

GREATER MANCHESTER PENSION FUND - LOCAL PENSIONS BOARD

Day: Thursday
Date: 19 January 2023
Time: 3.00 pm
Place: Teams

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 6 October 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>6, 7, 8, 9, 10, 11,</td><td>3&10, 3&10, 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	6, 7, 8, 9, 10, 11,	3&10, 3&10, 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 (3.00PM) To consider the attached report of the Director of Pensions / Assistant Director for Administration.	9 - 24						
6.	SUMMARY OF GMPF DECISION MAKING (3.20PM) To consider the attached report of the Director of Pensions.	25 - 28						

Item No.	AGENDA	Page No
7.	BUSINESS PLANNING AND RISK MANAGEMENT (3.30PM) To consider the attached report of the Director of Pensions.	29 - 40
8.	THE PENSIONS REGULATOR (TPR) (3.40PM) To consider the attached report of the Director of Pensions / Assistant Director for Funding and Business Development.	41 - 68
9.	CEM ADMINISTRATION BENCHMARKING (3.50PM) To consider a report of the Director of Pensions / Assistant Director for Pensions Administration.	69 - 90
10.	2022 ACTUARIAL VALUATION (4.00PM) To consider the attached report of the Director of Pensions.	91 - 148
11.	PROGRESS REPORT ON RISK MANAGEMENT AND AUDIT SERVICES - 17 SEPTEMBER 2022 TO 31 DECEMBER 2022 (4.10PM) To consider the attached report of the Interim Head of Risk Management and Audit Services.	149 - 154
12.	URGENT ITEMS To consider any additional items the Chair is of the opinion shall be dealt with as a matter of urgency.	
13.	DATE OF NEXT MEETING To note the date of the next meeting of the Local Pensions Board on 13 April 2023.	

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

6 October 2022

Commenced: 15:00

Terminated: 16:50

Present:

**Councillor Fairfoul
Jack Naylor
Paul Taylor
David Schofield
Mark Rayner
Catherine Lloyd**

**Employer Representative - Chair
Employer Representative
Employer Representative
Employee Representative
Employee Representative
Employee Representative**

Apologies for Absence Chris Goodwin and Michael Cullen

15 DECLARATIONS OF INTEREST

There were no declarations of interest.

16 MINUTES

The minutes of the Local Pensions Board meeting on the 28 July 2022 were approved as a correct record.

17. PROGRESS REPORT ON RISK MANAGEMENT AND AUDIT SERVICES 9 JULY 2022 TO 16 SEPTEMBER 2022

Consideration was given to a report of the Interim Head of Risk Management and Audit Services. The report summarise the work of the Risk Management and Audit Service for the Period 9 July 2022 to 16 September 2022.

That Board were advised that the progress report showing the actual days spent against the planned days for 2022/23 was the cumulative position from the 1 April 2022 to 16 September 2022 and was attached at Appendix 1. The service had spent 78.64 days against the 300 planned days up to 16 September 2022. Whilst this was less days than would be expected at this stage in the year, the Interim Head of Risk Management explained that they were process of recruiting staff, and would endeavour to catch up on the number of days spent later in the financial year.

A review of the remaining audits in the plan had been undertaken and discussions had been held with Pension Fund Management to ensure that the high risk areas are appropriately prioritised for completion. The audits undertaken would provide the necessary assurance around the key systems and controls in place. There were a number of audits in the plan that could be carried forward or rescheduled due to timing issues or following requests from Senior Management.

It was explained that a number of employer audits were undertaken on an annual basis, in agreement with the Pension Fund, to provide assurance in respect of the pension's administration processes in place at the employer to confirm the accuracy of the contribution payments being made to the Pension Fund.

There were some concerning issues highlighted as part of the employer audit review, predominantly in relation to the information being provided to the Pension Fund on the iConnect submission. Sample testing highlighted incorrect CARE pay, employee contributions, employer contributions and final pay being reported on the submission for a number of members.

It was also found that the iConnect submission was not always being submitted in line with the timescales outlined in the Pension Administration Strategy. Whilst issues were highlighted with the

iConnect submissions it was confirmed that in general the iTrent Payroll System was administering LGPS pensions correctly. There was a further reporting issue identified in respect of Assumed Pensionable Pay and whilst confirmation was received that manual adjustments were being made to correct any identified errors, a number of employees were identified within the audit sample where manual adjustments had not been made to ensure that the correct CARE pay was recorded for them. The employer confirmed that a system fix is being sought for this issue.

A number of recommendations were made which would improve the control environment in place in respect of pension administration at the employer. Staff were already aware of some of the issues and it was evident that they were committed to implementing the recommendations and making the required improvements. Positive management responses were received to all the recommendations made within the audit report.

In addition, a recent investigation has been undertaken in respect of a person obtaining a GMPF member's personal details and impersonating the member, which resulted in the member's bank account details being changed and one month's pension payment being paid to the impersonator. As a result of the investigation a number of control issues were identified in respect of the processes being operated. A number of recommendations were made, which once implemented would strengthen internal control and minimise the risk of such an occurrence happening in the future.

During the period three Post Audit Reviews had been completed. The recommendations for the Greater Manchester Property Venture Fund and employer Audit – Oldham Council had been 100% implemented. With regards to Creditors – Second Post Audit Review, A number of recommendations were still not fully implemented; however, there had been a change in management and a new Interim Head of Pension Fund Accountancy was appointed in April 2022. Positive management responses had been provided to the recommendations made and assurance given that they would be implemented. The outstanding recommendations would be reviewed as part of the next GMPF Creditor Payments audit, which was yet to be scheduled.

RESOLVED

That the report be noted.

18. GMPF STATEMENT OF ACCOUNTS AND ANNUAL REPORT 2021-2022

Consideration was given to a report of the Director of Pensions / Assistant Director for Local Investments and Property). The report provided information on the progress of the governance arrangements for the audit of GMPF Accounts 2021/22.

The Board were advised that the audit remained in progress, whilst field work was largely complete and no major issues had been identified, the AFR had not to date been issued by Mazars.

The internal team had made some amendments to disclosures within the accounts alongside some presentational changes following comments from the auditors.

The completion process for 2021/22 was subject to completion of 2020/21 audit by Mazars for Tameside. This was subject to a national resolution on a technical issue related the treatment of 'infrastructure' assets held by local authorities.

RESOLVED

That the report be noted.

19. ADMINISTRATION UPDATE

Consideration was given to a report of the Director of Pensions / Head of Pensions Administration. The report provided the Working Group with a summary of the Work and Projects being carried out by the Member services section of Pensions Administration.

It was reported that in addition to the usual work items undertaken across the section, several other key work items have been progressed over the quarter.

The work to produce and issue annual benefit statements for contributing members had now been completed, with over 99% of all statements due having been uploaded to My Pension by the statutory deadline of 31 August 2022.

The project to move processes online had also progressed. The first phase of the project to move the benefits on hold into payment process online had now been completed. As mentioned at the last meeting, the Fund had seen a substantial increase in these requests over recent months, which had resulted in members experiencing much longer wait times than normal. This work, alongside other steps being undertaken to process requests already received, was already having a positive impact on turnaround times.

The Pension Payments team had been working with other teams in the service to implement new Altair software functionality that provides an automated transfer of data between the benefits and payroll modules of the system. This software development, known as EA2P, required some fundamental programming changes to be made by our software provider that required substantial testing to be carried out by all teams. This change also required revised internal payroll deadlines to be worked to in August to enable a smooth transition. The changes were successfully implemented at the beginning of September and would make the process of adding new payments to payroll more efficient.

Work to produce and issue pension saving statements to those members who have exceeded, or were close to exceeding, the annual allowance tax limits had been progressing well. 744 contributing members were initially identified as requiring a statement, and at the time of writing this report, 689 of these cases had been reviewed and tax allowance amounts calculated. The team was on track to have completed all cases and to issue all statements needed by the 6 October statutory deadline.

The review of the pension overpayment recovery process had been progressed and there was a separate report on the agenda covering this. Confirmation of the total pension overpayments amounts attempting to be recovered as of 31 August could be found attached at appendix 1.

In addition to measuring the performance using key performance indicators, GMPF issues surveys to members to obtain a view of member experience for several key processes. Three surveys were carried out in quarter 1 and the results were subsequently reviewed by the Complaints and Issues Board. Appendices 2a, 2b and 2c provided details of the questions asked in the surveys and show the responses received from members. All subsequent actions identified were added to a surveys action plan, a copy of which was provided at appendix 2d.

In regards to changes to printing and post processes the Contributing Members team had transitioned to using the automated printing solution, Print Me, for many of their letters. Work was currently underway to transition the printing for the two final teams within Member Services, being Retiring Leavers and Leaving Members. The efficiencies made from implementing this change and from moving processes online had seen the level of printing being carried out from Guardsman Tony Downes House reduce significantly. This had allowed colleagues to focus on other key areas of work as well as enhancing GMPF's business continuity plans by increasing resilience.

As part of the anti-fraud work, the Pension Payments team undertook an annual process to confirm pensioners that lived overseas were still alive and due their pension, referred to as an existence check.

The team had been working through the final stages of the annual existence check exercise. Members who had not returned their certificate or completed one of the validation options and had a pension of £300 or more per month had their pension payments suspended from September. 220 pensions were suspended. This generated a large response from these members and the team was reinstating those pensions where the member had now responded and completed the required

checks.

A review of the remaining members who had not responded would be carried out in the coming weeks. There were 178 members who had a pension of £299 or less per month who were yet to respond and whose pension would be suspended shortly. A further update on this work would be provided at the next meeting.

Almost all the Annual Benefits Statements for 2022 due for contributing members were produced and distributed ahead of the statutory deadline of 31 August 2022. The work undertaken by the Retiring Leavers team in collaboration with Developments and Technologies to move the first process online for members has been very successful from the team's point of view. Future member surveys would provide more detailed member feedback on the new process, but positive feedback was being received from those members who have got in touch with us.

RESOLVED

That the information provided be noted.

20. PENSIONS ADMINISTRATION AND BENEFITS REVIEW

Consideration was given to a report of the Director of Pensions / Assistant Director for Administration. The report provided a review of the work carried out by the Administration teams during 2021/22 together with information about the membership of the Fund as of 31 March 2022. The report also provided information about how LGPS benefits were inflation proofed and explained the impact changes in inflation had on member pension benefits.

The report set out that the primary focus of the service over the last two and half years had been to respond to the demands generated by the coronavirus pandemic. A significant amount of time had been spent on reassessing and changing how the administration service was delivered and on developing the team's resilience and capacity. The team had implemented new systems and had enhanced the technology around them, which had reformed how teams worked and how they delivered their service to members.

It was reported that the total number of pension accounts administered by GMPF had continued to increase at a similar rate to previous years. The total number of pension accounts as of 31 March 2022 was 404,932. The largest group of members were those with benefits on hold, so with a deferred pension, deferred refund, or those who had a choice between the two and who left their decision as undecided. This group made up 36% of the total number of accounts. The next largest group was those who are in receipt of a pension, so members who had claimed their pension and those who were receiving a dependant's pension. This group was 35% of the total. The remainder were the contributors, making up 29% with 69% of members being female.

It was explained that the number of members choosing to bring their benefits into payment had increased substantially more than expected over the last twelve months. The numbers were much higher than anticipated, and the rise in requests from members enquiring about claiming their benefits on hold had proved challenging to manage and had led to longer than normal turnaround times. However, team plans put in place to address this over the last two months have led to wait times reducing and these were expected to return to normal levels over the coming weeks. Voluntary retirement was the most common reason for retirement, with 61 being the average age that a member begins to receive their pension.

During 2021/22, the Ministry of Justice made changes to the structure of the National Probation Service, which resulted in a higher than normal increase in the total number of contributors joining the Fund. The work resulting from this restructure required GMPF to take on extra resource. Several colleagues were recruited on temporary contracts to help undertake the tasks involved, many of whom have subsequently secured permanent positions.

In regards to Member Services One of the key projects undertaken over the last few years had been

to maximise the use and functionality of our online member portal, My Pension. This became a greater priority when the pandemic broke, to ensure GMPF members could exchange documents with us electronically during lockdown. Members could use My Pension to upload documents and could also now complete many transactions safely and securely using their My Pension account, including electing to bring their pension into payment.

One of the projects undertaken during the year was to reform how our overseas pensioners could complete their annual existence checks. Several other improvements had also been made to internal processes. This included changes to printing arrangements and to how incoming post was dealt with, both of which had strengthened further our business continuity plans.

An update was provided on Employer Services, it was stated that the last twelve months had seen the support programme for employers expand. The ability to hold online training sessions and online meetings had led to more regular and improved engagement with our employers. A revised programme of training had been implemented, alongside new videos, support meetings and a new induction programme for all newly admitted employers. The project to onboard all existing employers to monthly data collection was also completed during the year.

In regards to Communications and Engagement, during July 2021, a new contact centre system was implemented. This new system was used primarily by the Customer Services team to manage and answer calls to the Fund's general helpline telephone numbers. Member newsletters sent out throughout the year had been very successful and created a lot of engagement. Member events had also continued to be well attended. The events programme had been expanded during the year to include some new 'bite sized' events that introduce a topic, with members being able to book onto a further 'in depth' session if they want to learn more.

On Developments and Technologies, a large amount of the team's focus had been on introducing changes that help GMPF's teams work more efficiently and effectively, particularly in a hybrid working environment. Alongside the introduction of the new contact centre, Microsoft Teams Calls was installed for all GMPF colleagues last year. The team also installed a new IT helpdesk system and made several updates to the IT infrastructure.

The Assistant Director for Funding and Business Development explained to the Board how Benefits were linked to Inflation. It was stated that most pension schemes included a mechanism for inflation proofing, to try to ensure pension benefits broadly maintain their purchasing power when the cost of living increases. However, the extent of inflation proofing, and the methods used to achieve this, differ from scheme to scheme. It was explained that broadly speaking, LGPS benefits were fully linked to increases in the Consumer Price Index ('CPI'), which was now the Government's preferred inflation measure. However, the calculation and timing of increases differed depending on the type of benefit being built up and whether it was in payment or not.

LGPS benefits earned in respect of pensionable service prior to 1 April 2014 were calculated with reference to a member's pensionable salary at the point they retire or leave LGPS employment (often referred to as 'final salary'). Inflation proofing for contributing members is achieved in part through this link to final pay. The assumption being that a member's pay should broadly keep pace with increases in the cost of living, and so using final pay to calculate a member's benefits when they leave or retire would automatically provide an inflation proofed benefit.

However, the career average scheme ('CARE scheme'), which replaced the final salary scheme in 2014, worked differently. A member builds up pension each year based on their pay in that year. The total pension built up in the CARE scheme was calculated as of 31 March each year and then revalued on 1 April in line with Treasury Revaluation Orders. The Public Service Pensions Act 2013 required the Treasury to specify a measure of price inflation to be used for revaluation. The price inflation measure used to date had been the annual change in the CPI up to September of the prior year (for example CPI inflation in September 2022 for the 1 April 2023 revaluation). It should be noted that Treasury Orders could be negative if there is a fall in price inflation, so CARE pensions could be reduced as well as increased by the revaluation process. The principles described also applied to pensions that would be payable to dependents should a member die in service. A

Inflation had increased significantly over recent months (CPI had increased by 9.9% over the year to August 2022), reducing the purchasing power of LGPS pensions in payment. This purchasing power was set to reduce further up until the time that the annual pension increases were applied in April 2023. The increase in CPI over the 12 months to September, which most LGPS pension increases were expected to be equal to, would be released on 13 October 2022.

CPI inflation was expected to increase further over the next few months. As a result, LGPS pension increases were likely to lag behind inflation. However, it should be noted that CPI was only one measure of inflation and individual members would experience differing levels of price inflation depending upon their personal circumstances. When CPI inflation started to fall this 'lag effect' would be reversed, with members likely to receive one or more pension increases which were more than CPI inflation at that point.

The Assistant Director of Funding and Business Development highlighted that GMPF had no ability to determine the amount or timing of pension increases. State Pension benefits were also expected to increase in April 2023 in line with the increase in CPI to September 2022. Other benefits that some GMPF members would receive (for example housing benefit) could also be increased.

RESOLVED

That the report be noted.

21. 2022 ACTUARIAL VALUATION

Consideration was given to a report of the Director of Pensions / Assistant Director of Pensions for Funding and Business Development. The report detailed progress to date on the valuation project and highlights some of key issues which were discussed at the recent meeting of the Management Panel and due to be discussed at the forthcoming meeting of the Administration, Employer Funding and Viability Working Group.

It was reported that over the last two months, the GMPF Actuary had been undertaking calculations using the actuarial assumptions set out in the draft FSS. Steven Law of Hymans Robertson delivered a presentation at the September 2022 Management Panel meeting summarising changes in membership data over the inter-valuation period and preliminary whole-fund valuation results. Preliminary results for individual employers are not yet available (expected early November).

At a whole fund level, the funding position of GMPF had improved slightly since the 2019 actuarial valuation. Using the assumptions set out in the draft FSS, GMPF's funding level as at 31 March 2022 is 104%. Full details can be seen in Hymans' presentation, which was attached as Appendix 1.

RESOLVED

That the Local Pensions Board:

- (i) Note the report and the appended slides which were presented by the GMPF Actuary at the recent Management Panel; and**
- (ii) Note progress on the valuation.**

21 BUSINESS PLANNING AND RISK MANAGEMENT

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

The detailed business plan for 2022/23 was attached at Appendix A. The core values and strategic objectives remained the same as those agreed last year, set to reflect the current ambitions and expectations of the Fund.

There were six strategic projects, outlined in the appendix and in section 2 below, that had been

identified as those that were of priority and where regular reports on progress would be provided to the Management Panel and Local Board each quarter. All projects and business as usual objectives were documented in detail within a single spreadsheet to enable the Director and officers to monitor and analyse progress each month.

In conjunction with Business Planning, GMPF Officers had also undertaken a review of proposed standing agenda items for the Panel, Working Groups, Local Board and Northern LGPS Joint Committee, which would help deliver the Strategic Objectives via the successful completion of tasks set out in the Business Plan. These draft schedules were attached at Appendix B for comment.

Discussion ensued on Risk 19 – Data protection breaches by GMPF and how the risk rating was still red. Members of the Board enquired on what could be done to bring this rating down. The Assistant Director for Administration, explained that there were number of pieces of work underway which could reduce the risk rating of which one was the work on 365 security.

RESOLVED

That the progress on the key business plan tasks be noted.

23. SUMMARY OF GMPF DECISION MAKING

Consideration was given to a report of the Director of Pensions / Assistant Director of Pensions for Funding and Business Development. This report provided a summary of the agenda items discussed and the recommendations made by the GMPF Working Groups over the period since the previous Local Board meeting, which were approved at the Management Panel meeting on 16 September 2022. It also summarised the decisions made by the Management Panel at the 16 September meeting.

At the meeting of the Administration, Employer funding and Viability Working Group on the 29 July 2022 a number of reports were considered for noting, the working group receive its regular Administration, Developments & Technologies Update. The report suggested replacing outdated audio-visual technology and soundproofing meeting rooms.

At the meeting of the Investment Monitoring and ESG Working Group on the 29 July 2022 a number of reports were considered for noting. No recommendations were made at this meeting.

At the meeting of the Policy and Development Working Group on the 8 September 2022 a number of reports were considered for noting. GMPF's largest fund manager, UBS, outlined a proposal for a pilot of a Global (Developed) Equity Value allocation, for consideration by working group members. It was explained that valuation dispersion within stock markets remained high and UBS believes that stocks with value characteristics have scope for an unusually large degree of out-performance versus non-value stocks over the next few years. UBS gave a detailed account of UK and Europe ex-UK equity performance. UBS further commented on opportunities for future investment. Members approved a pilot of a Global (Developed) Equity Value allocation within the UBS mandate, subject to satisfactory completion of additional due diligence, to be submitted to the next meeting of the Working Group.

A meeting of the GMPF Management Advisory Panel took place on the 16 September 2022, the Panel received an update on the GMPF's approach to climate risk including a presentation from Trucost, who provided an assessment of the carbon footprint of GMPF's equity and corporate bond holdings. The report also provided a 'mapping exercise' of GMPF's holdings against analysis undertaken by the Transition Pathway Initiative, a global asset-owner led initiative which assesses companies' preparedness for the transition to a low carbon economy.

The 2022 actuarial valuation was discussed at this meeting, with the Fund's actuary, Hymans Robertson providing a presentation. The discussion centred on the whole fund valuation results which revealed that GMPF has slightly improved its funding position since the 2019 actuarial valuation. It was recommended that the Management Panel:

RESOLVED

That the report be noted.

24. THE PENSIONS REGULATOR (TPR)

Consideration was given to a report of the Director of Pensions / Assistant Director for Funding and business Development / Assistant Director for Administration.

Members of the Board were advised that a copy of the current breaches log was attached 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.

In regards to the late payment of contributions and escalation procedures, Appendix 3 attached to the report contained details of expected contribution payments, which had not been received by GMPF by the 19th of the month following the month to which they related for June 2022 and July 2022. Appendix 4 attached to the report provided further analysis on the contribution payments received in respect of June 2022 to July 2022 period, detailing the number of employers making payments in accordance with GMPF's deadline of the first day of the following month.

RESOLVED

That the developments set out in the report be noted.

25 URGENT ITEMS

There were no urgent items.

CHAIR

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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