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GREATER MANCHESTER PENSION FUND - LOCAL PENSIONS BOARD

Day: Thursday
Date: 28 July 2022
Time: 3.00 pm
Place: Boardroom - Guardsman Tony Downes House,
Manchester Road, Droylsden, M43 6SF

Item No.	AGENDA	Page No						
1.	APOLOGIES FOR ABSENCE To receive any apologies for absence.							
2.	DECLARATIONS OF INTEREST To receive any declarations of interest.							
3.	MINUTES To receive the minutes of the Local Pensions Board meeting on the 7 April 2022.	1 - 8						
4.	LOCAL GOVERNMENT (ACCESS TO INFORMATION ACT) 1985 - EXEMPT ITEMS The Proper Officer is of the opinion that during the consideration of the items set out below, the meeting is not likely to be open to the press and public and therefore the reports are excluded in accordance with the provisions of the Schedule 12A to the Local Government Act 1972. <table border="1"><thead><tr><th>Item</th><th>Paragraphs</th><th>Justification</th></tr></thead><tbody><tr><td>5,6,7,8,9,10,11,12,13,14,15</td><td>3&10, 3&10, 3&10, 3&10, 3&10</td><td>Disclosure would, or would be likely to prejudice the commercial interests of the Fund and/or its agents which could in turn affect the interests of the beneficiaries and/or tax payers.</td></tr></tbody></table>	Item	Paragraphs	Justification	5,6,7,8,9,10,11,12,13,14,15	3&10, 3&10, 3&10, 3&10, 3&10	Disclosure would, or would be likely to prejudice the commercial interests of the Fund and/or its agents which could in turn affect the interests of the beneficiaries and/or tax payers.	
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5.	ADMINISTRATION UPDATE To consider a report of the Director of Pensions / Assistant Director for Administration.	9 - 22						
6.	GMPF IT & SYSTEMS UPDATE To consider a report of the Director of Pensions / Assistant Director for Administration.	23 - 38						

From: Democratic Services Unit – any further information may be obtained from the reporting officer or from Louis Garrick, Senior Democratic Services Officer, to whom any apologies for absence should be notified.

Item No.	AGENDA	Page No
7.	2022 ACTUARIAL VALUATION To consider a report of the Director of Pensions / Assistant Director for Funding and Business Development.	39 - 94
8.	SUMMARY OF GMPF DECISION MAKING To consider a report of the Director of Pensions / Assistant Director for Funding and Business Development.	95 - 108
9.	POOLING UPDATE To consider a report of the Director of Pensions / Assistant Director for Funding and Business Development.	109 - 114
10.	ANNUAL REPORT To consider a report of the Director of Pensions / Assistant Director for Funding and Business Development.	115 - 122
11.	BUSINESS PLANNING AND RISK MANAGEMENT To consider a report of the Director of Pensions.	123 - 134
12.	THE PENSIONS REGULATOR (TPR) To consider a report of the Director of Pensions / Assistant Director for Funding and Business Development.	135 - 190
13.	RISK MANAGEMENT AND AUDIT SERVICES PLANNED WORK 2022/23 To consider a report of the Interim Head of Risk Management and Audit Services.	191 - 228
14.	RISK MANAGEMENT AND AUDIT SERVICES - ANNUAL REPORT 2021/22 To consider a report of the Interim Head of Risk Management and Audit Services.	229 - 240
15.	PROGRESS REPORT ON RISK MANAGEMENT AND AUDIT SERVICES 4 APRIL 2022 TO 8 JULY 2022 To consider a report of the Interim Head of Risk Management and Audit Services.	241 - 248
16.	URGENT ITEMS To consider any additional items the Chair is of the opinion shall be dealt with as a matter of urgency.	
17.	DATE OF NEXT MEETING To note the date of the next meeting of the Local Pensions Board on 29 September 2022.	

From: Democratic Services Unit – any further information may be obtained from the reporting officer or from Louis Garrick, Senior Democratic Services Officer, to whom any apologies for absence should be notified.

GREATER MANCHESTER PENSION FUND - LOCAL PENSIONS BOARD

7 April 2022

Commenced: 15:00

Terminated: 16:20

Present:	Councillor Fairfoull	Employer Representative
	Paul Taylor	Employer Representative
	Michael Cullen	Employer Representative
	Jayne Hammond	Employer Representative
	Catherine Lloyd	Employee Representative
	David Schofield	Employee Representative
	Pat Catterall	Employee Representative

Apologies for Absence **Councillor Naylor, Chris Goodwin and Mark Rayner**

36 DECLARATIONS OF INTEREST

There were no declarations of interest.

37 MINUTES

The minutes of the Local Pensions Board meeting on the 13 January 2022 were approved as a correct record.

38 FINAL ACCOUNTS AND BUDGET/MEDIUM TERM FINANCIAL PLANNING

Consideration was given to a report of the Director of Pensions / Assistant Director for Local Investments and Property. The report provided information on the GMPF Accounting Policies and Critical Judgements for 2021-22. The report also set out the expenditure budget for 2022/23 and the medium-term financial plan for 2022-25 as considered by Management Panel.

In regards to Accounting Policies and Critical Judgements, it was reported that the only change was that this year would see a change in disclosure of certain costs for certain types of pooled private market investments. These having previously been accounted for within the changes in value of investments would now be identified separately where possible. These were the costs identified by the custodian through their administration and accounting of GMPF private market investments and whilst meeting accounting requirements would not be exactly the same as those calculated by CEM that were disclosed within the Annual Report. The estimate was that these would be in the region of £90m per annum from 2022/23. These changes in disclosure make no difference to the projected outcomes for the Fund NAV statement in accounts or the medium-term plan.

The Director of Pensions set out the expenditure budget for 2022/23 and the medium-term financial plan for 2022-25. It was explained that the level of budget sought for 2022/23 sought an increase from that in 2021/22. This budget covers the expenditure by the Fund on governance, administration and investment costs for oversight and internal management. External investment management fees were overseen by Management Panel in a more detailed fashion with comparison to peer pension funds provided by CEM. The budget was attached as Appendix 1 to the report.

RESOLVED

That the report be noted.

39 ADMINISTRATION UPDATE

Consideration was given to a report of the Director of Pensions / Assistant Director for Administration. The report provided the Local Board with an update on key activities taking place in the Administration section during the last quarter, including comments on administration performance and on complaints and disputes. The report also detailed the areas of focus for the next quarter.

It was reported that overall, administration workflow and performance remained consistent. There was generally much less volatility in workloads now as the effects of the pandemic changed. The administration performance dashboard for quarter 3, October to December 2021, was attached at Appendix 1.

The main themes of the complaints received over the quarter related to issues with logging into My Pension or regulatory decisions that members were unhappy with. The compliments received relate to good customer service being provided by GMPF colleagues.

The transition to using My Pension online for all key processes continues, and officers continued to work closely with the software supplier as they developed new functionality that would benefit members when using My Pension and provide a better customer experience

Members were advised that the transition of files to Microsoft SharePoint, which began in May 2021 continued, with file migrations planned until the end of the year. Work to develop the new telephony infrastructure that went live at the start of July 2021 also continued, with changes being introduced to the contact centre software from 1 April 2022 to provide more detailed reporting on the types of calls and emails received.

In regards to Member Services, work had commenced on the project to produce Annual Benefit Statements (ABSs) for 2021/2022 for both contributing members and members with benefits on hold. The statutory deadline for issuing these statements was 31 August 2022. Statements for members with benefits on hold will be uploaded to their My Pension accounts by 31 May 2022.

It was highlighted that the Retiring Members and Leaving Contributors teams were receiving large numbers of revised pay notifications following the recent pay award. Leaving Contributors had received over 500 revised pay notifications so far from the National Probation Service, all of which would require benefits on hold to be recalculated for those members.

The review of the pension overpayment recovery process had been progressing and new procedures were being put in place to strengthen the likelihood of recovery whilst ensuring cost efficiency. There was still further work to be done to finalise these, which would be a priority for the next quarter.

It was reported that work was about to commence on reviewing the processes linked to external pension transfers. On the 8 November, The Occupational and Personal Pension Schemes (Conditions for Transfers) Regulations 2021 were laid and took effect from 30 November 2021. These regulations set out additional checks that all pension arrangements must make before paying a transfer value to a new arrangement. These checks included looking for six red flags and if any of these were present the transfer cannot proceed, including the member not providing required evidence, the member having been cold-called, and the member being incentivised or pressured to make the transfer.

The Board were advised that the Department for Work and Pensions (DWP) responded to the consultation 'Stronger Nudge to pensions guidance' on 17 January 2022. On the same day, the DWP laid before Parliament the Occupational and Personal Pension Schemes (Disclosure of Information) (Requirements to Refer Members to Guidance etc) (Amendment) Regulations 2022. The regulations come into force on 1 June 2022 and apply to England, Scotland and Wales. These new regulations would require administrators of occupational pension schemes, including the LGPS, to give to their members, in certain cases, a stronger nudge to Pension Wise guidance.

Administering authorities would need to give the stronger nudge where they receive an application, or a communication in relation to an application, from a member to start receiving their additional voluntary contributions (AVCs) on or after 1 June 2022.

In regards to Employer Services, there continued to be a significant number of employers applying to join GMPF with 90 applications currently being progressed. A further 29 enquiries had been made by employers considering applying for admission. A significant amount of work had also been undertaken to identify and provide support to all employers who were failing to submit their monthly data returns on time for one reason or another. In February 2022, a notice of warning letter was sent to employers who have failed to submit their monthly returns on time on three or more occasions within the last twelve months.

Within the Development and Technologies team, work to replace and renew both the IT hardware and software infrastructure of GMPF continued. Work this quarter had focussed on the introduction of Multi-Factor Authentication (MFA) across the Microsoft 365 tenancy and on sourcing replacement hardware for one of our on premise servers. Work to migrate files and documents to SharePoint had also continued, with all Administration teams having now migrated their structural team files. The focus had now moved on to the migration of collaborative files where cross working between teams was needed.

Work on the area of cyber security also continues. Work in relation to the procurement of Cyber Security support services had progressed. A specification had been drafted for two areas of support to be procured separately. The intention was to proceed with the procurement of the first area of support during quarter 1 and the second during quarters 2 and 3 of this year.

The Communications and Engagement service continued to make changes to the Enghouse phone system to meet the demands of callers, and to improve functionality. A full report was being finalised that included statistics that give data around all aspects of calls, such as wait times and handling times so that this could be readily available and easy to produce in future. The next phase in the project was implementing emails within the Enghouse system. Testing on this had now been completed and from 21 March 2022, all emails regarding My Pension would be filtered through the Enghouse system.

Recent newsletters issued to contributing members and those with benefits on hold resulted in the number of calls and emails received increasing significantly. There was also an increase in online member engagement across several areas. A newsletter for pensioner members would be sent to members and promoted on the website when pensioner P60s were issued.

Officers had also been supporting with the creation of a new benchmarking framework to be hosted by CEM. The aim of the Voice of the Customer framework was to enable the consistent measurement of member and employer feedback across the pensions industry

RESOLVED

That the information provided in the report be noted.

40 PENSIONS DASHBOARD UPDATE

Consideration was given to a report of the Director of Pensions / Assistant Director for Funding and Business Development / Assistant Director for Administration. The report provided the Local Board with an update on the Government's Pensions Dashboard project.

The Board were reminded of the background of the Government's Pensions Dashboard project. The intention was that an individual would use a dashboard to submit a request to find their pensions information (confirming their identity and giving the relevant consent). A 'pension finder service' then sends this 'find request' to all pension schemes. If a pension scheme finds a match with this individual, it would confirm this with the dashboard service and, if the individual then requests to view their information, the dashboard would pull the individual's data directly from the pension

scheme for them to view.

It was explained that Pension dashboards would be online platforms providing one place for individuals to access pension information from multiple sources, including accessing data about their State Pension.

The Working Group were advised that LGA had responded to the DWP consultation on behalf of all LGPS funds. In their response, the LGA expressed concern that the timescales being proposed by DWP could be unachievable. They believed the work involved for LGPS funds to be able to connect to the dashboard architecture and the requirement for funds to implement the McCloud changes in the same timeframe, would create a significant challenge.

They also highlighted several other issues, including the DWP's apparent exclusion of deferred refund entitlements from dashboards. This appeared to go against one of the main project objectives, being to reunite people with pension benefits they had lost touch with.

In regards to next steps no specific tasks were being carried out by officers at present in relation to the dashboard project, other than responding to requests for feedback or information as it was received. It was anticipated the DWP would issue its response to the consultation feedback in the coming months and that more information would be published in the summer. The GMPF team would continue to work closely and give input to the various parties and forums supporting this project.

RESOLVED

That the report be noted.

41 THE PENSIONS REGULATOR (TPR)

Consideration was given to a report of the Director of Pensions / Assistant Director for Funding and Business Development / Assistant Director Pensions Administration. The report provided the Local Pensions Board with a copy of the current breaches log and decisions made by the Scheme Manager regarding the reporting of these breaches, including details of any late payment of contributions. The report also provided an update on TPR's proposed Single code of Practice.

A copy of the current breaches log (excluding late payments of contributions) was attached to the report as Appendix 1. The criteria that officers used to assist them in assessing whether a breach might be deemed 'material' was also attached at Appendix 2.

The Board were advised that attached at Appendix 3 were details of expected contribution payments (with matching remittance information) which had not been received by GMPF by the 19th of the month following the month to which they related (for example 19 November for October contributions) for November 2021 through to January 2022.

Further, attached to the report at Appendix 4 was further analysis on the contribution payments received in respect of the November 2021 to January 2022 period, specifically detailing the number of employers making payments (and the amount of contribution payments received) in accordance with GMPF's deadline of the first day of the following month.

The Assistant Director for Funding and Business Development reported that in regards to the TPR's Single Code of Practice the TPR did not have a firm final publication date for the new code. However, it did not expect to lay the new code in Parliament before spring 2022 and it was, therefore, unlikely to become effective before summer 2022. Given the expected delay in implementation, GMPF would seek to assess itself against the draft code of practice and would report back to the Board on progress at future meetings.

RESOLVED

That the report be noted.

42 SUMMARY OF GMPF DECISION MAKING

Consideration was given to a report of the Director of Pensions / Assistant Director for Funding and Business Development. The report summarised the recommendations made by the GMPF Working Groups over the period from January 2022 to March 2022, which were approved at the Management Panel meeting on the 18 March 2022. The report also summarised the decisions made by the Management Panel at the same meeting.

The Assistant Director of Funding and Business Development highlighted key items considered by the GMPF Working Groups and GMPF Advisory and Management Panels.

The Administration, Employer Funding and Viability Working Group received a report on academy consolidation. The working group was informed of the latest developments regarding a MAT that was seeking to consolidate its LGPS participations in a single LGPS fund.

It was explained that to consolidate liabilities into a single LGPS fund it was necessary for the Secretary of State to issue a Ministerial Direction to allow for the substitution of Administering Authorities under the LGPS Regulations. It was also required under the Regulations to consult prior to granting a Ministerial Direction.

The meeting of the GMPF Management Panel on the 18 March 2022 were presented with the proposed GMPF budget for 2022/2023 and the draft medium-term financial plan for 2022 to 2025. The medium-term financial plan was constructed using the actuarial assumptions in the Funding Strategy Statement, and the out-turn was largely subject to financial markets and their impact on investment performance. The significant differences in the proposed 2022/23 budget compared to the 2021/22 budget were highlighted and explained to members. The Management Panel approved the expenditure budget for 2022/23 and approved the Medium-Term Financial Plan.

RESOLVED

That the report be noted.

43 POOLING UPDATE

Consideration was given to a report of the Director of Pensions / Assistant Director for Funding and Business Development. The report provided an update on the activities of the Northern LGPS Pool and relevant national pooling developments.

The Board were reminded that on 3 January 2019 MHCLG released new draft statutory guidance on LGPS asset pooling for 'informal' consultation. Parties that were consulted include pools, administering authorities and local pension boards. The guidance was intended to replace previous pooling guidance, in particular the LGPS Investment Reform Criteria and Guidance issued in November 2015. Government was yet to publish a response to this consultation and therefore the 2015 guidance currently remains in force.

Further, DLUHC civil servants had indicated that a consultation on several key policy areas for the LGPS was expected to be issued in summer 2022. This consultation was expected to cover LGPS pooling as well as the implementation of TCFD ('Task-force on Climate-Related Financial Disclosure') requirements for LGPS funds. However, given the delays experienced to date and the volume and nature of other Government business, there was clearly potential for delay.

The Assistant Director for Funding and Business Development provided an update on the main ongoing work streams for the Northern LGPS. The report set out details of the Northern Private Equity Pool, Direct Infrastructure, Responsible investment, Property Framework, Housing Investment and NLGPS branding and communication work streams. It was highlighted that costs savings had largely been driven by the Northern Private Equity Pool and partners in GLIL.

RESOLVED

That the report be noted.

44 BUSINESS PLANNING, BUDGET AND RISK MANAGEMENT

Consideration was given to a report of the Director of Pensions. The report provided details of the current business plan and highlighted the current key risks being monitored.

The Board were advised that the overarching risk register was reviewed and updated at least once each quarter and the latest version was included within this report for review at Appendix A. The key risks being monitored at present were listed on the 'Current Issues' tab.

The war in Ukraine potentially impacted several risks. Direct exposure to Russian or Ukrainian issued securities was very limited but wider investment risks extended beyond this. Officers had liaised with the Fund Managers, who were assessing the risks in what was a fast-moving scenario. The key risks identified were:

- Risk 1 – Strategic asset allocation underperforming liabilities over triennial valuation period
- Risk 2 – Investment management arrangements failing to add value
- Risk 4 – Employers unable to meet deficit on cessation
- Risk 8 – System failure (specifically due to cyber-attacks)
- Risk 26 – Implementation of Responsible Investment policy

Some of the other specific risks that had been monitored closely by officers this quarter were summarised and the Board were asked to note the following:

- Risk 9 – Assessing the impact of the McCloud changes

DLUHC had confirmed that its consultation response on the anticipated changes due to the McCloud judgement was now unlikely to be issued before July 2022. The scope of those affected had been widened to match the unfunded public sector pension schemes. The lack of certainty continues to cause issues for funds and their software suppliers and further reduces the timeframes that all parties originally set out to work to.

Additionally, officers continued to work on identifying the best routes to ensure any data changes were captured and uploaded effectively, but there were several risks that need to be carefully considered and this was continuing to prove a challenge. This work continued to be a key focus for the team, who were collaborating with colleagues from several other LGPS funds to try to identify all viable options.

- Risk 19 – Cyber security work

The risks relating to cyber security were greater than ever and work continued to ensure existing controls were still working and to put new controls in place wherever possible.

RESOLVED

That the report be noted.

45 PROGRESS REPORT ON RISK MANAGEMENT AND AUDIT SERVICES 18 DECEMBER 2021 TO 18 MARCH 2022

Consideration was given to a report of the Head of Risk Management and Audit Services. The report summarised the work of the Risk Management and Audit Service for the period from 18 December 2021 to 18 March 2022.

It was stated that the team continued to work remotely from home, in the main, although

opportunities were now available to work/meet in office space should staff wish to, as the COVID restrictions had now been lifted, and a hybrid way of working was being developed.

The progress report showed the actual days spent against the planned days for 2021/22, 310 days had been spent against the 300 planned days up to 18 March 2022.

It was reported that one final report had been issued during this period. As the Council undertook the Treasury Management function for both the Council and the GMPF the audit covered a sample of transactions for both organisations and a joint Audit was undertaken.

As at 31 March 2021, a total of £507m was invested on behalf of the Pension Fund. No borrowing was undertaken on behalf of the Pension Fund. The Council had adopted and followed the CIPFA Prudential Code and CIPFA Treasury Management Code of Practice. The overall objective of the audit was to provide officers and members with assurance that adequate systems and controls within Treasury Management were in place to ensure that risks were controlled and minimised.

The Audit highlighted that there were some good practices embedded within the Financial Management Team to ensure that the Treasury Management function was operating effectively. The Treasury Management function complied with the CIPFA Code of Practice and prudential limits and indicators were in place. The limits and indicators were reviewed annually. The overall audit opinion was a **High** level of assurance.

Other work in this period involved advice and support given, on request, to GMPF officers as detailed in the report.

Also a review of the January 2022 iConnect files was submitted for a Local Authority employer. Whilst a small number of issues were identified on the submitted files there was confidence that things were now moving in the right direction in respect of the quality of Pensions Administration for this employer. Work would continue with the Pension Fund and the service would continue to monitor the quality of the Pensions Administration processes at the employer as part of ongoing employer visits.

A review of the 2019/20 year end return was undertaken for a housing association employer in addition to a Post Audit Review. It was highlighted that the Post Audit Review found that the 2019/20 year end return contained errors, which would have impacted annual benefit statements. The Audit Service reviewed the 2019/20 return alongside carrying out the Post Audit Review. The review found a previous Post Audit Review recommendation that had not been implemented. The recommendation not implemented was communicating with affected members. This would be done once the 2019/20 annual return had been accepted by GMPF.

In regards to fraud and irregularities, there had been a new fraud case reported in the period. The case had been reported to Action Fraud, and an investigation had taken place. A control report had been compiled with a number of recommendations to improve the systems in place.

RESOLVED

That the report be noted.

46 URGENT ITEMS

There were no urgent items.

CHAIR

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