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GREATER MANCHESTER PENSION FUND - LOCAL PENSIONS BOARD

Day: Thursday
Date: 28 September 2023
Time: 3.00 pm
Place: 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 20 July 2023.	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</td><td>3&10, 3&10, 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	5,6,7,8,9,10,11, 12	3&10, 3&10, 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.	PENSIONS ADMINISTRATION AND BENEFITS REVIEW To consider a report of the Director of Pensions / Assistant Director for Administration.	9 - 22						
6.	THE PENSIONS REGULATOR (TPR) To consider a report of the Director of Pensions / Assistant Director for Administration.	23 - 52						

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

Item No.	AGENDA	Page No
7.	SUMMARY OF GMPF DECISION MAKING To consider a report of the Director of Pensions.	53 - 56
8.	GMPF CYBER SECURITY To consider a report of the Director of Pensions / Assistant Director for Administration.	57 - 118
9.	BUSINESS PLANNING AND RISK MANAGEMENT To consider a report of the Director of Pensions.	119 - 164
10.	GMPF BUSINESS CONTINUITY To consider the attached report of the Director of Pensions / Assistant Director for Pensions Administration.	165 - 188
11.	LOCAL BOARD GOVERNANCE REPORT FOR EMPLOYERS To consider a report of the Director of Pensions / Assistant Director for Administration.	189 - 192
12.	INTERNAL AUDIT PROGRESS REPORT - SEPTEMBER 2023 To consider the attached report of the Interim Head of Audit.	193 - 206
13.	URGENT ITEMS To consider any additional items the Chair is of the opinion shall be dealt with as a matter of urgency.	
14.	DATE OF NEXT MEETING To note the date of the next meeting of the Local Pensions Board on 25 January 2024.	

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

Agenda Item 3

GREATER MANCHESTER PENSION FUND - LOCAL PENSIONS BOARD

20 July 2023

Commenced: 15:00

Terminated: 16:15

Present:

Councillor Fairfoull
Paul Taylor
Paul Entwistle
Michael Cullen

(Chair) Employer Representative
Employer Representative
Employer Representative
Employer Representative

Apologies for Absence

Councillor Jack Naylor

Chris Goodwin, Catherine Lloyd and Mark Rayner

1 CHAIR'S OPENING REMARKS

The Chair, Councillor Fairfoull, began by welcoming everyone to the meeting. The Chair then announced the recent sudden and untimely death of David Schofield, who was a Local Board Trade Union member and previous Management Advisory Panel member. He had been a stalwart to the Fund and would be sadly missed, particularly for his good humour and pragmatic interventions. The meeting then observed a moments silence in respect.

2 DECLARATIONS OF INTEREST

There were no declarations of interest.

3 MINUTES

The minutes of the Local Pensions Board meeting on the 13 April 2023 were approved as a correct record.

4 GMPF FINAL ACCOUNTS

Consideration was given to a report of the Director of Pensions / Assistant Director for Local Investments and Property. The report detailed the progress of the governance arrangements for the budget setting and financial reporting. This was provided by the attached appendix to the report that was presented to the GMPF Management Panel on 14 September 2023.

Members of the Board were advised that there was no movement from the position as at the last meeting of Management Panel for the audit of GMPF's 2022 and 2023 accounts. Following work with auditors Financial Reporting Council CIPFA, and GM authorities the auditors are closer to issuing audit opinions for these accounts but they were still outstanding.

RESOLVED

That the report be noted.

5 LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985 – EXEMPT ITEMS

RESOLVED

That under Section 100 (A) of the Local Government Act 1972 the public be excluded for the following items of business on the grounds that:

- (i) they involve the likely disclosure of exempt information as defined in the paragraphs of Part 1 of Schedule 12A of the act specified below; and

(ii) in all circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information for reasons specified below:

Items	Paragraphs	Justification
6, 7, 9, 10, 11, 13	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.

6 ADMINISTRATION UPDATE

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

The performance dashboard for quarter 4 (January to March 2023) could be found at Appendix 1. Overall, levels of casework and performance against turnaround targets remained relatively consistent. Performance levels remained high and work on projects that supported improving the service provided to members continued. It was reported that two areas experienced substantial increase in workload. The first affecting member benefits, where significant numbers of revised pay figures were received because of the backdated pay award agreed in the autumn. The second affecting customer services, where there was higher than expected demand from members for support. Steps had therefore been taken to address these issues, and officers were continuing to make changes aimed at achieving improvements.

It was reported that all key processes had been transitioned to My Pension and the focus had now switched to making further improvements to the workflows and processed to improve the customer experience. Registration figures continued to increase and usage figures further increased in response to the member newsletters being issued during February and March 2023.

Member events continued to be popular and very well received. Eleven member events were held in quarter 4 with 488 members attended. The events programme included LGPS overview presentations, pre-retirement presentations and sessions for members on pensions tax limits and ways to top up benefits. Thirteen employer events were also held, several on using the monthly data submitting system, plus ones on pensionable pay and ill health, with 176 employer representatives in attendance at one or more session.

In regard to Member Services, work had been undertaken on producing the Annual Benefit Statements for 2022/23 for both contributing members and members with benefits on hold. Statements for members with benefits on hold were all uploaded to their My Pension accounts by 31 May 2023. The annual allowance exercise for 2022/23 had commenced, with initial data extraction work and checks were underway. It was reported that GMPF must issue Pension Saving Statements for all members who have exceeded the annual allowance by October 2023 and an update on the progress of this project would be provided at the next meeting.

The project to move processes online so that members could access various documents through My Pension account continued to progress. Work was underway to improve the online process for contributing members who retire. New workflow was being built and robust testing would then be completed to ensure the process is fit for purpose. It was explained that the work was slightly behind schedule and a further progress update on the work would be provided at the next meeting.

In Employer Services, there continued to be a steady number of employers who had applied to join GMPF, with 39 admission cases currently being progressed. Within these, there are 12 employers

who may need to apply for admitted body status but where application forms have not yet been received. Work was ongoing with these employers.

Monthly data submissions continued to be monitored at the TPR breaches meeting held monthly. The number of submissions received on time remained consistent with 78.57% of employers meeting the deadline in April 2023. Further work and support was required with those employers who are not submitting their data on time.

The Employer Services section was responsible for undertaking the data collection and reconciliation work linked to the McCloud project. Although the regulations were still awaited, the team had been working for some time on finding a solution for identifying the missing data needed and for adding this to member records. 140 data files have been issued to employers to date and employers had been given three weeks to check this data and return securely to GMPF.

In regards to the Developments & Technologies section, officers had undertaken work with Tameside MBC IT team and its website development partner in respect of migrating website content to a new software platform. It was explained that GMPF continued monitoring all attempted cyber-attacks and statistics for quarter 4 (January to March 2023) could be found in appendix 2 which included an update on cyber compliance, statistics from security systems and an update on cyber incidents and trends.

The Customer Services and Communications dashboard was attached at appendix 3. This dashboard provided long term statistics about general engagement from April 2022 to March 2023, with other statistics for quarter 4. High call volumes coupled with resource issues on the Customer Services team had resulted in much longer than normal wait times and high numbers of abandoned calls. These challenges were being addressed and steps were being taken to review team processes, arrange regular support from other teams, and to recruit additional Customer Service officers to increase team size and resilience

RESOLVED

That the report be noted.

7 THE PENSIONS REGULATOR (TPR)

Consideration was given to a report of the Director of Pensions / Assistant Director for Pensions Administration. The report provided the Local Board with a summary of the current breaches log and decisions made by the scheme Manager regarding the reporting of these breaches. The report also included an update on the TPR proposed Single Code of Practice now called the General Code.

A copy of the current breaches log (excluding late payments and contributions) 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. It was explained that GMPF officers continued to meet monthly and considered the materiality of any breaches that had occurred and discussed the appropriate actions to be taken to minimise the potential for breaches to occur in the future.

It was explained that one of the key requirements of Code of Practice number 14 is that Scheme Managers operated appropriate systems to ensure that contributions are paid to the Scheme in accordance with requirements in the Scheme Regulations. Officers continued to meet monthly to discuss issues that related to the monitoring of late contributions and examined options for improving current processes. Following the implementation of monthly data collection from employers, compliance with data submission deadlines was also monitored.

As mentioned at previous Local Board meetings, TPR issued a consultation on its Single Code of Practice on 17 March 2021. TPR had recently issued communications which confirmed that the single code will now be called the General Code of Practice and was likely to be published late 2023.

TPR had confirmed that the main aim of the General Code was to ensure consistency in its expectations for all types of pension scheme, and that the General Code would be considerably shorter than all the codes it replaced. Content would be separated into five key areas, being:

- The Governing Body
- Funding and investment
- Administration
- Communication and disclosure
- Reporting to TPR

GMPF had undertaken a GAP analysis which was appended to the April 2023 Local Board report. Further analysis would be undertaken when the final code is issued, and requirements are clear.

RESOLVED

That the Local Pensions Board

- Review the current breaches log and consider the decisions made by the Scheme Manager regarding reporting those breaches**
- Note the other relevant developments set out in the report.**

8 SUMMARY OF GMPF DECISION MAKING

Consideration was given to a report of the Director of Pensions. The report summarised the recommendations made by the GMPF Working Groups over the period from April 2023 to June 2023, which were approved at the Management Panel meeting on 14 July 2023. It also summarised the decisions made by the Management Panel at the same meeting.

The Director of Pensions summarised the recommendations made by the Administration, Employer Funding and Viability Working Group and Investment Monitoring and ESG working Group on the 14 April 2023 and the recommendations made by the Policy and Development Working Group on the 22 June 2023.

At its 14 July 2023 meeting, the GMPF Management Panel approved the recommendations from the various Working Group meetings. The Panel informed about the Fund's cash management strategy. The report viewed by Panel contained details of the performance achieved over the last 3 years. Panel were presented with broad proposals for an operationally simplified and 'futureproofed' set of cash management arrangements that were recommended for adoption. It was recommended that the Management Panel:

- Note performance in relation to cash management;**
- Approve, in principle, the decision to move to new cash management arrangements, with a detailed proposal to be presented at the next Panel meeting.**

The Panel were further informed about a large and mature admission body of GMPF who notified the Fund of its intention to exit the LGPS. It was recommended that the Management Panel:

- Authorise the Director of Pensions to determine an appropriate exit strategy for the employer in consultation with GMPF's Actuary and investment advisors.**

It was reported that Investment Strategy was crucial for ensuing GMPF's long term investment success. Panel delved deep into the current investment strategy and areas for improvement. It was recommended that the Management Panel:

- Adjust the Public Equity to take account of the changes in 'realistic benchmark' allocations to Infrastructure, Private Debt, Special Opportunities Portfolio, Direct UK Infrastructure and Local Investment. More specifically, reduce the Public Equity allocation by 4.0% (from 45.3% to 41.3%) to take account of these changes.**
- Set the Public Equity benchmark allocation as 41.25%**

- (c) **Set the overall splits within the Public Equity allocation as:**
 - a. **59% Regional and 41% Global**
 - b. **Within the Global allocation: 36% Global Public Equity (managed by Ninety One), 52% Global Developed Equity (managed by SciBeta) and 12% Global Developed Value Equity (managed by UBS)**
 - c. **Within the Regional allocation: 91% by UBS (Active) and 9% by L&G (Index Tracking)**
- (d) **To implement the third tranche in terms of moving gradually over a number of years from the recouched current mix of the Regional Equity allocation towards a Market Cap weighted shape as adopted at the July 2021 Panel. No further change necessary at this time.**
- (e) **Maintain the strategic target allocation to private equity at 5%.**
- (f) **Change the realistic allocation to Infrastructure from 4.0% to 5.0%.**
- (g) **Change the realistic allocation to Private Debt from 3.5% to 5.0%.**
- (h) **Change the realistic allocation to Special Opportunities Portfolio from 2.0% to 2.5%.**
- (i) **All increases in realistic allocation to Infrastructure, Private Debt and Special Opportunities Portfolio to come entirely from Public Equities.**
- (j) **Change the realistic allocation to GLIL from 3% to 3.5%.**
- (k) **Maintain the overall limit on those assets which are locally invested at 5% of Main Fund as agreed at the July 2011 Panel. Change the 'realistic benchmark' allocation for Local Investments from 3.0% to 3.5%.**
- (l) **The nature, timing and detailed implementation of any benchmark changes necessary to reflect the decisions of the Panel be settled by the Director of Pensions following consultation with the Advisors and/or managers where appropriate.**
- (m) **All the other recommendations made to Policy and Development Working Group at their April 2023 meeting be adopted.**

RESOLVED

That the report be noted.

9 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 report set out the progress being made on the six key strategic projects set out in the 2022/23 business plan. All projects were reported to be either on track or complete with key project 4, McCloud, being reported as having a minor lag due to the amended regulations and guidance still being awaited. However, internally, work had been progressed on the system amendments and data capture. Data validation work with employers was underway, although software issues had been identified and fault fixes from the software supplier were awaited. This project will feature in the business plan for 2023/24.

All business plan tasks continued to be monitored and reviewed each month by the Director of Pensions. The business plan for 2023/24 would be presented at the next Local Board meeting.

The risk register was reviewed and updated at least once each quarter and the latest version was included within this report for review at Appendix 2. The key risks being monitored at present were listed on the 'Current Issues' tab. Specific issues that had been monitored closely by officers this quarter were explained, including the increased levels of cyber fraud / cyber-attacks. Officers explained that the risks related to cyber security were greater than ever and work continued to ensure that existing controls were still working and putting new controls in place wherever possible.

RESOLVED

That the developments set out in the report be noted.

10 LOCAL BOARD GOVERNANCE FOR 2023/24

Consideration was given to a report of the Director of Pensions / Assistant Director for Pensions Administration. The report provided information about GMPF's Local Pension Board terms of references and set out details of the membership of Local Board for the next municipal year.

It was explained that all local board members, trustee members and advisors must adhere to GMPF's rules around confidentiality. Many of the items considered and discussed were confidential and there was often some commercial sensitivity linked to them. Members were also reminded that they must adhere to GMPF's IT and cyber security policy and rules. All board members who were not representatives of Tameside MBC would receive a GMPF iPad and be given a GMPF Microsoft 365 account.

A copy of the Conflicts of Interest policy was attached at Appendix 2. The Director of Pensions explained that it was vital that all board members understood the importance of adhering to the GMPF Conflicts of Interest policy. Members of the Board were advised that they must complete a Declaration of Interest form on appointment. They must also declare any interests at the start of a meeting, or at the earliest opportunity during the meeting. They must also notify the Director of Pensions as soon as possible if a conflict is identified outside of a meeting.

The Director of Pensions advised that the process of appointing a new trade union representative had started following the passing of David Scofield.

RESOLVED

That the report be noted.

11 THE INTERNAL DISPUTE RESOLUTION PROCEDURE AND RESOLVING COMPLAINTS

Consideration was given to a report of the Director of Pensions / Assistant Director for Pensions Administration which provided Local Board with information about the internal dispute resolution procedure for the LGPS. The report also explained how GMPF implements the arrangements for resolving disputes and how it manages non-dispute complaints.

It was explained that information about the dispute process was included in all GMPF letters and correspondence where the member could potentially need to access the dispute procedure. Members were encouraged to contact GMPF initially to see if the dispute can be resolved without the need to move to stage one. GMPF normally has three designated pensions referees. There was a referee that hears stage one appeals (so stage one appeals against the administering authority), and two stage two referees. The GMPF Compliance and Legal teams provided administrative support to the pension referees.

GMPF continued to provide technical support to its employers when dealing with stage one appeals and would provide bespoke training when requested. Every dispute case that was dealt with by one of the three pension referees was reviewed by the GMPF Complaints and Issues Board. This internal group, chaired by the Director of Pensions, continued to review all cases each month and considered them in detail. The Board aimed to ensure any actions for GMPF, or the relevant scheme employer, are acted upon and all learning points have been identified. It was reported that the total number of appeals received and dealt with by GMPF in 2022/23 was 22. The number of appeals received increased in 2017 but had reduced each year since.

GMPF also received complaints that were not disputes but that needed to be responded to and resolved. It is important these were captured so that officers can understand the issues and identify the learning points to try to prevent future issues. Complaints received were mainly around issues with accessing My Pension and dissatisfaction with the processes used, but they can also be about delays, communications, call wait times and policies.

It was highlighted that all complaints were allocated to the relevant team or section manager to respond to and resolve. Managers must capture any learning points they had identified and log them within the system. A complaints dashboard was produced each month and was reviewed by the Complaints and Issues Board. The focus was on understanding if each complaint had been resolved to the satisfaction of the member or not, and whether all learning points had been captured. A copy of the latest dashboard for May 2023 was attached at appendix 1.

The Pensions Administration Working Group received copies of the dashboard for each month at its quarterly meetings, together with information about all work carried out that relate to improving service and reducing complaints. It was reported that officers were constantly looking at how the work of the Complaints and Issues Board could be developed to improve member satisfaction and reduce complaints. Officers also looked to improve the training given to managers to better support them to respond to complaints, alongside a review of the support package for employers.

RESOLVED

That the report is noted.

12 INTERNAL AUDIT ANNUAL OPINION 2022/23

Consideration was given to a report of the Interim Head of Audit. The report detailed Internal Audit's annual opinion 2022/23 for GMPF.

It was reported that on the basis of audit work completed, the opinion on the GMPF's framework of governance, risk management and internal controls was reasonable in its overall design and effectiveness. Certain weaknesses and expectations were highlighted by audit work. These matters have been discussed with management and recommendations have been made. These recommendations have been implemented or were in the process of being addressed.

Members of the Local Board were reassured that GMPF was committed to providing effective counter fraud arrangements and ensured that there are adequate measures in place to prevent, detect and investigate fraud and corruption. It was explained that Internal Audit have two counter fraud specialists who facilitated the co-ordination of counter fraud activities. A summary of the work undertaken on unplanned / irregularity / fraud referrals during the period was provided at appendix 3.

It was further highlighted that there were no specific issues that had been highlighted through the work undertaken by Internal Audit during the year. Internal Audit conducted Post Audit Reviews (PAR's) following each audit. A summary of the PAR's undertaken for 2022/23 was detailed at appendix 1. The process for follow up as well as reporting was being reviewed as part of the root and branch review. Members of the Board highlighted the importance of communicating and sharing the learning from Internal Audit's with other employers to aid further learning.

RESOLVED

That the report is noted.

13 INTERNAL AUDIT PLAN 2023/24

Consideration was given to a report of the Interim Head of Audit which detailed the Internal Audit plan for GMPF for 2023/24/ which identified the audit work required to achieve a reasonable level of assurance to be provided by Internal Audit in compliance with the Public Sector Internal Audit Standards (PSIAS).

The Risk & Internal Audit Service had been exposed to capacity issues in its management. The former Interim Head of Risk Management and Audit Services and the Principal Auditor had retired and been replaced by an Interim Head of Audit. This provided an opportunity to review the audit plan as well as the arrangements within Internal Audit to bring them in line with current / best

practice, as well as putting in place measures to mitigate any future risk of lack of capacity within the service.

It was explained that in order to deliver a plan in line with the preferred delivery, a refreshed plan linked directly to risk was required to target audit resources to the areas of most materiality and significant by focussing on:-

- Key risks and priorities
- IT audit programme
- Other audit work
- Counter fraud

It was reported that work had already commenced against the plan. This did not affect the ability to make changes to the plan, as the audit planning process was an iterative one. The detailed audit coverage which listed the top strategic risks was detailed at appendix 1. Members of the Local Board were advised that moving forward, the approach to the refreshed plan should be an agile one, where Internal Audit would respond to the changing assurance need, by constantly scanning the environment, which enabled a change to the focus of the audits should GMPF's organisational priorities or significant risks change. Any change to the plan during the year would be notified for approval by the Board in subsequent Internal Audit progress reports. The plan had been approved by GMPF's management team and would be delivered, in accordance with the Council's Internal Audit Charter.

RESOLVED

That the report is noted

14 URGENT ITEMS

There were no urgent items

CHAIR

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