

CLWYD PENSION FUND COMMITTEE

Date of Meeting	Wednesday, 19 June 2024
Report Subject	Administration and Communications Update
Report Author	Pensions Administration Manager

EXECUTIVE SUMMARY

This update report includes matters arising relating to administration and communications since the previous update report provided at the February Committee meeting. These are mainly for noting, albeit comments are clearly welcome. The two areas for approval relate to:

- minor changes to the Fund's Administration Strategy and Statement of Administering Authority Discretionary Policies.
- delegation of decisions relating to the introduction of National Pensions Dashboard project.

The report includes updates on:

- Progress against the administration and communications related matters in the Fund's 2024/25 Business Plan
- Current developments and news including updates on the Fund's McCloud programme and the 2024 Pension Increase award
- Monitoring against the Administration Strategy in relation to day-to-day tasks and key performance indicators, showing the position for completed and outstanding tasks to 31 May 2024 and KPI measures to the end of April 2024
- Administration and communication risks on the Fund's risk register (which has itself been updated in line with the Risk Management Policy agreed at the March Committee)

RECOMMENDATIONS				
1	That the Committee consider the update and provide any comments.			
2	That the Committee consider and approve the proposed amendments to the updated Administration Strategy and Statement of Administering Authority's Discretionary Policies and delegate any final minor changes.			
3	That the Committee consider the update relating to the implementation of the National Pensions Dashboard requirements, and approve the delegation of key decisions to the Project Management Group.			

REPORT DETAILS

1.00 A	DMINISTRATION AND COMMUNICATIONS RELATED MATTERS			
Bı	Business Plan 2024/25 Update			
1.01 Pr	rogress against the business plan items for quarter one of this year is ositive for the majority of items as illustrated in Appendix 1. Key items to ote relating to this quarter's work (Q1) are as follows:			
•	A1 – McCloud judgement – as usual an update on this programme is included later in this report. A2 – National Pensions Dashboard – an update on this is included later in this report and includes information on the preparation work carried out by the project team to date and the planned project governance structure. A5 - Preparation of Member Data for Interim Valuation and Triennial Valuation – The technical Team continues to work through the year end processes and cleanse member data. This item is on track and will continue into the next quarter when data will be supplied to the Fund Actuary for the interim valuation as at 31 March 2024. A6 - Review Administration & Communications Related Policies and Strategies – an update on this item is included in section 1.04 in this report.			
•	A7 – Implement the Communications Strategy – Further information is provided later in the update report. The key areas of work for this quarter are: o a review of the Fund's website content ensuring clear and concise language is being used. This is expected to be complete by the end of this month the submission of an application to FCC for an improved telephony service. The outcome of the application was to be decided at the Digital Strategy Board meeting on the 13 th June. The Pension Administration Manager will provide a verbal update. Some other areas included in the communications part of the business plan, such as developing a suite of member and employer videos covering all areas of the Fund including funding and investments, and considering the wider structure of the Fund's website, have not yet commenced due to other priorities. A8 – Benefit payment decisions and requirements – It is intended to establish further processes to assist with decision making relating to who benefits are paid to including death grants and the use of child trust funds. This piece of work has been delayed due to other higher priority work but is due to be completed in Q2. A9 – Employer escalation procedure – Additional monitoring reports have been developed to assist the Fund identify whether employers are meeting their agreed service standards as detailed in the Administration Strategy. Using the results from this monitoring, it is intended to implement an employer escalation procedure to ensure that scheme members receive information about their benefits in a timely manner. The reports have been developed and are currently being			

E1 – Employer Liaison Team Expansion to more employers—
 Discussions are underway with an employer that wishes ELT to assist
 with their Fund related duties and complete a data cleansing exercise
 to assist with McCloud data and Pension Dashboard preparation. The
 connection process and data collection for this employer is scheduled
 for Q2.

1.02 Current Developments and News

The following details developments and news in addition to business as usual

McCloud update

McCloud Regulatory Update – On 1 March the Department for Levelling Up Housing and Communities issued its consultation on its draft statutory guidance on the McCloud implementation to a selected group of LGPS stakeholders. This guidance will cover identifying members in-scope, prioritisation of cases and some other technical issues. The consultation closed on 12 April and a response and final guidance is expected later in the year; it is assumed that this will be delayed because of the election period. This could have an impact on the expected rectification completion date of 31 August 2025.

The LGA has provided part 1 of its administration guide, and further sections are awaited which will cover other types of calculations and revisiting past calculations.

Regulations are still required in order to effectively implement the remedy for teachers' excess service, and it is expected that there will be a technical consultation on these in due course. The delay due to the election period will impact getting these regulations made, and therefore the expected rectification completion date. In the meantime, Teachers' Pensions have started to contact LGPS employers and funds informing them of the process they are implementing to move eligible excess service into the LGPS.

CPF Programme Update - An update on the progress of the Clwyd Pension Fund McCloud programme is attached as Appendix 2. The programme currently has an overall health status of green, meaning that it is largely on track to meet the annual benefit statement deadline of 31 August 2025. Individual workstreams are running to different timescales than originally planned due to delays in receiving employer data, final regulations and national guidance and there are expected to be further delays in regulations and guidance due to the election period. The overall status of the project will be reconsidered once more is known. This might include the expected completion date being extended by Government, albeit it is assumed this would not be until after the election.

The McCloud Team continue to engage and work with employers regarding the submission of their data. The data collection exercise is nearly complete with only a small number of employers still to submit data, and discussions are ongoing with these employers. The data validation

and upload of data milestone completion timescale has had to be extended to December 2024. This is due to further automated solutions which are awaited from the software provider and which are required to ensure efficiencies, reducing the manual effort required.

With regards to communications, pensioners and dependants were written to in April to request information on previous public sector pension scheme membership, as part of the Clwyd catch up newsletter. This will assist the Fund in assessing if further members are in-scope for McCloud, by way of previous public sector pension scheme membership. A similar communication is due to be sent to active and deferred members as part of the newsletter sent with the Annual Benefit Statements later in the summer.

Engagement with the Fund's software supplier is continuing to ensure changes are implemented in a timely manner. A software update in February largely fixed the issues relating to new retirement and leaver cases, which was previously resulting in a high degree of manual effort by the team in processing day to day cases. Further software updates are expected to resolve additional McCloud processing issues and are scheduled for June and August and as part of usual practice these will be fully tested. A representative of the McCloud Team attends a weekly webinar hosted by the software providers, along with other LGPS funds, to share best practice ideas and discuss any issues.

Benefit rectification for previous retirements and leavers has not yet commenced. This continues to be delayed due to external factors, including the final regulations being laid so near to the coming into force date, and the delay in expected guidance on the exercise. This delay has made it challenging for software providers to update the software to cover the types of cases where retrospective calculations need to be carried out. As mentioned above, statutory guidance is still awaited on how Funds will be expected to prioritise their retrospective cases. The current expectation to complete rectification by 31 August 2025 is due to the legislative requirement to include the McCloud underpin in 31 March 2025 Annual Benefit Statements and Annual Benefits Statements must legally be issued by 31 August each year.

1.03 National Pensions Dashboard

In the 2016 Budget, the Government made a commitment that Pensions Dashboards would be created by the pensions industry, enabling pension savers to view details of all of their pensions online and in one place. In 2019, the Money and Pensions Service (MaPS) established the Pensions Dashboards Programme (PDP) to design and implement the infrastructure that will make Pensions Dashboards work. The Pension Schemes Act 2021 provides a legal framework for Pensions Dashboards including new powers to compel trustees/scheme managers to provide information to Pensions Dashboard providers.

The Government has now confirmed that all public sector pension schemes must be connected to the pensions dashboards ecosystem and be in a position to process 'Find' and 'View' requests by 31 October 2025. Getting ready to connect to Pensions Dashboards will be a significant task

for the Fund, particularly for the resourcing of the Administration Team in both the lead up to the connection deadline of 31 October 2025 (including significant data cleansing) and following the connection date when members will start to request information via the dashboards.

Pensions Dashboard "readiness" covers a wide range of areas. A lot of work has already been carried out in preparation for this, particularly focussing on:

- identifying any data that requires to be cleansed or otherwise updated so it is fit for integrating with the pensions dashboard and
- working with procurement colleagues to investigate the most effective way to appoint a supplier (Integrated Service Provider ("ISP")) who can provide the system which will integrate with the national pensions dashboard ecosystem.

The project also requires a number of key decisions to be made, many of which are legal requirements on the scheme manager, albeit most are of a technical nature. A list of some of the key decisions that are expected to be required is outlined in Appendix 5.

The Fund's Project Team is now developing the project initiation documentation, including the project plan. As part of this, key roles and responsibilities will be allocated. It is not expected that this will need to be as large a project as McCloud, but The Pensions Regulator has stated the following as part of guidance which can be found here — https://www.thepensionsregulator.gov.uk/en/trustees/contributions-data-and-transfers/dashboards-guidance

"There is significant work involved to comply with your dashboards duties and you may need to engage third-party suppliers to help you with this work, such as an administrator or an integrated service provider (ISP). You should work with your advisers to assess the impact of the changes and plan how you will meet your dashboard duties."

Appendix 5 includes a high level summary of the expected project management structure and roles for the project. A Project Management Group ("PMG") will be established which includes the Head of Clwyd Pension Fund, the Pensions Administration Manager (who will also be the Project Sponsor), the Project Team Leader (Project Manager) and the Chair of the Pension Board. The Committee are asked to delegate any key decisions to be made in relation to the pensions dashboard, including those outlined in Appendix 5, to the PMG, subject to the Head of Clwyd Pension Fund and the Pensions Administration Manager being present when any key decisions are being made.

The Fund's business plan has already included a budgetary provision relating to this project which was estimated at £100,000. Based on initial estimated costs for the additional system, at this point in time it is expected that this budget will be sufficient for system implementation and other costs during 2024/25. There will be ongoing system costs that will be incorporated into future budgets as part of annual business planning. Any need for additional budget which will impact the overall budget for the Fund will be brought back to the Committee for approval.

Going forward, the Committee will be provided with updates similar to those provided in paragraph 1.02 in relation to the McCloud project so the Committee can remain aware of how the project is progressing. More detailed updates will also be provided the Pension Board.

1.04 Other updates

- Existence checking As mentioned previously, it is a requirement of the CPF Anti-Fraud and Corruption Strategy that a triennial existence check is made in relation to the Fund's overseas pensioners. All 58 pensioners whose pension is paid into an overseas bank account have been contacted with 91% of the pensioners having now had their identity confirmed. The remaining 9% of pensions have been suspended on the assumption the members have passed away, and will be reinstated if the members get in touch.
- Year End process The Technical and Payroll Team are nearing completion of the year end process ensuring all active members have up to date pay, contributions and other information on their CPF records. As well as ensuring members' records are up to date for when they eventually retire or leave the scheme, this information is necessary for accurate annual benefit statements, and the interim and triennial actuarial valuations. The Administration Team continue to look for improvements in the processing of data, which means the year-end process becomes more streamlined each year and improves the accuracy of the data used by the Actuary in the triennial valuation, which could avoid higher employer contributions being required if margins for prudence are needed in their calculations. This also benefits preparations for the interim valuation process that is being carried out this year.
- Annual Pensions' Increase The Technical and Payroll Team have successfully completed the application of the 2024 Pension Increase award, processing the annual inflationary increase (6.7%) to all pensioners, dependants and deferred members, and sending a communication confirming the increase to pensioners and dependants. The Fund's policy is to only send hard copy letters notifying of the pensions increase to pensioners/dependants who have requested paper as their communication preference; the remaining are all uploaded onto MSS and, where an email address is held, a notification of the letter being uploaded is sent.
- Project Team The Project Team is now operational following the return of the Technical and Payroll Team Leader from maternity leave. The staff member who was temporarily seconded to cover that position during the maternity absence is now able to focus fully on the Project Team along with other appointed team members. The team have a range of areas to work through, including preparing for the launch of the National Pension Dashboard and progress on this will be provided in future reports. A further priority for the team is the recalculations of member benefits for members who have already left following the backdated 2023 pay award as mentioned at the previous Committee meeting.

1.05 | Policy and Strategy Implementation and Monitoring

Administration Strategy

The Fund's existing Administration Strategy was agreed by the Committee in May 2021 and has been subject to minor amendments since then. It is considered that much of the existing Administration Strategy remains to be appropriate overall and given the expected publication of the Good Governance recommendations later this year (noting that the LGA have suggested this timeframe could now be delayed due to the upcoming Election), a further fundamental review is planned at that time and any additional changes will be brought to the Committee for approval. However there are some minor changes that are required to be made at this time, and Appendix 3 includes the proposed updated Administration Strategy. The changes are highlighted with deleted text struck through.

The key changes are as follows:

- References to General Data Protection Regulations have been changed to the Data Protection Act 2018
- A new reference to the recent statutory Annual Report guidance and the additional key performance measures required has been added
- The approach for levying employer costs for poor performance and the approach to charging employers interest for late contribution payments have been updated, which also includes a delegations to officers which are referred to in the separate Statement of Administering Authority Discretionary Policies
- An additional employer responsibility for issuing a schedule with AVC payments has been added to Appendix B: Responsibilities and performance standards

The Committee are asked to approve the amendments as highlighted in the Pensions Administration Strategy in Appendix 3 and the extracts from the Statement of Administering Authority Discretionary Policies in Appendix 4. The Committee are also asked to delegate any final minor changes to the Administration Strategy, following consultation, to be made by the Head of Clwyd Pension Fund and Pensions Administration Manager, with any more substantive changes being brought back to Committee for consideration.

1.06 The latest monitoring information in relation to administration is outlined below:

<u>Day to day cases</u> – Appendix 6 provides the analysis of the numbers of cases received and completed on a monthly basis from April 2022 up to and including May 2024, and how this is split in relation to our three unitary authorities and all other employers.

The number of incoming cases for February up to and including May was 11,405 which is expected given the normal additional work generated by the year end process. The number of cases completed by the team since the last update for the same period was 10,953, however the processing time for some cases is taking longer due to manual workarounds for

McCloud and therefore this number is lower than might otherwise have been the case,. The Operations Team have also had two full time members of staff absent from work due to long term sickness during this period; a further staffing update is provided in section 2.01 of this report.

As a result of this, the number of open cases increased to 6,286 at the end of May from 5,950 at the end of January. It is positive that the increase in open cases is not more significant considering the points highlighted above. The Pension Administration Manager will continue to monitor the impact that the McCloud regulations/guidance and system functionality is having on case completion numbers.

1.07 Key performance indicators – Appendix 7 shows our performance against the KPIs measured monthly up to and including April 2024. The summary reports illustrate the number of cases that have been completed over either 3 months or 12 months, as well as the proportion completed within the agreed KPI target timescales.

As can be seen, across three months and twelve months, there are several KPIs where the number of completed cases has increased and others that have reduced. Key points to note are:

- Joiners 694 joiner cases have been completed over the last three months with a 7% increase of those being completed within the legal and overall (member experience) KPIs.
- Leavers 386 leaver cases have been completed over the last three months which is slightly higher than the three month period up to January 2024. Performance against the legal and internal CPF measure remains unchanged, however the number completed within the overall KPI has reduced by 11% in the last three month period (albeit it has improved in the last 12 months). The overall KPI measure includes the employers' time and it is hoped that the new employer monitoring and escalation process which is mentioned earlier in this report will assist in identifying and improving this going forward.
- Some transfers in and out have been, and continue to be, on hold pending new GAD guidance being issued and although some guidance was received in January, not all transfers are able to be processed due to an outstanding system update and awaiting further guidance. As mentioned in the previous update report, processing has re-commenced for those cases that can be actioned but the numbers of both in and out transfers being completed will continue to fluctuate until business as usual can resume. Work continues to catch up on those cases previously on hold.
- Retirements 434 retirement cases have been completed over the last three months (which is one less than the number completed in the three month period up to January). Over the 12 month period there has been an increase of 184 retirement cases being processed and there has been a small increase in both the legal and overall measures.

The Operations Team continues to prioritise cases where a payment is made either to an individual or a third party. A number of high priority processes (e.g. retirements) are now taking longer to complete due to the added complexity that the McCloud ruling has brought. This will continue until all guidance has been received, all member data has been uploaded onto the pension system, and system functionality has been upgraded to remove manual intervention and workarounds.

The management of meeting challenging regulatory timescales which apply to significant numbers of cases continues to be difficult whilst a number of staff continue their training. Resourcing is considered further later in this report.

1.08 Internal dispute resolution procedures (IDRP)

All 2022/2023 cases have recently been concluded:

- There were nine Stage One appeals against employers. Seven were rejected and two were upheld.
 - Of the seven that have been rejected, four relate to nonaward of ill health retirement and three relate to the tier of ill health awarded
 - For the two that have been upheld, both members have now been awarded tier one ill health retirement
- One Stage Two appeal was submitted against the employer. The member appealed that they were only awarded tier two ill health retirement. This appeal was rejected.

In relation to cases for 2023/2024:

- There were two Stage One appeals against employers. One has been rejected and one is still ongoing.
 - The rejected case relates to non-award of ill health retirement
 - The ongoing case is due to the fact that the member is disputing the tier of ill health retirement that they have been awarded
- There was one Stage Two appeal which was submitted against the employer. The member appealed that they were only awarded tier two ill health retirement. This appeal was rejected.

In relation to cases for 2024/2025:

- There is one Stage One appeal against the employer. The case is ongoing and relates to non-award of ill health retirement.
- There are currently no Stage Two appeals.

There continues to be no appeals against the administering authority, which is extremely positive.

		2023/2024		
	Received	Upheld	Rejected	Ongoing
Stage 1 - Against Employers	2	0	1	1
Stage 1 - Against Administering				
Authority	0	0	0	0
Stage 2 - Against Employers	1	0	1	0

Stage 2 - Against Administering				
Authority	0	0	0	0
	2024/2025			
	Received	Upheld	Rejected	Ongoing
Stage 1 - Against Employers	1	0	0	1
Stage 1 - Against Administering				
Authority	0	0	0	0
Stage 2 - Against Employers	0	0	0	0
Stage 2 - Against Administering				
Authority	0	0	0	0

There are no Clwyd Pension Fund cases that are currently with the Pensions Ombudsman. However, there is a case which is being considered through the Council's Stage 2 complaints process.

1.09 | Communications Strategy

The Communication Strategy focuses on improved member and employer engagement. To help achieve this the following meetings have taken place since the last update report:

- a number of virtual member presentation sessions were held for Coleg Cambria employees. The training sessions were provided by the Communications and Regulations team leader along with the Communications Officer. Feedback from these sessions was very positive with members confirming a better understanding of the scheme.
- training was provided for a number of our Town Council employers relating to the scheme in general with a specific focus on the leaver process.
- 1.10 The Communications Team has maintained regular engagement with employers and scheme members over recent months. Other key points in relation to communications include:
 - Twenty three 1-2-1 member sessions have taken place
 - A survey was issued to all employers that attended the Employer Engagement Session (ESS) asking for feedback. Of the feedback received all employers found the meeting useful and confirmed that they would continue to attend future meetings.
 - Eight update emails have been sent to all employers including confirmation of the employee contribution rates for 2024/2025, LGA training date information for 'Employer Role in the LGPS' and a request for employers to ensure their discretionary policies and signatory lists are up to date.
- 1.11 Appendix 8 provides an updated summary of Member Self Service ("MSS") registered users, which shows that enrolment to MSS has increased slightly since the last update with now over 55% of the scheme membership having registered. The number of members that have opted

for paper correspondence remains at approximately 19% of the scheme membership.

For those members registered on MSS, use of the facilities remains high. For the period of January up to and including April:

- 69 members have requested a retirement pack for their deferred benefit.
- 20,721 benefit projections have been calculated.
- there have been 400 changes to members' expression of wish details, 504 address updates and 20 bank account changes.

The Fund is working towards onboarding members of the LGPS Councillor Scheme to MSS this Autumn / Winter and is currently in the process of writing out to all LGPS Councillor members. The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 state that notice must be given, and a member needs to be written to three times before changing from paper to electronic communications. This allows time for members to get in touch if they would prefer their communication preference to remain as paper.

1.12 **Delegated Responsibilities**

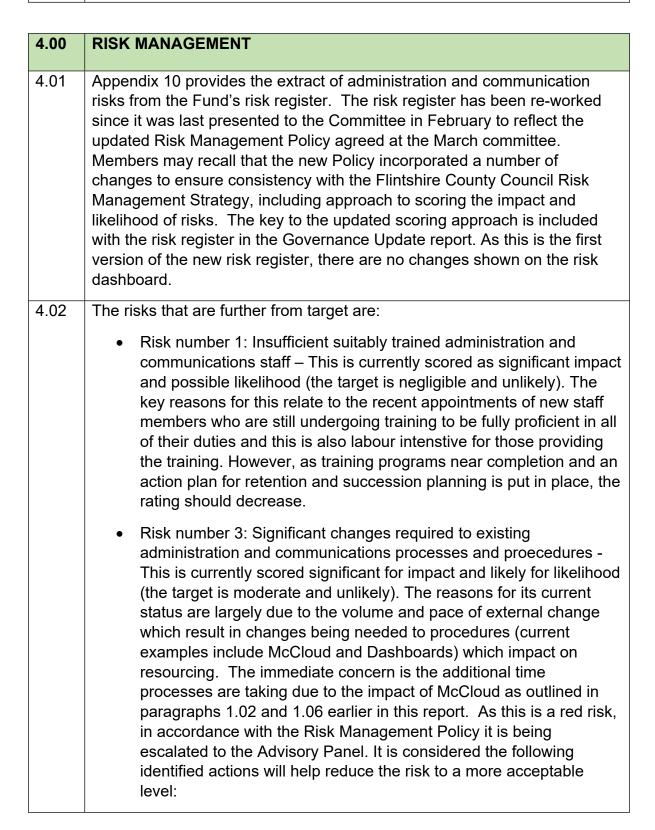
The Pension Fund Committee has delegated a number of responsibilities to officers or individuals. NIC Solutions Ltd has been approved to join the scheme as a new employer using these delegated responsibilities since the last Committee meeting. Further details are contained in Appendix 9.

2.00 **RESOURCE IMPLICATIONS** 2.01 Since the last update, two members of staff from the Administration Team have been absent due to long term sickness. The relevant Team Leaders along with HR colleagues are monitoring the situation and an update will be provided at the next meeting if needed. A fixed term contract for a full-time Payroll Officer position is currently being advertised due to the existing fixed term contract coming to an end in July. The vacant Communication and Marketing Officer role is being reviewed and will be advertised once the review of the job description is complete. The vacant Pension Assistant role position in the Project Team is to remain vacant for the time being due to more efficient functionality being developed by Heywood within the processes associated with the Pension Assistant role. Depending on what efficiencies are realised this may result in a review of resource within this area. Whilst waiting for this functionality to be completely developed, the existing Flintshire County Council apprentice within the team continues to assist in this role which is the normal practice for all trainees. Again, due to the training requirements for new staff being very labour

intensive, improvements in KPI performance will be over a number of months. Resource requirements will be monitored within the ELT

particularly in light of a potential additional employer utilising ELT services as per paragraph 1.01.

3.00	CONSULTATIONS REQUIRED / CARRIED OUT
3.01	The proposed changes to the Administration Strategy will be consulted with the Fund's employers.



	 Software releases are due in the coming months which are expected to resolve a number of the McCloud processing issues and reduce the manual effort required. 	
	 With regards to Dashboards and as discussed earlier in this report the Project Team are now fully resourced, have commenced the preliminary preparation work required for dashboard readiness and are now developing the project initiation documentation. 	
4.03	Work continues in all areas to reduce the risks that are not on target. It is also worth noting that three of the risks' current scores match their target risk scores which is extremely positive (these are risks 5, 7 and 8).	

5.00	APPENDICES
5.01	Appendix 1 – Business Plan progress Appendix 2 – McCloud Programme update report Appendix 3 – Administration Strategy proposed amendments Appendix 4 – Extracts from Statement of Administering Authority Discretions Policy with proposed amendments Appendix 5 – National Pension Dashboards key decisions and project management roles and responsibilities Appendix 6 – Analysis of cases received and completed Appendix 7 – Key Performance Indicators Appendix 8 – Member Self Service update Appendix 9 – Urgent delegation Appendix 10 – Risk register update

6.00	LIST OF ACCESS	IBLE BACKGROUND DOCUMENTS		
6.01	Report to Pension Fund Committee – Pension Administration Strategy (March 2021)			
	 Report to Pension Fund Committee – Communications Strategy (June 2022) 			
	· •	 Report to Pension Fund Committee - 2023/24 Business Plan and Clwyd Pension Fund Risk Management Strategy (March 2023) 		
	Contact Officer: Telephone: E-mail:	Karen Williams, Pensions Administration Manager 01352 702963 karen.williams@flintshire.gov.uk		

7.00	GLOSSARY OF TERMS
7.01	(a) CPF – Clwyd Pension Fund – The Pension Fund managed by Flintshire County Council for local authority employees in the region and employees of other employers with links to local government in the region.

- (b) Administering authority or scheme manager Flintshire County Council is the administering authority and scheme manager for the Clwyd Pension Fund, which means it is responsible for the management and stewardship of the Fund.
- (c) **PFC Clwyd Pension Fund Committee** the Flintshire County Council committee responsible for the majority of decisions relating to the management of the Clwyd Pension Fund
- (d) **LPB or PB Local Pension Board or Pension Board** each LGPS Fund has an LPB. Their purpose is to assist the administering authority in ensuring compliance with the scheme regulations, TPR requirements and efficient and effective governance and administration of the Fund.
- (e) **LGPS Local Government Pension Scheme** the national scheme, which Clwyd Pension Fund is part of.
- (f) **TPR The Pensions Regulator** a government organisation with legal responsibility for oversight of some matters relating to the delivery of public service pensions including the LGPS and CPF.
- (g) SAB The national Scheme Advisory Board the national body responsible for providing direction and advice to LGPS administering authorities and to DLUHC.
- (h) **DLUHC Department of Levelling Up, Housing and Communities** the government department responsible for the LGPS legislation.