional exempt information on the Pension Reform Agenda Report, Investment Report and Governance Report.

## PENSION COMMITTEE

### SUMMARY OF THE MINUTES: 24 JULY 2025

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Apologies for absence were received from Councillor Taylor.

The following Pension Board Members were in attendance: Ray Martin, Philippa Buckingham, Zoe O'Sullivan, Trevor Redmond, Neil Simpson, Councillor Andrew Wilson

The meeting was convened ahead of the Pension Committee Strategy Day, and the agenda contained one exempt substantive item.

### PENSION REFORM AGENDA

The Committee considered an exempt report introduced by Susan Greenwood and resolved to agree the recommendations within the report.



**Report to:** Pension Board

**Date of meeting:** 11 September 2025

**By:** Chief Finance Officer

**Title:** Pension Reform Agenda

**Purpose:** To provide an update on changes effecting Local Government Pension Schemes and the East Sussex Pension Fund

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## **RECOMMENDATION:**

**The Pension Board is recommended to note the updates in relation to next steps for the East Sussex Pension Fund in terms of pension fund pooling as set out in this report.**

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### **1. Background**

- 1.1 The report has been prepared to update the Pension Board on the government's proposed changes to pension fund pooling, highlighting the key proposals and the government's response to the proposal put forward by the ACCESS pool.
- 1.2 Officers have extensively covered the background to the 'Fit for the Future' consultation and the requirements the Fund must comply with by 31 March 2026. Full details can be found in [previous reports at agenda item 6](#).
- 1.3 Board members will be aware that, following the decision by government not to support the proposal put forward by the ACCESS pool to comply with the requirements of the 'Fit for the Future' consultation, officers have been working extensively with advisors and officers from the West Sussex Pension Fund (recognising the impact of proposed devolution and new Mayoral Combined County Authority for Sussex and Brighton) to identify a new pooling partner for the Fund.

### **2 Indication of Preference to Join with Border to Coast Pension Partnership**

- 2.1 Following extensive due diligence work carried out from April 2025 in conjunction with officers from the West Sussex Pension Fund and Barnett Waddingham (who acted as adviser to both East and West Sussex) a report was considered by the Pension Committee at its meeting on 24 July 2025. An evaluation of all the options available to the Fund with regard to investment pooling was presented to the Committee, who approved the Officers' recommendation that the Fund agree to focus all further due diligence on the Border to Coast Pension Partnership ("BCPP"). The Pension Committee of West Sussex Pension Fund resolved to approve the same recommendation.
- 2.2 Extensive detail in relation to the due diligence work carried out on the pooling options available, scoring criteria and rationale for any recommendations made can be found in the report to the [Pension Committee meeting dated 24 July 2025](#) under exempt agenda item 7 and associated appendices.
- 2.3 BCPP have been informed of the Fund's preference and are happy to welcome both East and West Sussex Pension Funds into the partnership, as are the current partner funds of BCPP.

- 2.4 Officers have also informed other pools of the preference expressed by the Fund as well as advising government in a call on 10 August 2025. Government have not provided any indications that are contrary to supporting the preference expressed.
- 2.5 A public statement was also released by BCPP of behalf of the Fund on Monday 14 August 2025 and the Fund also provided internal and external communications to the relevant stakeholders.
- 2.6 Officers will continue to carry out due diligence in conjunction with Barnett Waddingham and West Sussex Pension Fund, but this due diligence work will focus solely on BCPP.
- 2.7 At the Pension Committee meeting on 25 September 2025, provided the further due diligence work carried out further supports the recommendation for the Fund to join BCPP, the Committee will consider a final recommendation in relation to the Fund's pooling intentions and consider a recommendation to seek approval and delegation from Full Council in relation to the Fund joining BCPP and the necessary work that will be required to be carried out. Officers will continue to work extensively with all parties to ensure the Fund is compliant with the prevailing regulations by 31 March 2026.

### **3 Moving Forward and Dissolution of the ACCESS Partnership**

- 3.1 East and West Sussex are part of a group of seven ACCESS partner funds that have indicated a preference for moving to BCPP. The other partner funds expressing a preference for BCPP are Cambridgeshire, Essex, Hertfordshire, Kent and West Northamptonshire. Therefore, this group represents a majority of ACCESS partner funds both in terms of asset size and number of partner funds. Officers for East and West Sussex will work with officers from these partner funds to collectively complete the necessary documentation to allow the funds to join BCPP as a shareholder by 31 March 2026.
- 3.2 The 4 remaining ACCESS partner funds – Norfolk, Hampshire, Isle of Wight and Suffolk have expressed a preference to join LGPS Central. Therefore, as a collective pool, ACCESS will now start to work towards its dissolution. Officers are working with officers from partner funds and the ACCESS Support Unit (ASU) to determine how best to move forward. This is a detailed and complex process to determine the most cost-effective way to dissolve the collective partnership both from a legal and regulatory and operational perspective.

### **4. Conclusion**

- 4.1 The Board is recommended to note this report.

**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer: Susan Greenwood, Head of Pensions  
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**Report to:** Pension Board

**Date of meeting:** 11 September 2025

**By:** Chief Finance Officer

**Title:** Governance Report

**Purpose:** To provide an update on governance workstreams and changes affecting Local Government Pension Schemes and the East Sussex Pension Fund

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## RECOMMENDATION:

The Pension Board is recommended to:

- 1) Note the legal and regulatory changes together as set out in this report; and
  - 2) Comment on and note the updated Governance and Compliance Statement as set out in Appendix 2 of this report.
- 

## 1 Background

1.1 This report is presented to the Pension Board to provide an update on the steps being taken to adopt good practice and ensure compliance with regulatory requirements for the East Sussex Pension Fund (the Fund or ESPF).

## 2 Legal and regulatory changes

2.1 On 29 May 2025, the Government published its [response to the 'Local Government Pension Scheme \(England and Wales\): Fit for the future' consultation](#). The response sets out the core proposals that will be taken forward. A more comprehensive review of the investment and pooling reforms is provided at agenda item 6. However, a summary of the confirmed changes relating to investment pooling are:

- All assets to be managed by the new pool from April 2026.
- The Administering Authority will retain control of strategic asset allocation though advice should be provided by the pool and not from investment consultancy firms.
- Pools must be registered with the Financial Conduct Authority.
- Funds will need to set out their aspiration for local investments and work with local authorities and, in particular, with Mayoral Combined County Authorities to identify opportunities. It would be then up to the pool to assess and implement local investments.

The primary governance reforms that will be taking include:

1. **appointing a senior Local Government Pension Scheme (LGPS) officer with overall delegated responsibility for the management and administration of the Scheme.** – *ESPF will await clarity in the legislation that will follow on this point, specifically around the definition of a 'Senior LGPS Officer'. However, it is expected that such a role could be filled by either the Section 151 Officer or Head of Pensions.*
2. **a requirement to prepare strategies on governance, knowledge and training (replacing the governance compliance statement), and administration.** – *Again, similar to all provisions at this stage, ESPF will await further details in the legislation but at present officers believe this does not represent a requirement for extensive work in creating new*

*fund policies, but instead the reformatting and in some areas consolidation of existing fund documentation.*

3. **the knowledge and training strategy will be required to include a conflicts of interest policy.** – *Similar to the above, it is anticipated that this will simply require the consolidation of existing Fund policies.*
4. **a requirement to take part in an independent governance review (IGR) every 3 years.** – *This was extended from an initially proposed biennial review. ESPF welcomed this proposal in its consultation response on the basis that such a review would provide a structured mechanism for identifying strengths, addressing weaknesses, and promoting best practices. Officers also accept that the extension of the required frequency from 2 to 3 years also has merit in alleviating the demands on cost and resources generated by such an exercise. There will be a requirement to submit Independent Governance Reports to the Ministry of Housing, Communities and Local Government (MHCLG), and administering authorities will be expected to progress recommendations made in the reports. Where Government have concerns, they may bring the issue to the attention of The Pensions Regulator and in extreme cases may directly intervene.*
5. **ensuring pension committee members meet new knowledge and understanding standards.** – *This was a provision also welcomed by ESPF in its response to the consultation. Requiring Pension Committee members to have appropriate knowledge and understanding is critical and ESPF have the same requirements on Pension Committee members to those required under the Pensions Act for Local Pension Board members. Effective decision-making in the LGPS context requires committee members to navigate complex investment, governance and funding challenges confidently. Aligning knowledge requirements with those of local pension boards will enhance overall governance consistency and ensure that all decision-makers operate with a baseline level of competency. However, officers have remaining concerns regarding how this may impact the use of substitutes and the issue of non-compliance but anticipate both to be addressed in the legislation.*
6. **appointing an independent adviser (non-voting) to the Pension Committee.** – *Government have clarified that such an independent adviser, when appointed would not have voting rights on the Committee. Officers welcome the additional scrutiny such an appointment would bring, and the expert advice that can be offered in aiding Committee members to make better informed decisions. Again, officer are awaiting clarity in the legislation before actioning this.*

2.2 The Pensions Scheme Bill was introduced in Parliament and given its first reading in the House of Commons on 5 June 2025. The Bill will provide powers to the Secretary of State to:

- direct LGPS funds to join or leave a pool company;
- provide guidance to pool companies;
- direct a pool company in 'prescribed circumstances' on how it manages its activities or the decisions it makes or to follow guidance.

2.3 Included within the Autumn Budget 2024, the Government announced that for deaths occurring after April 2027:

- the majority of unused pension funds and death benefits will be included in assessing the value of a deceased person's estate for inheritance tax purposes.
- Pension scheme administrators will be responsible for reporting and paying any inheritance tax due on pensions to HM Revenue and Customs (HMRC).

2.4 This was followed by the launch of a consultation from HM Treasury titled [‘Inheritance Tax on Pensions: liability, reporting and payment’](#). At the February 2025 meeting of the Pension Board, officers provided members with a copy of the Fund’s response.

2.5 On 21 July 2025, HM Treasury published a [response to the consultation](#), and confirmed the following key amendments to the proposals made:

- All death-in-service benefits from the LGPS will be excluded from the value of an individual’s estate for inheritance tax purposes.
- It will be the responsibility of the personal representative to the estate to report and pay any inheritance tax liability to HMRC and not that of pension scheme administrators. However, pension scheme administrators will have a duty to support personal representatives in doing so.
- To support personal representatives and beneficiaries unable to pay inheritance tax on pensions, the Government will provide a range of payment options, including an option for pension beneficiaries to instruct pension scheme administrators to pay inheritance tax in respect of pensions on their behalf. Albeit that the liability for the inheritance tax remains with the beneficiaries.

2.6 HM Treasury has now published [draft clauses for inclusion in the Finance Bill 2025-26](#). These are open for technical consultation until 15 September 2025. These clauses will amend the Inheritance Tax Act 1984. Officers do not propose to respond to the consultation.

2.7 As reported to the Pension Board at its meeting on 5 June 2025, on 15 May 2025 Government launched a consultation titled [‘Local Government Pension Scheme in England and Wales: Access and fairness’](#). The consultation relates to a range of proposals including the gender pensions gap, forfeiture concerns, and opt out rates. Having consulted with Chairs of both the Pension Board and Pension Committee, officers submitted a response to the consultation on 1 August 2025, a copy of which is provided at Appendix 1 to this report.

### **3 Governance and Compliance Statement**

3.1 Regulation 55 of The Local Government Pension Scheme Regulations 2013 requires administering authorities to prepare, publish and keep under review a Governance Compliance Statement. The Pension Committee last approved a statement in June 2024, and this was due for review in June 2025. However, officers recommended that such a review be delayed given the significantly changing environment as a consequence of proposals stemming from the ‘Fit for the Future’ consultation.

3.2 However, given that further legislation and detail is to date unavailable, in order to meet with both the regulatory requirement and that of the Fund’s policy itself requiring an annual review, Officers have updated the existing policy without making any substantive amendments, reflecting the arrangements as they stand. The Governance and Compliance Statement will undergo a full review incorporating both investment pooling reforms following their conclusion.

3.3 The Governance and Compliance Statement will require a full overhaul, not only in relation to the requirements of the ‘Fit for the Future consultation’, but also in relation to the references to the powers of the Pension Committee in relation to pooling and the ACCESS pool, as the Fund will cease to be a member of the ACCESS investment pool in 2026. Officers are fully cognisant of the need to update this document in its current or revised form in due course once officers have the required detail and guidance.

3.4 The updated Governance and Compliance Statement is provided at Appendix 2.

## **4 Conclusion**

4.1 The Board is recommended to note the legal and regulatory changes detailed within this report and comment on and note the proposed changes to the Governance and Compliance Statement ahead of approval by the Pension Committee.

**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer: Susan Greenwood, Head of Pensions  
Email: [Susan.Greenwood@eastsussex.gov.uk](mailto:Susan.Greenwood@eastsussex.gov.uk)

This response is made on behalf of East Sussex Pension Fund (ESPF, the Fund) in its capacity as scheme manager of an LGPS Fund.

Our response to the call for evidence is set out below and we would be pleased to expand, clarify or discuss any of the comments made.

Where this response uses the term LGPS fund the term should be taken to refer to the administering authority (scheme manager) as set out in the Local Government Pension Regulations 2013.

### **Equalising survivor benefits**

***Q1: Do you agree with the government's proposed amendment of survivor benefits rules?***

We support the proposed amendments to remove the discrimination.

***Q2: Do you have any comments on the intended approach to equalising survivor benefits?***

We believe it is appropriate to change the LGPS Regs so that all pensions to the survivor of a marriage or civil partnership is calculated the same way irrespective of their sex/sexual orientation or either the member or survivor. The benefits should be backdated to dates set out in the consultation and amount payable at the rate due to the higher of male/female entitlement.

***Q3: Do you have any comments on the administrative impact, particularly in identifying cases where calculations of past benefits would need to be revisited?***

Whilst we fully support the proposals, we hope that Ministers have learnt from other recent projects that have spanned a decade or more (such as GMP and McCloud) and ensure that the implementation period for the remedy is more realistic and reasonable. This will be a complex and challenging project just to identify (relatives can be upset and offended by late questioning, which may not lead to additional benefits) and find the survivors (via archived files, tracing agencies, very hard where no pension being paid), let alone performing the calculations. We need to recognise that some pension administration software providers development time is already tied up with automating McCloud calculation routines for the next two years. That said, we also need to appreciate the likely age profile of the affected survivors, is such that this should be prioritised amongst the wider benefit changes identified in the consultation. The administrative impact of this undertaking will be very significant as historical pension changes tend to have to be calculated manually.

***Q4: Do you have any further comments on the proposed changes?***

We would appreciate more detailed guidance from MHCLG on more opaque areas such as how to deal with situations where the survivor has subsequently died, possibly recovery of an overpaid child pension where a backdated partner's pension becomes payable, impact on trivial commutation values, levels of interest on retrospective benefits due, tax implications,

impact on transfer out values (which include value of survivor benefits), define reasonable attempts to find a survivor and most importantly timescales to work towards.

#### **Cohabitee survivor benefits**

***Q5: Do you agree with the government's proposals to formalise the removal of the nomination requirement?***

Yes, it's logical to remove the requirement for a cohabitee to be nominated.

***Q6: Do you have any comments on the government's proposals to formalise the removal of the nomination requirement?***

We don't believe there is any administrative impact of this change.

***Q7: Do you have any comments on the proposed approach to backdating?***

We agree that the decision not to backdate cohabiting partner's pensions for leavers before 1 April 2008 is the correct and fair thing to do. Similar process to be followed and resulting administrative burden as per Q3 above, ( more so to identify death between 2008 and 2014 with no spouse or equivalent pension is payable then decide any cohabiting status at date of death – manual process).

#### **Death grants – removing age 75 limit**

***Q8: Do you agree with the proposed amendments to death grants?***

Yes, we have concerns that an age cap could be classed as age discrimination.

***Q9: Do you have any comments on the government's proposals to remove the age 75 cut-off from the LGPS Regulations?***

We believe identifying deaths in scope will be easy but determining beneficiaries for some cases will be much more difficult and time consuming – thus to repeat that retrospective changes are complex from an administrative perspective.

***Q10 – Do you have any comments on the proposed approach to backdating?***

We accept the change should be backdated to 6 April 2011 when legislation changed.



***Q11 – Do you have any comments on the administrative impact, particularly in identifying historic cases where death grants that were not paid would now be paid?***

Should this change be implemented and historic payments made, we would appreciate, the removal of, or more guidance on, the need to use the special lump sum death benefits tax charge of 45% and if it should be paid to the personal representative (see Q12). There may also be tax implications if the survivor's pension is being commuted under triviality whilst other benefits remain. This has the potential to become a very complex area.

**Death grants – personal representatives**

***Q12: Do you agree with the proposal to remove the two-year limit?***

Yes, we agree paying death grant benefits to personal representatives after two years (from date of death) should be removed.

***Q13 – Do you have any comments on the government's proposal to remove the two-year limit?***

No comment

**Gender pensions gap – authorised absences under 31 days**

***Q14: Do you agree that the LGPS Regulations should be updated so that any unpaid leave under 31 days is pensionable as a way to address the gender pension gap?***

We believe that the current need for members to make a positive election within a limited period of returning to work does lead to short gaps in service for members which will predominantly impact women due to childcare and caring responsibilities. Making short period of authorised unpaid leave pensionable will help resolve the issue. Most unpaid leave is for a few days covering child sickness so not clear why the proposal is not, say, 7 days?

***Q15: Do you agree the government should use the actual lost pay option when calculating contributions, or do you think APP should be the chosen option? Please explain the reasons for your view.***

Using actual pay lost is simple for members to understand and pension payroll software to automate.

## **Gender pensions gap – cost of buying back pension lost in an unpaid break of over 30 days**

### ***Q16 – Do you agree with the proposal to align the cost of buying back unpaid leave over 30 days with standard member contribution rates?***

We agree the cost of buying back additional pension should use the actual lost pay approach (not APP), it's the question of what the period of unpaid leave is being treated as pensionable. A longer period could potentially result in lower paid members (mainly woman) electing to opt-out of the scheme.

### ***Q17 – Do you agree with the proposal to change the time-limit for buying back unpaid leave pension absences from 30 days to 1 year?***

We agree 30 days is not long enough. The proposal should be within one year or date of leaving, if earlier.

### ***Q18 – Do you agree with removing the three-year limit on employer contributions in Regulation 15(6)?***

We are opened minded to the limit being removed. We think it very unlikely that employers will approve unpaid leave of absence of more than three years. The additional pension via APC is complex and requires more clarity – with annual limits on what can be bought, using age and sex related rates, used both for purchasing lost and extra pension, employers sometimes contribute in full or part, can have multiple regular contribution contracts. Should survivor's and children's benefits be included?

## **Gender pensions gap – pension contributions during child related leave**

### ***Q19 – Do you agree with updating the definition of child-related leave to include all periods of additional maternity, adoption and shared parental leave without pay?***

We agree with the proposal that all child-related leave becoming pensionable will have a positive impact in reducing the gender pensions gap.

## **Gender pensions gap – making reporting mandatory in the LGPS**

### ***Q20: Do you agree that gender pension gap reporting should be mandatory in the LGPS?***

Yes, we agree. Measuring the pensions gap over time will help determine if further changes are required

### ***Q21 – Do you agree that the 2025 valuation (and associated fund annual reports) is preferable?***

We agree that a three-year cycle for reporting is an appropriate timeframe that gives a better opportunity for a change in the gap to materialise. In addition, it minimalises the administrative burden of a more regular exercise.

***Q22 – Do you agree with the threshold of 100 employees for defining which employers must report on their gender pension gap?***

We agree small data sets should not be included, so agreed with a 100 threshold, but believe active LGPS members should be the measure.

***Q23 – Do you agree with the gender pension gap definition being ‘the percentage difference in the pension income for men and women over a typical working life’?***

We agree that the definition will capture pension gap data. MHCLG does need to specify the terms to be used by the 100 administering authorities (and their Actuaries) in the LGPS to ensure reporting consistency as regard future assumptions. Members can have multiple roles at different employers in the same or different Funds, as well as employments outside Local Govt (some transferred-in, others not), some will be paying additional contributions, throughout their working lifetimes. We appreciate the 2025 valuations are underway and data may already be provided to Fund Actuaries, so hopefully, they have agreed a joined-up way forward.

***Q24 – Do you agree with the gender pension savings gap being ‘the percentage difference in the pension savings accrued over one year for men and women’?***

We believe this measure may be a more meaningful measure to recognise the movement in the pensions gap and be more easily delivered. See our response to Q23.

**Opt-outs**

***Q25 – Do you agree that the annual report is the best method of reporting data on those who choose to opt-out of the scheme?***

We believe the annual report is an appropriate place for opt-out data to be reported but it would also be sensible to capture the data centrally, say via the Pension Regulator annual returns.

***Q26 – Do you foresee any issues with administering authorities’ ability to gather data on opt-outs?***

This data is not currently collected and administering authorities having to collect new data from employers will be challenging. The administering authorities do not know if non-member individuals involved in auto enrolment are still employed or left. Employers can also pay short-term refunds via employer payrolls that administering authorities have no sight off. Administering authorities have large numbers of scheme employers with differing engagement (some have employees whom will never be eligible to join the LGPS like Teachers & Fire staff [or

over age 75's] whilst other small employer often has no dedicated staff for pensions). It will be essential for payroll software suppliers to come up with automated solutions (an eligible for LGPS marker?). Employer responsibilities would need to be document in the Fund's administration strategy with consequences for non-compliance.

***Q27 – When updating the annual report guidance to reflect opt-out data collection, what information would be most useful to include?***

The guidance should set out clearly which employees should be in-scope (or excluded from scope). The format of the required data (at individual or role level, only reporting on position at year end? What to do with casual workers?) to evidence the opt-out rates.

***Q28 – Do you agree with the proposal to collect additional data about those opting out of the scheme?***

MHCLG has considered data protection legislation in that pension funds can only collect data required for a legitimate purpose – not sure collecting data about employees not in the scheme is appropriate? However, if collected using a secure, anonymous form they we would support the approach to collecting “additional data” when a member opts out.

***Q29 – Are you an employer, part of an administering authority or member of a pensions board?***

An officer of an administering authority acting on behalf of both the pensions board and committee.

***Q30 – Do you have any comments on the collection of additional information?***

We would expect and support the reason for opt-out (from a possible drop-down option of reasons). We would be cautious about trying to determine if employers are encouraging opt-outs at an individual level and some data items may be contentious. We understand the MHCLG desire to understand if particular groups are disproportionately represented in opt-outs at administering authority level.

**Forfeiture**

***Q31 – Do you agree that the government should amend regulations 91 and 93 of the 2013 Regulations to remove the requirement that the member must have left employment because of the offence in order for an LGPS employer to be able to make an application for a forfeiture certificate or to recover against a monetary obligation?***

Yes, an individual election to leave employment when knowingly being investigated can create an avoidance loophole.

**Q32 – Do you agree that the three-month time limit for an LGPS employer to make an application for a forfeiture certificate should be removed?**

We also support removing the time limit for an employer to make a forfeiture application.

**Q33 – Do you agree that Regulation 92 of the 2013 Regulations should be revoked?**

We don't see that Regulation 92 adds much value as it appears to be the same as the default position. It may be helpful for MHCLG to clarify what action the Administering Authority is supposed to take if the member requests to retire with the maximum retirement grant or transfer-out when the employer has applied for a forfeiture certificate.

**Q34 – Do you agree that in order to give full effect to the proposed amendments equivalent modifications should apply to earlier schemes?**

Yes, the change needs to apply to all members.

**Q35 – Do you agree that there should be forfeiture guidance to assist employers in making applications?**

Yes, as employers rarely use the process.

## **McCloud**

**Q36 – Do you agree with the government's proposal for pension debits and credits?**

Yes. Statutory Guidance for divorce pension debit/ pension credit members is outstanding, impacting the 2025 ABS and the McCloud remedy. The proposals set out in the consultation seem reasonable and are consistent with how the wider remedy works and will presumably be impacted by the 31 August 2026 implementation deadline. Given the MHCLG delay in providing any guidance have potentially exasperated any overpayments, it would good to have some clarity if the debits are to be reclaimed or written-off?

**Q37 – Do you agree with the government's proposal to cover deaths on 30 September 2023?**  
Yes.

**Q38 – Do you agree with the government's proposal to clarify if interest applies on Club Transfers?**  
Yes.

**Q39 – Do you agree with the government's proposal to include part 4 tax losses in the 2023 regulations?**  
Yes.

***Q40 – Do you agree with the government’s proposal for transfers from other public service schemes for members over 65 years old?***

We believe the proposal described is reasonable, but we would need to see and understand the GAD guidance. The change would mean that members transferring remediable service from other public service pension schemes over the age of 65 would receive underpin protection when they transfer to the LGPS. It is not clear if MHCLG expects administering authorities to retrospectively revisit transfers-in since 1<sup>st</sup> April 2014?

**Lifetime Allowance**

***Q41 – Do you agree with the proposal to omit Regulation 50 and the equivalents to it (to the extent that they have been preserved) in the 1997 and 2008 Regulations?***

Yes.

***Q42 – Do you agree with the proposal to withdraw the actuarial guidance linked to Regulation 50?***

Yes.

***Q43 – Do you agree with the proposal to amend the definition of BCE in the 2013 Regulations?***

Yes.

***Q44 – Do you agree with the proposed approach to PCELSs?***

Yes.

***Q45 – Do you agree with the proposed approach to issue updated actuarial guidance on the treatment of PCELSs?***

Yes.

***Q46 – Do you agree with the proposed amendments to the Regulations?***

Yes. We believe these proposals will bring the regulations up to date and in line with some overriding legislation.

***Q47 – Do you have any comments on the proposals in this chapter?***

We applaud the spirit of the proposals but clarity on detail is important. We agree with the loosening of the five year refund rules but not that a member should lose their right to a refund if not paid before age 75. We remain concerned about the disruption and administrative impact of implementing the proposals.

## **Administrative impact of proposals**

### ***Q48 – Do you have any comments about the impact the combined proposals in this document will have on administration?***

We understand the good intentions of the proposals from which will result in positive outcomes for some members and survivors. However, we expect there will be a significant impact on administrators who have limited and overstretched resources. Administering Authorities are already struggling to keep up with other large/complex pension projects, often driven by Government changes, such as McCloud, Pensions Dashboard, GMP reconciliation/rectification, Unitarisation, Pooling changes/Fit for the Future reform. There is also the matter of keeping pace with technological improvements in AI and automating processes/procedures and creating online workflow and interaction with both employers and members. What we need is a realistic implementation period, particularly for the retrospective aspects such as even identifying and finding survivors to pay. We will have to revisit death estates that were closed years ago and may then make no additional payments, potentially creating many complaints about lack of unnecessary interference and lack of empathy.

### ***Q49 – Are there any areas where you believe the proposals are significantly more complex and would benefit from a later implementation date?***

We think the proposals could be split into phases/stages and areas within prioritised. MHCLG should recognise some areas of change are long standing areas of inequity and retrospective that need to be addressed first. There are other proposals that, whilst important, are forward looking and can be implemented later.

### ***Q50 – Do you have any comments on the proposed approach to cost?***

Not at this stage – pension administration and payroll software costs (and third party consultancy support) can be significant but the most important aspect is the timing and cost to the Administering Authorities.

## **Public Sector Equality Duty**

### ***Q51 – Do you consider that there are any particular groups with protected characteristics who would either benefit or be disadvantaged by any of the proposals? If so, please provide relevant data or evidence.***

No.

### ***Q52 – Do you agree to be contacted regarding your response if further engagement is needed?***

Yes.

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# Governance and Compliance Statement

September 2025



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## Governance Policy Statement

### Introduction

This is the Governance Policy Statement of the East Sussex Pension Fund (the Fund). The Fund is managed by East Sussex County Council (ESCC) who is the Administering Authority (Scheme Manager) on behalf of all the relevant scheme employers. All Local Government Pension Scheme (LGPS) Funds in England and Wales are required to publish and keep under review a Governance Compliance Statement.

The Public Services Pensions Act 2013 (The Act) introduced a new framework for the governance and administration of public service pension schemes. The Act has a material impact on existing governance arrangements in the Local Government Pension Scheme (LGPS), which are enforced by changes to the LGPS regulations.

As a result of the Act, The Pensions Regulator introduced codes of practice covering specific areas relating to public sector pension schemes. The Code of Practice which previously applied to Public Service Pension Schemes, Code of Practice 14, was superseded by the General Code in March 2024.

As Administering Authority, ESCC is the designated statutory body responsible for administering the Fund on behalf of the constituent Scheduled and Admitted Bodies in the relevant area. The LGPS regulations specify that, in investing the Fund's money, regard must be given to the need for diversification and for proper advice obtained at reasonable intervals.

### Governance of East Sussex Pension Fund

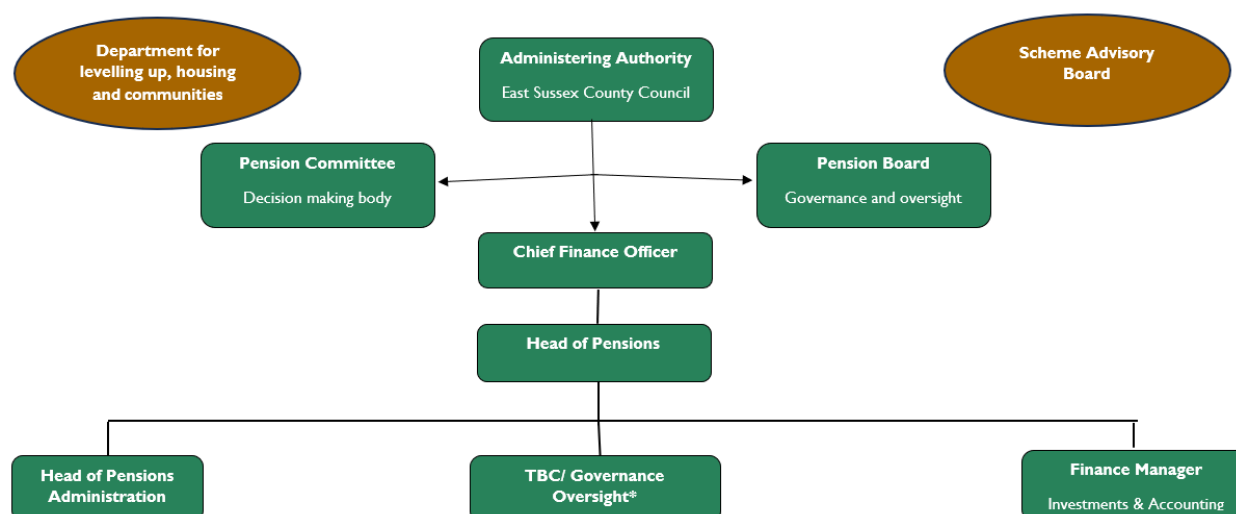
ESCC operates a Cabinet style decision-making structure. Under the Constitution, the Pension Committee has delegated authority to exercise the powers of the County Council in respect of all powers and duties in relation to its functions as the Scheme Manager and Administering Authority for the Fund, including the approval of the Fund admission agreements.

Delegations by the administering authority are published in the Council's constitution which can be accessed [here](#)

The Fund governance focuses on:

- The effectiveness of the Pension Committee, the Local Pension Board (Pension Board) and Officers to which delegated function has been passed, including areas such as decision-making processes, knowledge and competencies.
- The establishment of policies and their implementation.
- Clarity of areas of responsibility between Officers and Pension Committee/Board members.
- The ability of the Pension Committee/Board and Officers to communicate clearly and regularly with all stakeholders.
- The ability of the Pension Committee/Board and Officers to ask for the appropriate information and advice and to interpret that information in their supervision and monitoring of the Scheme in all areas.
- The management of risks and internal controls to underpin the framework.

## East Sussex Pension Fund Governance & Compliance Statement 2025



\*Senior Team structure currently under review by Head of Pensions as at August 2025.

The Overall responsibility for the governance of the Local Government Pension Scheme and for the approval of this document resides with the Pension Committee. To aid the decision making process, a decision making and responsibilities matrix has been developed.

### Responsibilities of the East Sussex Pension Committee

The Pension Committee is established as the Fund's delegated scheme manager and is responsible for arrangements for the investment, administration funding, communication, risk management and the overall governance process surrounding the Fund. It acts with the delegated authority of ESCC, which is the formal scheme manager.

The Pension Committee is responsible for setting all Fund policies including the setting of the appropriate funding target.

The Pension Committee will exercise its functions in accordance with fiduciary duties, safeguarding the interests of the beneficiaries of the Fund.

Committee Members must take decisions in accordance with their public law obligations, including the obligations of reasonableness, rationality and impartiality.

Committee Members are required to be rigorous about conflicts of interest and potential conflicts of interest, actual or perceived, as laid out in the Conflict of Interest Policy.

The Committee is subject to the statutory obligation of political balance in the membership of the Committee. Whilst all Committee Members bring with them their own knowledge and experience, political views should form no part of the consideration of issues or of the decision-making process.

Detailed terms of reference for the Committee are included as **Appendix A**.

Attendance of Committee meetings is reported in the Annual Report.

## Responsibilities of the East Sussex Pension Board

The Pension Board's primary role is to assist the Fund in ensuring that the Fund is managed and administered effectively and efficiently.

The Pension Board will provide assistance to ESCC as the Administering Authority and the LGPS Scheme Manager in securing compliance with:

- LGPS Regulations and any other legislation relating to the governance and administration of the LGPS.
- requirements imposed in relation to the LGPS by TPR.
- ensure effective and efficient governance and administration of the LGPS; and
- any other matters as the LGPS regulations may specify.

The role of the Pension Board is to provide oversight of these matters and it is not a decision-making body. The Board seeks assurance that due process is followed by the Fund.

Detailed terms of reference for the Board are included as **Appendix B**.

Attendance of Board meetings is covered in the Annual Report.



## **Operational Procedures of the Pension Committee & Pension Board**

The Pension Committee and Pension Board is advised by the Chief Finance Officer (in their capacity as section 151 Officer) and a number of external expert advisors including but not limited to the Fund Actuary, Legal Adviser, Investment Consultant and Independent Adviser, as required by the Pension Committee or Pension Board.

The Pension Committee and Pension Board receive full reports on all necessary matters as decided by the Chief Finance Officer, along with matters as requested by the Pension Committee or Pension Board for detailed reports and discussion. Provision exists for the calling of special meetings if circumstances demand.

The work plan of both Pension Board and Pension Committee is set out in a work program agreed at each quarterly meeting. This helps the stakeholders understand what will be discussed at future meetings. The Pension Board and Pension Committee consider reports on administration of the Fund, the Risk Register and any breaches of the law at all core meetings.

Agendas and reports for both the Board and Committee are published on the ESCC website at least 5 working days in advance of the meeting. All meetings are open to the public except where the Board and Committee resolve to exclude the press and public due to the consideration of information that is exempt under section 12A of the Local Government Act 1972. Meetings are held in person with some capacity for attendance online. The meetings of both the Pension Board and Pension Committee are made available to the public through a webcast.

The Pension Committee receives and reviews quarterly reports in relation to Investment matters including all its Investment Fund Managers through its Investment Consultant, Isio. The Pension Committee is also advised by an additional Independent Advisor, Linchpin Advisory Ltd, to help balance the advice providing additional challenge and debate to decision making.

The Pension Board meets around two weeks in advance of the Pension Committee to enable the Board to consider and comment on the reports due to be considered by the Committee. The Pension Board also have sight of the last Pension Committee minutes for completeness on discussions and decisions made by the Pension Committee. The Board's minutes are included as part of the Pension Committee agenda pack and the independent chair of the Board attends the Committee meetings commenting on discussion points raised by the Board on each item. This ensures the Committee takes into account the comments of scheme member and scheme employer representatives of the Board, ahead of the Committee making decisions.

The Fund produces a Funding Strategy Statement which sets out the approach to funding related matters. The strategy takes into account advice from the Fund Actuary and seeks to ensure a consistent approach to all employers, including the Council where it acts as an employer rather than the Administering Authority.

## **Frequency of meetings of the East Sussex Pension Committee**

The Pension Committee is scheduled to meet at least 4 times a year with an additional meeting scheduled to discuss the investment strategy. Attendance at these meetings is reported in the annual report.

## **Frequency of meetings of the East Sussex Pension Board**

The Pension Board is scheduled to meet at least 4 times a year. Attendance at these meetings is reported in the annual report.

## **Membership of the Pension Committee**

ESCC appoints five members to the Pension Committee in accordance with political balance provisions contained in s.15 Local Government and Housing Act 1989. These provisions require that the make-up of the Committee is in line with the political balance of the Local Authority – ESCC.

The Pension Committee is currently made up of 3 Conservative, 1 Liberal Democrat and 1 Green Councillor. All members of the Committee have voting rights.

Whilst ESCC is also a scheme employer, the appointment of the Pension Committee is under the capacity of ESCC as Administering Authority and, as such, the Committee members are not appointed as scheme employer representatives but representatives of the Administering Authority to act on behalf of all Scheme members and Scheme employers.

This is made expressly clear in the Pension Committee Terms of Reference where it states “No matters relating to East Sussex County Council's responsibilities as an employer participating within the East Sussex Pension Fund are delegated to the Pension Committee”. The members of the Pension Committee are required to consider “views expressed by employing organisations and staff representatives in relation to the operation of the East Sussex Pension Fund” but are not permitted to take decisions to benefit any particular employer ahead of the overall interests of the Fund.

The Local Government Association (LGA) obtained legal opinion from James Goudie QC in January 2015 where it was confirmed that a Pension Committee with investment decision making powers is a Finance Committee and is, therefore, restricted in its membership, excluding non-elected members onto the Committee unless there is a separate subcommittee for investment decisions, which consists solely of elected members of the Administering Authority. For the Fund, investment decisions are taken by the Pension Committee.

The current roles and responsibilities set out in the Terms of Reference of the Pension Committee, indicate that this Pension Committee is appointed to regulate and control the finance of the Fund. As such non-ESCC Councilors would not be permitted to be allowed to be members of the Pension Committee via section 102(3) of the Local Government Act 1972.

The Pension Committee is required under the 2016 LGPS Investment Regulations to take ‘proper advice’ – meaning the advice of a person whom the authority reasonably considers to be qualified by their ability in and practical experience of financial matters in formulating its investment strategy. Whilst all Committee Members bring with them their own knowledge and experience, political views should form no part of the consideration of issues or of the decision-making process. Committee Members must act as fiduciaries, safeguarding the interests of those to whom they owe their duties. Committee Members must take decisions in accordance with their public law obligations, including the obligations of reasonableness, rationality and impartiality.

## **Membership of the Pension Board**

In accordance with Regulation 107 of the LGPS Regulations 2014, a Pension Board must include an equal number of employer and member representatives with a minimum requirement of no less than four in total. In considering the size of the East Sussex Pension Board, the Administering Authority has taken into consideration number of factors including:



## East Sussex Pension Fund Governance & Compliance Statement 2025

- The size of the Fund governing arrangement and decision-making process.
- The number of scheme members, number and size of employers within the Fund and any collective arrangements in place for them to make decisions or provide input in relation to Fund matters.
- The direct and indirect cost of establishing and operating the Board.

The Pension Board consists of 7 members as follows:

- Scheme Employer representative x 3 (to represent all employers within the scheme)
- Scheme Member representative x 3 (to represent all members of the scheme; active, deferred and pensioners)
- Independent Chair x 1

Employer representatives and scheme member representatives have voting rights. The Independent Chair does not have voting rights.

In accordance with the 'Guidance on the creation and operation of Local Pension Boards in England and Wales' issued by the Scheme Advisory Board all employers and members are encouraged to make a nomination for the role of an Employer or Member Representative on the Board.

An independent chair is appointed to enhance the experience, continuity, knowledge, impartiality and performance of the Board. The chair of the Board is invited to attend Pension Committee meetings where they are able to report back on discussions and recommendations from the Board, to represent the views of the employer and member representatives into Fund decision making. All Pension Board members are welcome to attend the Pension Committee meetings.

The term of office for Board members is 4 years. This can be extended following reselection by 2 years.

### Pension Board Representatives nomination/appointment

The methodology for appointing employer and member representatives is not prescribed by the Regulations. It is therefore up to the Administering Authority to establish an appropriate process, which has been included within the Pension Board terms of reference. For details see Appendix B to this statement.

Pension Board representatives are normally appointed for a term of 4 years. Appointments are made by the Governance Committee. The Governance Committee can also agree a temporary extension of up to 2 years. In the case of multiple appointments and re-appointments the Governance Committee may choose to appoint members on a mixture of full and 2-year terms to minimise the number of vacancies needing simultaneous appointments in the future.

Where a Pension Board Representative has their term extended this can only happen once before a full appointment process will be run.

Since April 2024 it has been necessary make two appointments to the role of employer representatives.

The vacancies for employer representatives arose following the resignation of a former member in May 2024 and the retirement of another in March 2025. For the first of these vacancies, a nomination was made The Southfield Learning Trust. This nominee was approved and formally appointed to the



Pension Board by the Governance Committee at its meeting on 25 June 2024. The second of the two vacancies was filled following a nomination by Beacon Academy. This appointment was formally approved by the Governance Committee at its meeting on 15 July 2025.

There have been no member representative vacancies, since April 2024, however officers requested that the term of office for one member representative on the Board was extended. This was approved by the Governance Committee at its meeting on 15 July 2025.

### Vice Chair appointment

Meetings of the Pension Board cannot go ahead without the Chair or Vice Chair present, so there is a risk that a meeting of the Board would not be able to proceed if the Chair is unable to attend for any reason.

The Pension Board agreed that in order to maintain the balance between scheme members and employer representation that a scheme member vice chair and an scheme employer vice chair would be nominated from the existing Pension Board members, and that the role of vice chair would alternate between scheme member and employer at each meeting.

### Consultation with Employing Authorities

All employing bodies are kept informed of current pension issues, such as proposed changes in the regulations and their implications, by a regular newsletter. They are encouraged to get in touch if they have questions.

In addition to these electronic briefings, the Fund holds an annual Employers' Forum to which all scheduled and admitted bodies of the Fund are invited. The meeting held in November 2024 was held online. The forum covers both actuarial and investment issues and has historically contained a presentation from the Fund's Actuary. In 2023 Employers received information about a range of topics including admissions and cessations to and from the Fund, an update on the administration and communications of the Fund, details of the then forthcoming 2025 triennial valuation and a presentation on the payment of additional voluntary contributions to the Fund's chosen provider, Prudential.

An annual survey is carried out with employers to obtain input into the administration of the Fund.

Where there are proposed changes to the Administration Strategy or to the Funding Strategy Statement, employers are consulted prior to implementation of the revisions.

The Fund has an Employer Engagement team to specifically focus on improving the information sharing and support to scheme employers. This team works in consultation with other Fund Officers to ensure an effective, joined up service is provided.

### Consultation with Scheme Members

#### Newsletters

The Fund will promote newsletters via email which will direct members to our website to view content. The newsletter will cover current pension topics linked to the LGPS and the wider pensions industry. Further communications may be sent to members highlighting issues of importance, such as changes in Scheme regulation or operation as they arise. Active members – two newsletters a year  
Deferred and Pensioner members – one newsletter a year.

### Website

The Fund has its own website (<https://www.eastsussexpensionfund.org/>) which provides extensive information about the LGPS, guides, factsheets, forms and up to date news about the Fund's activities. The website will act as the bedrock and basis of the content of many of the Fund's other communication channels. There are specific sections dedicated to different types of members. For example...Joining the Scheme/Paying in/No longer paying in/Retirement/Pensioners.

### Annual Report and Accounts

The audited accounts of the Fund are prepared as of 31 March each year and published on our website, usually in early December. The report details the management and financial performance of the Pension Fund during the year.

### Annual benefit statement

Annual benefit statements are provided to active and deferred members by 31st August each year. The statements are made available online via 'My Pension' the Fund's member self-service website or posted to members who have opted out of electronic communications.

Active members - Statements are provided which details a pension forecast to the member's normal pension age (assuming they continue to contribute to the LGPS), a pension breakdown of benefits accrued over the last Scheme year (to 31st March) and benefits payable on death.

Deferred members - Statements are provided which detail member's current deferred pension (to 31st March) and benefits payable on death

### 'My Pension' - member self-service website

Members have online access (once registered) to their East Sussex Pension Fund records through 'My Pension' - a secure online self-service website.

Substantial improvements were made in July 2024 including:

- Simple registration and log in.
- Enhanced security including multi-factor authentication, ensuring safe access to pension information.
- Updated look and design – making the site easier to understand and navigate around.
- Online annual benefit statements (active and deferred members only) – broken down into simpler chunks using visual aids to help members understand their pension benefits.
- View the latest estimated pension valuation (active and deferred members only).
- The ability to update personal details such as email address, home address, expression of wish nomination(s) and communication preferences.
- New retirement planner - which allows members to set retirement goals and identify whether they are on track to reach them (active and deferred members only).
- A range of benefit calculators.

Active members only - The deferred benefit calculator details estimated benefits if a member leaves the LGPS. The voluntary retirement calculator details benefits payable based a specified retirement date (early, normal or late). There's also a death in service calculator.

Deferred members only – The deferred pension payment calculator details the benefits payable to members based on them taking retirement (early, normal or late). There is also a calculator which provides an illustration of death benefits payable.

- Online access to pay slips and P60s - Pensioners can view and print all pay slips\* and P60s and access a calculator showing what their pension would be worth if they were to die whilst in receipt of a pension (Pensioner members only).

\* Pensioners who have opted out of electronic communication will only receive pay slips in the post in March, April and May or when net pay changes by more than £5.

The Fund will be looking to implement further developments to 'My Pension' including allowing members to carry out administrative processes online, thereby making processes quicker, simpler and more secure.

### **Member training – active members only**

East Sussex Pension Fund offer free online Local Government Pension Scheme training to contributing members. This is promoted via Scheme employers with courses run three times per year. There are three courses available:

- 1) Introduction to the LGPS – this session covers the benefits of being in the LGPS.
- 2) Your Pension MOT – A course designed to help members keep up to date and engaged with their pension.
- 3) Preparing for retirement -This course will help members who are thinking ahead to retirement and want to know more about the process, how benefits are calculated and answers to key retirement questions.

### **Pension increase statements – pensioner members only**

A letter is made available via 'My Pension' each year to all pensioners informing them of changes to their pensions in payment (pensions are adjusted each April in line with the cost of living). For pensioners who have opted out of electronic communications, this will be sent by post. The pension increase percentage is also posted on the pensioner page of our website.

### **Prospective member communication**

The Fund works with Scheme employers to assist in the joining arrangements for the LGPS. We hold general information and literature for prospective pension Fund members on the ESPF website. There is a specific section dedicated to new joiners - Joining the Scheme. Upon joining the Fund, members are sent a welcome letter confirming their membership in the LGPS. This includes links to a Scheme guide, details of how to access 'My Pension' – our member self-service website and encourages members to complete a nomination form and consider transferring in any pensions from elsewhere within a 12-month window.

More detail on the approach to communication is covered in the separate [Communications Strategy](#), which is available on the website.

## **Working Groups**

The Fund has set up a number of working groups to help progress specific projects or areas of focus. The Pension Board are able to initiate working groups to focus on areas that would benefit from focus of the employer or member representatives.

An update is provided at each Pension Board and Pension Committee meeting to report back on the activities of each working group as appropriate.

In 2024/25 the Fund had two working groups. An investment implementation working group and an administration working group.

Each working group has its own terms of reference and membership which is firstly discussed at Pension Board and approved by Pension Committee.

The Chair of the Pension Committee is invited to join the Investment Implementation Working Group, while membership of the group is Officers and Advisers. All other working groups consist of a mix of Officers, Pension Board members and Pension Committee members.

## Conflicts of interest

**A conflict of interest is a financial or other interest which is likely to prejudice a person's exercise of their duties as a member of the Pension Board or Pension Committee. It is not permitted for a Pension Board member to have an actual conflict of interest.**

To prevent conflicts of interest members of the Pension Board, Committee and Officers are required to disclose interests. Potential conflicts are also disclosable as a standing item on the agenda for Board and Committee meetings. Interests which may lead to a potential conflict are additionally reviewed annually. The policy equally applies to advisers, suppliers and contractors who are required to disclose information about potential conflicts of interest as part of their contractual terms, with this being part of the procurement process.

Where a potential conflict of interest is identified the person with the potential, or perceived, conflict is not able to take part in discussions on the topic; excluded from voting; or otherwise has the conflict managed at the discretion of the Chair or Vice Chair as appropriate.

The Fund has a conflict of interest policy which is published on its website - [Conflict of interest policy - East Sussex Pension Fund](#). This policy is due for its triennial review in September 2027.

A register of interests is maintained for the Fund by the Democratic Services Team.



## **Knowledge and understanding**

It is a requirement that members of the Pension Board have sufficient knowledge and understanding to carry out their function. Where a new member joins the Pension Board, they are to develop this level of knowledge as soon as possible.

Whilst the law does not stipulate a timeframe for gaining this knowledge, it does for a new trustee of a private occupational scheme and an inference can be drawn that the same six-month time period should apply.

The Scheme Advisory Board's (SAB) Good Governance Report says that Officers and Committee members should also have sufficient knowledge and understanding to carry out their functions. The Fund's Training Strategy is in line with this recommendation and applies to Pension Board and Pension Committee members as well as officers. It is linked to the CIFPA Knowledge and Skills matrix.

The Fund has a Pensions Training Co-Ordinator. This Officer engages with the Chairs of both the Pension Board and Pension Committee to establish the individual needs of members, as well as liaising with Officers, to develop a detailed training plan. This plan will be in line with the published Training Policy. Details of the events individuals attend are recorded.

New members of the Pension Board and Pension Committee, along with those already in role and relevant Officers, are invited to induction training. Some of this training is provided by the Fund's legal, actuarial and investment advisors.

The Fund carries out an annual training needs analysis with Committee and Board members by means of a self-assessment questionnaire. The results of these training needs lead to the creation of the annual training plan for Board and Committee members and is being used to develop the content of training events which will be offered to Pension Board and Pension Committee members over the forthcoming year.

Training attendance is covered in detail as part of the Annual Report.

The Fund invite members of both the Pension Board and Pension Committee to a range of in-house and external training sessions and conferences to help develop their knowledge and skills relevant to their roles. In addition, officers attend training sessions and conferences in compliance with the training strategy and their professional CPD requirements to stay current. Notification of forthcoming training opportunities is provided at least once per month. The Fund have a budget assigned for training to ensure this is a priority of the Fund and sufficient resources available.

## **Interaction with Officers**

Fund Officers carry out the day-to-day work involved with running the Fund. They are divided into Accounting and Investment, Pensions Administration, Employer Engagement, Governance and Compliance and Projects. All teams are overseen by the Head of Pensions who reports to the Chief Finance Officer.

The Chief Finance Officer has two roles as the s.151 Officer for the Pension Fund and, separately, the s.151 Officer for the Council acting in its capacity as Local Authority.

Officers provide papers for both the Pension Board and Pension Committee in advance of meetings. The content consists of information to bring to the attention of the Pension Board and Pension Committee, together with information requested by the Pension Board and Pension Committee through the quarterly agreed workplan.

Where the Pension Board has concerns that the Pension Committee is not acting in line with the principles of good governance it can raise the matter with the Chief Monitoring Officer and, by extension, the Governance Committee.

### **Good Governance report**

In February 2021 the SAB published an updated version of its report following its review of good governance across the LGPS. This report covers representation, conflicts of interest and knowledge and understanding.

The SAB made several recommendations in the areas of service delivery along with compliance and improvement.

The Government has now consulted on making changes to the scheme's governance as part of the 'Fit for the future' consultation. and these proposals are largely in line with the 2021 recommendations of the SAB

### **Admissions to the Fund**

Where a new employer seeks to join the Fund a policy is in place to smooth the admission process. When the Fund becomes aware of a new employer, the new employer is sent a copy of the relevant documentation to help guide it through the process.

### **Pension Administration Strategy**

The Fund operates a Pension Administration Strategy in accordance with Regulation 59 Local Government Pension Scheme Regulations 2013. This document considers the relationship between the Fund and participating employers, setting out expectations for both the delivery of services and detailing the employers' obligations.

The Administration Strategy is kept under review and scheduled to be updated in the Autumn/Winter of 2025. After a period of consultation with all relevant stakeholders, an updated version will be presented to the Pensions Committee for formal approval.

### **Audit review of service provision**

The ESCC Internal Audit team carries out independent appraisals of the County Council's systems under the direction of the Chief Operating Officer. The Pension Fund has commissioned 70 days of audit to review various aspects of its service provision. An annual audit plan is reviewed and approved at the start of the year with all audit findings reports being considered and discussed at each Pension Board and Pension Committee meeting once the reports are finalised.

In 2024/25 the internal audit team carried out audits on Pension Fund Investments and Accounting, Administration of Pension Benefits and Pension Fund Compliance with Regulatory Requirements



## Business planning

The Fund maintains a business plan annually. At each Committee and Board meeting there is a discussion of the work to be conducted in each quarterly meeting over the next 12 months, allowing members of both the Board and Committee to request additional tasks be added as needed.

The Fund budget is approved by the Pension Committee on an annual basis.

Key Performance Indicators are reported against each quarter. The relevant documents are published as part of the Board and Committee meeting packs, which can be located at [Browse meetings - Pension Board | East Sussex County Council](#) and [Browse meetings - Pension Committee | East Sussex County Council](#).

## LGPS Asset Pooling Governance - ACCESS Pool

ACCESS (A Collaboration of Central, Eastern and Southern Shires) is made up of 11 Local Government Pension Schemes (LGPS) Administering Authorities, which are committed to working together to optimise benefits and efficiencies on behalf of their individual and collective stakeholders, operating with a clear set of objectives and principles that drives the decision-making process.



## **ACCESS Pool Governance**

The diagram above sets out the overarching ACCESS structure.

The ACCESS Pool is not a legal entity in itself but is governed by an Inter Authority Agreement signed by each Administering Authority. The Inter Authority Agreement sets out the terms of reference and constitution of ACCESS.

The formal decision-making body within the ACCESS Pool is the ACCESS Joint Committee. The Joint Committee has been appointed by the 11 Administering Authorities under s102 of the Local Government Act 1972, with delegated authority from the Full Council of each Administering Authority to exercise specific functions in relation to the Pooling of Pension Fund assets.

The Joint Committee is responsible for ongoing contract management and budget management for the Pool and is supported by the S151 Officers, Officer Working Group and the ACCESS Support Unit. The Officer Working Group are Officers identified by the Administering Authorities whose role is to provide a central resource for advice, assistance, guidance and support for the Joint Committee.

The ACCESS Support Unit (ASU) provides the day-to-day support for running the ACCESS Pool and has responsibility for program management, contract management, administration and technical support services.

The Section 151 Officer of each Pension Fund provide advice to the Joint Committee and in response to decisions made by the Joint Committee ensure appropriate resourcing and support is available to implement the decisions and to run the ACCESS Pool.

Strategic oversight and scrutiny responsibilities remain with the Administering Authorities as does all decision-making power to their own Funds asset allocation and the pooling of assets that each Fund holds within the arrangements developed by the ACCESS Pool.

At its meeting on Monday 7 March 2022, the ACCESS Joint Committee agreed proposals enabling each ACCESS Authority's Local Pension Board to send two observers, on a rotational basis, to Joint Committee meetings. In practice, observers from three ACCESS Authority Local Pension Boards at a time will attend JC meetings in person, allowing each Pension Board to be represented at least once a year.

The observers can be drawn from scheme member representatives, employer representatives or independent members. This arrangement was continued for 2024/25.

## **ACCESS Operator**

Waystone Group were appointed to provide a pooled operator service. Waystone is responsible for operating an authorised contractual scheme (ACS) along with the creation of a range of investment sub-funds to meet the needs of the investing authorities enabling them to execute their asset allocation strategies and the appointment of the investment managers to those sub-funds. The operator role is FCA regulated.

## **ACCESS Implementation Adviser for illiquid assets**

The ACCESS Pool has appointed APEX, the specialist service provider to the asset management industry, as implementation adviser for the pooling of illiquid assets, including private equity, infrastructure, private debt and real estate. As implementation adviser, APEX will provide support to the Pool in selecting individual investment opportunities and investment managers to build portfolios in a range of illiquid assets.



## Review of Governance Policy Statement

Responsibility for this document resides with the Chief Finance Officer and will be reviewed by no less frequently than annually.

This document will be reviewed if there are any material changes in the administering authority's governance policy or if there are any changes in relevant legislation or regulation.

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## Delegation of Functions

The following functions are delegated by the Administering Authority:

### Scheme Administration

**Governance Principles: Effective committee delegation; appropriate accountability; rigorous supervision and monitoring**

Including, but not exclusively or limited to, record keeping, calculation of and payment of benefits, reconciliation and investment of contributions, preparation of annual accounts, and provision of membership data for actuarial valuation purposes.

The Administering Authority has responsibility for “Scheme Administrator” functions as required by HM Revenues and Customs (HMRC) under the Finance Act 2004.

**Delegated to:**

Pension Committee (monitoring)

Chief Finance Officer (Pension Fund Governance and Investment implementation)

### Funding

**Governance Principles: Effective committee delegation; appropriate accountability; written plan policies**

Including, but not exclusively or limited to, setting of the appropriate funding target for the Local Government Pension Scheme. The Chief Finance Officer shall be responsible for maintaining the Funding Strategy Statement (FSS) and business plan. The Pension Committee shall be responsible for approving the FSS and business plan.

**Delegated to:**

Pension Committee (policy approval)

Chief Finance Officer (maintaining FSS and policy implementation)

### Investment

**Governance Principles: Effective committee delegation; appropriate accountability; written plan policies**

Including, but not exclusively or limited to, setting of an appropriate investment strategy or strategies, selection of investment managers, setting of performance benchmarks and regular monitoring of performance. The Pension Committee shall be responsible for agreeing the Investment Strategy Statement (ISS).

**Delegated to:**

Pension Committee (strategy approval, manager selection, benchmarks, monitoring)

Chief Finance Officer (Pension Fund investment implementation)

## **Communications**

### **Governance Principle: Effective information flow; written plan policies**

Including, but not limited to, setting of a communication strategy, issuing of benefit statements, newsletters, and annual report. The Pension Committee shall be responsible for agreeing the Communications Policy.

#### **Delegated to:**

Pension Committee (policy approval)

Chief Finance Officer (Pension Fund policy implementation)

## **Risk Management**

### **Governance Principle: Effective committee delegation; appropriate accountability; written plan policies**

Including the identification, evaluation and monitoring of risks inherent within the Local Government Pension Scheme. The Pension Committee shall be responsible for approving the Risk Register. The Chief Finance Officer shall be responsible for maintaining the risk register.

#### **Delegated to:**

Pension Committee (pension fund risk register approval)

Chief Finance Officer (maintaining the pension fund risk register)

Delegations by the administering authority are published in the Council's constitution which can be accessed in full [here](#).

## Compliance Statement

The Fund fully complies with the best practice guidelines on governance, issued by the Department for Levelling Up, Housing and Communities, for details see the table below.

### A - Structure

Task	Compliance status
The management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing council.	Fully Compliant
That representatives of participating LGPS employers, admitted bodies and scheme members (including pensioner and deferred members) are members of either the main or secondary committee established to underpin the work of the main committee.	Fully Compliant
That where a secondary committee or panel has been established, the structure ensures effective communication across both levels.	Fully Compliant
That where a secondary committee or panel has been established, at least one seat on the main committee is allocated for a member from the secondary committee or panel.	Fully Compliant

### B – Committee membership and representation

Task	Compliance status
That all key stakeholders are afforded the opportunity to be represented. within the main or secondary committee structure. These include: - i) employing authorities (including non-scheme employers, eg, admitted bodies). ii) scheme members (including deferred and pensioner scheme members), iii) where appropriate, independent professional observers, and iv) expert advisors (on an ad-hoc basis).	Fully Compliant
That where lay members sit on a main or secondary committee, they are treated equally in terms of access to papers and meetings, training and are given full opportunity to contribute to the decision-making process, with or without voting rights.	Fully Compliant

### C – Selection and role of lay members

Task	Compliance status
That committee or panel members are made fully aware of the status, role and function they are required to perform on either a main or secondary committee.	Fully Compliant
That at the start of any meeting, committee members are invited to declare any financial or pecuniary interest related to specific matters on the agenda.	Fully Compliant

## D – Voting

Task	Compliance status
The policy of individual administering authorities on voting rights is clear and transparent, including the justification for not extending voting rights to each body or group represented on main LGPS committees.	Fully Compliant

## E – Training/Facility time/expenses

Task	Compliance status
That in relation to the way in which statutory and related decisions are taken by the administering authority, there is a clear policy on training, facility time and reimbursement of expenses in respect of members involved in the decision-making process.	Fully Compliant
That where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or any other form of secondary forum.	Fully Compliant
That the administering authority considers the adoption of annual training plans for committee members and maintains a log of all such training undertaken.	Fully Compliant

## F – Meetings (frequency/quorum)

Task	Compliance status
That an administering authority's main committee or committees meet at least quarterly.	Fully Compliant
That an administering authority's secondary committee or panel meet at least twice a year and is synchronised with the dates when the main committee sits.	Fully Compliant
That an administering authority who does not include lay members in their formal governance arrangements, must provide a forum outside of those arrangements by which the interests of key stakeholders can be represented.	Fully Compliant

## G – Access

Task	Compliance status
That subject to any rules in the council's constitution, all members of main and secondary committees or panels have equal access to committee papers, documents and advice that falls to be considered at meetings of the main committee.	Fully Compliant

## H – Scope

Task	Compliance status
That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.	Fully Compliant

## I – Publicity

Task	Compliance status
That administering authorities have published details of their governance arrangements in such a way that stakeholders with an interest in the way in which the scheme is governed, can express an interest in wanting to be part of those arrangements.	Fully Compliant



## Appendix A

### Pension Committee terms of reference and membership

#### Membership

The East Sussex Pension Committee will be composed of five members of East Sussex County Council, determined by the Council at the Council's Annual Meeting. (N.B. When making nominations Members should have regard to the need to ensure a balance of experience and continuity).

Named substitutes are permitted for East Sussex County Council members.

#### Terms of Reference

The Pension Committee's will exercise on behalf of East Sussex County Council all of the powers and duties in relation to its functions as the Scheme Manager and Administering Authority for the East Sussex Pension Fund except where they have been specifically delegated to another Committee. The Pensions Committee will exercise its functions in accordance with the fiduciary duties of the Council as the administering authority of the East Sussex Pension Fund.

The Pension Committee will have the following specific roles and functions, taking account of advice from officers and the Fund's professional advisers:

- Ensuring the Fund is administered, managed and pension payments are made in compliance with the regulations and having regard to statutory guidance that govern the operation of the Local Government Pension Scheme from time to time, and other legislation.
- Determining the Fund's aims and objectives, strategies, statutory compliance statements, policies and procedures for the overall management of the Fund, including but not limited to funding, investment, administration, communication and governance.
- Determining how the various administering authority discretions are operated for the Fund.
- Monitoring the implementation of all Fund policies and strategies on an ongoing basis.
- In relation to the LGPS ACCESS Pension Fund Pool:
  - Considering pooling matters including recommendations made by the ACCESS Joint Committee;
  - determining the transition of the assets held by East Sussex Pension Fund in relation to the Pool and the funds or sub-funds operated by the Operator;
  - recommending to the Governance Committee a member of the East Sussex County Council Pension Committee to the Joint Committee as and when required, having regard to the advice of the Head of Pensions;
  - appointing an East Sussex County Council officer to working groups such as the Officer Working Group as and when required;

- advising the representative on the Joint Committee and Officer Working Group on such matters as may be required;
  - monitoring the performance of the LGPS ACCESS Pool and its Operator and recommending actions to the ACCESS Joint Committee, Officer Working Group or ACCESS Support Unit, as appropriate;
  - receiving and considering reports from the LGPS ACCESS Joint Committee, Officer Working Group and the Operator;
  - undertaking any other decisions or matters relating to the operation or management of the LGPS ACCESS Pool as may be required, including but not limited to appointment, termination or replacement of the Operator and approval of the strategic business plan.
- Making arrangements for actuarial valuations, ongoing monitoring of liabilities and undertaking any asset/liability and other relevant studies.
- Making decisions relating to employers joining and leaving the Fund. This includes approving which employers are entitled to join the Fund, and any requirements relating to their entry, ongoing monitoring and the basis for leaving the Fund.
- Agreeing the policy for exit credits and terms on which employers may leave the Fund.
- Approving decisions on cessations, post cessation arrangements, guarantees and bonds.
- Agreeing the terms and payment of bulk transfers into and out of the Fund.
- Ensuring robust risk management arrangements are in place, considering and making recommendations in relation to the internal audit strategy and internal audit report pertaining to the management of the fund and reviewing its findings.
- Agreeing the Fund's annual business plan and annual and medium term budgets, and monitoring progress against them.
- Selection, appointment and dismissal of the Fund's advisers and suppliers, including actuary, benefit consultants, investment consultants, global custodian, fund managers, lawyers, pension fund administrator, Additional Voluntary Contribution providers and independent professional advisors. This includes determining the services to be provided and monitoring those services, including where this relates to shared services arrangements.
- Agreeing the Fund's Knowledge and Skills Policy and monitoring compliance with the policy.
- Agreeing the Administering Authority responses to consultations on LGPS matters and other matters where they may impact on the Fund or its stakeholders.
- Considering views expressed by employing organisations and staff representatives in relation to the operation of the East Sussex Pension Fund.
- Considering the Fund's financial statements and approving an Annual Report on the activities of the Fund in line with legislation and guidance.



- Considering the Breaches Register at every quarterly Pension Fund meeting and reviewing recommendations from the Pensions Board.



Notes: 1. No matters relating to East Sussex County Council's responsibilities as an employer participating within the East Sussex Pension Fund are delegated to the Pension Committee.

Notes: 2 As a Non-Executive Committee, no matters relating to the Pension Fund's non-executive responsibilities as Scheme Manager are delegated to an Executive of East Sussex County Council.

Notes: 3 The Committee's primary contacts will be the Head of Pensions, Chief Finance Officer and its retained advisors

### Training

The East Sussex Pension Fund has a dedicated Knowledge and Skills Policy which applies to all members of the Committee, and which includes the expectation to attend regular training sessions in order they may maintain an appropriate level of knowledge and skills to perform their role effectively.

## Appendix B

# Constitution and terms of reference of the East Sussex Pension Board

### Introduction

The Pension Board is established by East Sussex County Council (ESCC) under the powers of Section 5 of the Public Services Pensions Act 2013 and regulation 106 of the Local Government Pension Scheme (LGPS) Regulations 2013 ("the LGPS regulations" which includes such regulations as govern the Local Government Pension Scheme from time to time). ESCC is the scheme manager (and administering authority) to the East Sussex Pension Fund (ESPF).

The East Sussex Pension Fund Board was appointed by East Sussex County Council (the Scheme Manager and Administering Authority to East Sussex Pension Fund) as its Local Pensions Board in accordance with section 5 of the Public Service Pensions Act 2013 and Part 3 of the Local Government Pension Scheme Regulations 2013. As such, Parts 4 Rules of Procedure (Council's procedural Standing Orders) sub-parts 1, 2, 3, 4, 5 and 6 of the Constitution of East Sussex County Council do not apply to this Pension Fund Board unless expressly referred to within and permitted by these Terms of Reference and Rules of Procedure.

The Board will exercise all its powers and duties in accordance with legislation and these Terms of Reference and Rules of Procedure. The Board shall have the power to do anything which is considered to facilitate, or is conducive or incidental to, the discharge of its functions.

### Powers of the Pension Board

The Pension Board will exercise all its powers and duties in accordance with the law and this Terms of Reference.

ESCC considers this to mean that the Pension Board is providing oversight of these matters and, accordingly, the Pension Board is not a decision-making body in relation to the management of the Fund but instead can make recommendations to assist in such management. The Fund's management powers and responsibilities which have been, and may be, delegated by ESCC to committees, sub-committees and officers of ESCC, remain solely the powers and responsibilities of those committees, subcommittees and officers including but not limited to the setting and delivery of the Fund's strategies, the allocation of the Fund's assets and the appointment of contractors, advisors and fund managers. The Pension Board operates independently of the ESPF Pension Committee.

The Pension Board will ensure that in performing their role it:

- is done effectively and efficiently and
- complies with relevant legislation and
- is done by having due regard and in the spirit of The Pensions Regulator's Code of Practice and any other relevant statutory or non-statutory guidance.

## Objectives and role of the Pension Board

The role of the Pension Board is defined by the LGPS Regulations as being to assist the Scheme Manager (ESCC as Administering Authority) to:

- secure compliance with the LGPS Regulations and any other legislation relating to the governance and administration of the LGPS and requirements imposed in relation to the LGPS by the Pensions Regulator;
- ensure the effective and efficient governance and administration of the LGPS. This should be interpreted as covering all aspects of governance and administration of the LGPS including funding and investments.

In doing this the Pension Board:

- Shall assist the Scheme Manager with such matters as the LGPS Regulations and guidance may specify.
- Shall seek assurance that due process is followed with regard to the Pension Committee and may review any decisions made by or on behalf of the Scheme Manager or action taken by the Scheme Manager.
- Shall seek assurance that any identified issues raised by Pension Board members are considered.
- Shall comment on and assist in identifying and managing breaches of the law in relation to ESPF matters.
- Shall make representations and recommendations to the Pension Committee as appropriate and shall consider and, as required, respond to any Government / Responsible Authority or Scheme Advisory Board requests for information or data concerning the Fund.
- May also undertake other tasks, including (but not limited to):
  - assisting the Pension Committee by reviewing aspects of the performance of the ESPF – for example by reviewing the risk management arrangements within ESPF (although the Pension Committee will remain accountable for risk management);
  - reviewing administration standards or performance or review efficacy of ESPF member and employer communications;
  - reviewing published policies to ensure they remain fit for purpose and are complete;
  - reviewing ESPF annual reports; or being part of any consultation process with the purpose of adding value to that process based on, for example, their representation of employers and ESPF members;
  - discussing strategic matters such as communications where requested by the Pension Committee.
- Will produce an annual report which is shared with the Scheme Manager. It will outline the work of the Pension Board throughout the scheme year, which will help to –
  - inform all interested parties about the work undertaken by the Pension Board
  - assist the Pension Board in reviewing its effectiveness and identifying improvements in its future operations.
- Shall carry out an annual self-assessment of the effectiveness of the Pension Board, and produce a report on this which will be shared with the Pension Committee.
- Must provide a record of each meeting to the following Pension Committee meeting and may make reports and recommendations to the Pension Committee insofar as they relate to the role of the Pension Board.
- Shall assist in considering whether the East Sussex Pension Fund is being managed in accordance with the LGPS and other relevant legislation, including consideration of cases that have been referred to the Pension Regulator and/or the Pension Ombudsman; recommending changes to processes, training and/or guidance where necessary.
- Shall monitor administrative processes and support continuous improvements.

- Will ensure the scheme administrator supports employers to communicate the benefits of the LGPS to scheme members and potential new members.

## Membership

The Pension Board shall consist of:

- 3 employer representatives - employer representatives that can offer the breadth of employer representation for the ESPF.
- 3 scheme member representatives – member representatives nominated to ensure a broad representation of scheme membership (active, deferred, and pensioners). Two will be nominated by the trade unions, and the rest will be drawn from the total ESPF active, deferred and pensioner membership.
- Independent Chair - The Pension Board shall be chaired by an Independent Chair.

Substitutes for Board members are not permitted.

The Quorum of the Board will be 3 Members, excluding the Independent Chair. To be quorate the meeting must include at least one employer representative and one scheme member representative.

The Board has the power to set up working groups

## Appointment of members of the Pension Board

The appointment process has been approved by the Governance Committee.

All appointments to the Pension Board shall be by the Governance Committee under delegated authority from the County Council, including the Independent Chair.

The Vice Chair will alternate between scheme member representatives and employer representatives at each meeting. The Vice Chairs will be nominated from the existing Board members whenever one of the existing Vice Chairs is replaced.

Appointments to the Pension Board shall be managed, wherever possible, so that appointment and termination dates are staggered such that there remains continuity for one meeting to the next.

## Term of office

Employer representative appointments will expire after a 4-year period from their date of appointment by the Governance Committee or such time as resolved by the Governance Committee. The Governance Committee may agree an extension to this period by up to a further 2 years after which there shall be a further appointment process. Reappointment of existing members is permitted. Appointment will automatically cease if the individual is no longer in the employment of that employer, no longer holds office in relation to that employer or is no longer an elected member of that employer, as appropriate.

Scheme member representative appointments will expire after a 4-year period from their date of appointment by the Governance Committee or such time as resolved by the Governance Committee. The Governance Committee may agree an extension to terms of office up to a further 2 years after which there shall be a further appointment process. Reappointment of existing

members is permitted. Appointment will automatically cease if the individual is no longer a trade union representative or representative of ESPF members (in accordance with the criteria set by the Governance Committee).

The Independent Chair appointment will expire after a period of 4 years from their date of appointment by the Governance Committee. The Governance Committee may agree an extension to terms of office by up to a further 2 years after which there shall be a further appointment process. Reappointment of the Independent Chair is permitted.

Term dates may not be exact due to the period of the appointment process. The term of office may therefore be extended for this purpose or other exceptional circumstances by up to three months with the agreement of the Governance Committee.

A Pension Board member who wishes to resign shall submit their resignation in writing to the Independent Chair. A suitable notice period must be given, of at least 1 month, to enable a replacement member to be found.

The role of the Pension Board members requires the highest standards of conduct and the ESCC Code of Conduct for Members will apply to the Pension Board's members. ESCC Standards Committee will monitor and act in relation to the application of the Code.

Poor performance will result in corrective action being taken, and in exceptional circumstances the removal of the Pension Board member by the Governance Committee.

Removal of the Independent Chair will be by the Governance Committee.

## Chairing

It will be the role of the Chair to:

- Settle with officers the agenda for a meeting of the Pension Board.
- Manage the meetings to ensure that the business of the meeting is completed.
- Ensure that all members of the Pension Board show due respect for process and that all views are fully heard and considered.
- Strive as far as possible to achieve a consensus as an outcome.
- Ensure that the actions and rationale for decisions taken are clear and properly recorded.
- Uphold and promote the purpose of the Pension Board, and to ensure that meetings are properly conducted and professional advice is followed.
- To use their expertise and experience and liaise with the Head of Pensions to arrange such advice as required subject to agreement by the Head of Pensions on such conditions as that officer determines.
- Sign the minutes of each Pension Board meeting following approval by the Board.
- Prepare with the Head of Pensions an appropriate budget for the Pension Board's consideration before being formally considered by the Scheme Manager along with the ESPF Annual Budget.

## East Sussex Pension Fund Governance & Compliance Statement 2025

- Liaise with officers and advisors on the requirements of the Pension Board, including advanced notice for Scheme Manager officers to attend and arranging dates and times of Board meetings.
- Provide guidance on all points of procedure and order at meetings having regard to advice from officers.

Other tasks which may be deemed appropriate by the Scheme Manager for the Independent Chair of the Pension Board.

- Liaise with the Chair of the Pension Committee as deemed appropriate.

Other tasks that may be requested by the Board, within the remit of these Terms of Reference and subject to agreement with the Head of Pensions.

- Annually review and report on the activities of the Pension Board.
- Commission a triennial review of LGPS & public pension fund non-statutory best practice guidance (referencing the SAB & other relevant bodies deemed relevant by the Board) which then brings recommendations to the Committee (when appropriate) for amendments to the operation of the Fund. Support arrangements and administration.

ESCC officers will provide governance, administrative and professional support to the Pension Board, and ESCC Member Services will provide secretariat support to the Pension Board, and as such will ensure that:

- Meetings are timetabled for at least four times per year.
- Adequate facilities are available to hold meetings.
- An annual schedule of meetings is produced.
- Suitable arrangements are in place to hold additional meetings if required.
- Papers are distributed 5 clear working days before each meeting except in exceptional circumstances.
- Draft minutes of each meeting are normally circulated 7 working days following each meeting including all actions, decisions and matters where the Pension Board was unable to reach a decision will be recorded.
- Final reports, minutes and agendas relating to the Pension Committee are shared appropriately with the Board.

The records of the meetings may, at the discretion of the Board, be edited to exclude items on the grounds that they would either involve the likely disclosure of exempt information as specified in Part 1 of Schedule 12A of the Local Government Act 1972 or it being confidential for the purposes of Section 100A (2) of that Act.

The minutes and any consideration of the Pension Board shall be submitted to the Pension Committee.

The Pension Board must comply with the General Data Protection Regulation and the Scheme Manager's data protection policy. It must also adhere to the Scheme Manager's requirements, controls and policies for Freedom of Information Act compliance.

## **Expert advice and access to information, including the Pension Committee**

The Pension Board will have access to professional advice and support provided by officers of ESCC and, via them and where appropriate, advisers to the ESPF. In addition, Pension Board members will receive the final reports, minutes and agendas relating to the Pension Committee, save where the Committee expressly decides otherwise such as where an item is exempt, although this is anticipated to be in exceptional cases.

Insofar as it relates to its role, the Pension Board may also:

- Request information and reports from the Pension Committee or any other body or office responsible for the management of the Fund.
- Examine decisions made or actions taken by the Pension Committee or any other body or officer responsible for the management of the Fund.
- Access independent professional advice from actuaries, other independent advisers, and investment managers as required, where there are major matters being considered, i.e., investment strategy, triennial valuation, etc.
- Access to professional advice regarding non-major decisions will require the approval of the Pension Committee for additional resources.
- Attend all or any part of a Pensions Committee meeting unless they are asked to leave by the Committee or as a result of a conflict of interest.

ESCC officers will provide such information as is requested that is available without incurring unreasonable work or costs.

## **Knowledge and Skills**

Pension Board members will be required to have the ‘capacity’ to carry out their duties and to demonstrate a high level of knowledge and of their role and understanding of:

- The scheme rules (i.e., regulations).
- The schemes administration policies.
- The Public Service Pensions Act (i.e., being conversant with pension matters relating to their role) and the law relating to pensions.

A program of updates and training events will be organised by ESPF officers.

It is for individual Pension Board members to be satisfied that they have the appropriate degree of knowledge and understanding to enable them to properly exercise their functions as a member of the Pension Board.

In line with this requirement, Pension Board members are required to be able to demonstrate their knowledge and understanding and to refresh and keep their knowledge up to date. Pension Board members are therefore required to:



- Participate in training events (a written record of relevant training and development will be maintained).
- Undertake a personal training needs analysis or other means of identifying any gaps in skills, competencies and knowledge relating to Pension Board matters.
- Comply with the Fund's Knowledge and Skills Policy insofar as it relates to Pension Board members.

## Standards and Conflicts of Interest

A conflict of interest is defined in the Public Service Pensions Act 2013 as: “in relation to a person, means a financial or other interest which is likely to prejudice the person’s exercise of functions as a member of the Pension Board (but does not include a financial or other interest arising merely by virtue of membership of the scheme or any connected scheme).”

The Public Service Pensions Act 2013 requires that members of the Pension Board do not have conflicts of interests. As such all members of the Pension Board will be required to declare any interests and any potential conflicts of interest in line with legal requirements in the Public Service Pensions Act 2013 and the Pension Regulator’s code. These declarations are required as part of the appointment process, as well as at regular intervals throughout a member’s tenure.

The Pension Board shall adopt a policy for identifying and managing potential conflicts of interest.

Members of the Pension Board must provide, as and when requested by the Scheme Manager, such information as the Scheme Manager requires to identify all potential conflicts of interest and ensure that any member of the Pension Board or person to be appointed to the Pension Board does not have a conflict of interest at appointment or whilst a member of the Pension Board.

Part 5(1) of ESCC Code of Conduct shall apply in relation to the standards of conduct of Pension Board members, insofar as they can be reasonably considered to apply to the role of members of the Board, including the non-disclosure of confidential information.

Members of the Pension Board must adhere to the requirements of the ESPF Procedure for Monitoring and Reporting Breaches of the Law and should be mindful of the individual legal requirements in Section 70 of the Pensions Act 2004 relation to reporting breaches of the law in relation to ESPF matters.

## Access to the Public and Publication of Pension Board information

Members of the public may attend the Pension Board meeting and receive papers, which will be made public in accordance with the Access to Information Rules in ESCC's Constitution.

In accordance with the Public Service Pensions Act 2013, ESCC is required to publish information about the Pension Board and up-to-date information will be posted on the ESPF website showing:

- a. Names of and information regarding the Pension Board members
- b. How the scheme members and employers are represented on the Pension Board
- c. Responsibilities of the Pension Board as a whole
- d. Full terms of reference and policies of the Pension Board and how it operates.



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In accordance with good practice, ESPF may publish other information relating to the Pension Board as considered appropriate from time to time, and which may include:

- a. the agendas and meeting records
- b. training and attendance logs
- c. an annual report on the work of the Pension Board.

All or some of this information may be published using the following means or other means as considered appropriate from time to time:

- a. on the ESPF website – [East Sussex Pension Fund](#)
- b. on the ESCC website – <http://www.eastsussex.gov.uk>,
- c. within the ESPF Annual Report and Accounts,
- d. within the ESPF's Governance Policy and Compliance Statement.

Information may be excluded on the grounds that it would either involve the likely disclosure of exempt information as specified in Part 1 of Schedule 12A of the Local Government Act 1972 or it being confidential for the purposes of Section 100A(2) of that Act.

## Expense reimbursement, remuneration and allowances

All Pension Board members will be entitled to claim travel and subsistence allowances for attending meetings relating to Pension Board business (including attending training) at rates contained in the Members' Allowances Scheme in the ESCC's Constitution. In addition, scheme member representatives may be paid an allowance equivalent to the co-optees' allowance in the ESCC Scheme of Members' Allowances in relation to time spent at meetings and training events relating to their role as a ESPF Pension Board member, unless they are attending they are attending during their normal working day without a reduction in pay or leave (in which case no allowance will be paid for that time). The Independent Chair's remuneration will be approved by the Governance Committee following consultation with the Chair of the Pension Committee. All costs will be recharged to the Fund.

## **Accountability**

The Pension Board collectively and members individually are accountable to the Scheme Manager (ESCC), the Pensions Regulator, and the Local Government Pension Scheme Advisory Board. The Local Government Pension Scheme Advisory Board will advise the Responsible Authority (in the case of the LGPS the MHCLG) and the Scheme Manager. The Pensions Regulator will also be a point of escalation for whistle blowing or similar issues.

## **Decision Making Process**

Employer representatives and scheme member representatives have voting rights, albeit the Pension Board is expected to operate on a consensus basis. The Independent Chair does not have voting rights.

In the event of an equal number of votes being cast for or against a proposal there shall be no casting vote, but the proposal shall be considered to have been rejected. The Scheme Manager shall be alerted when a decision is reached in this manner.

## **Reporting and escalation**

The Pension Board must provide minutes of each meeting to the following Pension Committee meetings and may make reports and recommendations to the Pension Committee insofar as they relate to the role of the Pension Board. Any such reports or recommendations must be provided in advance of the next Pension Committee meeting to the S151 Officer.

An annual report of the Pension Board must be provided to the S151 Officer and the Pension Committee and be published in the Fund's Annual Report and Accounts.

Where the Pension Board considers that a matter brought to the attention of the Pension Committee has not been acted upon or resolved to their satisfaction, the Pension Board will provide a report to the Monitoring Officer.

The Breaches Register will be presented at each meeting and considered by the Pension Board who may make recommendations to the Pension Committee.

## **Review, Interpretation and Publication of Terms of Reference and Rules of Procedure**

These Terms of Reference have been agreed by ESCC. The Council will monitor and evaluate the operation of the Pension Board and may review these Terms of Reference and Rules of Procedure from time to time.

These Terms of Reference are incorporated into the Council's Constitution and published on the Council's website and may be amended by the same means as permitted for the Constitution. It will also form part of the ESPF's Governance Policy and Compliance Statement which will be made available in accordance with the requirements of the LGPS Regulations.

**Report to:** Pension Board

**Date:** 11 September 2025

**By:** Chief Finance Officer

**Title:** Employer Engagement and Communications Report

**Purpose:** This report provides an update on activities by the Employer Engagement team and on Fund Communications activities.

**RECOMMENDATION:**

The Pension Board is recommended to note employer engagement and communications updates detailed in this report.

**1. Background**

- 1.1 This report is presented to the Pension Board to provide an update on employer engagement tasks that directly affect the East Sussex Pension Fund (the Fund) and Communications activity of the Fund.
- 1.2 Scheme Employers (scheduled and admitted bodies) must pay both employee and employer contributions to the Fund monthly, no later than 19 days of the following month in which the contributions were deducted from payroll. The contribution rates for members are set annually by the Local Government Pension Scheme (LGPS) and are based on salary bandings. The Employer contribution rate is set at the triennial valuation and recorded in the rates and adjustment certificate issued by the Fund’s actuary or set on admission to the Fund agreed by the Fund’s actuary.
- 1.3 The Fund has a [Communications Strategy](#) (updated in June 2025) which defines the main methods of communication provided for key stakeholders. This includes making the best use of technology where appropriate, to provide quicker and more efficient communications for the Fund’s stakeholders. The Fund will ensure that communication methods are accessible to all.

**2. Employer Engagement Activities**

**Employer Contributions**

2.1 Employer contributions - The below table sets out the number of late payments received after 19 days have elapsed following contributions deducted from payroll between August 2024 and June 2025.

	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	April	May	June
Payments Due	146	151	151	151	152	155	155	154	148	151	151
Late Payment	3	2	5	4	4	1	4	1	0	0	1
Existing employers late	3	2	3	4	4	1	4	1	0	0	1
New employers late	0	0	2	0	0	0	0	0	0	0	0

- 2.2 From August 2024 until June 2025 there have been just 25 late payments of contributions out of 1,665 expected payments and in the last quarter only one late payment.
- 2.3 Revised LGPS31 forms with updated contribution rates were sent to all employers in April 2025 highlighting the payment due date. Subsequent email reminders have also been sent to employers in the subsequent months.

## **Late payment(s) for June 2025**

2.4 Regarding the late payment in June 2025:

- After querying with the employer, they advised that the person responsible for this task had recently gone onto long term sick leave, they have now delegated it to another colleague to avoid any further late payments.

## **Scheme Member Training**

2.5 The Employer Engagement team will be repeating the 3-part member level training series in October 2025. Each of the 3 sessions will be run twice.

The booking levels are currently (as of 15 August 2025)

1. Introduction to LGPS - 35
2. Your Pension MOT - 50
3. Preparing for Retirement – 84

## **I-Connect support**

2.6 The Employer Engagement team continue to support and assist the I-Connect team with the preparation work required for onboarding new employers onto I-Connect, however, there has been a natural pause of the actual onboarding part as officers wait for the annual benefit statements to be produced, the onboarding of employers will recommence in September 2025.

## **Communications Update**

### **3. Scheme Member training**

3.1 The communications team continue to work closely with the Employer Engagement team in putting together a booking process, promotion via Scheme employers, scripts, YouTube videos and sending out and collating feedback.

3.2 All slide decks used during Scheme Member training sessions have been updated to:

- Reflect 2025/26 limits,
- tweak content based on feedback from earlier sessions in January and May, and
- include new Local Government Association (LGA) presentation content launched in August 2025 (where necessary)

3.3 [Training dates for 2026](#) have been agreed and added to the website.

### **4. East Sussex Pension Assistant (ESPA)**

4.1 The Communications team have been heavily involved in pulling together a knowledge base of over 200 questions and answers to test as part of the new digital assistant (which will sit on designated pages of the website as an automated tool to support members). The next steps in the project include user acceptance testing.

### **5. Employer Forum**

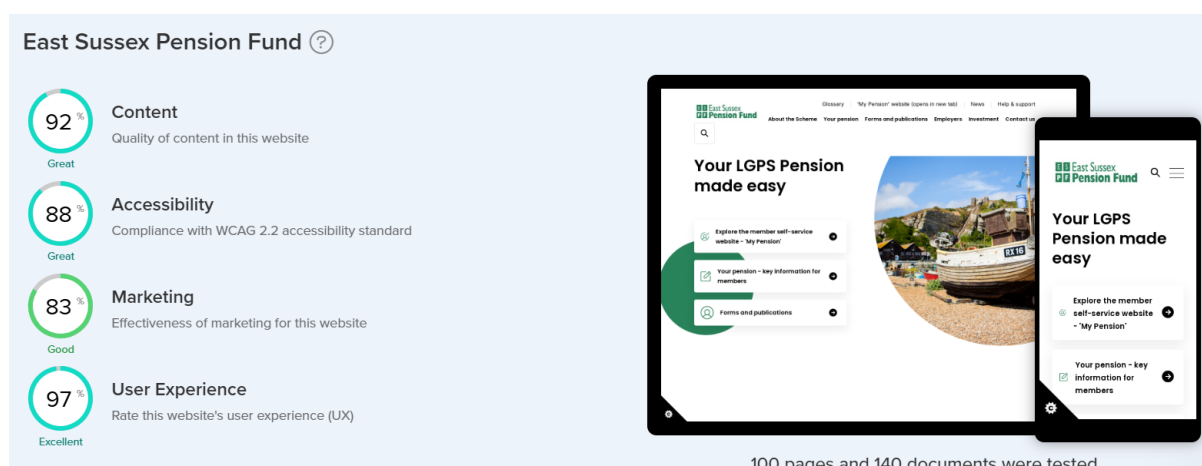
5.1 The agenda for the 2025 Employer Forum (face to face) has been finalised. To date there are approximately 63 registrations (including Fund staff) but have until mid-November to promote further.

## 6. East Sussex Pension Fund main website

6.1 The website continues to be updated with relevant and engaging information for members and employers.

6.2 The following guides have been updated: HR guide, Payroll guide, annual allowance fact sheet, Councillors' guide (all available via the 'Forms and publications' section of the ESPF website).

6.3 The Communications team continue to monitor the website (including all PDF documents) to ensure accessibility guidelines are adhered to. The primary tool used to manage accessibility is 'Silktide' which is a web governance platform that helps improve website quality and user experience by identifying and fixing issues related to accessibility, content, and marketing. It offers a comprehensive suite of tools for automated testing, analytics, and data privacy, including features like accessibility checks against Web Content Accessibility Guidelines (WCAG) standards, content quality analysis, and General Data Protection Regulation (GDPR) compliance monitoring. A snapshot of the Silktide results (as of 15 August 2025) can be shown below:



6.4 Website analytics data are detailed in Appendix 1.

## 7 Border to Coast Pensions Partnership pooling communications

7.1 The Communications team delivered a full internal communications plan to support the 'Border to Coast' pooling preference as indicated by Committee, this included working closely with counterparts in West Sussex. Communications included:

- An internal email to all East Sussex County Council (ESCC) staff
- An email to all employers in the Fund
- Promotional call to actions on the homepage, investment and employer pages of the website
- An [official statement on the website](#) (which the above linked to)

## 8 Annual Benefit Statements 2025

8.1 All communications (letters and/or emails) have been drafted for the 2025 Annual Benefit Statement (ABS) exercise. This year there are 24 individual templates to reflect members' McCloud status (for example if they don't qualify). Where possible officers will point members towards the online version housed on 'My Pension' – the member self-service website. Communications are set to be issued in the last 2 weeks of August to comply with the end of month statutory deadline.

## 9 'My Pension' - member self-service website

9.1 An updated version of the member self-service website, 'My Pension' went live on the 17 July 2024. The launch of this updated functionality is helping transform the way

members access and engage with vital pension information online. The Fund will continue to promote ‘My Pension’ through newsletters, the website and through employers.

9.2 ABS will be issued in the last 2 months of August 2025. A lot of these communications point members to registering for ‘My Pension’, so it is expected the figures shown in the table below to improve.

9.3 Shown below (as of 14 August 2025) are current registration levels (excluding electronic opt outs) compared to :

Type of member	On Engage (number)	% registered for ‘My Pensions’	Old MSS % registered
Contributing	9797	45.8	51
No longer contributing	7476	34.2	46
Pensioners	7978	61.1	50
Widow/dependant	580	36.0	19

**10 Conclusion and reasons for recommendation**

10.1 The Pension Board is recommended to note the updates provided in the report.

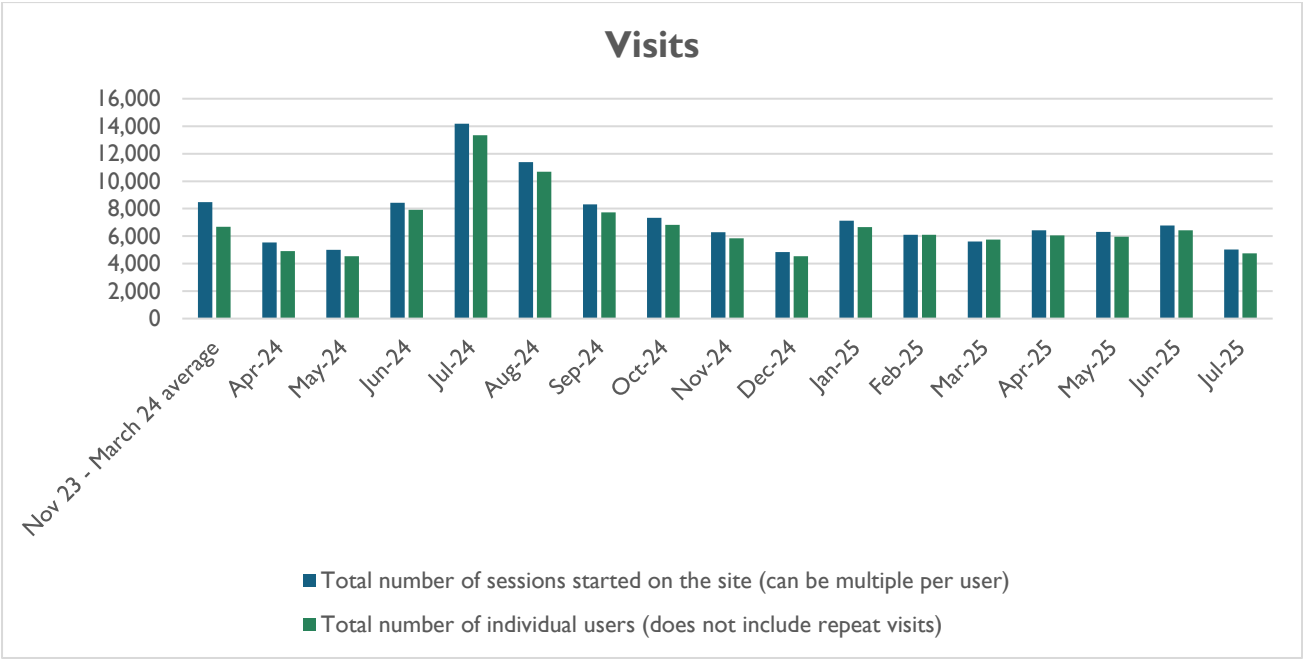
**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer: Susan Greenwood, Head of Pensions  
Email: [Susan.Greenwood@eastsussex.gov.uk](mailto:Susan.Greenwood@eastsussex.gov.uk)

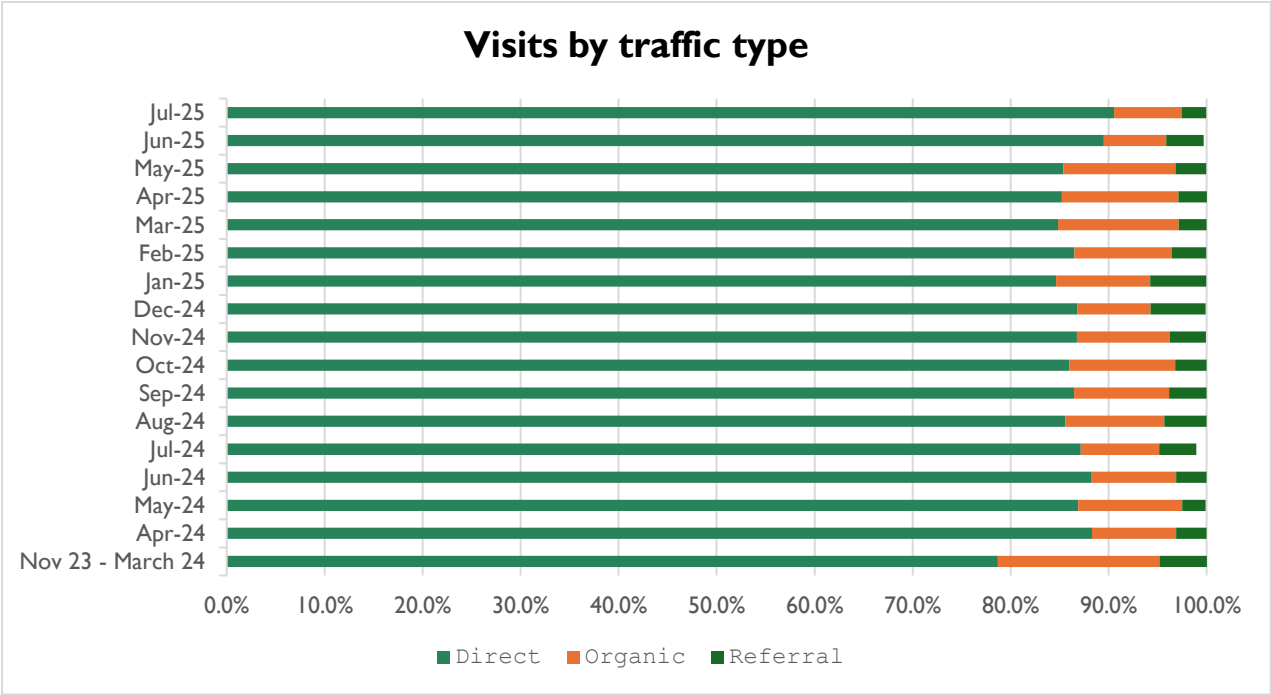


Appendix I – [East Sussex Pension Fund website](#)

Total number of visitors to the website

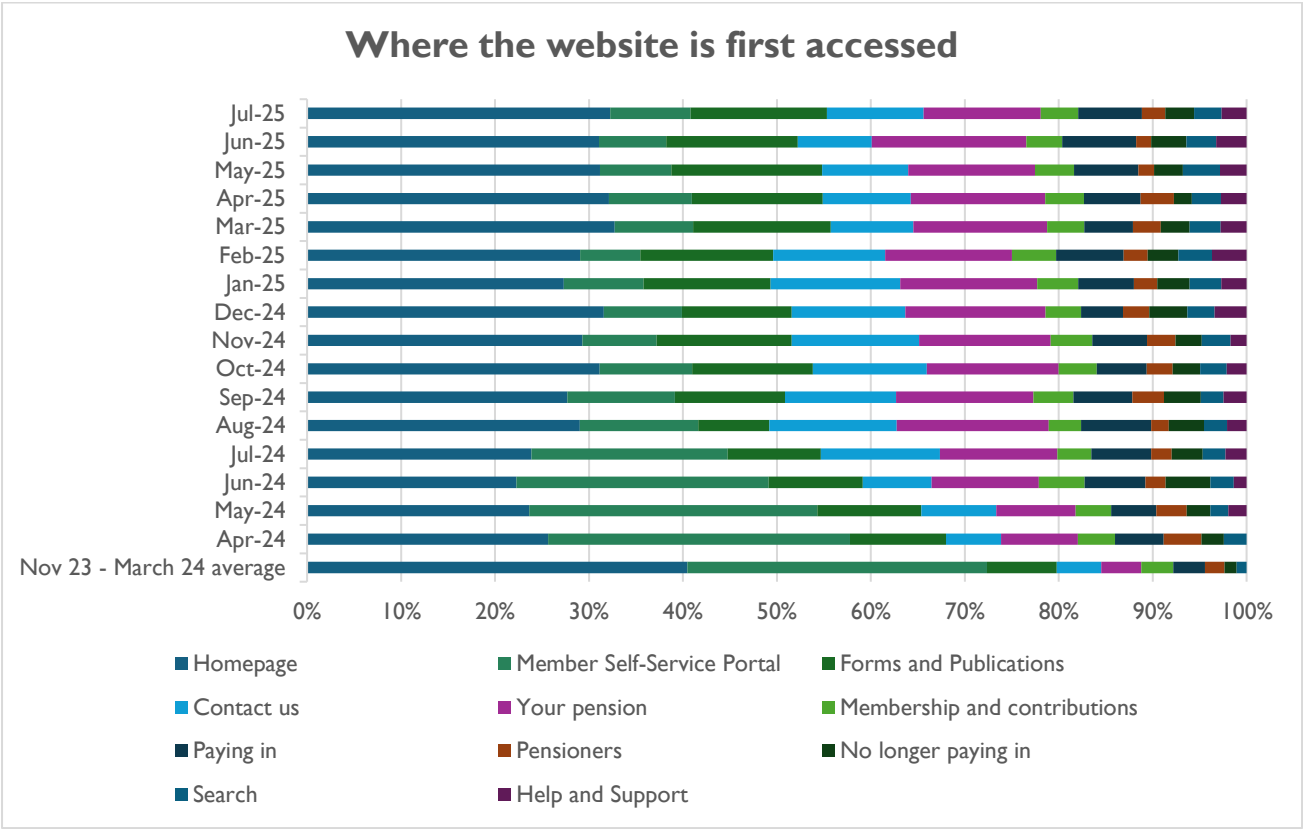


How do people reach the website

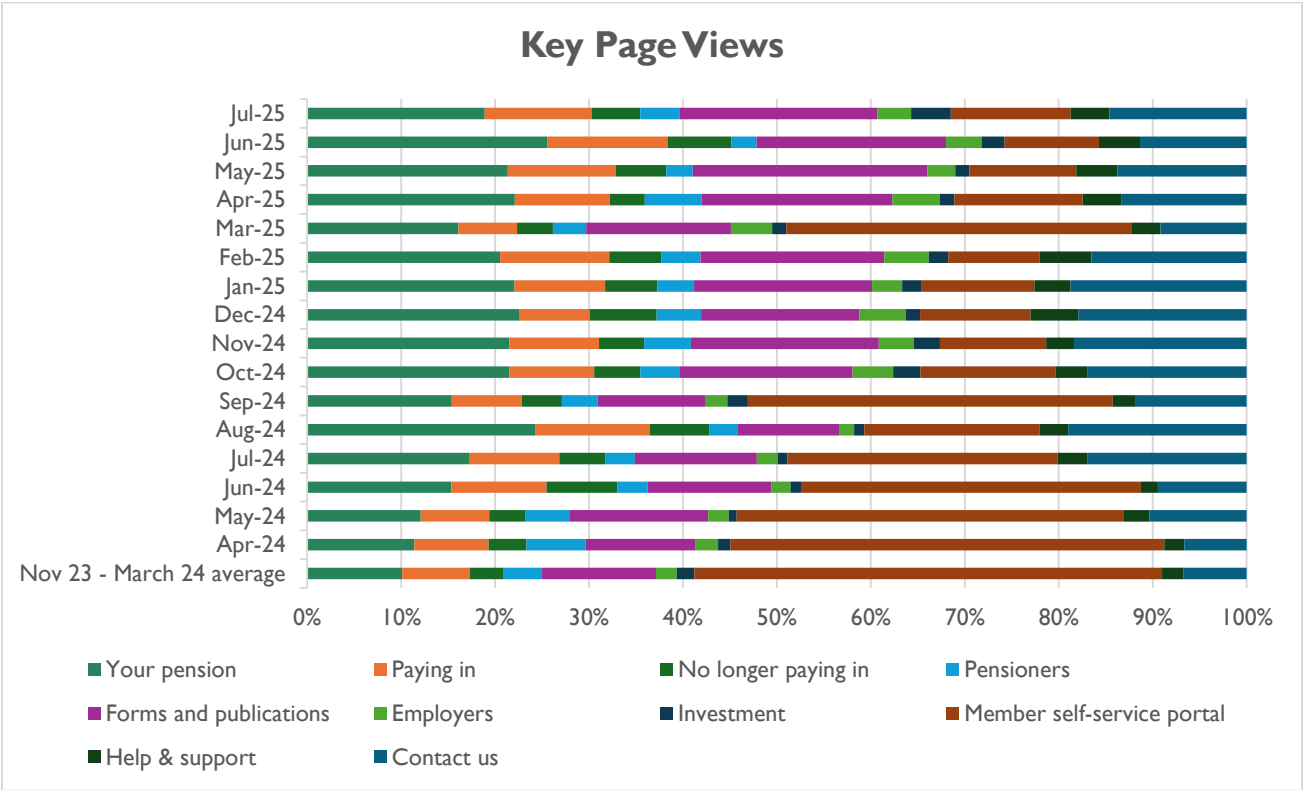


- Direct** Visited the site by typing the URL directly into their browser or clicked on links
- Organic** Visitors referred by an unpaid search engine listing, e.g. a Google.com search.
- Referral** The number of people who click external links to visit your site (for example employer intranet sites).

Where the website is first accessed



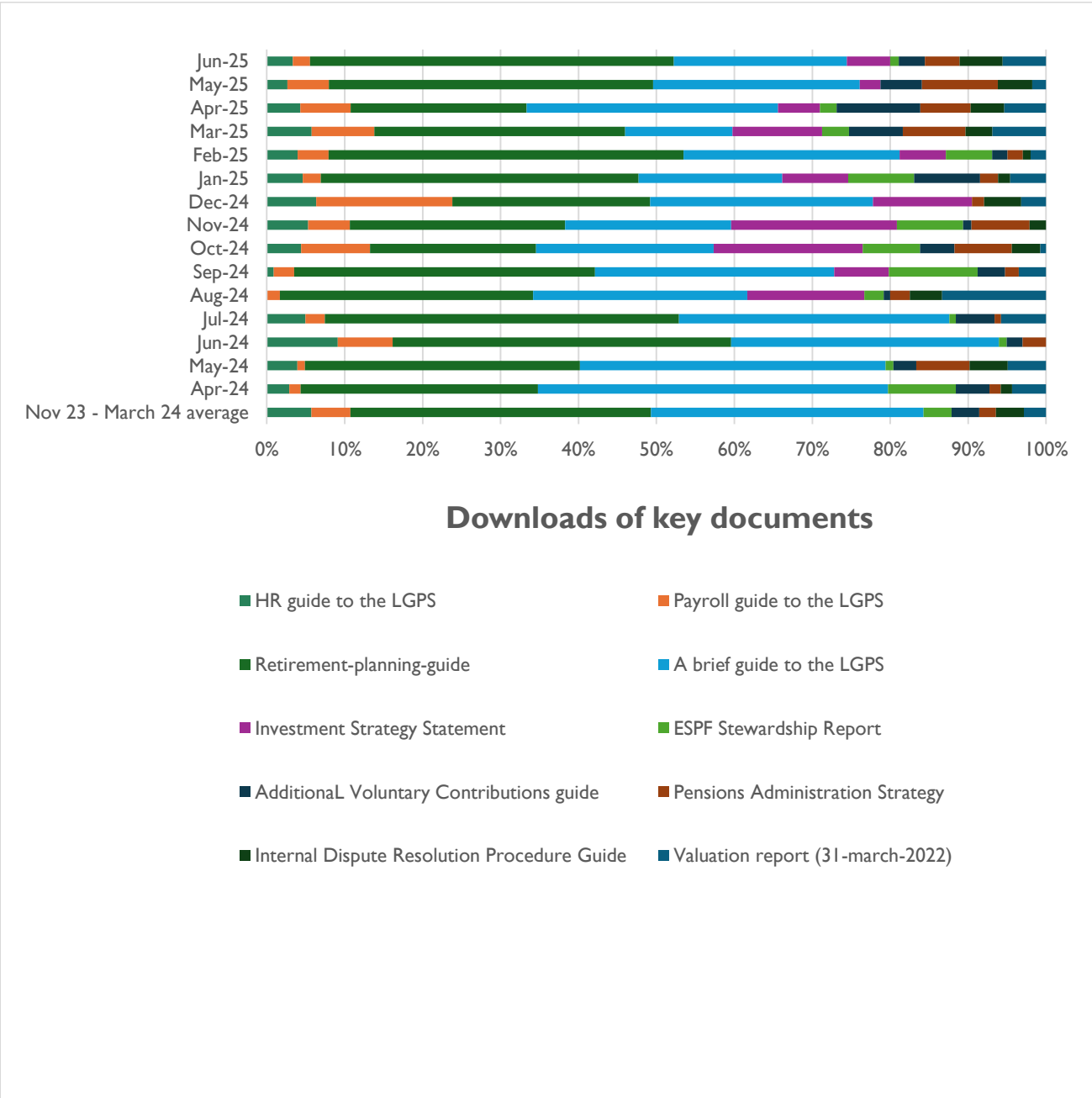
Key page views



Shown above is a graph which shows how a selection of key website pages are being used month on month.



Usage of key documents



The graph above concentrates on the main guides we promote via members and employers.

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**Report to:** Pension Board

**Date of meeting:** 11 September 2025

**By:** Chief Finance Officer

**Title:** Pension Administration - updates

**Purpose:** To provide an update to the Pension Board on matters relating to Pensions Administration activities.

## RECOMMENDATION:

The Pension Board is recommended to note the updates and make any comments for feedback to the Pension Committee.

### 1. Background

1.1 The in-house Pensions Administration Team (PAT) carries out the operational, day-to-day tasks on behalf of the members and employers of the East Sussex Pension Fund (the Fund, ESPF) and for the Administering Authority. They also lead on topical administration activities, projects and improvements that may have an impact on members of the Local Government Pension Scheme (LGPS).

### 2. Key Performance Indicators (KPI)

2.1 The Performance Reports for the months of April, May and June 2025 can be found at Appendices 1 to 3. The report now includes all tasks performed by the PAT and is reported directly from the Altair Insights system. A summary is included in the table below:

Month	o/s* at start	Post received	Post completed	Completed in SLA**	% within SLA	Outside SLA**	Total o/s* at end	Open tasks at end
Jan 25	1,719	3,126	2,279	2,078	91.2%	201	1,892	1,069
Feb 25	2,372	2,368	2,148	1,793	83.5%	355	2,557	1,034
Mar 25	2,283	2,364	2,355	1,977	83.9%	378	2,251	740
<b>Q1, 25</b>		<b>7,858</b>	<b>6,782</b>	<b>5,848</b>	<b>86.2%</b>	<b>934</b>		
Apr 25	2,066	1,949	2,015	1,705	84.6%	310	1,979	470
May 25	1,828	1,772	1,803	1,647	91.3%	156	1,759	356
Jun 25	1,637	1,810	1,674	1,556	93.0%	118	1,729	351
<b>Q2, 25</b>		<b>5,531</b>	<b>5,492</b>	<b>4,908</b>	<b>89.4%</b>	<b>584</b>		

\*o/s = outstanding      \*\*SLA = Service Level Agreement

2.2 On 29 July 2025, the Admin Working Group ("AWG") were provided with a performance history since April 2024 when the current monthly performance format was introduced. It showed for the 12 months before this quarter; 9 months were red and 3 amber. The AWG also looked at the detailed reasons for tasks that missed their SLA for June 2025 and saw much improvement. It was noted that the June 2025 performance has exceeded 92% for the first time and is therefore green against the agreed target levels. In addition, the number of cases that are showing as missing targets is at its lowest level.

2.3 To aid visibility of the work being undertaken by the PAT team, Appendix 4 provides a high-level view of performance achieved (as previously presented to Pension Board and Pension

Committee) over several years. The volume of tasks received being reported has increased – 9,629 in 2022, 15,411 in 2023 and 23,898 in 2024.

2.4 The Fund aims to achieve a gold standard service provision for the Pensions Helpdesk and the results for April to June 2025 are included in Appendix 5. From April 2024 the Helpdesk has been delivered by an in-house team within PAT. Due to the transition into an in-house team the reportable information relating to service delivery has reduced. The roll out of the East Sussex County Council (ESCC) telephony upgrade was completed mid-May 2025. As a result, the Helpdesk was expecting access to call centre technology but that has yet to be installed. It is anticipated that call centre technology will be installed from October 2025 so the PAT will again review the format and type of Management Information data available.

### **3. Pension Administration Staffing Update**

3.1 There have been no resignations since the last meeting, but a Project Officer has moved from PAT to the Fund team in August 2025. The PAT has appointed a new Pensions Administrator and Helpdesk Operator to replace last quarter's leavers. An offer has been accepted for a replacement Projects Officer from an internal candidate.

### **4. Projects update**

#### **McCloud remedy**

##### **Part time hours history data loading to Altair**

4.1 Work on part time hours history data loading to Altair has proven much more complex and time consuming than expected. The PAT started to load data in May 2025 broken into 5 batches:

- Employers with active members
- Brighton and Hove City Council (BHCC)
- Concurrent Combinings – simple
- Concurrent Combinings – complex
- Employers with members but no actives

4.2 The data had to be loaded through 4 stages – provisional and actual in the test system and then repeated in the live system. Between each load for each batch, officers have been correcting and reducing errors and issues.

4.3 The “**employers with active members**” and “**BHCC**” data loaded 104,243 lines of data but failed to load 12,585 lines that generated errors. Officers have resolved all the errors relating to active (on 31 July 2025) and deferred members (19 August 2025). The remaining 1,889 errors relate to cases not requiring an ABS and will be investigated at a later date.

4.4 The “**employers with members but no actives**” and “**concurrent combinings – simple**” loaded 3,062 lines of data but failed to load 375 lines that generated errors. These were investigated and resolved on 8 August 2025.

4.5 There are 136 members in the “**Concurrent Combinings – complex**” category that will need a thorough manual review and most likely further support and data input from employers. These will not be investigated in time for the 2025 ABS runs.

##### **Service Breaks history data loading to Altair**

4.6 The service break data was collated for all members in a single file which contained 22,659 lines of data in respect of 7,388 members. The provisional results on 1 August 2025 created 3,091 errors and this was down to 558 errors on the actual live run on 8 August 2025. There remain 102 errors to still be investigated as at 23 August 2025.

### McCloud underpin applies (bites)

4.7 The McCloud underpin protection was turned on 7 August 2025 which created new documents when running a Benefit Calculation (including a new document called UNDERPINLG – if the current guaranteed amounts shown on this document are zero [the overwhelming majority of cases are expected to be zero] no underpin applies). If a member is not eligible for McCloud underpin the existing documents will be produced.

4.8 The position as at 11 August 2025 was as follows:

Status	Count for live bulk McCloud underpin calculation	Provisional ABS run
1 = Active	155/24,871 = 0.62%	446*
2 = Undecided Leaver	9/953 = 0.94%	9
4 = Deferred	292/34,045 = 0.86%	285
5 = Pensioner	205/23,781 = 0.86%	205
7 = Death	3/NA	3
<b>Total</b>	664/83650 = 0.79%	948

\* The calculation looks at the amounts for CARE & Final Salary as at 31 March 2022

### Annual Benefit Statements

4.9 The ongoing delay has resulted due to the Altair records with the McCloud Underpin data and running the underpin calculations in readiness. As Officers correct errors on Altair records, the underpin calculations need to be re-run resulting in cases being both added and excluded so numbers are fluctuating daily.

4.10 The week commencing 19 August 2025, Officers were finalising the usual random ABS calculations matrix to ensure manual check for members with as many different scenarios as reasonably possible. The last check was to manually review the accrued pensions for the cases with the largest provisional underpin position as at 31 March 2025. Final checks showed there were 25 correct cases where the provisional underpin amount is greater than £1k on the annual pension, with the highest being £4,848.51). Further checks were to be done on a further 18 where the % change is > 20%.

4.11 The final guaranteed figures will only be known at normal retirement date. The ABS do include projected provisional figures, and these will potentially change the position considerably as the Career Average Revalued Earnings (CARE) figures are unchanged, but the Final Salary comparator is payable at age 65 so given the CARE benefits are due at State Pension Age (SPA) (67 or 68 for some members), the Final Salary numbers have a late retirement factor applied. Officers have found the impact can be significant. An example case found showed at 31 March 2025 the provisional underpin was £0 (Final Salary was -£83.17) but at CARE normal retirement age the provisional underpin had increased to £1,204.14.

4.12 Statutory guidance states the McCloud underpin should be included for all members, where appropriate, as at 31 March 2025 and therefore failure to do so should be deemed as a breach. This was discussed at great length at the AWG meeting on 22 August 2025 and, based on the estimated numbers available at that time, AWG were minded to log and report the breach to the Pensions Regulator (TPR) shortly after the 31 August 2025 statutory deadline.

4.13 Table below shows the position on 22 August 2025:

McCloud Group	Status			% of membership		
	Active	Deferred	Total	Active	Deferred	Total
1	790	254	1,044	3.4%	0.8%	1.8%
2	3,432	4,369	7,801	14.6%	13.0%	13.7%
3	364	199	563	1.6%	0.6%	1.0%
4	18,876	28,726	47,602	80.5%	85.6%	83.5%
<b>Grand Total</b>	<b>23,462</b>	<b>33,548</b>	<b>57,010</b>			

A description of each group is below:

#### GROUP 1

Your estimated final guaranteed amount is included in the annual pension figure(s) shown on your statement.

#### GROUP 2

Your pension is protected by the underpin under the McCloud remedy. However, your estimated final guaranteed amount is £0. This is because your career average pension is more than the pension you would have built up in the final salary scheme.

#### GROUP 3

Your pension is protected by the underpin under the McCloud remedy. However, it was not possible for us to reflect your protection in this year's statement.

#### GROUP 4

Some members are protected by the McCloud remedy, but not all. Members who are protected would have their pension increased if they would have built up a bigger pension in the final salary scheme than the career average. We have checked your records, and you are not protected under the McCloud remedy.

4.14 ABS were run on 26 August 2025 and communications issued by 31 August 2025. The final numbers are:

Count of ABS Run Status	McCloud Groups					ABS
	Group 1	Group 2	Group 3	Group 4	Grand Total	Not Run
Active	758	3,444	400	18,903	23,505	231
Deferred	119	4,455	233	28,405	33,212	267
<b>Grand Total</b>	<b>877</b>	<b>7,899</b>	<b>633</b>	<b>47,308</b>	<b>56,717</b>	

Count of ABS Run Councillors	Count	ABS Not Run	% Run
Deferred	39	0	100

4.15 The AWG also determined that the retrospective McCloud underpin recalculation cases (prioritising post 30 September 2023 deaths and retirements) must be done without undue delay. All calculations must be complete by the end of the extended implementation period i.e. 31 August 2026.

## **Pensions Dashboards**

4.16 Heywood are the Fund's Integrated Service Provider (ISP), and the project remains on track:

Phase 1 – created the ISP data console and data transfer tested. Additional testing of the “view” and “find” data completed. Officers have documented a new process on how to resolve a “partial” match.

Phase 2 – Meeting 28 August 2025 to discuss the implementation and onboarding before the deadline on 31 October 2025.

4.17 Officers are looking to create a new Prudential Additional Voluntary Contribution (AVC) data screen on Altair to hold the annual data that can be submitted to the ISP via a single source.

4.18 A training session for Pension Board and Pension Committee members has been arranged for 16 September 2025.

## **Annual Allowance (AA) for 2024/25**

4.19 Officers identified 300+ potential cases in scope in August 2025. Given the AA limit increased from £40k to £60k in the previous year, fewer members were expected to be impacted. Further investigation showed 270 members could be descoped from the data collection stage. Some additional salary data will be required from a few employers for a small number of members in early September. All the necessary calculations and letters will be issued before the statutory deadline 06 October 2025.

## **Additional Voluntary Contributions implementation of approved changes**

4.20 At the 27 February 2025 Pension Committee meeting, the following decisions were made:

- Change the default investment fund for new members from “With Profits” to the Lifestyle approach “Dynamic Growth Targeting Cash”.
- Retain the “With Profits” fund as the default for existing investors including their future contributions. The fund will also remain a self-select option for new members.
- Hard Close funds where no assets remain – “Fixed Interest” and consider closing the “Index-Linked” that had one deferred member.
- Allow soft Close funds to be used by existing investors.
- Introduce a Sharia compliant equity option.
- not to look for a self-select Bond fund.

4.21 These decisions were implemented by the Chief Finance Officer and Officers after co-ordination with Barnett Waddingham (BW) and the Prudential (Pru). The expectation was it would take several months to communicate and implement.

4.22 The priority was to determine if the “Index-Linked” fund could be closed. Recognising that it

would be a costly exercise (selecting an alternative) and this would give rise to transaction costs and potential out of market risk. The member has now self-selected to move the assets from the “Index-Linked” to “Equity” fund on 15 August 2025. As there are now no remaining assets in the “Index-Linked” fund, it can be hard closed.

4.23 BW are drafting the communications for all AVC investors so there can a single announcement of all the changes. The effective date is still to be determined (likely October 2025) noting that the Pru need at least 6 weeks’ notice.

## **5 Conclusion and reasons for recommendation.**

5.1 The Pension Board is recommended to note the report and make any comments for feedback to the Pension Committee.

**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer: Paul Punter, Head of Pensions Administration  
Email: [paul.punter@eastsussex.gov.uk](mailto:paul.punter@eastsussex.gov.uk)



# APPENDIX 1

## East Sussex Pensions Administration - Member Experience / Performance Indicators

Apr-25

Activity	Items outstanding at start of period	Post received	Post completed	Completed within KPI	% Complete within KPI	Completed outside KPI	Average No. days taken	Longest No. days taken	Items outstanding at end of period	open tasks at end of period
Aggregation- Payment	121	173	186	136	73.10%	50	9.1	49	108	35
Aggregation- Quote	183	86	89	60	67.40%	29	11.4	48	180	152
APC/AVC's	28	67	47	47	100.00%	0	0.2	N/A	48	11
Deaths – initial letter acknowledging death of member	1	26	26	25	96.20%	1	0.1	1	1	0
Deaths- With Benefits	127	57	62	55	88.70%	7	4.1	25	122	17
Deaths-No Further Benefits	23	28	23	21	91.30%	2	3	16	28	4
Deferred Benefits	304	203	248	189	76.20%	59	13.1	143	259	67
Divorce Quotes	4	2	2	2	100.00%	0	2	N/A	4	2
Divorce - Proceeding	4	17	14	14	100.00%	0	4	N/A	7	3
General Enquiries	89	246	243	238	97.90%	5	2	11	92	19
Interfund in- Payment	120	63	25	25	100.00%	0	0.7	N/A	141	8
Interfund In- Quote	359	17	24	19	79.20%	5	6.4	16	352	14
Interfund Out- Payment	28	22	15	15	100.00%	0	7.7	N/A	35	11
Interfund Out- Quote	22	28	24	21	87.50%	3	13.3	85	26	16
Refunds- Frozen	155	122	197	118	59.90%	79	17.5	97	80	28
Refunds- Payment	20	65	70	54	77.10%	16	3.4	17	15	9
Retirements – letter notifying actual retirement benefits	37	187	180	153	85.00%	27	3.7	9	44	31
Retirements – letter notifying estimate of retirement benefits	17	223	232	230	99.10%	2	5.2	3	8	4
Retirements – process and pay pension benefits on time	234	200	218	205	94.00%	13	2.4	44	216	19
Transfer In- Payment	38	14	9	9	100.00%	0	2.8	N/A	39	3
Transfer In- Quote	104	35	13	5	38.50%	8	30.4	143	126	7
Transfer Out- Payment	25	8	9	9	100.00%	0	3.2	N/A	24	4
Transfer Out- Quote	21	55	54	50	92.60%	4	5	7	22	6
Trivial Commutation	2	5	5	5	100.00%	0	1.4	N/A	2	0
Grand Totals	2,066	1,949	2,015	1,705	84.6%	310			1,979	470

Priority 1
Priority 2
Priority 3
Priority 4
Priority 5

The Admin Strategy is a mixture of 90% or 95% KPI targets and these can vary within the task list

92%+
87%+
<87%

<1K
1k to 1.5k
>1.5k

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## APPENDIX 2

### East Sussex Pensions Administration - Member Experience / Performance Indicators

May-25

Activity	Items outstanding at start of period	Post received	Post completed	Completed within KPI	% Complete within KPI	Completed outside KPI	Average No. days taken	Longest No. days taken	Items outstanding at end of period	open tasks at end of period
Aggregation- Payment	94	98	113	104	92.00%	9	4.1	29	79	16
Aggregation- Quote	150	93	128	66	51.60%	62	37.7	74	115	87
APC/AVC's	47	11	24	24	100.00%	0	1.5	N/A	34	5
Deaths – initial letter acknowledging death of member	0	23	23	23	100.00%	0	0	N/A	0	0
Deaths- With Benefits	111	59	66	64	97.00%	2	2	4	104	9
Deaths-No Further Benefits	28	51	43	42	97.70%	1	1.7	2	36	5
Deferred Benefits	250	233	242	219	90.50%	23	5	174	241	55
Divorce Quotes	4	0	1	1	100.00%	0	2	N/A	3	1
Divorce - Proceeding	7	11	14	14	100.00%	0	2.5	N/A	4	2
General Enquiries	82	205	208	207	99.50%	1	0.9	30	79	16
Interfund in- Payment	142	60	48	48	100.00%	0	1.5	N/A	123	11
Interfund In- Quote	333	31	25	17	68.00%	8	9.1	36	339	20
Interfund Out- Payment	32	22	17	14	82.40%	3	8.3	14	37	11
Interfund Out- Quote	23	42	38	37	97.40%	1	7.7	4	27	18
Refunds- Frozen	75	114	122	111	91.00%	11	3.3	28	67	12
Refunds- Payment	14	53	60	52	86.70%	8	2.1	5	7	3
Retirements – letter notifying actual retirement benefits	42	161	163	144	88.30%	19	2.8	10	40	24
Retirements – letter notifying estimate of retirement benefits	8	176	172	172	100.00%	0	2.7	N/A	12	9
Retirements – process and pay pension benefits on time	185	230	208	203	97.60%	5	1.4	14	207	32
Transfer In- Payment	39	20	13	13	100.00%	0	1.3	N/A	39	5
Transfer In- Quote	117	19	13	10	76.90%	3	9.8	37	123	5
Transfer Out- Payment	23	8	8	8	100.00%	0	3.6	N/A	23	4
Transfer Out- Quote	21	36	39	39	100.00%	0	2.9	N/A	18	5
Trivial Commutation	1	16	15	15	100.00%	0	0.3	N/A	2	1
Grand Totals	1,828	1,772	1,803	1,647	91.3%	156			1,759	356

Priority 1
Priority 2
Priority 3
Priority 4
Priority 5

The Admin Strategy is a mixture of 90% or 95% KPI targets and these can vary within the task list

92%+
87%+
<87%

<1K
1k to 1.5k
>1.5k

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# APPENDIX 3

## East Sussex Pensions Administration - Member Experience / Performance Indicators

Jun-25

Activity	Items outstanding at start of period	Post received	Post completed	Completed within KPI	% Complete within KPI	Completed outside KPI	Average No. days taken	Longest No. days taken	Items outstanding at end of period	open tasks at end of period
Aggregation- Payment	71	131	111	98	88.30%	13	3.4	13	91	33
Aggregation- Quote	87	161	148	97	65.50%	51	19.8	168	100	74
APC/AVC's	35	63	64	63	98.40%	1	0.7	3	34	4
Deaths – initial letter acknowledging death of member	0	26	26	26	100.00%	0	0.1	N/A	0	0
Deaths- With Benefits	103	46	51	49	96.10%	2	2.2	15	98	7
Deaths-No Further Benefits	34	35	40	35	87.50%	5	3.6	15	29	4
Deferred Benefits	224	112	146	137	93.80%	9	5.4	72	190	27
Divorce Quotes	3	1	1	1	100.00%	0	2	N/A	3	1
Divorce - Proceeding	3	11	13	13	100.00%	0	2	N/A	1	0
General Enquiries	72	203	194	190	97.90%	4	1.4	106	81	13
Interfund in- Payment	125	59	41	41	100.00%	0	1.2	N/A	112	5
Interfund In- Quote	317	73	28	20	71.40%	8	11	65	362	21
Interfund Out- Payment	34	23	19	18	94.70%	1	9.2	1	38	19
Interfund Out- Quote	23	40	34	32	94.10%	2	6.9	1	29	20
Recalculations - NEW JUNE 2025	14	53	51	51	100.00%	0	4.2	N/A	16	7
Refunds- Frozen	61	73	77	76	98.70%	1	3.5	1	57	6
Refunds- Payment	6	46	38	35	92.10%	3	1.3	4	14	9
Retirements – letter notifying actual retirement benefits	39	148	149	135	90.60%	14	2.8	12	38	26
Retirements – letter notifying estimate of retirement benefits	12	172	168	167	99.40%	1	2.7	2	16	13
Retirements – process and pay pension benefits on time	183	201	183	181	98.90%	2	1.1	4	201	27
Transfer In- Payment	41	21	16	16	100.00%	0	2.5	N/A	33	1
Transfer In- Quote	113	37	10	9	90.00%	1	4.7	1	140	17
Transfer Out- Payment	20	10	11	11	100.00%	0	1.6	N/A	19	4
Transfer Out- Quote	15	57	46	46	100.00%	0	1.9	N/A	26	13
Trivial Commutation	2	8	9	9	100.00%	0	1.2	N/A	1	0
Grand Totals	1,637	1,810	1,674	1,556	93.0%	118			1,729	351

Priority 1
Priority 2
Priority 3
Priority 4
Priority 5

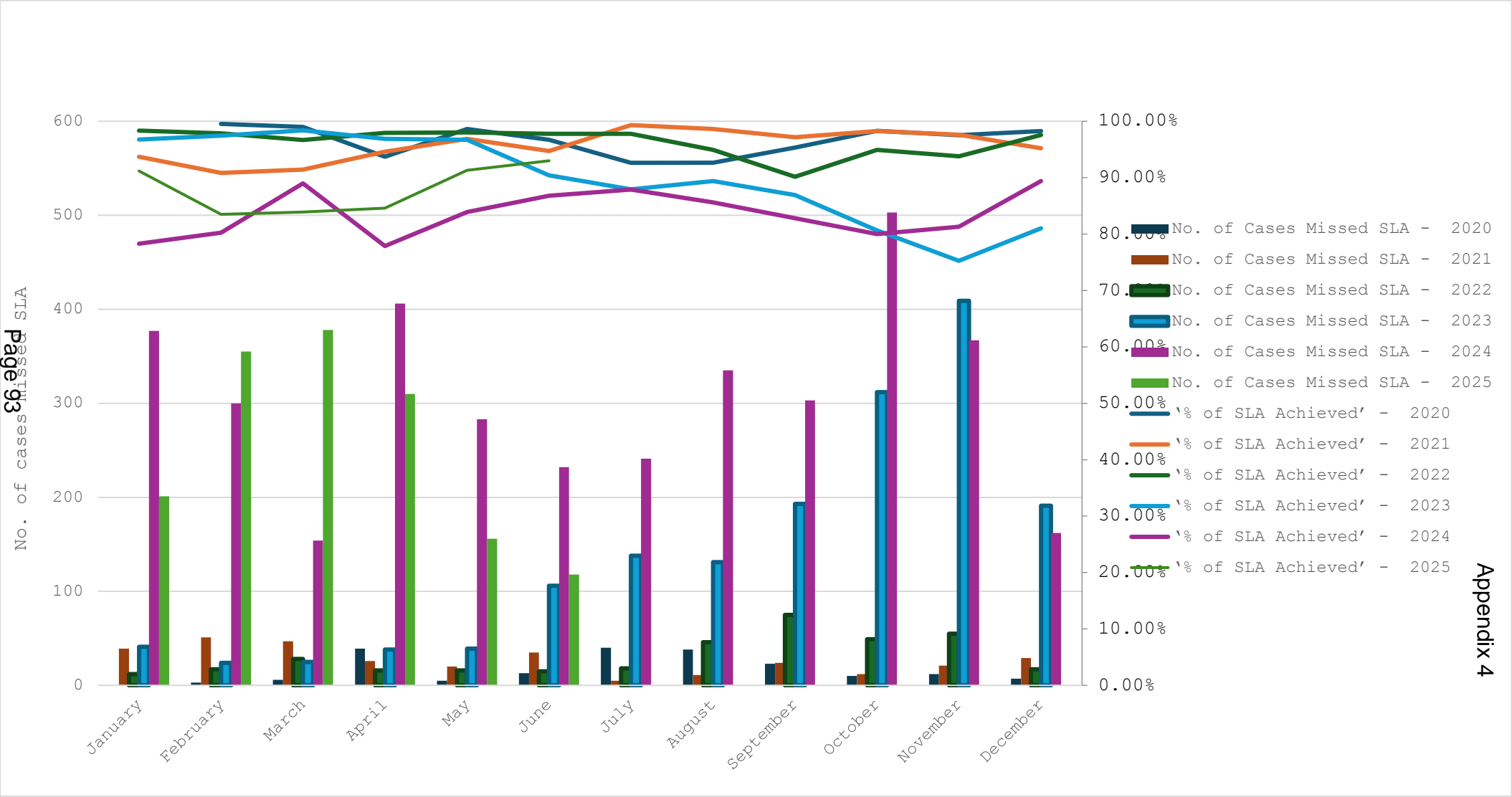
The Admin Strategy is a mixture of 90% or 95% KPI targets and these can vary within the task list

92%+	<1K
87%+	1k to 1.5k
<87%	>1.5k

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APPENDIX 4

East Sussex Pension Fund – Historical Overall Performance since February 2020



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## Appendix 5

### Helpdesk performance

Since 1st April 24 the Fund no longer have access to Achiever software so can no longer determine the Call Answer Time or the Abandoned Call Rate. Although members can still dial both the Main Helpline and Website Helpline numbers, they both feed into one Hunt Group resulting in no differentiation between call types. On 17 May 25 ESCC telephony went live - the helpdesk was NOT treated as a Contact Centre (and still awaiting to be set up – project with IT).

#### Combined Main & Website Helpline for ESPF

Service level	% enquires dealt with at 1 <sup>st</sup> point of contact	Email response time
GOLD TARGETS	85%	100% < 3 days
SILVER TARGETS	80%	75%+ < 3 days
BRONZE TARGETS	70%	75%+ < 10 days
BELOW BRONZE	<70%	<75% < 10 days
Period	% enquires dealt with at 1 <sup>st</sup> point of contact	Email response time
Apr 25	81%	100% < 3 Days
May 25	83%	75%+ < 10 days
Jun 25	80%	75%+ < 3 days

#### Monthly transaction volumes

Month	Telephone Calls	Email's Processed	Call Back's	Tasks	Total
Apr 25	1,081	1,097	46	399	2,623
May 25	983	1,030	36	203	2,252
Jun 25	805	1,316	24	220	2,365

#### Top five reasons for calls

Month	MSS login / issues	Receipt of Claim form	Claim form guidance	Tax, Payslip P60	Document / Form enquiry	Progress Update	Update address	Leaver Forms
Apr 25		3 <sup>rd</sup>	1 <sup>st</sup>		5 <sup>th</sup>	2 <sup>nd</sup>	4 <sup>th</sup>	
May 25	1 <sup>st</sup>		3 <sup>rd</sup>	2 <sup>nd</sup>		5 <sup>th</sup>		4 <sup>th</sup>
Jun 25	1 <sup>st</sup>	4 <sup>th</sup>	2 <sup>nd</sup>		3 <sup>rd</sup>		5 <sup>th</sup>	

#### Telephone survey

Apr to Jun 2025	1 Star	2 Star	3 Star	4 Star	5 Star
1. How easy was it for you to contact the Pensions Helpdesk today?	3	2	8	39	292
2. How confident are you that your question was resolved or will be resolved in the relevant timelines?	11	11	12	45	256
3. Based on your recent experience how strongly would you recommend using the Helpdesk to a colleague?	6	8	13	30	277
4. How satisfied were you with your overall experience today?	9	6	15	33	271
5. How many times have you called the helpdesk about the request / issue?	Zero/Once = 264	Twice = 51	Three = 15	Four+ = 11	

#### Customer Thermometer (email feedback)

Month	Excellent	Good	OK	Poor
Jan 25	56	14	11	8
Feb 25	46	6	0	11

Mar 25	47	11	5	9
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**Report to:** Pension Board

**Date of meeting:** 11 September 2025

**By:** Chief Internal Auditor

**Title:** Internal Audit Report

**Purpose:** This report advises the Board of the outcome of the Pension Fund Governance Arrangements audit.

---

## **RECOMMENDATION:**

**The Pension Board is recommended to note the Pension Fund Governance Arrangements audit report (Appendix 1).**

---

## **1. Background**

1.1 The review of Pension Fund Governance Arrangements was completed as part of the Internal Audit Strategy for Pensions 2025/26 and provides assurance on the overall effectiveness of the system's controls. This is the first audit completed for 2025/26.

1.2 As a result of our work on Pension Fund Governance Arrangements, we were able to provide an opinion of **Substantial Assurance** over the controls in place.

1.3 The Internal Audit Report on Pension Fund Governance Arrangements can be found at Appendix 1.

## **2. Conclusions and Recommendation**

2.1 The Pension Board is recommended to note the Internal Audit report.

## **RUSSELL BANKS**

**Orbis Chief Internal Auditor**

Contact Officer: Nigel Chilcott, Audit Manager  
Tel No.: 07557 541803

Contact Officer: Danny Simpson, Principal Auditor  
Tel No.: 07701 394826

## **BACKGROUND DOCUMENTS:**

None

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# Internal Audit Report

## Pension Fund Governance Arrangements

### Final

Assignment Lead: Amanda Craig, Principal Auditor

Assignment Manager: Danny Simpson, Principal Auditor

Prepared for: East Sussex County Council

Date: August 2025

### Report Distribution List

#### Draft Report

- Susan Greenwood, Head of Pensions
- Dave Kellond, Compliance and Local Improvement Partner

#### Final Report

As draft report with the inclusion of:

- Ros Parker, Chief Operating Officer
- Ian Gutsell, Chief Finance officer
- Paul Linfield, Communications Manager
- Paul Punter, Head of Pensions Administration
- Pension Board
- Pension Committee

<p>This audit report is written for the officers named in the distribution list. If you would like to share it with anyone else, please consult the Chief Internal Auditor.</p>
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**Anti-Fraud Hotline:** ☎ 01273 481995, ✉ [fraudhotline@eastsussex.gov.uk](mailto:fraudhotline@eastsussex.gov.uk)

### 1. Introduction

- 1.1. Governance is the combination of processes and structures put in place by an organisation to inform, direct and monitor activities in order to achieve its objectives. Both governance and internal control arrangements must be kept under review to ensure that they continue to operate effectively, meet legislative needs and reflect best practice.
- 1.2. The East Sussex Pension Fund (ESPF) provides retirement benefits for employees of the County Council and 140 other employer organisations, including Brighton & Hove City Council, district and borough councils and academic institutions.
- 1.3. ESPF pools with another 10 funds as part of the ACCESS Pool, a collaboration of central, eastern and southern shires.
- 1.4. This review has focused on the controls in place to ensure that ESPF roles and responsibilities are sufficiently well defined, documented and understood to ensure that the accountability and resilience of the Fund are maintained in the face of loss of key personnel.
- 1.5. This review is part of the agreed Internal Audit Plan for 2025/26 and has been delivered in compliance with the Global Internal Audit Standards and the Local Government Application Note.
- 1.6. This report has been issued on an exception basis whereby only weaknesses in the control environment have been highlighted within the detailed findings section of the report.

### 2. Scope

- 2.1. The purpose of the audit was to provide assurance that controls are in place to meet the following objectives.
  - Roles and responsibilities, including delegations for decision-making, are clear to ensure timely decisions, including those on investments.
  - Robust arrangements are in place to ensure continuity and knowledge sharing if Committee Members or officers were to leave their positions.
  - All agreed actions from the 2022/23 Governance Arrangements have been implemented in full.

### 3. Audit Opinion

- 3.1 **Substantial assurance is provided in respect of Pension Fund Governance Arrangements.** This opinion means controls are in place and are operating as expected to manage key risks to the achievement of system or service objectives. *Appendix A provides a summary of the opinions and what they mean and sets out management responsibilities.*

### 4. Basis of Opinion

- 4.1. Based on the testing undertaken, we have been able to provide an opinion of Substantial Assurance over the controls in place because:
- 4.2. The roles and responsibilities of the Pension Board and Pension Committee are known, understood and documented, and there are terms of references setting out their remits. The Board and Committee meet regularly, and minutes of meetings are published online.
- 4.3. There is adequate representation on the Board to allow for employers to contribute to decisions, without undue influence.
- 4.4. The Board and Committee have effective oversight of the Fund through information received in order to scrutinise, provide challenge and, where appropriate, make decisions. As there are clear policies, procedures and protocols in place and the Board and Committee receive reports on risk management, breaches, communication, investments, and performance, to name a small sample.
- 4.5. Members and officers declare any actual or perceived conflicts of interest and are not permitted to vote or be involved in decision making in any areas where they may be considered to have a personal or prejudicial interest.
- 4.6. However, there are opportunities to further strengthen the control environment, which are summarised below. These include findings raised as part of the 2024/25 Pension Fund Compliance with Regulatory Requirements review; however, we have not raised additional findings, and these have not fed into the assurance opinion for this audit.
- 4.7. Whilst there is a comprehensive Risk Management Policy in place, there is not a detailed definition of the Fund's risk appetite contained within this, to ensure that any decisions taken and mitigating actions are within the risk tolerances of the Fund.
- 4.8. The following findings had been identified, in the 2024/25 Compliance with Regulatory Requirements review:
- Whilst Members of the Board and Committee have sufficient knowledge and experience to execute their duties effectively, the training available and circulated to officers, Board and Committee members is not always well attended and there is no mandatory training. This will need to be considered in relation to any changes in governance required as part of the 'Fit for the Future' consultation launched by the government regarding pension reforms. This was also raised as a finding in the 2022/23 Pension Fund Governance audit.
  - Some policies on the Pension Fund website still refer to the previous Head of Pensions, who is no longer in post. We are aware some policies have been updated in this time, and this is a work in progress.



### 5. Action Summary

- 5.1. The table below summarises the actions that have been agreed together with the risk rating in the context of the area under review:

Risk	Definition	No	Ref
High	This is a major control weakness requiring attention.	0	N/A
Medium	Existing procedures have a negative impact on internal control or the efficient use of resources.	0	N/A
Low	This represents good practice; implementation is not fundamental to internal control.	1	1
Total number of agreed actions		1	

- 5.2. Full details of the audit findings and agreed actions are contained in the detailed findings section below.
- 5.3. As part of our quarterly progress reports to the Audit Committee we seek written confirmation from the service that all high priority actions due for implementation are complete. The progress of all (low, medium and high priority) agreed actions will be re-assessed by Internal Audit at the next audit review. Periodically we may also carry out random sample checks of all priority actions.

### 6. Acknowledgement

- 6.1. We would like to thank all staff that provided assistance during the course of the audit.

## Internal Audit Report – Pension Fund Governance Arrangements

### Detailed Findings

Ref	Finding	Potential Risk Implication	Risk	Agreed Action
1	<p><b>Risk Appetite</b></p> <p>The East Sussex Pension Fund (ESPF) website contains the current Risk Management Policy for the Fund. The policy sets out the Fund's approach to risk, including roles and responsibilities.</p> <p>The policy states: "<i>Whilst all of these strategies [terminate, treat, tolerate, and transfer] are available, there will be some areas of risk which the Fund will not tolerate and will always seek to reduce to an acceptable level. These areas are based on the Fund's risk appetite which is defined as 'the amount of risk an organisation is willing to accept'.</i>"</p> <p>From the statement above, there is clear definition of the principle of risk appetite; however, there is no specific definition of the Fund's own risk appetite.</p>	Without defining the Fund's risk appetite, it is difficult to determine an appropriate level of control to manage potential risks.	Low	<p>We shall consider how to capture the Fund's risk appetite, given the many forms of risk the Pension Fund takes, and how we define, record and monitor these risks, particularly for investments</p> <p>We shall review how this fits into the governance framework in the future.</p>
<b>Responsible Officer:</b>		Susan Greenwood, Head of Pensions	<b>Target Implementation Date:</b>	31 August 2026

# Appendix A

## Audit Opinions and Definitions

Opinion	Definition
<b>Substantial Assurance</b>	Controls are in place and are operating as expected to manage key risks to the achievement of system or service objectives.
<b>Reasonable Assurance</b>	Most controls are in place and are operating as expected to manage key risks to the achievement of system or service objectives.
<b>Partial Assurance</b>	There are weaknesses in the system of control and/or the level of non-compliance is such as to put the achievement of the system or service objectives at risk.
<b>Minimal Assurance</b>	Controls are generally weak or non-existent, leaving the system open to the risk of significant error or fraud. There is a high risk to the ability of the system/service to meet its objectives.

## Management Responsibilities

The matters raised in this report are only those which came to our attention during our internal audit work and are not necessarily a comprehensive statement of all the weaknesses that exist, or of all the improvements that may be required.

Internal control systems, no matter how well designed and operated, are affected by inherent limitations. These include the possibility of poor judgment in decision-making, human error, control processes being deliberately circumvented by employees and others, management overriding controls and the occurrence of unforeseeable circumstances.

This report, and our work, should not be taken as a substitute for management's responsibilities for the application of sound business practices. We emphasise that it is management's responsibility to develop and maintain sound systems of risk management, internal control and governance and for the prevention and detection of irregularities and fraud. Internal Audit work should not be seen as a substitute for management's responsibilities for the design and operation of these systems.

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**Report to:** Pension Board  
**Date of meeting:** 11 September 2025  
**By:** Chief Finance Officer  
**Title:** Pension Fund Risk Register  
**Purpose:** To consider the Pension Fund Risk Register

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## **RECOMMENDATION:**

**The Pension Board is recommended to review and note the Pension Fund Risk Register.**

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## **1 Background**

1.1 Risk management is the practice of identifying, analysing and controlling in the most effective manner all threats to the achievement of the strategic objectives and operational activities of the Pension Fund. It is not a process for avoiding or eliminating risks. A certain level of risk is inevitable in achieving the Fund's objectives, but it must be controlled.

1.2 Effective risk management is an essential part of any governance framework as it identifies risks and actions required to mitigate their potential impact. For a pension fund, those risks will come from a range of sources, including the funding position, Local Government Pension Scheme (LGPS) Pooling, General Data Protection Regulation (GDPR), investment performance, membership changes, benefits administration, costs, communications and financial systems. Good information is important to help ensure the complete and effective identification of significant risks and the ability to monitor those risks.

1.3 Since the last meeting of the Pension Board and Pension Committee, officers have continued to review the Risk Register to ensure all appropriate risks and mitigations have been identified.

1.4 It is accepted that whilst mitigations are put in place for identified risks, it will not always be possible for all risk to be eliminated. In these cases, a level of risk is tolerated and kept under review.

## **2 Supporting Information**

2.1 A summary of the risk register of the Fund is included as Appendix 1. The full Risk Register is not published with this report but is available to Pension Board members upon request.

## **3 Changes to the Risk Register**

3.1 There have been three amendments to the Risk Register since the last meeting of the Pension Board.

3.2 Risk A3, 'Production of Statutory Member Returns' - The post-mitigation score has been increased on account of the added complication of displaying the McCloud remedy in annual benefit statements as at 31 March 2025 and other statutory documents such as pension savings statements.

3.3 Risk G1, 'Key Person Risk' – The post-mitigation score has been increased on account of the Interim Deputy Head of Pensions having completed the fixed term contract and left in July 2025. The Head of Pensions is currently evaluating the available options for the most effective way to proceed to manage the Fund, which includes recruitment and/or reorganisation and will conclude this process in September 2025.

3.4 Risk G3, 'Cyber Security' – Whilst the pre and post mitigation scores have remained constant, the Risk Control/Response details have been expanded to reflect the work carried out and planned to improve the resilience of the Fund to cyber risks.

3.5 Risk I5, 'Funding risk – higher inflation' has been updated to reflect the preference expressed for the Fund to join Border to Coast Pension Partnership investment pool from 1 April 2026, to ensure compliance with prevailing pooling legislation from that date and the work and risks around completing this.

## **4 Conclusion**

4.1 The Pension Board is recommended to review and note the Pension Fund Risk Register.

**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer: Susan Greenwood, Head of Pensions  
Email: [Susan.Greenwood@eastsussex.gov.uk](mailto:Susan.Greenwood@eastsussex.gov.uk)

# Appendix 1

## Summary Post Mitigation Risk scores

Reference Strategic Risk		Sep-23	Nov-23	Feb-24	Jun-24	Sep-24	Nov-24	Feb-25	Jun-25	Change from Sept 23
<b>Employer</b>										
E1	<b>Contributions Funding</b> Failure to collect contributions from employers in line with Funding strategy requirements and Rates and Adjustment Certificate	4	4	4	4	4	4	4	4	↔
E2	<b>Employer data</b> Employers fail to provide accurate and timely data to the PAT team	9	9	9	9	9	9	9	9	↔
E3	<b>Employer Covenant</b> Delay in employers agreeing Admission Agreement, risk of insufficient security	4	4	6	6	6	6	6	6	↔
<b>Administration</b>										
A1	<b>Pensions service Delivery</b> Inadequate delivery of Pensions Administration	6	6	6	6	6	6	6	6	↔
A2	<b>Regulatory Change</b> Risk that new benefit structures can not be set up correctly or in time	6	6	6	6	6	6	6	6	↔
A3	<b>Production of Statutory member returns</b> Risk of failure to produce ABS, annual allowance and event reports	6	6	6	6	4	4	4	4	↔
A5	<b>Transfer Scams</b> Failure to comply with CETV anti scam checks	2	2	2	2	2	2	2	2	↔
A7	<b>MBOS Project</b> Failure to deliver the new ERP system to effectively deliver for Pension Fund accounting and payroll requirements	6	6	6	6	6	6	6	6	↔
<b>Governance</b>										
G1	<b>Key Person risk</b> Risk of loss of key / senior staff resulting in lost knowledge and skills with in the Pensions Team	4	4	6	6	8	8	6	6	↔
G2	<b>Committee / Board Member</b> Lack of decision making caused by loss of Pension Committee/Pension Board members or insufficient knowledge and skills of members	9	6	6	6	6	6	6	6	↔
G3	<b>Cyber Security</b> Risk of Loss of data or systems breaches through cyber attacks	8	12	12	12	12	12	12	12	↔
G4	<b>Governance and Compliance</b> Inadequate governance arrangements and controls to discharge powers & duties	6	3	3	3	3	3	3	3	↔
G5	<b>Data Breach</b> Failure to comply with General Data Protection Regulations	4	4	4	4	4	4	4	4	↔
G6	<b>Fraud</b> Internal and External fraud risk	4	4	2	2	2	2	2	2	↔
<b>Investment/Funding</b>										
I1	<b>Funding risk - poor investment returns</b> Risk that investment strategy fails to result in performance required to meet the needs of the Funding strategy discount rate	4	4	4	4	4	4	4	4	↔
I3	<b>Regulatory risk</b> Failure to comply with regulations, legislation and guidance from an accounting and investment perspective	2	2	2	4	4	4	4	4	↔
I4	<b>Investment Pooling</b> Inability to comply with government direction on pooling, insufficient sub funds to implement investment strategy, poor management of the pool	12	9	9	9	9	9	9	9	↔
I5	<b>Funding risk - higher inflation</b> Risk of inflation leading to increased liabilities, lower asset returns and a funding gap	6	6	6	6	6	6	9	6	↓
I6	<b>Environmental, Social and Governance</b> Risk of ESG factors within Investment strategy, underlying holdings and implementations of investment decisions	4	4	6	6	6	6	6	6	↔
I7	<b>Climate change</b> Risk to assets and liabilities associated with Climate Change	4	4	6	6	6	6	6	6	↔
I8	<b>Liquidity</b> Insufficient cash to pay benefits as they fall due	4	4	4	4	4	4	6	4	↓
I9	<b>Money Purchase Additional Voluntary Contributions</b> Inadequate offering to Scheme Members	2	2	2	2	2	2	2	2	↔

Ref	Strategic Risks	Pre-mitigati on RAG	Risk Control / Response	Post-mitigati on RAG	Risk Owner
<b>Employer Risk</b>					
E1	Contributions Funding Failure to collect contributions from employers in line with Funding strategy requirements and Rates and Adjustment Certificate	9	<ul style="list-style-type: none"> <li>•Monthly Employer contribution monitoring completed</li> <li>•Monitoring of late payments by Employer engagement team to address breaches for late payment, following an escalation process. Chasers are sent out during the lead up to the deadline to prompt employers providing information and payment on time</li> <li>•Contributions recorded in Finance system for each employer to track employer cashflows in line with actuarial requirements for Valuation and FRS17/IAS19 reporting requirements. Also enables ability to see trends in contributions collected</li> <li>•Pension Administration strategy refreshed in February 2023 clearly outlining ability to charge employers for late payment, late receipt of remittance advice or poor quality of data. Late payment charges are now being administered as a deterrent and to cover the impact on the Fund for late payment.</li> <li>•Implementation of i-Connect is improving the quality of contribution data received to better aid reconciliation of payments and drill into the accuracy of employers' contribution payments, however functionality is still being improved by the software provider</li> <li>•Regular reporting to Pensions Board on any late payment of contributions</li> <li>•Covenant review undertaken helps identify employers most likely to have financial difficulties. This will be renewed in 2025.</li> <li>•Triennial valuation process aims to stabilise contribution rates where possible and senior management involved in detailed discussions on funding assumptions. Triennial Valuation complete for 2022 and new rates set for April 2023 onwards. LGPS31 forms issued to all employers with new rates.</li> <li>•Guide to Employers on implications of Pensions on Outsourcing published and issued to all employers</li> <li>•Contribution deferral policy approved by Committee in June 2020</li> <li>•Deferred debt and debt spreading policies approved in June 2023</li> <li>•Employer engagement team are confirming the correct signatories for contribution submissions to ensure they are signed off at an appropriate management level</li> <li>•Regular communication with Employers through Employer engagement team</li> <li>•Cash Management covered by internal audit in 2022/23 and 2023/24 looking at contribution collection and cash management strategy with substantial assurance</li> </ul>	4	Head of Pensions
E2	Employer data Employers fail to provide accurate and timely data to the PAT team	12	<ul style="list-style-type: none"> <li>•Pension Administration Strategy in place and last reviewed in 2023</li> <li>•Employing authorities are contacted for outstanding/accurate information</li> <li>•User Guide and Training provided to Employers for outsourcing implications with LGPS</li> <li>•Regular communication and meeting with administration services regarding service updates and additional data, when required</li> <li>•Employer engagement team established from January 2021 to support employers and provide training where required</li> <li>•Issuance of a quarterly employer newsletter to support employers in their understanding of current pensions issues and activity for the Pension Fund</li> <li>•A data cleansing plan was completed in June 2020 lead by Hymans. The PAT look at Data Improvement as part of BAU and is a regular item on the Administration working group. Data is also cleansed where appropriate as part of other projects</li> <li>•i-Connect system limits employer ability to submit incorrect data. Data is received monthly rather than annually to allow for regular cleansing and discussion with employers</li> <li>•Meetings held between senior pensions Management team and employers where there are current or historic data concerns</li> <li>•As part of the lead into the 2022 triennial valuation data cleansing and challenge was conducted by the Actuary with PAT to ensure the integrity of data. Work will commence on data cleansing for both Dashboard and the 2025 triennial valuation.</li> </ul>	9	Head of Pensions



E3	Employer Covenant Delay in employers agreeing Admission Agreement, risk of insufficient security	8	<ul style="list-style-type: none"> <li>•Full suite of admission agreements in place to ensure the Fund can provide comprehensive admission agreements at the outset of negotiations in line with the risk sharing arrangements agreed with the letting employer. New templates have been developed for pooling rate. Fixed rate template and Bond template in place. These templates are shared with the employers early in the process to speed up the agreeing of new admission agreements</li> <li>•Guide to outsourcing is publicly available and distributed to all employers. This guide directs employers of all the activities and considerations they need to take on any outsourcing arrangement with TUPE staff implications. New employers are given a copy as part of Admission Agreement process</li> <li>•Officers meet regularly to review status and movement on each in progress admission and an update is provided at team meetings monthly to ensure the admission is complete and effective at all stages</li> <li>•A data flow and process map is in place to ensure officers request and communicate all the required information in a timely manner and on execution of the agreements data is required in line with the Administration strategy</li> <li>•Admissions in progress are reported quarterly to Board and Committee to ensure awareness of status</li> <li>•Security obtained for new admissions in form of bond or a guarantee from an appropriate body which has the means to support the guarantee</li> </ul>	6	Head of Pensions
<b>Administration</b>					
A1	Pensions service Delivery The scheme is not administered correctly resulting in the wrong benefits being paid or benefits not being paid, including the result of poor data	9	<ul style="list-style-type: none"> <li>•The PAT team is in-house provision and enables the management team to have complete control over service delivery</li> <li>•Annual internal audit report on the administration of pensions including regular reporting and monitoring of "red" recommendations to ensure the service is acting in line with best practice. The Fund has received reasonable assurance since bringing inhouse with no red recommendations.</li> <li>•Quarterly Reports to Pension Board and Committee on areas of work and KPIs</li> <li>•New service level KPI's now reportable within the Administration software</li> <li>•Awareness of the Pension Regulator Guidance by all team members, with training provided at team meetings or through provision of courses</li> <li>•Task workflow is managed by the Senior Pension Officers to all PAT staff and helpdesk add all tasks to the workflow system, to ensure all tasks completed as planned and to a high standard. PAT staff also add tasks as appropriate.</li> <li>•Checklists in place and all activity impacting members recorded on member records for other teams members to access</li> <li>•All tasks are peer reviewed. Constant monitoring / checking by team managers and senior officers for more junior staff members</li> <li>•In house risk logs covering projects</li> <li>•SAP / Altair reconciliation monthly to ensure pension payment records complete and correct</li> <li>•Most calculations automated to reduce manual error risk</li> <li>•Task management systems built into Altair to ensure activity is completed and monitored</li> <li>•Regular meetings with payroll, HR, ICT and PAT</li> <li>•Pensions Admin working group in place to discuss service delivery issues on a regular basis</li> <li>•Pensions Admin Team has skills matrix to identify training needs for particular processes</li> </ul>	6	Head of Pensions Administration
A2	Regulatory Change - Risk that new benefit structures can not be set up correctly or in time. - LTA replaced with max cash limits. - Introducing inheritance tax. - Change in minimum retirement age	9	<ul style="list-style-type: none"> <li>•Projects and/or working groups in place to deal with current regulatorily benefit changes</li> <li>•Attendance at networks and officer groups to stay on top of upcoming changes in regulation</li> <li>•Reports to Pension Board and Committee to ensure knowledge is shared to decision makers</li> <li>•Oversight via Pension Admin Working Group</li> </ul>	6	Head of Pensions Administration

A3	Production of Statutory member returns Risk of failure to produce ABS, annual allowance and event reports	15	<ul style="list-style-type: none"> <li>•Regular contact with employers to get data</li> <li>•Clear project plan with early communications and planning with milestones to ensure Statements created in time to allow time for distribution to staff</li> <li>•Less than 10 employers are now to be onboarded to i-Connect, thus ensuring better quality &amp; speedy data including joiners/leavers. Annual Allowance data will continue for cases deemed in scope annually but with the limit increasing to £60k, those impacted are significantly reduced</li> <li>•Breaches policy in place and Breach reporting to Committee and Board quarterly to raise and consider breach reporting levels</li> <li>•The issue of the McCloud remedy is regularly reviewed by the Admin Working Group as well as regular meetings between the Fund and the software provider.</li> </ul>	6	Head of Pensions Administration
A5	Transfer Scams Failure to comply with CETV anti scam checks	6	<ul style="list-style-type: none"> <li>•Process in place for making checks required by law and/or recommended by TPR. Appropriate training to be identified and offered to staff to build understanding of risk and appropriate mitigations</li> <li>•Process mapping process has taken place to ensure transfers are fully documented with clear guidance to staff in carrying out this activity</li> <li>•Member informed of "red flags" identified</li> <li>•Scorpion campaign material provided to members seeking a CETV</li> <li>•Quality assurance checks ensure appropriate checks carried out</li> <li>•We are now reinstating deferred benefits for scammed cases</li> </ul>	2	Head of Pensions Administration
A7	Implementation of Oracle Failure to deliver the new ERP system to effectively deliver for Pension Fund accounting and payroll requirements	9	<ul style="list-style-type: none"> <li>•Officers are part of the project roll out and involved in testing. Needs of the Pension Fund are therefore being considered</li> <li>•Officers produced process mapping for all functions within the existing finance system</li> <li>•A specific stream of planning has been identified in the project for the interface with Altair</li> <li>•S151 officer on the programme board and will make go/no go decision</li> <li>•Heywood's paid to produce a scheme specific payroll data output report for transfer to Oracle</li> </ul>	6	Head of Pensions
<b>Governance</b>					
G1	Key Person risk Risk of loss of key / senior staff resulting in lost knowledge and skills with in the Pensions Team	9	<ul style="list-style-type: none"> <li>•Diversified staff / team</li> <li>•Attendance at pension officers' user groups to network and exchange information</li> <li>•Procedural notes which include new systems, section meetings / appraisals</li> <li>•Succession planning within team structure, building from within the team</li> <li>•Robust business continuity processes in place around key business processes, including a disaster recovery plan</li> <li>•Knowledge of all tasks shared by at least two team members within PAT and in addition can be covered by senior staff in all areas</li> <li>•Training requirements are set out in training strategy, job descriptions and reviewed prior to recruitment processes</li> <li>•Training officer post</li> <li>•Training strategy in place and regularly reviewed with training log where required</li> <li>•Recruitment project to fill to vacant positions coming to an end with nearly all posts now filled</li> <li>•Utilisation of apprenticeships allow for bring new staff into to train in advance of vacancies</li> <li>•Team responsibilities being reviewed to ensure appropriate coverage of workstreams</li> <li>•An interim Deputy Head of Pensions has been appointed for 6 months to support the senior leadership team and has now started (November 2024)</li> <li>•The fixed term contract of the Interim Deputy Head of Pensions came to an end in July 2025. The Head of Pensions is evaluating the best way forward, either by recruitment or reorganisation</li> </ul>	9	Head of Pensions / Head of Pensions Administration
G2	Committee / Board Member Lack of decision making/functionality caused by loss of Pension Committee/Pension Board members or insufficient knowledge and skills of members	9	<ul style="list-style-type: none"> <li>•Record kept of terms of Office</li> <li>•Pension Board terms of Office staggered</li> <li>•Vice Chairs in place to cover chair absence</li> <li>•Officers aware of election cycles and request for officers as a preference over elected members is communicated to employers</li> <li>•Robust Terms of reference in place that is clear and comprehensive</li> <li>•Training plans in place for new members to build knowledge to required levels</li> </ul>	6	Head of Pensions

G3	Cyber Security Risk of Loss of data or systems breaches through cyber attacks	16	<ul style="list-style-type: none"> <li>• ICT defence - in-depth approach.</li> <li>• Utilising firewalls, passwords and ICT control procedures including system access and account deletion protocols. Network activity is monitored to identify security threats.</li> <li>• Email and content scanners</li> <li>• Using anti-malware which is regularly updated, together with other protective software</li> <li>• ICT performs penetration and security tests on regular basis</li> <li>• Encryption used on all data transfers</li> <li>• Service level agreement with termination clause</li> <li>• Regular reports SAS 70/AAF0106</li> <li>• Industry leaders providing services to the fund with data protection and cyber defence systems</li> <li>• Risk assessment completed with all new contracts with data transfer and new associated systems including penetration testing at outset</li> <li>• Pensions Team specific BCP being finalised and rolled out</li> <li>• Information security report no material vulnerabilities. Recommendations to be implemented.</li> <li>• Cyber training is provided to all staff around techniques and methods used to launch cyber attacks</li> <li>• Officers undertook a war games training session with IT in August 2024</li> <li>• Officers have begun procurement discussions both internally and with third-party contractors to assist in the production of an improved cyber risk policy of the Fund.</li> </ul>	12	Head of Pensions
G4	Governance and Compliance Inadequate governance arrangements and controls to discharge powers & duties	9	<ul style="list-style-type: none"> <li>• Training strategy in place which covers Pension Committee, Pensions Board and officers</li> <li>• 75 days of internal audit commissioned for each calendar year with regular reporting from IA to committee and board, including areas Governance and Compliance</li> <li>• External auditor provides audit plan at planning stage for each financial year and this is discussed by Audit committee as well as Pension Committee and Board</li> <li>• Investment regulations require proper advice</li> <li>• Procurement processes in place to ensure quality within replacement advisers</li> <li>• Review carried out against TPR General Code requirements to identify any governance gaps</li> <li>• Specialist legal advisers and governance advisers to provide clear and accurate advice to the Fund on point of law or regulation</li> <li>• Publication of annual Governance and Compliance Statement explaining governance arrangements and reviewed and approved by Board / Committee</li> <li>• Training coordinator appointed. This officer liaises with chair of Pension Board and Committee to identify training needs</li> <li>• Working groups in place, with own terms of reference, which report findings to full Board and Committee</li> <li>• Governance of meetings supported by Democratic Services</li> <li>• Governance structures held within ESCC constitution</li> <li>• Conflict of interest policy in place</li> </ul>	3	Head of Pensions
G5	Data Breach Failure to comply with General Data Protection Regulations and Disclosure Regulations	9	<ul style="list-style-type: none"> <li>• Contracts with external parties where there is a data role have clear terms and conditions as part of the data processing agreements</li> <li>• Data Impact assessment is carried out on all new tenders where data is involved</li> <li>• DPO is in place via ESCC</li> <li>• Privacy notice is on the website - the privacy statements have been refreshed each year</li> <li>• Memorandum of Understanding in place with employers within the fund</li> <li>• All staff are required to complete an information governance course on joining the Council and this is refreshed annually</li> <li>• Information governance Internal audit completed in Q4 2020/21 with a reasonable assurance level and all recommendations were completed</li> <li>• Pensions Manager for Governance and Compliance completed review on GDPR in Q4 2020/21 resulting in a newly designed webpage, new privacy notices and change to the retention period</li> </ul>	4	Head of Pensions

G6	Fraud Internal and External fraud risk	12	<ul style="list-style-type: none"> <li>•Quarterly review of log in credentials</li> <li>•Senior officers have sight of bank account</li> <li>•Senior officers are signatories to bank account</li> <li>•Multiple sign off needed to make payment, with appropriate seniority levels</li> <li>•Mortality checks, Tell us once and NFI data</li> <li>•Contract in place with a third party to support with mortality and address training</li> <li>•Journals over £1m have to be signed off by Head of Pensions</li> </ul>	2	Head of Pensions
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Investment/Funding					
I1	Funding risk - poor investment returns Risk that investment strategy fails to result in performance required to meet the needs of the Funding strategy discount rate	9	<ul style="list-style-type: none"><li>•Strategy is supported by expert Investment consultants. Challenge to Consultants through Independent Adviser</li><li>•Triennial valuation ensures funding position is known and contribution rates are stabilised</li><li>•Quarterly Performance monitoring, investment manager monitoring from consultants and Link for ACCESS sub funds. Officers have a rolling programme to meet and challenge investment managers</li><li>•Annual Investment Strategy Review, with interim rebalancing</li><li>•Quarterly Reporting to Pensions Committee, with decisions approved by committee, including Fund Manager performance</li><li>•Training strategy in place to ensure officers and committee members have sufficient knowledge and skills to implement and change the investment strategy</li><li>•Investment decisions are made in compliance with the ISS/FSS</li><li>•All investment decisions made, based on proper advice</li><li>•Diversified strategy to reduce correlation of manager volatility</li><li>•Changes to investment strategy are discussed with the actuary to ensure anticipated implications on funding aligned</li><li>•Revision of the Asset Liability Model to support a viable Strategic Asset Allocation for the new valuation</li></ul>	4	Head of Pensions
I3	Regulatory risk Failure to comply with regulations, legislation and guidance from an accounting and investment perspective	9	<ul style="list-style-type: none"><li>•Pensions Officers are kept up to date with changes to legislative requirements via network meetings, professional press, training and internal communication procedures</li><li>•Pension Fund financial management and administration processes are maintained in accordance with the CIPFA Code of Practice, International Financial Reporting Standards (IFRS), and the ESSC Financial Regulations</li><li>•Regular reconciliations are carried out between in-house records and those maintained by the custodian and investment managers</li><li>•Internal Audits - carried out in line with the Pension Audit strategy</li><li>•External Audit review the Pension Fund's accounts annually</li><li>•Specialist legal advisers to provide clear and accurate advice to the Fund on point of law or regulation</li><li>•Breaches policy in place to ensure breaches mapped and reported</li></ul>	4	Head of Pensions
I4	Investment Pooling Inability to comply with government direction on pooling, insufficient sub funds to implement investment strategy, poor management of the pool	16	<ul style="list-style-type: none"><li>•ACCESS Support Unit team provide support to the pool</li><li>•Operator contract provided by Waystone for assets held within the ACS. Operator novation imminent.</li><li>•The ACCESS Contracts Manager will monitor Waystone's progress closely.</li><li>•KPI's introduced within revised operator agreements</li><li>•Consultants involved in analysing the creation of sub-funds and transitioning of assets into the pool, under a variety of scenarios</li><li>•Opportunities to transfer securities in 'specie'. Reducing cost on transition</li><li>•Transition manager in place to preserving asset values, managing risk and project managing the transition process to ensure that costs are monitored and controlled</li><li>•Due Diligence completed by legal advisers to ensure no hidden costs or governance issues not known at time of decision to invest</li><li>•S151, chair of pension committee and monitoring officer representation on respective committees, working groups or distributions to ensure ESPF involved in all decisions and concerns and questions can be raised early in processes</li><li>•Regular meetings between officers and ACCESS pool with officers on a number of working groups to ensure involvement in decision making</li><li>•ACCESS governance review completed</li><li>•ACCESS have secured a stewardship consultant to suport development in RI activities for the pool</li><li>•Illiquid assets are in progress for pooling</li><li>•Fund has responded to key government consultations to ensure its view is shared with policy makers on recommended future changes in pooling.</li></ul>	9	Head of Pensions

I5	Investment Pooling Existing arrangements agreed via ACCESS do not meet the needs of East Sussex Pension Fund (confirmed following the Fit for the Future Review) and Fund moves to another Investment Pool to ensure compliance with prevailing legislation by 1st April 2026	12	Senior officers have worked extensively with officers from West Sussex and external advisors to identify a preferred pooling partner, given the government's confirmation that it does not support the proposals put forward by ACCESS in relation to the Fit for the Future consultation. Borders to Coast Pension Partnership has been identified as the Fund's preferred pooling partner going forward and officers are working with offices from West Sussex and 5 other partner funds from ACCESS that have also identified Borders to Coast Pension Partnership as the preferred pool to ensure documentation is in place to ensure the Fund complies with the legislation from 1st April 2026 and joins an investment pool supported by the government.	9	Head of Pensions
I6	Funding risk - higher inflation Risk of inflation leading to increased liabilities, lower asset returns and a funding gap	12	<ul style="list-style-type: none"> <li>•Investment strategy include weighting to index linked gilts, infrastructure and real estate which are all inflation correlated to mitigate increases in liabilities from inflation</li> <li>•Potential to further increase infrastructure weightings</li> <li>•Fund monitor portfolio sensitivity to inflation via expert investment consultants</li> <li>•Triennial Valuation assumptions include local knowledge of the Administering authority on anticipated pay inflation</li> <li>•Flexibility in the DGF mandates to react to the market and adapt the investment portfolio</li> <li>•Quarterly monitoring of funding position helps identify risk early</li> <li>•2022 Triennial Valuation completed - inflation models used to estimate the average inflation across a 20 year time horizon, including consideration of the current high inflation environment. Index linked gilt triggers introduced to benefit from market opportunities which provide alignment with changing liabilities</li> </ul>	6	Head of Pensions
I7	Environmental, Social and Governance Risk of ESG factors within Investment strategy not being properly considered affecting underlying holdings and implementations of investment decisions	8	<ul style="list-style-type: none"> <li>•Statement of Responsible Investment Principles outline responsible investment beliefs, implementation of decisions and monitoring of ESG factors</li> <li>•ESG is in the heart of all investment decisions and not a separate function or workign group</li> <li>•The Fund has trimmed unconscious exposure to companies with poor ESG rating through removal of traditional index funds ensuring active managers have a strong conviction in the underlying companies including on ESG matters and less traditional passive indexes / smart beta funds have robust screening processes in place to ensure ESG principles are taken into account</li> <li>•Tracking of the portfolio as underweight in fossil fuel exposure to benchmarks</li> <li>•Production of annual reports on the carbon footprint of the Fund and review of managers from ESG perspective including transition pathway of underlying companies</li> <li>•Stewardship code submission approved in February 2024 for the 2022 reporting year</li> <li>•Membership of collaborative groups to help drive policy change</li> <li>•Officers challenge managers on their holdings with regard ESG issues and query voting decsions.</li> <li>•Annual ESG impact assessment for all managers, including improvement actions on ESG methodology, reporting or collaboration.</li> <li>•Engaging via managers and investor groups including LAPFF with companies and driving them forward to comply with key ESG concerns using the greater voice by combined investment power</li> <li>•ESG factors incorporated into all decision making</li> </ul>	6	Head of Pensions

18	Climate change Risk to assets and liabilities associated with Climate Change	12	<ul style="list-style-type: none"> <li>•Statement of Responsible Investment Principles (SRIP) outlines investment beliefs including Climate Risk. The Fund take the SRIP into account for implementation of decisions and monitoring of investment managers, carbon emissions and climate risk to the Fund</li> <li>•Restructuring of the equity portfolio removed structural exposure to fossil fuel companies to avoid high risk companies from a climate perspective and minimises stranded asset risk from direct holdings in underlying portfolios.</li> <li>•The Fund are able to exploit opportunities from the low energy transition by investing in climate impact funds and resource efficient companies</li> <li>•The Fund has trimmed unconscious exposure to companies with high Carbon emission, poor energy transition plans and or fossil fuel companies, through removal of traditional index funds</li> <li>•Member of Institutional Investors group on climate change (IIGCC), the Fund also expects its managers to be IIGCC members</li> <li>•The Fund carries out annual carbon footprinting to better understand the carbon exposure and energy transition plans within the portfolio. Additionally, the Fund carries out ESG impact assessment of all investment managers which includes a climate score.</li> <li>•Signatory to UN PRI</li> <li>•Report in line with the TCFD framework</li> <li>•The Fund is investigating climate scenario modelling which will help better understand this risk and allow further consider approaches in tackling these risks</li> <li>•Where exposed to fossil fuels, the Fund uses its vote to drive engagement and improved practices. A number of Fund managers are Climate 100+ engagement partners, leading on this work with top emitting companies, while all managers are IIGCC members for collaborate weighting of AUM to influence action. Managers have escalation plans for when engagement is not effective which includes disinvesting from the high carbon or fossil fuel company.</li> <li>•Focus on Climate change through training to committee and officers</li> <li>•Focus on Climate Change in decision making and strategy changes</li> <li>•Limited impact to the Fund value from direct exposure to fossil fuel companies in the instance of carbon taxes, valuation falls or stranded assets due to the underweight, very low exposure to this sector and no structural allocation of these companies.</li> </ul>	6	Head of Pensions
19	Liquidity Insufficient cash to pay benefits as they fall due	8	<ul style="list-style-type: none"> <li>•Contributions monitored on monthly basis</li> <li>•Monitoring of members close to retirement</li> <li>•Daily cash position monitored</li> <li>•Distributing investments to ensure stream of income from investment activity</li> <li>•Income from investments is considered as a key risk in all investment strategy decisions and the income profile managed</li> <li>•Liaison between administration and investment team on cash requirements</li> <li>•Cash Management internal audit completed in Q3 2022/23 and will be picked up in the 2023/24 IA plan for further review</li> <li>•Cash Management strategy in place</li> </ul>	4	Head of Pensions
110	Money purchase AVC Inadequate offering for the scheme members on cost, return and/or risk grounds	4	<ul style="list-style-type: none"> <li>•A range of fund options provided, catering for different levels of member risk and return so they can design investment strategy for own circumstances</li> <li>•Continuing suitability of AVC offering is reviewed regularly</li> <li>•Implementation plan in place with regular monitoring and oversight. Escalation process agreed for any delays or operational issues arising during implementation</li> </ul>	2	Head of Pensions

## Risk Register Risk Scores

The risk scores are calculated using the risk matrix below:

90-100%	This week	Very High	LIKELIHOOD	5	5	10	15	20
60-90%	This Month	High		4	4	8	12	16
40-60%	This year	Medium		3	3	6	9	12
10-40%	Next 5 years	Low		2	2	4	6	8
0-10%	Next 10 years	Very Low		1	1	2	3	4
				1	2	3	4	
				IMPACT				
				Negligible No noticeable impact	Minor Minor impact, Some degradation of service	Major Significant impact, disruption to core services	Critical Disastrous impact, Catastrophic failure	
				SERVICE DELIVERY	Handled within normal day-to-day routines.	Management action required to overcome short-term difficulties.	Key targets missed. Some services compromised.	Prolonged interruption to core service. Failure of key Strategic Project
				FINANCIAL	Little loss anticipated.	Some costs incurred. Handled within management responsibilities.	Significant costs incurred. Service level budgets exceeded.	Severe costs incurred. Statutory intervention triggered.
				REPUTATION	Little or no publicity.  Little staff comments.	Limited local publicity.  Mainly within local government community.  Causes staff concern.	Local media interest.  Comment from external inspection agencies. Noticeable impact on public opinion.	National media interest seriously affecting public opinion



**Report to:** Pension Board

**Date of meeting:** 11 September 2025

**By:** Chief Finance Officer

**Title:** Work Programme

**Purpose:** To consider the Pension Board and Pension Committee work programme.

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## **RECOMMENDATIONS:**

The Pension Board is recommended to:

- 1) Consider and comment on the work programme; and
  - 2) advise of training completed, not recorded in the training log.
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## **1 Background & Supporting information**

1.1 The work programme contains the proposed agenda items for future Pension Board and Pension Committee meetings over the next year and beyond. It is included on the agenda for each quarterly meeting.

1.2 The work programme also provides an update on other work going on outside the Pension Board and Pension Committee's main meetings, including working groups, upcoming training and a list of any information requested by the Pension Board or Pension Committee that is circulated via email.

1.3 This item also provides an opportunity for Pension Board and Pension Committee members to reflect on any training they have attended since the last meeting.

## **2 Conclusion and reasons for recommendations**

2.1 The work programme sets out the Pension Board and Pension Committee's work both during formal meetings and outside of them. The Pension Board is recommended to consider the updated work programme including regularity of agenda items to ensure effective governance of the Fund at the scheduled meetings; advise of training completed, not recorded in the training log.

**IAN GUTSELL**  
**Chief Finance Officer**

Contact Officer: Susan Greenwood, Head of Pension Fund

Email: [Susan.Greenwood@EastSussex.gov.uk](mailto:Susan.Greenwood@EastSussex.gov.uk)

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## Pension Board and Committee – Work Programme

Future Pension Board Agenda		
Item	Description	Author/Owner
Standing items (items that appear on each agenda)		
Pension Committee Update	A consideration of the draft agenda of the Pension Committee and summary minutes of the last Pension Committee meeting decisions.	Head of Pensions
Pension Reform Agenda	A report on progress of the Fund with regard to the reforms set out in the governments' "Fit for the Future" consultation with regard to asset pooling and consideration of the potential future impact of local democratic reforms on the Fund.	Head of Pensions
Governance Report	A report on governance issues affecting the fund, developments in the LGPS and regulatory environment, policy amendments and ACCESS pool updates	Governance and Compliance Manager
Employer Engagement and Communications Report	A report on Employer Engagement matters to note, Employer Contributions update and Communications from the Fund	Communications Manager
Pensions Administration report	An update on the performance of the Pensions Administration Team covering KPI's and projects.	Head of Pensions Administration

Internal Audit reports	All internal audit reports on the Fund are reported to the Board	Head of Internal Audit
East Sussex Pension Fund (ESPF) Quarterly budget report	An update on the Funds budget. This is reported in Q2-4 only.	Pensions Manager – Investment and Accounting
East Sussex Pension Fund (ESPF) Risk Register	A report on the Funds Risk Register	Head of Pensions
Work programme	A report on the Board and Committee's work programme	Head of Pensions
East Sussex Pension Fund (ESPF) Breaches Log	A report on the Funds breaches log	Governance and Compliance Manager
Employer Admissions and Cessations	A report on the admission and cessation of employers to the Fund	Governance and Compliance Manager
<b>11 September 2025</b>		
Supplier Update	Update on supplier contracts and procurements	Governance and Compliance Manager
Governance and Compliance Statement	Annual Review of Governance and Compliance Statement	Governance and Compliance Manager

<b>4 November 2025</b>		
Independent Auditors Report on the Pension Fund Accounts 2024/25	A report on the External Audit findings of the Pension Fund financial Statements for 2024/25	Pensions Manager – Investment and Accounting
Pension Fund Annual Report and Accounts 2024/25	2024/25 Annual Report and Accounts for approval	Pensions Manager – Investment and Accounting
Employer Forum Agenda	Discussion on Pension Fund Employer Forum Agenda topics	Head of Pensions
2025 Actuarial Valuation and Funding Strategy Statement	Report from the Fund Actuary on the March 2022 triennial valuation process, methodology and assumptions with a draft Funding Strategy Statement for approval prior to consultation	Head of Pensions
Annual Training Plan	Report on Training completed in the year and training recommendations for the up-coming year	Head of Pensions
<b>12 February 2026</b>		
Business Plan and Budget 2026/27	Report to set the Budget for the Pension Fund for the Financial Year 2026/27 including the Business Plan with key deliverables for the year.	Head of Pensions
External Audit Plan for the East Sussex Pension Fund 2025/26	Draft External Audit Plan for 2025/26 Pension Fund Financial Statements	Pensions Manager – Investment and Accounting
2025 Valuation report and results and Final Funding Strategy Statement (FSS)	Final report and results from the Fund Actuary of the 31 March 2025 triennial valuation with the final FSS for approval post consultation.	Head of Pensions

Additional Funding Strategies	Triennial review of policies that support the FSS and funding position. This includes the Exit Credit Policy, Contribution Rate review Policy and Deferred Debt and Debt Spreading agreement policies.	Head of Pensions
<b>4 June 2026</b>		
Governance and Compliance Review	Governance Review to ensure compliance with Fit for the Future requirements	Governance and Compliance Manager

<b>Actions requested by the Pensions Board</b>		
<b>Subject Area</b>	<b>Detail</b>	<b>Status</b>
Ill Health insurance review	The Board requested a review to be carried out on the Ill Health Insurance provision in place in terms of commercial arrangements.	Ongoing 2025
Risk Register Full review	The Board have requested for a meeting to walk through all risks on the risk register as detail is usually only discussed on changes to the register, although the register is provided in full at each meeting for questions.	Completed in March 2025
AVC – Default fund/ review of option	Further investigation into the best default option for AVC investors through the Prudential.	Report completed and presented in February 2025. Work to implement recommend changes ongoing.

Future Pension Committee Agenda		
Item	Description	Author
<b>Standing items (items that appear on each agenda)</b>		
Governance Report	A report on governance issues effecting the fund, developments in the LGPS and regulatory environment, policy amendments and requirement to ensure compliance with the governance changes proposed in the 'Fit for the Future' consultation.	Governance and Compliance Manager
Pension Reform Agenda	A report on progress of the Fund with regard to the reforms set out in the governments' "Fit for the Future" consultation with regard to asset pooling and consideration of the potential future impact of local democratic reforms on the Fund.	Head of Pensions
Pensions Administration report	An update on the performance of the Pensions Administration Team covering KPI's and projects.	Head of Pensions Administration
Internal Audit reports	Internal audit reports on the Fund and annual audit plan.	Head of Internal Audit
East Sussex Pension Fund (ESPF) Quarterly budget report	An update on the Funds budget - <i>reported Q2-4 only</i>	Pensions Manager – Investment and Accounting
East Sussex Pension Fund (ESPF) Risk Register	A report on the Funds Risk Register	Head of Pensions

Work programme	A report on the Board and Committee's work programme	Head of Pensions
Investment Report	A Quarterly performance report of the investment managers	Pensions Manager – Investment and Accounting and Investment Consultant
East Sussex Pension Fund (ESPF) Breaches Log	A report on the Funds breaches log – <i>reported only when a new breach is recognised, or status changed. Report goes quarterly to Board.</i>	Governance and Compliance Manager
Employer Admissions and Cessations	A report on the admission and cessation of employers to the Fund - <i>reported only when outstanding admissions or cessations.</i>	Governance and Compliance Manager
<b>25 September 2025</b>		
Governance and Compliance Statement	Annual Review of Governance and Compliance Statement/ Consideration of governance requirements under 'Fit for the Future' consultation.	Governance and Compliance Manager
External Audit Report for the East Sussex Pension Fund 2024/25	Draft External Audit Report for 2024/25 Pension Fund Financial Statements	Pensions Manager – Investment and Accounting
Carbon Footprinting	A report on the carbon footprint of the portfolio of ESPF including whether investments are in line with transition pathways.	Pensions Manager – Investment and Accounting
ESG Impact Assessment	Annual assessment by Investment consultants on the ESG standing of Investment managers with action plan	Pensions Manager – Investment and Accounting



Investment Strategy Statement	Review of the Investment Strategy Statement to take into account any revisions to the investment strategy.  Review to include Statement of Investment Principles.	Pensions Manager – Investment and Accounting
Stewardship Reporting	Update on status for submitting annual submission to FRC for Stewardship activities for calendar year 2025	Pensions Manager – Investment and Accounting
Supplier Update	Update on supplier contracts and procurements	Governance and Compliance Manager
<b>18 November 2025</b>		
Independent Auditors Report on the Pension Fund Accounts 2024/25	A report on the External Audit findings of the Pension Fund financial Statements for 2024/25	Pensions Manager – Investment and Accounting
Pension Fund Annual Report and Accounts 2024/25	2024/25 Annual Report and Accounts for approval	Pensions Manager – Investment and Accounting
Employer Forum Agenda	Discussion on Pension Fund Employer Forum Agenda topics	Head of Pensions
2025 Actuarial Valuation and Funding Strategy Statement	Report from the Fund Actuary on the March 2025 triennial valuation process, methodology and assumptions with a draft Funding Strategy Statement for approval prior to consultation	Head of Pensions

Annual Training Plan	Report on Training completed in the year and training recommendations for the up-coming year	Head of Pensions
<b>26 February 2026</b>		
External Audit Plan for the East Sussex Pension Fund 2025/26	Draft External Audit Plan for 2025/6 Pension Fund Financial Statements	Pensions Manager – Investment and Accounting
2025 Valuation report and results and Final Funding Strategy Statement (FSS)	Final report and results from the Fund Actuary of the 31 March 2025 triennial valuation with the final FSS for approval post consultation.	Head of Pensions
Additional Funding Strategies	Triennial review of policies that support the FSS and funding position. This includes the Exit Credit Policy, Contribution Rate review Policy and Deferred Debt and Debt Spreading agreement policies.	Head of Pensions
Business Plan and Budget 2026/27	Report to set the Budget for the Pension Fund for the Financial Year 2026/27 including the Business Plan with key deliverables for the year.	Pensions Manager – Investment and Accounting
<b>18 June 2026</b>		
Governance and Compliance Statement	Annual Review of Governance and Compliance Statement	Governance and Compliance Manger
Annual Report of the Pension Board	Annual report of the Pension Board to the Scheme manager outlining the work throughout the year	Head of Pensions with the Chair of the Board

Governance Review	Review of all Governance approaches to ensure compliance with requirement of 'Fit for the Future' consultation.	Governance and Compliance Manager
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Actions requested by the Committee		
Subject Area	Detail	Status
Training	<p>Requests were made, following the July 2023 investment workshop day for various training items</p> <p>The items still to arrange are</p> <ul style="list-style-type: none"> <li>• How to invest in the energy transition. Eg electric storage/batteries, renewables, nuclear, hydrogen, EV's. What is cost and access to markets for these investments.</li> <li>• Cost benefit implications of de-risking the portfolio</li> <li>• Core responsibilities of Councillors in their role on the pension committee to ensure proper exercise of its responsibilities and powers. Readdressing the need for Governance framework role of the Committee and considering strategic investment change recommendations from expert advisers, rather than directing underlying investment holdings.</li> </ul>	In progress

Current working groups		
Title of working group	Detail and meetings since last Pensions Board and Committee meetings	Membership
Investment Implementation Working Group (IIWG)	<p>The Investment Working Group and ESG working group have been amalgamated, as agreed at Pensions Committee 21 September 2020.</p> <p>The IIWG has an advisory role to over oversee the implementation of decisions by the Pension Committee in relation to investment decisions and carry out detailed research and analysis for Pensions Committee.</p>	<p>William Bourne, Russell Wood, Susan Greenwood, James Sweeney, Representatives from Investment Consultant</p> <p>Cllr Fox or substitute committee member is invited to attend</p>
Administration Working Group	The Administration Working Group was set up in 2021 following the conclusion of the ABS and Data Improvement Working Group. The group discuss ongoing administration projects and areas of administration focus including McCloud implementation.	Cllr Fox, Ray Martin, Neil Simpson, Zoe O'Sullivan, Paul Punter, Susan Greenwood, Ian Gutsell

Training and Development – attendance at recent events			
Date	Topic	Committee	Board
Training and Development – members registered to attend future events			
Date	Topic	Committee	Board
16-Sep	<b>ESPF Pension Dashboard data and member experience</b> To cover the connection of East Sussex Pension Fund data to the Pension Dashboard ecosystem and the member experience.	Accepted invitation - Cllrs Swansborough, Taylor, Hollidge, Redstone	Accepted invitation - Neil, Zoe, Ray,
16-17 Sep	<b>DB Strategic Summit</b> Delegates will gain privileged insights into how the leading practitioners in the industry are resolving the main challenges in the dominant sector of the pensions marketplace. Topics for discussion: <ul style="list-style-type: none"> <li>• Securing benefits and investing for growth: the changing nature of defined benefit pensions</li> <li>• A year on from the US election. What is the outlook for fixed income?</li> <li>• How to enhance your passive equity portfolio</li> <li>• Delivering patient, mission impact investment to the Scottish economy</li> <li>• Delivering better pensions and investment through effective collaboration</li> <li>• Delivering better performance while also creating a positive societal impact: housing</li> <li>• Digital real estate</li> <li>• Dashboard masterclass: Looking under the bonnet – making sure you're ready for pensions dashboards</li> <li>• Managing currency risk</li> <li>• Playing the (anti) Trump card: the future of Sustainability and ESG in pensions investing</li> </ul>		Ray

	<ul style="list-style-type: none"><li>• Infrastructure (natural capital)</li><li>• Consolidation reprised – where are we at and where are we going?</li><li>• The future of defined benefit pensions</li></ul>		
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## Training and Development – Future Training Offered to Pension Board

16-Sep	<p><b>Pensions Age Autumn Conference 2025</b></p> <p>It's no secret that the UK pensions sector continues to face its fair share of challenges, but there are also opportunities on the horizon, as the landscape experiences a potential period of unprecedented change – consolidation and productive finance are key priorities for the UK government; pensions dashboards are close than ever; DB surpluses are forcing schemes and employers to consider a wider range of end-game options, while volatile markets continue to keep pension funds on their toes; value for money continues to run like a red line through all aspects of pensions management and design; and areas such as pensions inadequacy and lack of engagement continue to cause concern throughout the industry.</p>
16-Sep	<p><b>ESPF Pension Dashboard data and member experience</b></p> <p>To cover the connection of East Sussex Pension Fund data to the Pension Dashboard ecosystem and the member experience.</p>
16-17 Sep	<p><b>DB Strategic Summit</b></p> <p>Delegates will gain privileged insights into how the leading practitioners in the industry are resolving the main challenges in the dominant sector of the pensions marketplace. Topics for discussion:</p> <ul style="list-style-type: none"> <li>• Securing benefits and investing for growth: the changing nature of defined benefit pensions</li> <li>• A year on from the US election. What is the outlook for fixed income?</li> <li>• How to enhance your passive equity portfolio</li> <li>• Delivering patient, mission impact investment to the Scottish economy</li> <li>• Delivering better pensions and investment through effective collaboration</li> <li>• Delivering better performance while also creating a positive societal impact: housing</li> <li>• Digital real estate</li> <li>• Dashboard masterclass: Looking under the bonnet – making sure you're ready for pensions dashboards</li> <li>• Managing currency risk</li> <li>• Playing the (anti) Trump card: the future of Sustainability and ESG in pensions investing</li> <li>• Infrastructure (natural capital)</li> <li>• Consolidation reprised – where are we at and where are we going?</li> <li>• The future of defined benefit pensions</li> </ul>

14-16 Oct	<b>Annual Conference - 2030 Ready</b> The full programme is coming in summer 2025 and will include: <ul style="list-style-type: none"> <li>• Future-focused discussion across key themes including regulatory reform, member outcomes engagement, investment and risk management, consolidation, and DE&amp;I</li> <li>• 10 plenaries, 24 stream sessions, 6 fireside chats, 2 roundtables</li> <li>• Major names including Torsten Bell MP, IGG, Legal &amp; General, USS and Zedra</li> <li>• Diverse perspectives, from leaders to early career professionals, from governance, investment and legislation to member engagement</li> <li>• Unique networking</li> </ul>
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## Training and Development – Future Training Offered to Pension Committee

02-Sep	<b>2025 LGPS Valuations: unveiling initial results and early insights</b> To be covered - the outcomes and themes emerging from the 2025 English & Welsh valuations, including: <ul style="list-style-type: none"> <li>• Initial whole fund results from the 2025 LGPS valuations.</li> <li>• Insights into trends since the 2022 valuation.</li> <li>• What all this means for funds.</li> </ul>
09-Sep	<b>Evolving ESG practices in UK Fiduciary Management</b> This event will delve into insights gathered from the latest industry survey conducted by the EY-Parthenon team, focusing on how fiduciary managers are navigating the complexities of sustainability while fulfilling their fiduciary duties.
16-Sep	<b>Pensions Age Autumn Conference 2025</b> It's no secret that the UK pensions sector continues to face its fair share of challenges, but there are also opportunities on the horizon, as the landscape experiences a potential period of unprecedented change – consolidation and productive finance are key priorities for the UK government; pensions dashboards are close than ever; DB surpluses are forcing schemes and employers to consider a wider range of end-game options, while volatile markets continue to keep pension funds on their toes; value for money continues to run like a red line through all aspects of pensions management and design; and areas such as pensions inadequacy and lack of engagement continue to cause concern throughout the industry.
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23-Sep	<ul style="list-style-type: none"> <li>• <b>Climate in 2025 - What are the best next actions for asset owners and trustees?</b></li> </ul> <p>This in-person masterclass will examine the realities of climate risk, stewardship and fiduciary responsibility in today's investment landscape. The event will consider:</p> <ul style="list-style-type: none"> <li>• Where are we now on the climate journey?</li> <li>• What's working – and what's not?</li> <li>• And crucially, how can asset owners, trustees and advisers drive better alignment between risk, stewardship and long-term sustainability?</li> </ul>
30-Sep	<p><b>Achieving local impact by investing in renewable energy in the UK</b> - Online roundtable with Capital Dynamics</p> <p>In this session, we will explore how these two powerful trends converge – highlighting the compelling opportunity to finance critical clean energy infrastructure while aiming for stable, attractive returns. Beyond financial outcomes, such investments are vital in accelerating the transition to a greener economy, supporting local job creation and generating long-lasting benefits for communities across the UK.</p>
01-Oct	<p><b>ESG Club Conference 2025: Sustainable strategies for a divided world</b></p> <p>So given the political climate, have the net zero and social justice challenges adopted by many pension schemes and insurers become harder to achieve? To be discussed:</p> <ul style="list-style-type: none"> <li>• Transition Investing: Evolving investment opportunities</li> <li>• ESG compliance: Driving change or a growing governance burden?</li> <li>• Biodiversity – Turning theory into real-world outcomes</li> <li>• Net-Zero investments: Challenges and opportunities</li> </ul>

14-16 Oct	<p><b>Annual Conference - 2030 Ready</b></p> <p>The full programme is coming in summer 2025 and will include:</p> <ul style="list-style-type: none"><li>• Future-focused discussion across key themes including regulatory reform, member outcomes engagement, investment and risk management, consolidation, and DE&amp;I</li><li>• 10 plenaries, 24 stream sessions, 6 fireside chats, 2 roundtables</li><li>• Major names including Torsten Bell MP, IGG, Legal &amp; General, USS and Zedra</li><li>• Diverse perspectives, from leaders to early career professionals, from governance, investment and legislation to member engagement</li><li>• Unique networking</li></ul>
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