

CLWYD PENSION FUND COMMITTEE

Date of Meeting	Wednesday, 19 February 2025
Report Subject	Governance Update
Report Author	Head of Clwyd Pension Fund

EXECUTIVE SUMMARY

An update on LGPS governance matters and the Fund's governance policies is provided for discussion at each Committee. This report includes developments since the previous report provided at the November 2024 Committee, including:

- progress against the governance section of the Fund's Business Plan
- an overview of the impact on governance risks of the HMT Review/Fit for the Future Consultation and Project Snowdon
- other governance-related developments at national and Fund level, including updates from the LGPS Scheme Advisory Board
- the latest Pension Board minutes
- other updates to the governance risks on the Fund's risk register and the latest changes to our breaches of the law register
- forthcoming training and events, some of which are essential for Members.

The Fund's Knowledge and Skills Policy and Procedure for Reporting and Recording Breaches of the Law are due for review. This report includes the proposed amendments to these documents and asks the Committee to approve the updated versions.

REC	RECOMMENDATIONS		
1	That the Committee consider the update and provide any comments.		
2	That:		
	the Committee review and approve the updated Knowledge and Skills Policy and		
	 Committee members highlight by 28 February 2025 any specific subject matters, or knowledge and skills gaps, so that they can be included in next year's training plan. 		
3	That the Committee review and approve the updated Procedure for		
	Recording and Reporting Breaches of the Law / Late Payment of		
	Contributions by an Employer.		

REPORT DETAILS

1.00	GOVERNANCE RELATED MATTERS		
	Pucinace Plan Undata		
1.01	Business Plan Update		
	The business plan update in Appendix 1 shows the latest progress for the governance tasks in the 2024/25 Business Plan. Progress is being made, but some items have been delayed, deferred or stopped. This is largely due to a material amount of officers' time being taken up with the HMT Pensions Review Fit for the Future consultation and the desire to wait for any new guidance or legislation to be issued prior to progressing. The key points to note are as follows:		
	 G1 – Succession planning: We are working with the Council to implement the new Management Structure approved by Committee in June and the management job descriptions are currently going through job evaluation. This is behind schedule but it is hoped that aspect of the work can be completed early in 2025/26, albeit the succession planning work in relation to the wider team will now be part of the 2025/26 business plan. G2 – Governance arrangements: Draft terms of reference have been prepared for a new sub-group to the Advisory Panel; the Clwyd Pensions Operations Group (CPOG) which considers and oversees administration and governance matters. Shadow meetings have commenced involving the Pensions Administration Manager, Governance Assistant, Chair of the Pension Board and the Benefits Consultant from Mercer. However work has now been halted on the formalisation of any sub- groups due to the potential impact of the HMT Pension Review, particularly on any investment responsibilities to be carried out by such groups. It is proposed that this will commence again later in 2025/26 and therefore it will be included in next year's business plan. 		
	 G3 – Compliance with TPR General Code: Officers and advisers continue to work on implementing actions identified as part of the Fund's compliance check against the new TPR General Code. This is expected to be business as usual going forward and annual updates will be brought to the Committee. This is also considered at every Pension Board meeting. G4 – Implement regulatory and guidance changes: The HMT Pensions Review Fit for the Future consultation proposed a number of changes to regulations and guidance that were expected (i.e. Good Governance and pooling), but it is still not fully clear when any legislation will be laid in parliament or where any statutory guidance will be issued. Therefore these elements will be 		
	 brought forward into the 2025/26 business plan. G5 – Review of governance related policies: The Knowledge and Skills Policy has undergone a light touch review and an updated policy is attached to this update for approval. This will be further updated to capture the requirements from the Good Governance project once. we have a better understanding of when these requirements will come into force. 		

The proposed updates to the Cyber Strategy and Procedure for Recording and Reporting Breaches of the Law / Late Payment of Contributions by an Employer are also included as part of this Committee meeting for approval. This item is therefore on target.

• G6 – Review/tender key supplier contracts and Procurement Act changes:

The tender for the independent adviser services has now been completed and the extension of the actuarial and benefit consultant has also been completed.

 G7 – Appointments of Local Pension Board and Pension Fund Committee Members:

The scheme member (non-trade union) representative's term ends in February 2025, applications have now closed and interviews are taking place on 13 February. As set out within the Pension Board protocol, the appointment process is delegated to the Head of Clwyd Pension Fund and a verbal update will be provided at the Committee meeting. The second aspect of this work was reviewing the Chair of the Pension Board. Following the independent adviser procurement, the Pension Board agreed to reappoint Karen McWilliam as Chair of the Pension Board.

G8 – WPP Governance arrangements:
 Given the expected changes due to HMT's Fit for the Future consultation, this item has been deferred until further information about the requirements for WPP's structure is finalised.

Current Developments and News

1.02 HMT Review/Fit for the Future Consultation and Project Snowdon impact on governance risks

As discussed at the 27 November 2024 Pension Fund Committee, the implications of the proposals in the Fit for the Future Consultation represent considerable changes and challenges for the Wales Pension Partnership (WPP) and Clwyd Pension Fund. A response to the Consultation is expected in Spring 2025 and a separate report in this Committee meeting pack provides an update on this work (referred to as Project Snowdon). The governance risk register attached at Appendix 2 has been updated and includes a number of changes to recognise the impact of the proposed changes.

The details of the changes are included in paragraph 4.02. In summary, it is currently considered that there are significant increases in risks relating to the Fund's ability to deliver its responsibilities and meet its policy and strategy objectives, due to the Government's expected requirements to:

- establish an FCA regulated company
- transition all assets and
- implement the Government's requirements in relation to local investments

within the highly ambitious 31 March 2026 deadline imposed by the Government.

These increased risks relate to four main issues;

- current lack of clarity on what decisions will require to be made and by whom in relation to these changes
- the highly technical nature of the Project Snowdon work, which will include details on registration and approval of an FCA regulated company alongside legal, operational, financial and governance matters for WPP, which the Pension Fund Committee members and officers have not previously needed to be familiar with, and so will require training and support to assist their ability to oversee the developments and decision making (where required)
- the project timescale and potential pace of decision making that may be required, which does not easily sit with typical Pension Fund Committee, Flintshire County Council and WPP Joint Governance Committee meeting timetables and
- the uncertainty that any new WPP FCA regulated company will be able to implement existing and future requirements of the Clwyd Pension Fund's Investment Strategy Statement and Responsibility Investment Policy.

As part of Project Snowdon, it is planned that WPP will be providing ongoing information for all the Welsh Pension Fund Committees and officers to assist in oversight and decision making. CPF Committee Members and officers will therefore be relying on the required information (including any training) being of a high quality and being available in a timely manner. A key element of ensuring this happens is the participation by the Fund's officers in the Project Snowdon programme of work:

- The Head of Clwyd Pension Fund is a member of the Project Snowdon Steering Group (alongside the other Constituent Authority Section 151 Officers)
- The Head of Clwyd Pension Fund is the joint lead on the Project Snowdon legacy, local and passive asset workstream, and the Fund's Investment Officer is also a member of that workstream.

In addition the Fund's officers are having weekly meetings with the Fund's investment consultants (Mercer) and independent adviser (Aon).

It is hoped that, as the project continues over the next two to three months and further detail is provided from both WPP and the Government, these risks can be appropriately mitigated and managed and so the risk ratings can be reduced again.

1.03 Pension Board meetings

The last meeting of Pension Board was held on 17 January 2025 and the draft minutes are attached in Appendix 3. Key topics for discussion included the HMT Pensions Review, the Pension Fund team's accommodation changes, progress by the Administration Team with the McCloud and National Pensions Dashboard projects, and an update on cyber security and business continuity matters. As mentioned previously, the Board agreed that Karen McWilliam should be reappointed as the ongoing Chair of the Pension Board.

The next Board meeting is on 1 April 2025.

1.04 LGPS Scheme Advisory Board (SAB) updates

SAB Meetings

The LGPS SAB met on 25 November 2024. The meeting summary is now available and attached at Appendix 4.

The date of the next SAB meeting is 24 March 2024.

Letter to Chief Financial Officers and Pensions Committee Chairs
The Board Chair has written to Chief Financial Officers and Committee
Chairs to ensure they provide appropriate levels of resources to allow for
effective pension fund operation. This is a particularly useful letter which
highlights areas such as cost constraints on Councils not impacting
pension fund resources, the benefit of career paths for retaining key staff,
support for having a single senior LGPS officer and the need for having
service level agreements for council services that support the pension
function. The letter is attached as Appendix 5. Committee members and
officers should continue to be mindful of this advice when setting the
Fund's budget and in relation to ongoing resourcing matters, albeit
historically the Fund has approached budget setting as suggested by the
letter, and it has already a senior LGPS officer (the Head of Clwyd Pension
Fund).

SAB annual review

The SAB Chair has published the Board's inaugural Annual Review here. This document is an overview of the work completed by the Board over the previous 12 months and outlines the Board's priority work for the next 12 months.

<u>Updated Funding Strategy Statement Guidance</u>

Updated guidance for preparing and maintaining a Funding Strategy Statement (FSS) is now available on the SAB's guidance page <u>here</u>, replacing the 2016 CIPFA guidance.

Jointly approved by the Scheme Advisory Board, CIPFA, and MHCLG, the guidance emphasizes climate change considerations and is supported by a "key principles document" from LGPS fund actuaries.

The guidance helps administering authorities develop comprehensive funding strategies, focusing on roles and responsibilities, stakeholder engagement, funding risks, and links to other fund policies.

The new guidance is not expected to result in any fundamental shift in the funding strategy objectives for the Fund. However the Fund's FSS will need to be reviewed in light of the guidance and there will likely be some changes to the format and content. This will be done as part of the 2025 valuation and the Committee will need to agree the draft FSS and, following consultation with the employers, the final FSS.

LGPS Fit for the Future Consultation Response

The SAB released its <u>response</u> to the LGPS Fit for the Future consultation, before the deadline. The response was shaped by input from SAB members, scheme representatives, and advisers, and addresses key issues raised in the consultation.

LGPS Code of Transparency Data System

The SAB has decided on the future approach for the LGPS Code of Transparency data system. Following extensive research, including practitioner input, a market engagement exercise, and a survey of funds, the Board reaffirmed its commitment to the Code and the successful embedding of investment cost reporting in the LGPS.

At its 25 November 2024 meeting, the Board agreed to explore replacing the centrally procured system with a framework approach in collaboration with the National LGPS Frameworks team. This would provide basic cost template reporting to all funds while enabling optional procurement of data validation and benchmarking services.

The SAB is also exploring ways to enhance compliance and cost data reporting, including updated Board and CIPFA guidance and potential amendments to the LGPS Investment Regulations 2016.

Legal advice on fiduciary duty

On 15th January the Scheme Advisory Board (SAB) published a legal opinion from Nigel Giffin KC (Counsel) on fiduciary duty in the LGPS, which is an update on his original legal advice published in 2014. The updated opinion can be found here.

The original 2014 advice Mr Griffin provided concluded that:

- An administering authority has fiduciary duties to both scheme employers and scheme members
- Investment decisions should be directed towards what is best for the financial position of the fund
- Administering authorities can take wider social, ethical, or environmental considerations (non-financial factors) into account when making investment decisions as long as:
 - o there is no material financial detriment to the fund and
 - it does not involve the administering authority in preferring its own particular interests to those of other scheme employers or
 - in imposing views of its own which would not be widely shared by scheme employers and members.

The updated 2025 advice reinforces those conclusions, confirming that where an administering authority wants to take "non-financial" factors into account when investing its Fund, it must consider both the financial implications and the degree to which members would support that non-financial factor, to be sure that it is acting lawfully. These issues should be addressed through the implementation of the Fund's investment strategy. The legal opinion does caveat that the eventual detail of the legislation may change the conclusions in this advice.

The SAB may provide further advice for funds, but published this advice before the closure of the Fit for The Future consultation to assist funds with their response.

Knowledge and Skills Policy review

The Knowledge and Skills Policy was last reviewed and approved in September 2021 to meet the requirements of the new CIPFA Code of Practice and to ensure knowledge and skills of key decision makers met best practice. As part of that review, the 2021 Policy introduced a new objective: "Those persons responsible for the management and governance of the Clwyd Pension Fund are expected to be committed to attending and engaging with suggested training in accordance with the Knowledge and Skills Policy." Pension Fund Committee members are reminded of this commitment to training.

The Policy was due for review in September 2024 but was delayed due to the hope that the Good Governance recommendations would be implemented and that these requirements could be incorporated into the revised Policy.

The Good Governance recommendations were included as part of the Fit for the Future consultation, including introducing a legal requirement on the level of knowledge and skills required by Pension Committee members. It appears that the Government will legislate for these, and the current ambition is that regulations will be made in September with the requirements being effective from April 2026.

Given the Policy review has already been delayed and the uncertainty around whether the proposed timetable will be achieved, the Policy has undergone a light touch review. The proposed Policy is included as Appendix 6 and this highlights the proposed changes. These recommended changes are mainly to address the requirements of the Pensions Regulator's General Code of Practice. It is anticipated that a full review which will incorporate the Good Governance requirements will need be performed later in the year once the legislation and any guidance is released.

The key updates made include:

Consideration of skill-specific training offered to PFC and PB Chairs.

- Commitment to an aim of performing either a formal or informal training needs analysis (TNA) at least annually, and to consider individual training needs of PB members as part of the training plan.
- Additions to the list of initial information documents provided during the new member or officer induction process

The Committee is recommended to approve the revised Policy.

1.06 Policy requirements

The Fund's Knowledge and Skills Policy requires all Pension Fund Committee members, Pension Board members and Senior Officers to:

attend training on the key elements identified in the CIPFA
 Knowledge and Skills Framework as part of their induction and on

an ongoing refresher basis

- attend training sessions on "hot topic" areas, such as a high-risk area or an area of change for the Fund and
- attend at least one day each year of general awareness training or events.

The Fund's training plan forms part of the Fund's business plan for 2024/25 which was approved by the Committee at their March 2024 meeting.

Appendix 7 sets out the Fund's training plan and training undertaken since the last Committee meeting.

Training undertaken

A summary of attendance at the Fund's essential training sessions (other than induction training) over 2024/25 is included below:

	Date	Number of Committee attending (Proportion of total)	Number of Board attending (Proportion of total)	Number of Senior officers attending (Proportion of total)
	Essential T	raining Sessions	 Target attendar 	ice is 75%
Impact Investing	Jun 24	7 (78%)	2 (50%)	5 (100%)
Governance and national developments	Sep 24	7 (78%)	3 (75%)	3 (75%)
Funding Strategy and Actuarial Valuation Interim Review	Nov 24	8 (89%)	3 (60%)	2 (50%)
HMT Pensions Review and latest LGPS consultation	Nov 24	9 (100%)	3 (60%)	3 (75%)
Total		(86%)	(61%)	(76%)

Non-essential, general awareness training attended by Committee and Board members since the last update includes the CPF Discussion on its Fit for the Future consultation response on 15th January.

Future training and events

Officers will continue to provide information on further training sessions and events as this becomes available. New members of the Board and Committee will be expected to attend Induction Training. In addition, if any Committee or Board members wish to attend any of the following optional events that count as general awareness training, please contact the Governance Administration Assistant:

• LGC Investment Seminar – 27-28 March (Carden Park, Wrexham)

 PLSA Local Authority Conference – 16-18 June (Wyboston Lakes, Bedfordshire). Note this does clash with the next CPF Committee which is on 18 June.

The following are the next essential training sessions, which should be attended by all Committee and Board members (both will be run in hybrid format). It is proposed to hold these sessions after the Committee meetings and so members should make themselves available for the full day. Lunch will be provided for those attending in person.

- Taskforce on Nature-related Financial Disclosures (TNFD) and how the CPF intends to implement these – 19 February 2025 (pm)
- National Developments 19 March 2025 (pm)
- Training topic to be confirmed 18 June 2025 (pm).

1.07 2025/26 Training Requirements

Officers are currently developing the 2025/26 to 2027/28 business plan which the Committee will be asked to approve at the March meeting. This includes the proposed training plan for 2025/26, which will incorporate any areas of specific interest that will be included in the business plan for 2025/26. In advance of that, Committee members are asked to consider any specific subject matters that they would like to be included in next year's training plan, and highlight these to Morgan Nancarrow, the Governance Administration Assistant by the 28 February 2025. You should also highlight any knowledge or skills gaps that you feel you have.

This opportunity to identify knowledge and skills requirements is in line with best practice and consistent with the proposed changes to the Knowledge and Skills Policy (see paragraph 1.05), where an informal training needs analysis is carried out annually.

1.08 Recording and Reporting Breaches of the Law / Late Payment of Contributions by an Employer

Review of Procedure

The Fund's breaches procedure is reviewed every three years and as a result, updates have been made to address the requirements of the Pensions Regulator's General Code of Practice. The proposed new Procedure is attached as Appendix 8, but due to the number of changes, they have not been highlighted in the attachment. The key changes relating to this review are:

- Expanding the Procedure so it now includes the requirements relating to reporting late payment of contributions to the Fund by an employer
- Reordering the Procedure to be aligned with the expectations in the new Code
- Updating text to be aligned with the new Code
- Removing appendices that are either not relevant or replicate wording in the new Code (with links to this information being provided instead to ensure it remains up to date).

The Committee are asked to approve the updated Procedure.

Breaches log

The Fund's Procedure requires that the Head of Clwyd Pension Fund maintains a record of all breaches of the law identified in relation to the management of the Fund. Appendix 9 details the current breaches that have been identified.

There have been no new administration breaches which have not been highlighted to the Committee at previous meetings. There have been no new finance breaches since the last update.

1.09 **Delegated Responsibilities**

The Pension Fund Committee have delegated a number of responsibilities to officers or the Chair/Vice-Chair. Since the last update report, the only governance matter where the delegated powers have been used relates to approving the final response to the HMT Pension Review's Fit for the Future Consultation. The Committee are reminded that, at the September Committee meeting, it was agreed that responding to consultations relating to the Pensions Review which are out of the Committee cycle would be delegated to the Head of Clwyd Pension Fund, subject to:

- all draft responses would be issued to Committee members to provide any comments so that they could be incorporated
- if officers or the Committee consider that the issue requires more attention than an email, a Special Meeting may be called.

The Committee discussed the proposed consultation response at an informal meeting on 14 January 2025. The final consultation response was then agreed by the Head of Clwyd Pension Fund and circulated to Committee and Board members on 16 January 2025; it is attached at Appendix 10.

1.10 Calendar of Future Events

Appendix 11 includes a summary of all future events for Committee and Pension Board members, including Pension Fund Committee meetings, Pension Board meetings and training dates.

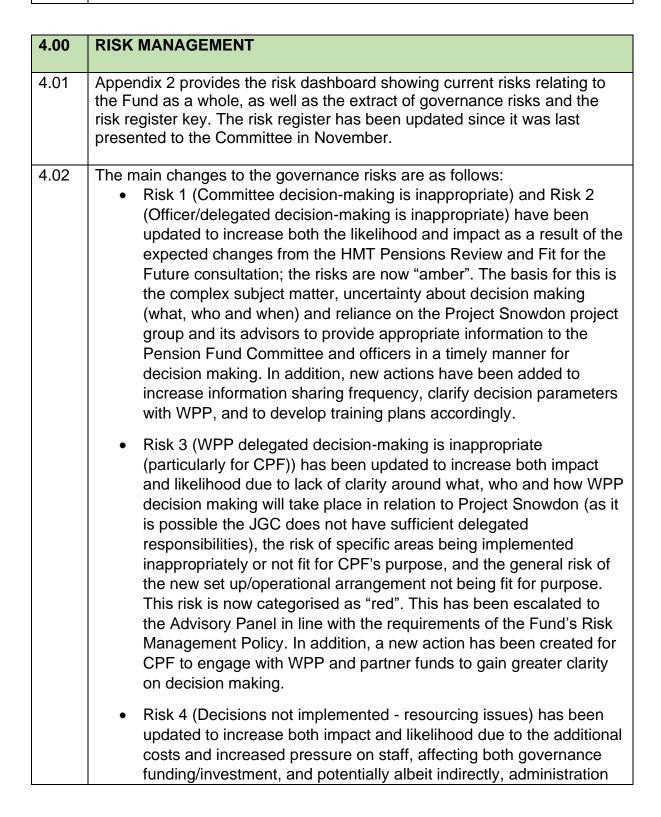
The next Committee dates, confirmed at the May Annual General Meeting, are as follows (all morning meetings starting at 9:30am):

- 19 March 2025
- 18 June 2025

2.00 RESOURCE IMPLICATIONS 2.01 The main material resource or budget implication relates to the unexpected work due to HMT's Pension Review which is taking a significant amount of officers' time and resulting in additional adviser costs that were not anticipated as part of the 2024/25 budget. An allowance will be included in the 2025/26 budget which will be brought to the March Pension Fund Committee for approval. The additional work could have an

	impact on the Fund completing other areas of planned work, and officers will continue to prioritise work if needed.
2.02	The Graduate Trainee Investment Officer achieved the CFA UK Certificate in Investment Management during December 2024 and has therefore been promoted to Investment Officer.

3.00	CONSULTATIONS REQUIRED / CARRIED OUT
3.01	None



as a result of the work involved with Project Snowdon. This risk is now categorised as "red". This has been escalated to the Advisory Panel appropriately. In addition, new actions have been added which include ensuring that: additional adviser costs for Project Snowdon are monitored separately, budgets are updated to include costs for Project Snowdon; and information is gathered to help the Fund understand the resourcing impact of Project Snowdon work on the Fund.

- Risk 5 (Decisions not implemented FCC barriers) has been updated to increase impact by one (meaning it is now "amber") given the key decision(s) FCC will need to make in relation to Project Snowdon, and therefore the need to ensure they receive appropriate education on the reasons and options in a timely manner. In addition, a new action has been added for the Head of Fund to engage with the Leader, Chief Executive and Monitoring Officer on the implications of Project Snowdon (and this engagement has already commenced).
- Risk 6 (Decisions not implemented provider failure) has been updated to increase impact and likelihood, and it is now "amber". There is uncertainty at this stage whether the new WPP Investment Management Company that could be established are able to implement CPF's strategies both in the short and longer term. In addition, there is a risk that WPP cannot deliver the Fund's current pooling requirements whilst also implementing the new model. New actions have been created to:
 - engage with WPP to ensure that the implementation plan will meet CPF's strategic requirements and
 - that their resourcing is appropriate for existing requirements as well as Project Snowdon
 - ensure the Fund feeds into the draft WPP shareholder and client agreements, governance structure and 2025/2026 business plan as they are developed.
- Risk 9 (Unable to adequately/ appropriately implement governance changes – external) has been updated to reflect some additional internal controls which have been put in place since the last Committee meeting relating to Project Snowdon.
- Most of the risks have also had their internal controls updated to recognise the involvement of the Fund's officers on Project Snowdon Steering Group and workstreams, and also the weekly Fund officer/adviser meeting taking place.
- In relation to other risks, various actions have been updated to reflect those now completed.
- 4.03 The increase to Risk 3 and 4 means that Risk 3, 4, 6 and 9 are now the risks that is furthest from target.

5.00	APPENDICES
5.01	Appendix 1 - Business plan update for governance tasks
	Appendix 2 - Risk Register
	Appendix 3 - Pension board meeting draft minutes
	Appendix 4 - SAB Meetings – Summary of 25 November 2024 meeting
	Appendix 5 - SAB Chair's letter to Chief Financial Officers and Pensions Committee Chairs
	Appendix 6 - Draft Knowledge and Skills Policy
	Appendix 7 - Training plan
	Appendix 8 - Draft Recording and Reporting Breaches of the Law / Late Payment of Contributions by an Employer
	Appendix 9 - Breaches log
	Appendix 10 - Fit for the Future Consultation Response
	Appendix 11 - Calendar of future events

6.00	LIST OF ACCESSIBLE BACKGROUND DOCUMENTS	
6.01	Report to Pension Fund Committee - 2024/25 Business Plan (March 2024 and June 2024)	
	Full hyperlinks for r	referred to information:
	SAB annual review: https://lgpsboard.org/images/Home/Annual%20review/SAB%20Annual%20Review%202024.25.pdf	
	Updated Funding Strategy Statement Guidance:	
	https://lgpsboard.org/index.php/board-publications/board-guidance	
	Legal advice on fiduciary duty: https://lgpsboard.org/index.php/board-publications/legal-opinions	
	Contact Officer:	Philip Latham, Head of Clwyd Pension Fund
	Telephone:	01352 702264
	E-mail:	philip.latham@flintshire.gov.uk

7.00	GLOSSARY OF TERMS
7.01	(a) CPF – Clwyd Pension Fund – The Pension Fund managed by Flintshire County Council for local authority employees in the region and employees of other employers with links to local government in the region.

- (b) Administering authority, scheme manager or Governing Body Flintshire County Council is the administering authority, scheme manager and Governing Body for the Clwyd Pension Fund, which means it is responsible for the management and stewardship of the Fund.
- (c) Committee or PFC Clwyd Pension Fund Committee the Flintshire County Council committee responsible for the majority of decisions relating to the management of the Clwyd Pension Fund.
- (d) **Board, LPB or PB Local Pension Board or Pension Board** each LGPS Fund has an LPB. Their purpose is to assist the administering authority in ensuring compliance with the scheme regulations, TPR requirements and efficient and effective governance and administration of the Fund.
- (e) **LGPS Local Government Pension Scheme** the national scheme, which Clwyd Pension Fund is part of.
- (f) SAB The national Scheme Advisory Board the national body responsible for providing direction and advice to LGPS administering authorities and to DLUHC.
- (g) MHCLG Ministry of Housing, Communities and Local Government the government department responsible for the LGPS legislation.
- (h) **JGC Joint Governance Committee** the joint committee established for the Wales Pension Partnership asset pooling arrangement.
- (i) CIPFA Chartered Institute of Public Finance and Accountancy a UK-based international accountancy membership and standard-setting body. They set the local government accounting standard and also provide a range of technical guidance and support, as well as advisory and consultancy services. They also provide education and learning in accountancy and financial management.
- (j) TPR The Pensions Regulator TPR has responsibilities to protect UK's workplace pensions and make sure employers, scheme managers and pension specialists can fulfil their duties to scheme members. This includes oversight of public service pension schemes, including the LGPS. Specific areas of oversight are set out in legislation and also expanded on within TPR's Guidance and Codes of Practice.
- (k) PLSA Pensions and Lifetime Savings Association PLSA aims to bring together the industry and other parties to raise standards, share best practice and support its members. It works collaboratively with members, government, parliament, regulators and other stakeholders to help build sustainable policies and regulation which deliver a better income in retirement.

(I) HMT – His Majesty's Treasury – HMT has a responsibility to approve all LGPS legislation before it is made