

Minutes of National Pension Officer Group (NPOG) meeting 11am 20 June 2025

Attendees – standing members

NPOG member	POG
Phil Drury	East Midlands Pension Officer Group
Vinny Kinder	East Midlands Pension Officer Group
Martin Doyle (Chair)	London Pension Officer Group
Richard Smyth	London Pension Officer Group
Heather Chambers	Northeast Pension Officer Forum
Lisa Garton	Northeast Pension Officer Forum
Zena Kee	Northern Ireland Local Government Officers' Superannuation Committee
Sinead Heath	Northern Ireland Local Government Officers' Superannuation Committee
Erin Savage (Secretary)	Scottish Pensions Liaison Group
Lisa Eaglesfield	Shrewsbury Pension Officer Group
Linda Radley	Shrewsbury Pension Officer Group
Matt Mott (Vice Chair)	Southeastern Counties Superannuation Officer Group
Joel Ellner	Southeastern Counties Superannuation Officer Group
Sandy Armstrong	Southern Area Pension Officer Group
Emma Sanders	Southwest Area Pension Officer Group
Nicky Russell	Southwest Area Pension Officer Group
Joanne Griffiths	Welsh Pension Officer Group

Attendees – representative members

Name	Organisation
Will King	MHCLG
Ben Lavelle	MHCLG
Lorraine Bennett	LGA
Jan Scott	SPPA

Name	Organisation
Eva Sobek	SPPA
William Dobbin	Department for Communities
Vincent Perry	Department for Communities
Jeremy Hughes	SAB

Attendees – software suppliers (part meeting only)

Name	Organisation
Claire Hey	Heywood
Matt Armitage	Heywood
Heidi Twort	Equiniti
Mark Broxup	Equiniti
Lissa Nicholls	Civica

Apologies

NPOG member	POG
Kevin Gerard	Welsh Pension Officer Group

1. Apologies for absence and circulation of attendee list

1.1 Apologies were noted.

2. Minutes of previous meeting – 4 April 2025

2.1 Minutes from the previous meeting had been circulated prior to this meeting.

2.2 LB noted an error in the minutes – paragraph 11.3 should refer to the ABS guide rather than the McCloud guide.

2.3 Minutes were approved by the group.

3. MHCLG overview of ‘Access and Fairness’ consultation and its proposed changes

3.1 BL presented a slide deck for discussion on the recent consultation and indicated that MHCLG were keen to hear feedback and views and encouraged all to respond to the consultation. There is a 12 week consultation period which will be followed by a response from Government. It is hoped that legislation will be in place this year.

3.2 The Government's intention is to fix historic discrimination and ensure equal access to the scheme, regardless of the sex of the eligible member and those they leave behind on death. There are four proposals relating to survivor benefits and death grants:

- The pension payable to the survivor of a marriage or civil partnership to be calculated in the same way, regardless of the sex or sexual orientation of the member or survivor with equalisation being "to the highest level of entitlement currently available (given the date of the marriage or civil partnership)"
- To remove the "requirement for a signed nomination form in the case of qualifying cohabitee survivors, retrospective for any individual who stopped being a member between 1 April 2008 and 31 March 2014"
- To remove the "age 75 cut-off on eligibility for death grants, backdated for all deaths on or after 1 April 2014, and
- To remove "the requirement on administering authorities to pay the death grant to the personal representative where it hasn't been paid within the two year limit, applicable for all death grants yet to be paid."
- Some of the proposals are in response to cases from the other public sector schemes, whilst others resolve issues within the regulations. One proposal is to remove the age 75 cut-off on eligibility for death grants.

3.3 This will require statutory guidance.

3.4 RS noted that some of the proposals will have backdated effect, and it may be difficult to identify those who are in scope. BL acknowledged the difficulties, and suggested funds should include this administrative burden in their consultation response.

3.5 LE asked if there would be a deadline for completing retrospective calculations. BL asked that comments on this be included in responses.

3.6 SA asked if changes to Inheritance Tax had been taken into account? BL advised that there is limited influence on wider Government policy but again comments and examples should be included in responses.

3.7 BL also introduced four proposals intended to help address the gender pensions gap (GPG):

- Making authorised unpaid absences under 31 days automatically pensionable,
- Updating the rules on buying back pension lost in an unpaid break of

over 30 days,

- Making additional maternity leave, additional adoption leave and shared parental leave during which no pay is received automatically pensionable with the cost to be met by the employer; and
- Making GPG reporting mandatory in the LGPS.

3.8 HC asked for further clarity on the GPG reporting requirements. WK advised that actuaries will include this as part of triennial valuations. The team have been working with GAD on guidance,

3.9 LE asked what will be done with the results – if a fund has a large gap what will happen? WK confirmed this will be a catalyst for further analysis and conversations at a local level.

3.10 BL covered proposals on opt-outs. The focus is on data collection and publication, with the aim to understand trends and form future policy from an informed basis:

- It will be required to publish data related to opt-outs in administering authority Annual Reports
- An optional form will ask members their reasons for opting-out as well as additional information (eg gender, age, ethnicity, marital status etc).

3.11 MM highlighted that funds often don't have full information – this is held at employer level. In addition, there is no real impetus for members to complete a form. JG raised data protection concerns and echoed the suggestion that employers would have more detailed data. HC noted that most opt-outs are at the point of joining, there are very few people opting out later.

3.12 ZK advised that NILGOSC have been collecting data for additional monitoring for some time. An anonymous form is issued for individuals to specify reason for opting out. They receive a large volume of responses. MM also noted that the proposals don't address the issues with low take-up of 50:50 – will there be guidance on how to promote this? ZK said that NILGOSC include questions relating to awareness of 50:50 on the opt-out information form and in member satisfaction surveys. Very few members are aware of 50:50.

3.13 MD asked about timescales for reporting on opt-outs. WK said that it is envisaged that 2025 data is reported next year.

3.14 BL also highlighted proposals relating to forfeiture for those who have been convicted of crimes that bring public service into disrepute. The government's

proposals aim to tackle some long-standing issues with forfeiture in the LGPS:

- Remove the requirement that a member must have left employment because of the offence
- Remove the 3-month time limit to make a forfeiture application, and
- Revoke regulation 92 and publish forfeiture guidance to assist employers in making applications.

- 3.15 MD noted that forfeiture was low on the priority list received back from regional POGs as there are few cases, however PD said that the number of cases may be low due to the current wording – and the 3-month time limit.
- 3.16 BL noted that it would be helpful to understand whether the changes would have any impact on software and payroll systems and therefore whether implementation of the proposals should be staggered in order to reduce the impact.
- 3.17 MD asked software suppliers to comment on the proposals and raise any immediate concerns.
- 3.18 CH advised that many of the proposals won't require software updates, and of those that do, some are already in place in the devolved nations, so calculations are there in the background. CH will ask the Insights team to comment on reporting requirements. CH noted that further guidance will be provided regarding the LSA and interaction with PCLES. Heywood will submit a response.
- 3.19 LN agreed that there should be little impact on software, however clarity on the reporting requirements would be helpful to allow Civica to work with their clients on this. More clarity on the reporting requirements and LSA changes would be helpful. Civica will discuss the proposals with their client group.
- 3.20 MB confirmed that Equiniti are preparing a response to the consultation. It would be good to understand timescales and perhaps to consider staggering implementation due to other work demands.
- 3.21 BL noted requests for further clarification and said that the team would be happy to discuss. BL also commented that the member voice is key so any thoughts from members would be welcomed.
- 3.22 VK asked for clarification regarding timing of Gender Pay Gap proposals – what does immediately mean? VK also highlighted that whilst our software

suppliers may not be impacted by proposals, some proposals will impact employers, and their payroll software will require amendment. Timescales for this need to be factored in. LB noted that the payroll providers are meeting next week.

- 3.23 PD asked about identifying past cases for retrospective cases. BL acknowledged the difficulties, but the policy intent is to provide equalised benefits and that a pragmatic and best intentions approach may be the way forward.

4. Software supplier update

Heywood

- 4.1 CH and MA provided an update.
- 4.2 CH confirmed that a system updates to facilitate McCloud within annual benefit statements had been delivered to clients and that Heywoods will review the LGA guidance and template documents for the future.
- 4.3 MA advised that an update on transfer progress would be shared with CLASS Management Team. The timeline for implementation has been reduced, phase 1 work will be 6 months earlier than anticipated, and phase 2 and 3 will also be delivered earlier.
- 4.4 JG asked about the recent issues with the valuation data extract. MA confirmed that options for resolution are being considered.

Equiniti

- 4.5 MB and HT provided an update.
- 4.6 MB confirmed that Equiniti will be submitting a response to the MHCLG consultation.
- 4.7 MB advised that product changes relating to Pensions Dashboard are with clients for testing with further releases scheduled. Equiniti are also looking at how they can support clients with data in the lead-up to connection dates.
- 4.8 HT provided an update on McCloud: high volume transactions are being tested by clients. Lower volume transactions such as divorce are in progress and expected to be ready in quarter 3. Bulk calculations for active and deferred members have been completed with pensioner bulk calculations to follow. Enhancements to online portals are in progress.

Civica

- 4.9 LN provided an update.
- 4.10 LN advised that in terms of McCloud updates, annual benefit statements had been updated in line with the technical guide. Civica will then focus on retrospective deaths, non-club transfers and CETVs.
- 4.11 For dashboards, the recent release facilitated ISP connection, and the team are now focussing on reporting and single source AVC data.
- 4.12 LN also confirmed that a new valuation extract had been delivered.
- 4.13 MM asked about a potential issue with UPM which would put the delivery of the dashboard release in doubt. LN will raise with the team and update.
- 4.14 MM also highlighted that he had not had delivery of the latest release and was now concerned about meeting the 31 August deadline for annual benefit statements.
- 4.15 MM also asked for an update on resource following the discussion at the April meeting. LN advised that recruitment is still on going, however new staff have joined since the April meeting.

5. LGA update

- 5.1 LB provided an update on current issues. LGA are working with the METS AVC group on dashboards issues. The intention is to produce a Memorandum of Understanding (MoU) for AVC providers as the dashboard requirements are not covered by existing contracts. The MoU should be ready by the end of July and will set out roles and responsibilities.
- 5.2 ESavage highlighted that due to the passage of time since AVC providers were appointed it was difficult to trace original contracts therefore the MoU will be helpful. LB confirmed that this will cover both multiple and single source.
- 5.3 LB advised that the TPR issued a statement on 19 June regarding the use of the regulatory provision to exercise discretion not to include underpin information for certain members in annual benefit statements. This covers breach of law and reporting requirements. LB will circulate a link to this (*post-meeting note – circulated to the group 20 June 2025*).
- 5.4 The group highlighted that the timing of this was not helpful as some funds have already started issuing benefit statements.

- 5.5 VK said that this had been discussed within POGs- should funds report to TPR if they have not completed rectification work by the deadline? LB confirmed that the discretion can be utilised on the same basis.
- 5.6 MD asked about process – should funds advise their Committee? LB said funds should document the decisions made and make both Committees and local pension boards aware. In addition, funds should have a plan in place for completion. An article will be included in the June bulletin.
- 5.7 HC asked if there was a potential for further extension to the deadline. WK said that due to the length of time required to implement regulation changes this is unlikely. However, it would be helpful to understand how widely the discretion will be used.
- 5.8 LB advised work has been done to update the Abolition of the LTA guide, however there are currently issues with the legislation, JE asked if LB was aware of any appetite to bring the lifetime allowance back? LB is not aware of any plans for this. LB also advised that legislation will be brought forward to cover the ruling from the Virgin Media case.
- 5.9 LB confirmed that the team intend to review the LGPS Regs and Scottish LGPS Regs sites. Feedback will be sought from funds and a communication on this will follow soon. The Communications Working Group LGPS promotion project is progressing well. This will include a range of different channels, include videos and social media. Materials should be ready by the end of July.
- 5.10 LB confirmed that LGA will publish a response to the MHCLG access and fairness consultation, likely by the middle of July. MD asked the group to send on responses to allow a group response to be issued. Responses should be sent to MD by the end of July.

6. Feedback from Regional POGS

6.1 East Midlands Pension Officer Group: McCloud

- Meeting the McCloud project deadline of having all cases resolved by 31/08/2025 and whether funds are requesting approval for an extension to the project by a year to their respective committees? Should the fact that funds have not met the deadline be recorded as a statutory breach and be reported to TPR?
- If Funds are not able to include underpin information in all of their annual benefit statements and use the discretion not to include for certain types of

members, in what circumstances should this also be reported to TPR? There was concern from Civica Funds about being able to provide an underpin amount in ABS's for any members at all and concern from Heywood Funds about including underpin information for the more niche groups of members where a software solution is not in place e.g. transfer ins. What counts as a material breach and do LGPS Funds require further guidance from TPR?

- The group agreed these points had been covered in previous agenda items.

6.2 Southwest Area Pension Officer Group: scheme change suggestions.

- Timeline LGPS Regulations 2013 Regulation 3 (7)(e) member vests “if the member has paid National Insurance contributions whilst an active member and ceases active membership after the end of the tax year preceding that in which the member attains pensionable age;”
- Timeline LGPS Regulations 2013 regulation 30 (1) with regards to a member being of NPA or greater who opts-out having to wait until they leave employment especially in terms of the LGPS Access and Fairness consultation that has been launched.”
- ESanders advised that these issues arose following member complaints. Members cannot have a refund based on current wording in the regulations, however contracting-out has come to an end. LB advised that overriding legislation does not permit for a refund to be paid if a member remains in service beyond NPA ie payment of a refund would be an unauthorised payment. However, the term pensionable age in regulation 3(7)(e) reflects the definition in the Pensions Act 1993 and links to GMP age and as such it may be appropriate to consider a change. All agreed.
- In relation to the second issue, LB confirmed that the difference is that the member has opted-out but remains in the same employment.

6.3 London Pensions Officer Group: scheme change suggestions.

- Remove requirement that deferred members have to make a written election to defer beyond NRD/NPA see reg 32(2) of [Timeline LGPS Regulations 2013](#) and see reg 50(2) of [Administration Regulations 2008](#) or “elects to defer” see reg 93(2) of the 1997 Regs [PT4CH3](#)
- RS advised that this issue arose from a member complaint. The member did not respond to the initial request for payment of their deferred benefits. The member was deemed to have deferred payment by not claiming therefore benefits were not backdated. The member holds that benefits should have

been backdated as no written election was made and has now taken the complaint through IDRPs and is now going to the Ombudsman. It's not clear which way this will go, but clarification in the regulations may prevent similar cases. MD suggested that group members refer to POGs. RS also noted that if benefits were backdated then any benefits paid in the period would have to be paid back if the LGPS benefits impacted the amount due. LB confirmed that DWP should assess all benefits payable from NPA whether the individual has claimed them or not.

7. SPPA update

- 7.1 An update had been provided by ESobek who introduced the key points.
- 7.2 A consultation will be carried out later in the summer which will cover changes required following amendments in primary legislation as well as some technical amendments including the 5-year refund limit and some technical changes in relation to McCloud.
- 7.3 SPPA is monitoring the 'Access and Fairness' consultation.
- 7.4 ESobek also noted that there has been an increase in IDRPs relating to flexible retirement.

8. LGPS England & Wales SAB update

- 8.1 JH provided an update on current work.
- 8.2 The Fit for Future consultation included proposals relating to pooling and rationalisation of pools, however local government elections were impacting on progress due to cancellation of Committee meetings.
- 8.3 The Pensions Schemes Bill has now been published - it includes powers to direct mergers of funds. More information on how these powers will be used would be helpful.
- 8.4 JH mentioned the proposal from Surrey proposing a single purpose authority – would this be a potential model?
- 8.5 JH noted that the England & Wales valuations are well underway. Employers are expecting a reduction in contribution rates. GAD is considering how discount rates are being set by fund actuaries – a lower discount rate would lead to a lower surplus. Guidance on how discount rates should be calculated may be considered.

- 8.6 The Board's chair held a meeting with Pension Committee Chairs and the Minister which went well. A further event will be arranged for Pension Committee and Pension Board Chairs to meet the Minister.
- 8.7 A roundtable on the gender pensions gap was held this week which included the other public sector schemes.
- 8.8 Cllr Phillips (Chair of SAB) will be stepping down. It's expected to take 6-9 months to appoint a successor.
- 8.9 MD asked if there was an update on New Fair Deal – JH expects this to be taken forward in Autumn.

9. Department for Communities (NI) update

- 9.1 An update had been provided by WD and VP introduced key points.
- 9.2 The Department is finalising a draft statutory instrument relating to McCloud and is also reviewing the England & Wales 'Access and Fairness' consultation prior to consideration by the Minister. The Department is also reviewing the Fit for Future work.

10. Dashboards and AVCs: Prudential Single File Specification

- 10.1 The single file specification had been circulated with meeting papers.
- 10.2 MD asked the group to circulate to their POGs.
- 10.3 A potential AVC sub-group was discussed again: LB mentioned that the METS group currently have an AVC sub-group which is working well, and another sub-group may lead to duplication.

11. Standing members only: request from software suppliers to attend NPOG meetings in full

- 11.1 Heywoods had asked if it would be possible to revert to the practice of National Technical Group whereby software suppliers attended the meeting in full.
- 11.2 The group discussed the request but overall felt that the current format allowed for better discussion. It was acknowledged that very few specific questions were being raised by the group which it made it difficult to prepare, however for now McCloud and Pensions Dashboard should be standing items and providers should be ready to provide updates on these items.

11.3 The group agreed to ensure specific questions were provided in advance of the meeting to allow providers to prepare in advance.

11.4 MD will feedback to all software suppliers to confirm the format will remain the same, to prepare for the above standing items and to also ask them to provide details of any specific questions for the group in advance of the meetings.

12. AOB

12.1 LB advised that a survey would be issued shortly regarding a skills assessment tool that the LGA are working on.

12.2 SA asked if others had been advised that dashboards registration codes had been sent to Council Chief Executives rather than funds – other members of the group were aware of this. LB will highlight to TPR.

12.3 PD asked if there was an update on electronic transfer of information for interfund (discussed at the February meeting). JG will raise again with Heywoods. Sanders noted the need for a standard format across all suppliers.

12.4 LE asked about data protection and deletion of member data in the context of the current consultation. It might be difficult to identify relevant members if data is being deleted. ZK noted that system functionality exists which allows some fields only to be deleted. It was agreed to raise with the software suppliers at the next meeting,

12.5 VK asked about orphan AVCs and how they should be treated for dashboard purposes. The question was asked but not answered on the recent dashboard webinar. LB noted that this is a bit of a grey area at present. Once clarification is available an update will be provided.

13. Date and time of next meeting

13.1 19 September 2025, LGA ,18 Smith Square