



LGPC Bulletin 271 – December 2025

This bulletin contains updates for all LGPS stakeholders. It includes important articles on:

- [Template privacy notices updated](#)
- [Illustration dates and unavailable codes](#)
- [Overpayment information for members](#)

If you have any comments or articles for future bulletins, please contact query.lgps@local.gov.uk.

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LGPS England & Wales

Access and Protections consultation response – LGPC response

On 22 December 2025, Lorraine Bennett emailed administering authorities with the LGPC's [response to the LGPS: Scheme improvements \(access and protections\) consultation](#). We shared a draft version of the response with you on 15 December 2025 to help you in preparing your own submissions. The consultation closed on 22 December 2025.

For a reminder of the proposals, see [bulletin 269](#). All consultation documents are available on the [Scheme consultations](#) page of www.lgpsregs.org.

Fit for the Future technical consultation – LGPC response

On 22 December 2025, Lorraine Bennett emailed administering authorities with the [LGPC's response to the Fit for the Future technical consultation](#).

We covered the consultation, which closes on 2 January 2026, in [bulletin 270](#).

The response focuses only on the draft LGPS (Amendment) Regulations 2026. All consultation documents are available on the [Scheme consultations](#) page of www.lgpsregs.org.

Police and Crime Commissioners – future changes

On 13 November 2025, [the Government announced that Police and Crime Commissioners \(PCCs\) will be abolished](#) at the end of the next electoral cycle in 2028.

Their responsibilities will transfer to regional mayors wherever possible. In areas without a mayor, elected council leaders will take on the role. The Government has confirmed that the unique circumstances of devolved arrangements in Wales will be considered.

Under Part 1 of Schedule 2 of the LGPS Regulations 2013, PCCs are currently recognised as Scheme employers, and Part 4 confirms their eligibility for LGPS membership. From 2028, these responsibilities will move to regional mayors or council leaders.

LGPS Scotland

Scottish SAB Bulletin – December 2025

The Scottish LGPS Scheme Advisory Board has published its [December 2025 bulletin](#). It provides an update on the key decisions and discussions from the Board's recent meeting.

The bulletin covers a range of topics, including:

- 2024 Scheme valuation
- Pensions Schemes Bill
- flexible retirement appeal cases
- working group updates
- good governance survey
- consultation on draft LGPS (Scotland) (Amendment) Regulations 2026
- gender pensions gap
- Fit for the Future proposals in LGPS (England and Wales)
- 2026 SAB meeting dates.

Other news and updates

Automatic enrolment thresholds 2026/27

The Department for Work and Pensions (DWP) has confirmed that the automatic enrolment thresholds will remain unchanged for the 2026/27 tax year.

Under section 14 of the Pensions Act 2008, the DWP must review these thresholds every year. Following [publication of its latest review](#), the DWP has decided to keep the current values for another year. This means the thresholds for 2026/27 will be:

- earnings trigger: £10,000
- lower limit qualifying earnings band: £6,240
- upper limit qualifying earnings band: £50,270.

Club memorandum

Following the migration of the Civil Service Pension Scheme administration to Capita, the location of the Club Memorandum page has changed. You can now find it at: www.civilservicepensionscheme.org.uk/public-sector-transfer-club

Scroll to the bottom of the page for links to:

- list of Public Sector Transfer Club members

- Transfer Club and Annual Allowance guidance
- the latest version of the Club Memorandum, valid from 1 October 2023.

The Club Memorandum is also available on the:

- [Other Government documents](#) page of www.lgpsregs.org
- [Other Government documents](#) page of www.scotlgpsregs.org

Finance (No. 2) Bill

The Finance (No. 2) Bill was introduced to Parliament on 2 December 2025 and had its second reading on 16 December 2025.

The Bill includes amendments that will bring most unused pension funds and death benefits within the value of an individual's estate for inheritance tax purposes, effective from 6 April 2027.

Further details, including the Bill's explanatory memorandum, can be found on [the dedicated page for the Bill on Parliament's website](#).

GMP equalisation – transfer top-up payments

We have received several queries about whether administering authorities can accept a Guaranteed Minimum Pension (GMP) equalisation top-up payment from another registered pension scheme for a previous transfer.

This follows the 2018 Lloyds GMP equalisation ruling (Lloyds Banking Group Pensions Trustees Ltd v Lloyds Bank plc), which confirmed that pension schemes must correct inequalities between men and women caused by the operation of GMPs. Trustees and scheme managers are required to adjust benefits so that no member is worse off than someone of the opposite sex. For more details, see [bulletin 177](#) and [bulletin 204](#).

Unfortunately, it remains unclear whether these top-up payments can be accepted by the LGPS. When we met with GAD and MHCLG in 2020 it was agreed that a consistent policy across all public service pension schemes would be preferable.

The Lloyds judgment does not specify how an incoming top-up payment should be converted into scheme benefits. If these payments are accepted, administering authorities will need guidance on:

- how the transfer-in calculation should work
- what the payment buys and which factors to use
- how to handle cases where the member has no remaining LGPS benefits (for example, due to death, trivial commutation, or transfer to another scheme).

We will raise the issue with MHCLG again in 2026 and keep administering authorities updated with any developments.

National Insurance Contributions (Employer Pensions Contributions) Bill

The National Insurance Contributions (Employer Pensions Contributions) Bill was introduced to the House of Commons and had its first reading on 4 December 2025. It had its second reading on 17 December 2025.

The Bill follows the recent Budget announcement to cap, from 6 April 2029, the value of pension contributions made through salary sacrifice that can benefit from employee and employer national insurance contributions relief. We covered the announcement in [bulletin 270](#).

The Bill extends to England, Wales, Scotland and Northern Ireland. It amends the Social Security Contributions and Benefits Act 1992 and the equivalent legislation in Northern Ireland and gives regulation-making powers to enable the Government to implement the changes.

HMRC has published a [tax information and impact note](#) alongside the Bill. For more details, including the explanatory memorandum, see the [Bill's page on the UK Parliament website](#).

PASA paper on the Data (Use and Access) Act 2025

The Pensions Administration Standards Association (PASA) has published a new paper called 'The Data (Use and Access) Act 2025 Unpacked: Six Key Areas for Pension Schemes.' It explains the 2025 Act and related guidance from the Information Commissioner's Office, focusing on what pension schemes need to know and do.

PASA highlights six areas that schemes should understand and act on:

- automated decision making
- digital verification services and the trust framework
- recognised legitimate interests
- subject access requests
- data protection complaints
- looking ahead.

For more details, read [the PASA press release](#).

Template privacy notices updated

On 16 December 2025, Lorraine Bennett informed administering authorities that updated versions of the template short-form privacy notice (v6.0) and full privacy notice (v7.0) are available. The notices were updated by Osborne Clarke LLP to reflect two key changes:

- the requirement to connect to pensions dashboards
- amendments introduced by the Data (Use and Access) Act 2025 under UK data protection law.

Administering authorities will need to tailor the templates to meet the specific needs of their fund. Before sharing with members, please ensure the first page (notes) and any explanatory footnotes are removed.

Both clean and tracked versions can be accessed on the Administrator Guides and Documents pages of www.lgpsregs.org and www.scotlgpsregs.org. Use the filters for GDPR or publication date to locate them quickly.

Action for administering authorities

Update local versions of your privacy notices with the changes.

Pensions dashboards

Illustration dates and unavailable codes

On 17 December 2025, the Pensions Regulator (TPR) shared some useful updates for administering authorities on a couple of dashboards hot topics. We will update the Pensions Dashboards connection guide and the AVCs and Pensions Dashboards administrator guide in due course. The following explains what these updates mean for administering authorities.

Aligning illustration dates for LGPS benefits

There has been ongoing discussion in the pensions industry about aligning illustration dates for members who hold both defined benefits (DB) and defined contributions (DC) within the same pension scheme. In the LGPS, this specifically impacts members with Additional Voluntary Contributions (AVCs).

The Department for Work and Pensions (DWP) has now confirmed its policy intent: illustration dates should align at a **benefit level**. DWP is currently considering whether this requires amendments to the Pensions Dashboards Regulations 2022.

For the purpose of supplying value data to the pension dashboards ecosystem, this means:

- The accrued and projected values for a benefit should be calculated on the same day.
- The defined benefit (DB) for a member can be calculated on a different day to their defined contribution (DC) benefit, as these are different benefits.
- If a member has two separate AVC arrangements they can also be calculated on different dates to each other, as they are different benefits.
- If a member has more than one pension account, they can be calculated on different dates to each other, as they are different benefits. This applies whether the pension accounts are held with the same or a different administering authority.

TPR will focus its regulatory activities on ensuring that information presented to savers is recent, clear, accurate and understandable. Specifically:

- value data must come from the most recent statement issued within the last 13 months, or from a calculation made within the last 12 months
- accrued and projected values for each benefit must share the same illustration date.

Unavailable codes and 10 day deadline for submitting value data

When value data is unavailable, administering authorities must explain why by submitting an appropriate code, as outlined in the [Pensions Dashboards Programme \(PDP\) Data Standards](#). Regardless of the code used, the missing value data must be provided to the dashboards ecosystem **within 10 working days**, starting from the day after a match is confirmed.

If an administering authority or AVC provider submits one of the following codes, TPR expects them to record how long it takes to calculate the missing value(s) and report this routinely to the Money and Pensions Service (MaPS) under the reporting standards.

- **DBC** – defined benefit or cash balance is being calculated and will be available within 10 working days
- **DCC** – defined contribution is being calculated and will be available within 10 working days.

If any other code is submitted, administering authorities will need to report the number of times they have used the code, but they will not have to tell MaPS how

long it took to calculate the missing value(s). However, TPR expects administering authorities to keep:

- a clear record of the number of members affected
- the rationale for using these codes
- evidence of a process to ensure missing values are provided to members in a timely manner

Where there is a severe delay in providing the value information to members, TPR expect authorities to consider if they need to report this to them.

Action for administering authorities

Review your dashboard processes and reporting to take account of this latest update and share this information with your AVC providers.

TPR Dashboards webinar

On 3 December, TPR hosted a webinar focusing on smaller schemes that are not yet connected. It featured contributions from TPR, PDP, PASA, Vidett, and included a valuable question and answer session.

A [recording of TPR's webinar](#) is available on their website.

PDP Webinar and progress update report

The Pensions Dashboards Programme (PDP) released their December 2025 progress update report. The [report](#) covers key developments, including:

- connection progress
- consumer testing of the MoneyHelper Pensions Dashboard
- private sector dashboards
- engagement activities
- updates from the Pensions Dashboards Advisory Group (PDAG)
- partner updates from DWP, TPR, and the Financial Conduct Authority (FCA).

The PDP also held a webinar on 10 December discussing the December progress update report. You can view a [recording of the webinar](#) on their website.

Training

2026 training programme

We are delighted to announce that our [2026 Training Programme](#) is now live, bringing you a full calendar of engaging, practical and tutor led courses.

The programme includes a blend of refreshed core sessions, popular returning topics and new additions shaped directly by your feedback.

We're pleased to introduce two new courses for 2026:

- **Additional Contributions** – a half-day online course covering additional pension contributions (APCs) and additional voluntary contributions (AVCs).
- **Understanding Tax Allowances in the LGPS** – a full-day course available online and in-person, covering annual allowance, lump sum allowances and inheritance tax. A Scotland-specific version of this course is also available.

For colleagues booking from Scottish funds, we warmly welcome your participation. However, please note that the training materials and examples used relate to England and Wales. The only exception to this is a dedicated Scottish-focused date for our Understanding Tax Allowances in the LGPS course. This session will take place online on [19 August 2026](#) and is reserved exclusively for Scottish LGPS attendees.

Bookings are processed on a **first-come, first-served basis**. To ensure fairness, each topic is limited to five delegates per organisation.

If you are unable to secure a place on a course or require more than five places, please email training.lgps@local.gov.uk with details of the course(s) you wish to attend, including the number of places required and preferred format (online or in person). We will maintain a waiting list and may consider running additional sessions if demand is sufficiently high.

We look forward to supporting your learning and development throughout 2026.

More information on all of our courses and their content is available on the Training and Development pages of www.lgpsregs.org.

Aggregation – England and Wales

- [Aggregation training – Online 12 May 2026](#)
- [Aggregation training – Online 29 October 2026](#)

- [Aggregation training – Online 19 November 2026](#)
- [Aggregation training – London 2 December 2026](#)

Additional contributions – England and Wales

- [Additional contributions – Online 10 September 2026](#) (1 place remaining)
- [Additional contributions – Online 22 September 2026](#)
- [Additional contributions – Online 1 October 2026](#)
- [Additional contributions – Online 13 October 2026](#)
- [Additional contributions – Online 5 November 2026](#)

Understanding tax allowances in the LGPS

- [Understanding tax allowances in the LGPS course – Online 19 August 2026](#) (Scottish LGPS only)
- [Understanding tax allowances in the LGPS course – London 8 September 2026](#) (1 place remaining)

Survivor benefits – England and Wales

- [Survivor benefits course – Online 22 July 2026](#)
- [Survivor benefits course – Online 27 August 2026](#)
- [Survivor benefits course – Online 24 September 2026](#)
- [Survivor benefits course – London 9 October 2026](#)
- [Survivor benefits course – Online 10 and 11 November 2026](#)
- [Survivor benefits course – Online 7 December 2026](#)

Intermediate retirements – England and Wales

- [Intermediate Retirements course – Online 16 April 2026](#)
- [Intermediate Retirements course – Online 5 May 2026](#)
- [Intermediate Retirements course – Online 2 June 2026](#)
- [Intermediate Retirements course – London 10 June 2026](#)

Advanced retirements – England and Wales

- [Advanced Retirements course – Online 29 April 2026](#)
- [Advanced Retirements course – Online 13 May 2026](#)
- [Advanced Retirements course – Online 24 June 2026](#)
- [Advanced Retirements course – London 1 July 2026](#)

Insight – England and Wales

- [Insight course – York residential 18 - 21 May 2026](#)
- [Insight course – Online 6 - 10 July 2026](#)
- [Insight course – Bournemouth residential 7 - 10 September 2026](#)
- [Insight course – Online 19 - 23 October 2026](#)

Employer role – England and Wales

- [Employer Role training – Online 21 April 2026](#)
- [Employer Role training – London 7 May 2026](#)
- [Employer Role training – Online 21 July 2026](#)
- [Employer Role training – Online 19 August 2026](#)
- [Employer Role training – Online 24 September 2026](#)
- [Employer Role training – Online 27 October 2026](#)
- [Employer Role training – Online 26 November 2026](#)

For any further enquiries, please contact us at training.lgps@local.gov.uk

Action for administering authorities

Please share details of the employer role training with your Scheme employers.

Administrator and employer training

We still have some availability on the courses covered by the 2025 programme:

Understanding transfers in training

- [Understanding LGPS Transfers In – Online 19 February 2026](#) (1 place remaining)
- [Understanding LGPS Transfers In – Online 25 March 2026](#)

These events are available to book via the [LGA events website](#). Each course page provides information on the programme, pricing and the booking link.

For more information on all available training courses, please visit [LGPS Training and Development](#).

LGPS Governance Conference 2026 – three places available

Our 2026 Governance Conference is being held in Cardiff on Thursday 29 January and Friday 30 January 2026 and the [conference programme is available to view](#).

We have three in-person places available. Bookings for in-person places close on 2

January 2026. It is also possible to join us virtually. [Book now to attend the LGPS Governance Conference 2026.](#)

The conference is aimed at officers, pension committee and local pension board members. It brings together LGPS professionals for two days of insightful discussions, expert analysis and valuable networking.

LGPS England & Wales Scheme Advisory Board (SAB)

Fit for the Future - technical consultation

The [Board's response](#) to the [Fit for the Future technical consultation](#) has been published.

The consultation seeks to understand whether the draft statutory instruments (linked below) will effectively deliver the policy proposals set out in the Government's response to the [Fit for the Future consultation](#):

- [LGPS \(Pooling, Management and Investment of Funds\) Regulations 2026](#)
- [LGPS \(Amendment\) Regulations 2026.](#)

The consultation closes on 2 January 2026.

Fit for the Future – closed consultation on draft investment, pooling and governance guidance

At MHCLG's request, the Board Secretariat sent the draft statutory guidance to all 86 administering authorities in England and Wales on 8 December 2025. The guidance accompanies the draft regulations currently under consultation. MHCLG has asked for comments by **12 January 2026**.

MHCLG has confirmed that the policy behind the guidance has already been consulted on. Feedback should therefore focus on whether the guidance reflects the policy intent set out in the Government's response to the Fit for the Future consultation.

The Board would have preferred a public consultation and did recommend to MHCLG that it take this course of action.

The draft guidance cannot be published or shared widely at this stage. However, the Board expects funds will need to share it with their advisers to prepare responses.

To support funds responses, the Board will publish its draft response on its website before 12 January 2026. To help draft that response, the Board has shared the draft guidance in confidence with Board members and Board committees.

Response to ‘Access and Protections’ consultation

The [Board’s response](#) to the [Scheme improvements \(access and protections\) consultation](#) has been published.

For this consultation, the Board endorsed much of the response from the LGPC (see [earlier article](#)). In particular, the Board would like to endorse the technical accuracy of their analysis of the impact of the proposals and how they might best be delivered. The main difference between the Board’s response and the LGPC’s is on the introduction of the normal minimum pension age and the need for protections for existing scheme members. That difference derives largely from the different composition of the Board, and the advocacy of the member representatives on it.

LGPS statistics for 2025/26

MHCLG officials have confirmed that there will be no significant changes to the data collected in the statutory return (SF3) for the 2025/26 scheme year.

[Bulletin 269](#) explained that MHCLG was reviewing SF3 data following the changes proposed under Fit for the Future. The review aimed to ensure the return continued to provide ministers with information on the areas they are most interested in.

Revised Code of Transparency now published

Earlier this year, the Board held a [consultation on proposed changes to Code of Transparency](#) following on from the decision to replace the centralised data system supporting the Code with a framework approach.

The consultation ran from 14 July 2025 to 15 August 2025. 36 responses were received from funds and pools (as clients) and Code signatories (including pools). All Code signatories who responded indicated that they would remain committed to the Code. A final draft was then put to the Investment Committee on 10 November and approved for publication on 24 November 2025 by the Board.

The Board is hopeful that these changes to the Code alongside the new framework expected to go live in 2026 will ensure that the Code continues to deliver on its intended aims of increased transparency within the sector.

A summary of the key changes can be found on the [Board’s news page](#).

The [revised Code](#) can be found on the Code of Transparency section of the Board website along with [updated FAQs](#) to reflect these changes.

Compliance and Reporting Committee – practitioner representative vacancy

The Board's Compliance and Reporting Committee (CRC) is seeking a practitioner representative following notification that Christina Thompson will be stepping down from the committee. The Board wishes to thank Christina for her contributions to the committee.

The Board is looking for a candidate who will be able to input to the expected increase of engagement with Scheme administration issues in 2026.

For more information on the committee, you can review the [CRC Terms of Reference](#). To express an interest in the vacancy, please email sabsecretariat@local.gov.uk.

SAB website

[The Board's website](#) provides information about its work. Use the links below to find out more about:

- [a summary of the last SAB meeting in November 2025](#)
- [latest news](#)
- [committee meetings including agenda papers](#) for meetings which took place in October and November 2025
- [Responsible Investment Advisory Group \(RIAG\) agenda and reports](#) from the meeting which took place in October 2025.

HMRC

Pension schemes newsletter 176

On 18 December 2025, HM Revenue and Customs (HMRC) published [Pension schemes newsletter 176](#). Articles of particular interest to administering authorities include:

- **Transfers to qualifying recognised overseas pension schemes (QROPS)** – a new reporting function is now available on the Managing pension schemes service, which replaces the APSS262 form.
- **Protections and enhancements look up service** – HMRC plans to launch a new authenticated look up service on the Managing pension schemes service in early 2026. Volunteers are invited to use the new service. To take part, email manraj.padam@digital.hmrc.gov.uk using 'Private Beta Research' in the subject header.

- **Mandatory tax adviser registration** – HMRC has updated plans requiring all tax advisers interacting with HMRC on behalf of clients to register and meet minimum standards. The article clarifies which persons are excluded after feedback from the pensions industry raised concerns that earlier draft legislation might have captured pension scheme administrators and practitioners.
- **Pension scheme return** – submission deadline reminder.
- **Event reporting** – submission deadline reminder.

Action for administering authorities

Update process for reporting QROPS transfers to HMRC.

TPO

Overpayment information for members and beneficiaries

On 16 December 2025, the [Pensions Ombudsman \(TPO\) published Pension overpayments information](#) for members and other beneficiaries of pension schemes. The information is designed to help them understand:

- what an overpayment is
- what obligations exist around repaying money that was overpaid
- what potential legal defences exist for specific situations that may mean they do not have to repay the money
- the requirement to engage with the scheme and provide evidence to support any of those defences
- what to expect from the scheme when an overpayment occurs
- how and when TPO can help if a dispute cannot be resolved with the scheme.

TPO hope the information will support administrators and members to work together to agree whether, how and over what period an overpayment should be recovered. This should allow those parties to resolve the issue without the need to go to TPO, and any complaints they do receive should be more straightforward to resolve.

For more information, see the [press release from TPO](#).

Action for administering authorities

Share the information with your members and relevant beneficiaries when issuing communications about a pension overpayment.

TPR

Administration guidance updated

On 9 December 2025, the Pensions Regulator (TPR) published revised [administration guidance](#). The guidance replaces TPR's previous 'Administration of a DC Pension Scheme guidance' and applies to all scheme types.

The guidance sets out the practical steps administering authorities can take to meet the expectations set out in the [administration module of TPR's code of practice](#) and it applies to the governing bodies of all pension schemes.

On the same day, TPR also published a blog spotlighting '[Strong administration as fundamental to good saver outcomes](#)'.

Blog on digital transformation

TPR has published a new blog titled '[Shaping the Future: How We Are Driving Digital Transformation with the Pensions Industry](#)'.

In the blog, Paul Neville, TPR's Executive Director of Digital, Data and Technology (DDaT), shares the latest vision, opportunities and priorities, developed through a newly established industry working group, to see schemes harness the power of technology to shape better retirements.

Fighting pension fraud webinar

The Pension Scams Action Group (PSAG) is hosting an [industry engagement webinar](#) on 18 March 2026. This free, one-hour session will cover progress updates, good practice and insights from industry partners.

Useful links

[LGPS member website \(England and Wales\)](#)

[LGPS member website \(Scotland\)](#)

[LGPS Advisory Board website \(England and Wales\)](#)

[LGPS Advisory Board website \(Scotland\)](#)

[LGPS Regulations and Guidance website \(England and Wales\)](#)

[LGPS Regulations and Guidance website \(Scotland\)](#)

[Current LGPS job vacancies](#)

[Public Sector Transfer Club](#)

[Recognised Overseas Pension Schemes](#) that have told HMRC that they meet the conditions to be a ROPS and have asked to be included on the list.

LGPS pensions section

Raising a query

If you have a technical query, please email query.lgps@local.gov.uk and one of the team's LGPS pension advisers will get back to you. To avoid delays in receiving a response, please do not email advisers directly.

Team contacts

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Further information

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