Paper A: Minutes of meeting held on 24 November 2025 - Hybrid

PRESENT

Cllr Nathan Yeowell	Chair, LGA
Cllr John Fuller	LGA
Cllr Keith House	LGA (partial attendance)
Cllr Martin Bailey	LGA
Cllr Georgia Taylor	LGA
Cllr Jordan Meade	LGA
Cllr Jayne Dunn	LGA
Cllr Rishi Madlani	LGA
Ben Lavelle	MHCLG
Will King	MHCLG
George Graham	SAB representative
Martin Doyle	National POG representative
David Murphy	NILGOSC
Kimberly Linge	SPPA
Linda Welsh	SPLG

Secretariat

Lorraine Bennett	LGPC
Lisa Clarkson	LGPC
Holly De-Buriatte	LGPC
Clair Alcock	Scheme Advisory Board (SAB)

Non attendees

Cllr Mark Jeffery	LGA
Cllr Mark Shooter	LGA
Eva Sobek	SPPA (apologies)
Alan Wilkinson	SPPA (apologies)

1. Actions Register

Action	Responsible	Deadline
Issue draft Access and Protection consultation response to Committee for approval	Lorraine Bennett	1 week before 22 Dec 2025
Continue strong representations on inheritance tax complexities	All Committee members	Ongoing
Provide brief pensions dashboard readiness update at next meeting	Martin Doyle (NPOG)	Next meeting (23 March 2026)
Note Scottish interest in Level 3 qualification rollout	Lisa Clarkson and Lorraine Bennett	Ongoing
Consider Levels 4-5 qualification development	Lisa Clarkson	Medium-term (3+ years)
Circulate climate data podcast to Committee	Holly De-Buriatte and Lorraine Bennett	After meeting
Post-valuation review - refer climate data/risk analysis concerns to SAB for consideration	Clair Alcock	Post-valuation round (2026)
Consider building 10-15 minutes into future agendas for policy discussions	Chair and Lorraine Bennett	From March 2026 meeting

2. INTRODUCTION FROM THE CHAIR

The Chair, Cllr Nathan Yeowell [NY], welcomed everybody to the first hybrid meeting of the 2025-2026 cycle. NY noted the presence of both returning and new members and emphasised the importance of making proceedings inclusive and accessible to those new to the subject area. NY encouraged members to ask questions if anything was unclear.

Cllr John Fuller [JF] explained the distinction between the LGPC (employer-side only forum) and the Scheme Advisory Board [SAB] (which includes both employer and employee representatives).

David Murphy [DM] noted to the new members that the Committee includes Northern Ireland and Scottish representatives as some of the issues discussed effect all the home nations.

NY recommended that, once nominated, all substitutes should attend all Committee meetings to ensure they are kept to speed with Committee affairs.

NY noted this would be George Graham's [GG] last meeting of both the LGPC and the SAB. On behalf of the Committee and previous members, NY thanked GG for his commitment and contribution over the years, noting his generosity in providing advice and guidance at various LGPS events.

The Committee formally minutes its thanks to GG for his contribution to the Committee and the wider LGPS and wished him well for his retirement.

3. APOLOGIES

Apologies for absence were received from Alan Wilkinson [AW] and Eva Sobek [ES]; Kimberly Linge [KL] attended in substitute.

4. MINUTES

The minutes from the 21 July 2025 meeting were agreed.

5. LGPS ACCESS AND PROTECTION CONSULTATION

Background

Lorraine Bennett [LB] introduced the consultation, which was launched in October 2025 with a closing date of 22 December 2025. This is the second member benefit consultation of the year, following the earlier Access and Fairness consultation.

LB sought the Committee's view on certain points in the consultation which will be fed into a draft response for subsequent review.

Normal Minimum Pension Age [NMPA]

LB informed the Committee that full detail about the increase to the NMPA is available in Paper D from the 24 March 2025 Committee meeting and summarised the current position to give background:

- Normal Minimum Pension Age is currently 55
- Legislated to increase to 57 from 6 April 2028 (Finance Act 2022)
- NMPA is the earliest age benefits can be paid across all registered pension schemes in the UK (except ill health benefits)
- If benefits are paid before NMPA, there are tax charges to both member and scheme.

The Finance Act 2022, which is overriding legislation to the LGPS, provided for transitional protections for members who, on 4 November 2021, the policy announcement date, had an unqualified right to take pension benefits and therefore would not be considered as an authorised payment. However, this transitional protection does not automatically give the member rights as the rules within the pension scheme must also allow it.

MHCLG is consulting on implementing this transitional protection in the LGPS regulations by providing protected ages. LB talked through how the proposed protection would impact the four categories of members set out in Paper B.

LB noted that at the 24 March 2025 meeting the Committee's view was there should be no transitional protection for members, with all required to take benefits at a minimum age of 57.

The following points were discussed:

- the strength and robustness of the legal advice obtained by the Government on whether introducing protections for certain members would constitute unlawful discrimination.
- the sector continues to implement the McCloud remedy, arising from previous protections that were found to be unlawful on age discrimination grounds.
- introducing protections would add significant complexity for scheme administrators.
- the number of members who take payment of their pension between ages 55 and 57 is currently unknown, although substantial early-retirement reductions act as a deterrent for some members.

- the potential creation of a two-tier workforce, whereby only some members would be able to access an unreduced pension immediately if made redundant between ages 55 and 57.
- while current redundancy numbers are low, these are expected to increase significantly as a result of Local Government Reorganisation (LGR). Introducing protections would therefore lead to substantially higher employer costs, as protected members would be able to access their pension from age 55 on redundancy.

Committee Position

The Committee unanimously agreed to maintain the position that protections should not be provided. All members should have a minimum pension age of 57 from 6 April 2028. The Government should legislate for this outcome as soon as possible.

Pension Access for Mayors and Councillors

LB summarised Paper B, setting out the Government's proposal to allow councillors (excluding town and parish councillors) and mayors, including deputy and other mayoral roles, to opt into the LGPS. Membership would be optional, with individuals required to elect to join rather than being automatically enrolled.

It was noted that councillors in England are currently the only UK councillors excluded from the LGPS, having been removed in 2014. In contrast, Welsh councillors remain in the 1997 scheme and Scottish councillors have access to the Scottish 2015 CARE scheme. Under the proposal, English councillors would join the 2014 CARE scheme. There are no plans to move Welsh councillors to the 2014 CARE scheme. It was also clarified that any service accrued by English councillors rejoining the LGPS would be held in separate tranches within a different scheme.

The consultation estimates an annual cost of £40–£45 million across England, based on assumptions about local government structures, take-up rates, demographics and allowance levels. No additional Government funding is proposed, on the basis that similar arrangements in other UK regions are unfunded.

Take-up rates in Wales were noted to be significantly higher than those previously seen in England and Wales when membership was subject to remuneration panel approval.

The Committee was invited to consider whether it supported the proposal, the opt-in approach, and whether it had any specific comments on implementation.

Clarification on Backdating
The Committee discussed rumours that the policy might be introduced retrospectively to allow councillors to backdate LGPS membership to 2014. Will King [WK] clarified that the proposal would apply on a prospective basis only, with no backdating of membership.

Concerns were raised that any suggestion of backdating could expose the sector to legal challenge, particularly given the policy rationale of avoiding “financial disadvantage” arising from public service. It was noted that this justification appears to conflict with the rationale for removing councillors from the scheme in 2014, potentially increasing the risk of claims from councillors who have served since that time.

JM requested the Government provide a categorical assurance that if backdating liabilities do occur the responsibility, they will not be pushed down onto local Councils. He emphasised that there needs to be national funding to cover such eventualities.

NY agreed this was a valid point about the problematic language.

Committee Position
The Committee unanimously agreed to support the proposal to allow Councillors and Mayors to join the LGPS.

Opt-In versus Auto-Enrolment
The Committee considered whether LGPS membership for Councillors and Mayors should be offered on an opt-in or automatic enrolment basis, noting a divergence of views.

Arguments in favour of automatic enrolment focused on alignment with national pension policy, maximising participation, and supporting protected groups, including addressing the gender pensions gap and barriers linked to lower financial literacy.

Arguments supporting an opt-in approach emphasised the distinct status of councillors and mayors as office holders rather than employees, the wide variation in roles, time commitments, age profiles and existing pension provision, and the difficulty of defining full-time versus part-time roles. Consideration was also given to respecting political choice and the associated legal and cost implications.

Arrangements in devolved administrations were noted, with automatic enrolment in Scotland and an opt-in approach in Wales.

Committee Position

Given the differing views, the Committee agreed that its response should reflect both majority and minority perspectives.

Majority view

- preference for an opt-in model, supported by proactive communication and encouragement to join
- recognition of the distinction between allowances and employment
- respect for political choice
- a pragmatic approach reflecting councillor demographics and existing pension arrangements
- maintaining the distinction between accountability to the electorate and employment relationships.

Minority view

- preference for automatic enrolment
- consistency with national pension policy
- benefits for protected groups and increased participation.

Additional consideration

The need for parity across home nations to avoid multiple and inconsistent regulatory frameworks.

Implementation issues

The Committee highlighted several key implementation issues.

It was emphasised that policy language should clearly avoid any reference to “reinstatement”, as this could imply retrospective rights and increase the risk of legal challenge. Communications should make clear that the proposal represents a new scheme with prospective application only.

The need for legal clarity was stressed, including publication of assurance that retrospective claims cannot arise and confirmation that any liabilities from legal challenge would not fall on local authorities, supported by national funding where required.

Concerns were raised about the proposed implementation date of 1 April, which does not align with election cycles and could result in short-term membership. It was suggested that commencement should align with the start of a new council term.

Finally, the importance of consistency across the UK was noted, to avoid multiple regulatory frameworks and to draw on experience from existing arrangements in devolved administrations.

Academies and Administration Authority Consolidation

The Committee discussed the Government's proposal to simplify the consolidation of academies within a single LGPS administering authority. Currently, academies are allocated based on geography, meaning Multi-Academy Trusts (MATs) are often spread across multiple funds, creating administrative complexity, multiple contribution rates and inconsistent processes. MATs have expressed a desire to consolidate into one administering authority to improve control and efficiency.

Under current arrangements, consolidation requires a direction from the Secretary of State. The consultation proposes removing this requirement where specified criteria are met, including value-for-money assessments, a pre-existing relationship with the chosen administering authority, agreement from all parties, administrative capability, and safeguards against contribution-rate shopping. An appeals process would be introduced to address issues arising post-transfer.

While the proposal was supported in principle, significant concerns were raised about unintended consequences. These included the potential cash-flow impact on funds losing academies, given that MATs typically have younger, active memberships and positive cash flow. The cumulative effect of consolidation could destabilise funds that become net losers, particularly if they are required to sell assets to replace lost contribution income. It was also noted that academies may move between MATs over time, increasing volatility.

The Committee highlighted the risk of contribution-rate shopping and noted that variations in employer contribution rates across funds may be a key driver. Reference was made to earlier sector work on academies, with a view that this should be revisited to assess whether underlying issues remain and what has changed.

Committee Position

Removal of Secretary of State consent

The Committee agreed in principle to the removal of the Secretary of State consent requirement, subject to significant caveats. Further work is required to assess cash-flow impacts, scheme stability risks, and the need for appropriate mitigation measures.

Discouraging contribution-rate shopping

The Committee agreed that further collaboration is needed to:

- review previous sector analysis on academies
- examine the ongoing relevance of employer contribution rate variation

- continue dialogue with MHCLG and the SAB to address root causes and promote greater consistency across funds.

New Fair Deal

LB provided an overview of the New Fair Deal proposals, which aim to extend existing central government arrangements into the LGPS, ensuring that staff who are compulsorily transferred or outsourced remain in a public service pension scheme.

Under current LGPS arrangements, contractors may offer either LGPS membership or a broadly comparable scheme. The proposals would remove the broadly comparable option and require outsourced staff to have access to the LGPS only. In this model, the outsourcing body would retain certain responsibilities as the deemed employer, while the contractor would pay the primary contribution rate set for the outsourcing body.

Key features noted included the removal of pension pricing risk from contracts, flexibility for contribution rates to be fixed or updated at each valuation, and the retention of certain regulatory responsibilities by the outsourcing authority. A six-month transitional period is proposed to allow existing outsourcing arrangements to continue temporarily while organisations adjust.

Committee Position

The Committee agreed in principle that the proposals are helpful and broadly supported their objectives, while noting that the detail of the regulations will be critical. It was agreed that the Committee’s response should reflect this support, alongside the need for careful consideration of the detailed proposals once published.

6. REGULATIONS UPDATE ENGLAND AND WALES

Paper C was presented by LB.

Enforcement Strategy Consultation

LB confirmed that she had submitted a response to The Pensions Regulator’s (TPR) Enforcement Strategy Consultation on behalf of the Committee. The response had been circulated to members in advance of the meeting. LB reported that there were no critical or contentious issues arising from the response, and no concerns had been raised by Committee members.

LGPS Statistics

NY welcomed the latest LGPS statistics and noted the encouraging figures regarding the overall size of the Scheme. Members expressed satisfaction with the positive trajectory demonstrated by the data.

Inheritance Tax Changes

JF raised concerns regarding proposed inheritance tax changes and their impact on scheme administration. LB explained that the Government's original proposal would have placed responsibility on pension scheme administrators to account for and pay inheritance tax to HMRC, creating a significant administrative burden. She noted that the Government has since revised its position.

Under the revised proposals, responsibility for inheritance tax has been returned to personal representatives rather than pension scheme administrators, representing a substantial improvement. In addition, death in service death grants have been removed from scope, significantly reducing complexity.

LB advised that the revised proposals continue to apply to deferred member and pensioner death grants, which presents ongoing challenges. MD highlighted that while pension funds currently have up to two years to pay death grants, the new inheritance tax framework requires information to be provided within six months to avoid interest charges, creating a material timing issue.

MD further noted the risk of disputes with personal representatives, who face a six-month deadline for probate and HMRC reporting, potentially before pension funds can provide all required information. This misalignment could result in personal representatives incurring interest charges through no fault of their own.

NY emphasised the importance of the Committee continuing to raise concerns and maintain pressure regarding the practical and operational difficulties arising from the inheritance tax changes.

7. SAB UPDATE [E&W]

Paper D was presented by Clair Alcock [CA].

CA reported that a technical consultation on LGPS governance and investment regulations had been published the previous week, marking a key milestone in proposed reforms to governance structures and investment arrangements. Members were advised that careful review of the technical detail would be required.

Pension Schemes Bill

CA noted that she and Councillor Roger Phillips (RP) had been invited to meet Baroness Sherlock to discuss the Pension Schemes Bill ahead of its Parliamentary consideration, providing an opportunity to represent LGPS views. She also advised that regulators' guidance is expected early in the New Year, requiring funds to prepare promptly for implementation.

Palestine Solidarity Campaign letter

In response to a query from GT, CA explained that the SAB had sought clarification from Government on divestment issues raised by the Palestine Solidarity Campaign letter. CA stressed that the SAB is not the appropriate body to take a position on matters of international law – this is a matter for government, which has the means to obtain proper legal advice and access to information that the SAB does not have.

NY added that the Government has declined to provide the clear steer that the sector was hoping for. This leaves the LGPS without clear direction on this sensitive matter.

NY suggested that this might be an issue worth raising with Committee chairs across the country. It could be useful to assess whether there are widespread concerns about this issue post-current valuation round, to see if there is collective pressure that could be brought to bear.

8. REGULATION UPDATE SCOTLAND

Paper E was presented by Kimberly Linge [KL].

Current Consultation

KL advised that the Scottish Government currently has a consultation open proposing regulatory changes, primarily focused on aligning pension provisions with new neonatal care leave entitlements and ensuring pension accrual continues appropriately during such leave. The consultation also addresses aspects of the gender pensions gap, with proposals aimed at reducing inequalities through regulatory change. KL noted that the consultation was due to close on 25 November 2025 and that seven responses had been received to date. While this was a relatively small number, initial reviews indicated general support for the proposals, with no fundamental objections, although some technical details will require further consideration.

KL further explained that, although the Scottish Government had originally intended to include consultation on the NMPA, this was not possible due to the timing of the change in government and the parliamentary recess. As a result, the NMPA will be consulted on at a later stage, likely once a new Scottish Government is in place following the elections, ensuring appropriate political oversight.

9. REGULATIONS UPDATE NORTHERN IRELAND

Paper F was presented by David Murphy(DM)

DM confirmed that there are currently no live consultations in Northern Ireland. However, developments in England and Wales continue to be monitored closely, as these often influence policy direction in Northern Ireland. DM noted that most of the proposals arising from the Access and Fairness consultation in England and Wales had already been implemented in Northern Ireland several years ago, meaning no further action was required in those areas. He did, however, expect some further work to be needed in relation to gender pensions gap issues.

In relation to the more recent Access and Protections consultation, DM highlighted that two issues were relevant for Northern Ireland: Normal Minimum Pension Age and New Fair Deal. DM indicated that Northern Ireland was likely to mirror the approach taken by MHCLG, aiming for consistency and avoiding unexpected changes. He emphasised that alignment across jurisdictions supports smoother implementation and helps prevent unnecessary divergence in pension provision across the UK.

10. NATIONAL POG [NPOG] UPDATE

Paper G was presented by Martin Doyle [MD].

MD reported that funds are experiencing a nationwide deterioration in service levels across several AVC providers. This is having a significant knock-on impact on the pensions dashboards programme, which depends on accurate and timely data from all providers, including AVC arrangements. MD warned that continued poor performance by AVC providers could jeopardise dashboard delivery, particularly with statutory deadlines approaching. In response, NPOG is arranging meetings with the two main AVC providers to address service level agreements and performance issues collaboratively before they escalate further.

JF queried whether pension software suppliers are adequately prepared for dashboard connectivity. It was noted that one supplier had faced issues due to a misunderstanding of requirements, but this is now being resolved and connections are being established. JF expressed concern about potential reputational damage to employers if members are unable to access pension information at launch and stressed the need for assurance that the sector is on track. NY acknowledged these concerns and agreed that a progress update should be provided at the next meeting.

11. TRAINING, CONFERENCE AND QUALIFICATION UPDATE

Paper H was presented by Lisa Clarkson [LC].

LC reported that the LGPS Annual Governance Conference in January 2026 is sold out, with 175 in-person and 31 online attendees, and five additional in-person places secured. Strong demand was noted, and LGPC councillors were reminded they could attend by contacting the training team.

LC also outlined an expanded 2026 training programme, with 71 days of training planned and high demand for commissioned courses, creating a significant workload for the team. The Certificate in LGPS Administration continues to be well received, with Cohort 3 (starting April 2026) already full.

NY gave congratulations to the team for their qualification work and filling Cohort 3.

GG offered congratulations to the team on their work developing and delivering the qualification. He characterised the qualification as a "significant game changer" in the way the sector can now provide development opportunities to the LGPS workforce.

Linda Welsh [LW] noted strong demand from Scottish funds for a Scottish LGPS qualification and asked when a rollout might become feasible, given previous advice that this was not possible due to LGA resource constraints.

GG asked whether Level 4 and 5 LGPS qualifications could be developed in future, stressing their importance for developing the next generation of senior LGPS officers and managers.

LB and LC acknowledged the strong interest in higher-level (Level 4 and 5) and Scottish-specific qualifications; however, the team is currently focused on embedding the Level 3 qualification before expanding further, to ensure sustainability and quality.

12. ANY OTHER BUSINESS

Climate data and valuations

NY proposed setting aside time in future meetings for topical issues, following a request from GT to raise concerns about climate data used in pension valuations. GT stated that actuarial climate assumptions remain overly optimistic and rely on outdated data, despite some improvement since the last valuation round, and suggested more rigorous, expert-led approaches in future.

The Committee noted the concerns but agreed it was not within its remit to direct actuaries. Members highlighted existing oversight through GAD and SAB, and existing guidance requiring funds to assess climate risk. It was agreed that GT’s concerns would be passed to SAB, and relevant materials shared for information.

NY thanked all attendees for their participation and contributions.

13. DATES OF NEXT MEETINGS

23 March 2026, 20 July 2026 and 23 November 2026.