

Public Document Pack



To: Councillor Cooke, Convener; Councillor MacGregor, Vice-Convener; and Councillors Davidson, Henrickson, Massey and van Sweeden; and two Labour vacancies and one Independent vacancy (Pensions Committee); Mr A Walker, Chairperson; Councillor Gordon, Vice-Chairperson; Councillor David Cameron, the Lord Provost and Councillor Smith; Mrs M Lawrence, Mr N Stirling, Mr S Thompson and Mr G Walters (Pension Board).

Town House,
ABERDEEN, 4 December 2025

PENSIONS COMMITTEE AND PENSION BOARD

The Members of the **PENSIONS COMMITTEE AND PENSION BOARD** are requested to meet in **Committee Room 2 - Town House** on **FRIDAY, 12 DECEMBER 2025 at 10.00am.** **This is a hybrid meeting and Members may also attend remotely.**

The meeting will be webcast and a live stream can be viewed on the Council's website.
<https://aberdeen.public-i.tv/core/portal/home>

JENNI LAWSON
CHIEF OFFICER – GOVERNANCE

B U S I N E S S

NOTIFICATION OF URGENT BUSINESS

- 1.1. There are no items of urgent business at this time

DETERMINATION OF EXEMPT BUSINESS

- 2.1. Members are requested to determine that any exempt business be considered with the press and public excluded

DECLARATIONS OF INTEREST AND TRANSPARENCY STATEMENTS

- 3.1. Members are requested to intimate any declarations of interest

DEPUTATIONS

- 4.1. There are no deputations at this time

MINUTES OF PREVIOUS MEETINGS

- 5.1. Minute of Previous Meeting of 12 September 2025 - for approval (Pages 3 - 8)

COMMITTEE BUSINESS PLANNER

- 6.1. Business Planner (Pages 9 - 10)

NOTICES OF MOTION

- 7.1. There are currently no motions to the Pensions Committee

SCRUTINY

- 8.1. Strategy - PC/DEC25/STRAT (Pages 11 - 66)

EXEMPT BUSINESS - NOT FOR PUBLICATION

- 9.1. Strategy - PC/DEC25/STRAT - Exempt/Confidential Appendix (Pages 67 - 68)
- 9.2. Investment Strategy - PC/DEC25/INV (Pages 69 - 76)
- 9.3. Asset and Investment Manager Performance - PC/DEC25/AIMPR (Pages 77 - 158)

Integrated Impact Assessments related to reports on this agenda can be viewed [here](#)

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Website Address: aberdeencity.gov.uk

Should you require any further information about this agenda, please contact Stephanie Dunsmuir, email sdunsmuir@aberdeencity.gov.uk

PENSIONS COMMITTEE AND PENSION BOARD

ABERDEEN, 12 September 2025. Minute of Meeting of the PENSIONS COMMITTEE AND PENSION BOARD. Present:- Councillor Cooke, Convener; Councillor MacGregor, Vice-Convener; and Councillors Davidson, Henrickson, Massey and van Sweeden (Pensions Committee); and Councillor Gordon, Vice Chairperson; Councillor Smith, Mrs M Lawrence, Mr N Stirling, Mr A Walker and Mr G Walters (Pension Board).

Also in attendance:- Jonathan Belford, Chief Officer – Finance; Laura Colliss, Pension Fund Manager; Graham Buntain, Investment Manager; and Anne MacDonald, Senior Audit Manager, External Audit.

The agenda and reports associated with this minute can be located [here](#).

Please note that if any changes are made to this minute at the point of approval, these will be outlined in the subsequent minute and this document will not be retrospectively altered.

ANNOUNCEMENTS

1. The Convener welcomed everyone to the meeting and congratulated Mr Walker and Councillor Gordon on being appointed as the new Chair and Vice Chair of the Pension Board at the recent annual Board meeting.

He further advised that the Fund had been short listed for two awards at the LAPF Investment Awards to be held on 2nd October, namely:

- Investment Innovation
- Pension Administration

Finally he advised that the Fund had also been short listed for a number of awards at the LGC on 28th November, namely:

- ESG Innovation
- Fund of the Year (Large)
- Innovation in Administration
- Outstanding Individual Contribution - LGPS, Jenna Watt
- Rising Star – LGPS, Noah Cuthbert and Sean Hunt

The Committee resolved:-

to congratulate the staff involved for the nominations.

DETERMINATION OF EXEMPT BUSINESS

2. The Committee was requested to determine that the following item of business which contained exempt information as described in Schedule 7(A) of the Local Government (Scotland) Act 1973 be taken in private – Item 12.1 (Asset and Investment Manager Performance Report).

PENSIONS COMMITTEE AND PENSION BOARD
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The Committee resolved:-

in terms of Section 50(A)(4) of the Local Government (Scotland) Act 1973, to exclude the press and public from the meeting during consideration of the above-mentioned item so as to avoid disclosure of exempt information of the classes described in paragraph 6.

MINUTE OF PREVIOUS MEETING

3. The Committee had before it the minute of its previous meeting of 20 June 2025 for approval.

The Committee resolved:-

to approve the minute as a correct record.

BUSINESS PLANNER

4. The Committee had before it the business planner as prepared by the Chief Officer – Governance.

The Committee resolved:-

to note the planner.

NESPF ANNUAL AUDIT REPORT AND COVERING LETTER - REPORT BY EXTERNAL AUDIT

5. The Committee had before it a report by the External Auditor on the 2023/2024 Annual Audit of the North East Scotland Pension Fund. The report summarised the findings from the 2024/25 annual audit of the North East Scotland Pension Fund (the Fund).

The Annual Audit Report comprised:

- significant matters arising from the audit of the fund's annual report and accounts
- conclusions on the following wider scope areas that frame public audit as set out in the Code of Audit Practice 2021:
 - financial management
 - financial sustainability
 - vision, leadership, governance and use of resources to improve outcomes
- conclusions on the administering authority's arrangements related to the pension fund for meeting its Best Value duties.

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The audit concluded that the accounts were free from material misstatement. Audit adjustments required to correct the financial statements had been properly reflected in the audited annual report and accounts.

The Fund had broadly effective and appropriate arrangements in place to secure best value and cover the wider scope audit areas i.e. Financial Management; Financial Sustainability; Vision, Leadership and Governance; and Use of Resources to Improve Outcomes. The report noted that governance could be further strengthened if the long-term vacancies in the membership of the Pensions Committee were filled.

The Committee heard in detail from Ms MacDonald in respect of the report.

Members asked a number of questions of Ms MacDonald and officers.

The Committee resolved:-
to note the report.

**CONSIDERATION AND SIGNING OF AUDITED ANNUAL REPORT AND ACCOUNTS
- PC/SEPT25/ARA**

6. The Committee had before it a report by the Chief Officer – Finance which presented the Audited Annual Report and Accounts for the North East Scotland Pension Fund (NESPF) for consideration and signing.

Members heard from Mr Belford in respect of the report, who also noted his thanks to the team for their work in preparing the accounts.

The report recommended:-
that the Committee –

- (a) consider and approve the Audited Annual Report and Accounts for the North East Scotland Pension Fund; and
- (b) instruct the Chief Officer – Finance, as the Local Government (Scotland) Act 1973 – Section 95 Officer, to sign the accounts on behalf of the Fund.

The Committee resolved:-

- (i) in relation to page 68, to note that officers would look to provide clarity around the management expenses in future reports;
- (ii) in relation to the query from Members around benchmarking of the Fund performance with other Funds, to note that officers could provide data on this outwith the meeting, but with the caveat that the figures were not necessarily comparing like for like due to different investment strategies;
- (iii) in relation to the query highlighting the significantly higher figures for private equity management fees, to note that officers would look into this further with the Accounting team and provide clarity to Members outwith the meeting via service update; and

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- (iv) to approve the recommendations.

STRATEGY - PC/SEPT25/STRAT

7. The Committee had before it a report by the Chief Officer – Finance which provided various updates and recommendations (if applicable) to changes to the North East Scotland Pension Fund.

The report provided an update on the Pension Fund Annual Benefit Statements; amendments to the Local Government Pension Scheme (Scotland) Regulations 2018; an update on the Pension Board, its annual report and details of the newly appointed Chair (Alan Walker) and Vice Chair (Councillor Gordon); and updates in relation to Mental Health Aberdeen and Robert Gordon's College exiting the Scheme.

The report advised that the following documents had also been updated as follows:-

- Appointment of Advisers (minor amendments to remove reference to Head of Commercial and Procurement, update to officers with access to Amelior, minor corrections to improve clarity)
- Governance Compliance Statement (minor corrections for typo's and grammar, amended Terms of Reference review date)

The report recommended:-

that the Committee –

- (a) approve the updates to the Fund policy documents as set out in 6.2 of the main report; and
- (b) note the remainder of the report for reassurance.

The Committee resolved:-

- (i) in relation to the impact of the amendments to the Local Government Pension Scheme, to note that officers would share a copy of the submission with Members;
- (ii) to note that officers could discuss with authorities such as the Scottish Public Pensions Agency and Central Government any potential changes to regulations which would be helpful to the Scheme, noting for example that it could be a more expensive scheme for employers to participate in; and
- (iii) to approve the recommendations.

MCCLLOUD DETERMINATION - PC/SEPT25/MCCLLOUD

8. The Committee had before it a report by the Chief Officer – Finance which provided an update on the Fund's decision to exercise its flexibility under the Local Government Pension Scheme (Remediable Service)(Scotland) Regulations 2023 to make a determination to extend the implementation phase of the McCloud Remedy to 31 August 2026.

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The report recommended:-

that the Committee note the contents of the report for reassurance.

The Committee resolved:-

to note the report.

INVESTMENT STRATEGY - PC/SEPT25/INVSTRAT

9. The Committee had before it a report by the Chief Officer – Finance which provided an update with regard to the Principles for Responsible Investment (PRI) submission.

The report recommended:-

that the Committee note the contents of the report for assurance.

The Committee resolved:-

to note the report.

In accordance with the decision taken at article 2, the following item of business was considered with the press and public excluded from the meeting.

ASSET AND INVESTMENT MANAGER PERFORMANCE REPORT - PC/SEPT25/AIMPR

10. The Committee had before it a report by the Chief Officer – Finance which set out the investment activity of the North East Scotland Pension Fund for the three month period ending 30 June 2025.

Members heard from Mr Buntain in respect of the report.

The report recommended:-

that the Committee note the contents of the report for assurance.

The Committee resolved:-

- (i) to note that officers would look to reduce the number of acronyms used in future reports;
- (ii) in relation to the tables on page 272 of the agenda, to note that officers would look to include data on annual performance, as well as quarterly in future reports;
- (iii) to note that the Investment Manager would liaise with Councillor Massey outwith the meeting to discuss some of detail in respect of page 273 of the agenda;

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- (iv) in relation to page 284 of the agenda, to note that officers would update Members as this matter progressed; and
 - (v) to note the report.
- **COUNCILLOR JOHN COOKE, Convener**

	A	B	C	D	E	F	G	H	I
1	PENSIONS COMMITTEE BUSINESS PLANNER The Business Planner details the reports which have been instructed by the Committee as well as reports which the Functions expect to be submitting for the calendar year.								
2	Report Title	Minute Reference/Committee Decision or Purpose of Report	Update	Report Author	Chief Officer	Directorate	Terms of Reference	Delayed or Recommended for removal or transfer, enter either D, R, or T	Explanation if delayed, removed or transferred
3	12 December 2025								
4	Strategy	Regular update on any changes to the North East Scotland Pension Fund and the Aberdeen City Council Transport Fund strategies		Mairi Suttie	Finance	Corporate Services	1.2, 1.4, 3-5		
5	Asset and Investment Manager Performance Report	To provide a review of the North East Scotland Pension Fund for the latest three month period		Graham Buntain	Finance	Corporate Services	5.2		
6	Investment Strategy	To present an update of the strategy		Graham Buntain	Finance	Corporate Services	5.2		
7	20 March 2026								
8	Statement of Accounts Action Plan	To provide Elected Members with high level information and key dates to the Statement of Accounts including linkages to the plans and timetables of the Council's External Auditors		Laura Colliss	Finance	Corporate Services	3.1		
9	Strategy	Regular update on any changes to the North East Scotland Pension Fund and the Aberdeen City Council Transport Fund strategies		Mairi Suttie	Finance	Corporate Services	1.2, 1.4, 3-5		
10	Asset and Investment Manager Performance Report	To provide a review of the North East Scotland Pension Fund for the latest three month period		Graham Buntain	Finance	Corporate Services	5.2		
11	Investment Strategy	To present an update of the strategy		Laura Colliss	Finance	Corporate Services	5.2		
12	Review of NESPF Compliance with the Public Service Pensions Act 2013 and Pension Regulator Requirements	To provide a review of compliance for 2024/25		Mairi Suttie	Finance	Corporate Services	4.1 and 4.2		
13	Internal Audit Annual Report 2024/25	To provide the Committee with Internal Audit's Annual Report for the North East Scotland Pension Fund for 2025/26		Jamie Dale	Internal Audit	Internal Audit	2.2		
14	External Audit Annual Plan 2025/26	To present the annual plan		Anne MacDonald	External Audit	External Audit	2.1		
15	19 June 2026								
16	Nominations to LAPFF Executive Committee	To determine any nominations		Laura Colliss	Finance	Corporate Services	6.1		
17	Strategy	Regular update on any changes to the North East Scotland Pension Fund and the Aberdeen City Council Transport Fund strategies		Mairi Suttie	Finance	Corporate Services	1.2, 1.4, 3-5		
18	Internal Audit Annual Report 2025/26	To present the annual report		Jamie Dale	Internal Audit	Internal Audit	2.2		
19	Investment Strategy	To present an update of the strategy		Laura Colliss	Finance	Corporate Services	5.2		

	A	B	C	D	E	F	G	H	I
	Report Title	Minute Reference/Committee Decision or Purpose of Report	Update	Report Author	Chief Officer	Directorate	Terms of Reference	Delayed or Recommended for removal or transfer, enter either D, R, or T	Explanation if delayed, removed or transferred
2									
20	Asset and Investment Manager Performance Report	To provide a review of the North East Scotland Pension Fund for the latest three month period		Graham Buntain	Finance	Corporate Services	5.2		
21	Training	To provide details of the training plan (2026/27)		Laura Colliss	Finance	Corporate Services	4.1 and 4.2		
22	Draft NESPF Annual Report & Accounts	To present the draft annual accounts		Laura Colliss	Finance	Corporate Services	3.1		
23	11 September 2026								
24	NESPF Annual Report & Accounts	To present the audited annual accounts		Laura Colliss	Finance	Corporate Services	3.1		
25	NESPF Annual Audit Report and Covering Letter	To present the External Audit annual audit report		Anne MacDonald	External Audit	External Audit	2.1		
26	Strategy	Regular update on any changes to the North East Scotland Pension Fund and the Aberdeen City Council Transport Fund strategies		Mairi Suttie	Finance	Corporate Services	1.2, 1.4, 3-5		
27	Asset and Investment Manager Performance Report	To provide a review of the North East Scotland Pension Fund for the latest three month period		Graham Buntain	Finance	Corporate Services	5.2		
28	Investment Strategy	To provide an update		Graham Buntain	Finance	Corporate Services	5.2		
29	Budget Forecast & Projected Spend	Update on budget and annual spend to date		Laura Colliss	Finance	Corporate Services	1.3		
30	11 December 2026								
31	Strategy	Regular update on any changes to the North East Scotland Pension Fund and the Aberdeen City Council Transport Fund strategies		Mairi Suttie	Finance	Corporate Services	1.2, 1.4, 3-5		
32	Asset and Investment Manager Performance Report	To provide a review of the North East Scotland Pension Fund for the latest three month period		Graham Buntain	Finance	Corporate Services	5.2		
33	Budget Forecast & Projected Spend	Update on budget and annual spend to date		Laura Colliss	Finance	Corporate Services	1.3		

ABERDEEN CITY COUNCIL

COMMITTEE	Pensions Committee
DATE	12 December 2025
EXEMPT	No, with the exception of Appendix III which is exempt under paragraph 6 of Part I of Schedule 7A of the Local Government (Scotland) Act 1973 as it contains information about the financial affairs of a particular person
CONFIDENTIAL	No, with the exception of Appendix III which contains data protected information
REPORT TITLE	Strategy
REPORT NUMBER	PC/DEC25/STRAT
EXECUTIVE DIRECTOR	Andy MacDonald
CHIEF OFFICER	Jonathan Belford
REPORT AUTHOR	Laura Colliss & Mairi Suttie
TERMS OF REFERENCE	1.4, 4-5

1. PURPOSE OF REPORT

- 1.1 To inform the Committee and provide recommendations (if applicable) to changes to the North East Scotland Pension Fund.

2. RECOMMENDATIONS

That the Committee:-

- 2.1 Note the final outcome of the annual benefit statement project, which was completed successfully, for assurance (item 4.1 of the main report);
- 2.2. Approve the recommendation to write-off the amount of overpaid pension benefits as detailed in the confidential Appendix III (item 4.3 of the main report);
- 2.3 Approve the updates to the Fund policy documents as set out in 6.2 of the main report;
- 2.4 Approve the travel for one Advisory Committee Officer (Pension Fund Manager or suitable Officer substitute) to attend the following Advisory Committee meetings (item 6.3 of the main report):
- Partners Group, 14-17 May 2026 – Abu Dhabi
 - HarbourVest, 11-13 May 2026 – Boston
 - RCP, 13 May 2026 – Chicago
 - Blackrock, June 2026 – New York
 - Unigestion, 24-26 June 2026 – Zurich
 - Blackrock, September 2026 - Europe
 - IFM, 19-21 October 2026 – Houston;

2.5 Delegate authority to the Chief Officer – Finance, following consultation with the Convener of the Pensions Committee, to approve travel for one Advisory Committee Officer (Pension Fund Manager or Suitable Officer Substitute) to attend the following Advisory Committee meetings once locations and times have been confirmed:

- Capital Dynamics, Date and Location – TBC; and

2.6 Note the remainder of the report for reassurance.

3. CURRENT SITUATION

3.1 See attached main report.

4. FINANCIAL IMPLICATIONS

4.1 The performance of the Fund over the long term can impact on the Fund's funding level and therefore the ability to meet its long-term liabilities.

5. LEGAL IMPLICATIONS

5.1 There are a number of legal implications arising from the implementation of the strategy which have been identified and addressed as set out in this report.

6. ENVIRONMENTAL IMPLICATIONS

6.1 There are no direct environmental implications arising from the recommendations of this report.

7. RISK

7.1 The Pension Fund maintains its own Risk Management Policy and regularly updates its Risk Register in line with change. This is reported quarterly to the Pensions Committee.

Appendix I, Copy of Risk Register (November 2025)

Category	Risks	Primary Controls/Control Actions to achieve Target Risk Level	*Target Risk Level (L, M or H) <small>*taking into account controls/control actions</small>	*Does Target Risk Level Match Appetite Set?
Strategic Risk	Lack of effective risk controls in relation to	The Fund maintains its own Risk Management Policy and regularly updates its Risk Register in line with change. This	L	Yes

	the Fund Strategy.	is reported quarterly to the Pensions Committee.		
Compliance	No significant risks identified.	N/A	N/A	N/A
Operational	No significant risks identified.	N/A	N/A	N/A
Financial	Financial loss for the Pension Fund where incorrect pension benefits are paid.	Write-off requests are managed in line with the NESPF Overpayments Policy and ACC Financial Regulations. Overpayments over a set limit require approval of the Pensions Committee.	N/A	Yes
Reputational	No significant risks identified.	N/A	N/A	N/A
Environment / Climate	No significant risks identified.	N/A	N/A	N/A

8. OUTCOMES

8.1 The proposals in this report have no impact on the Council Delivery Plan.

9. IMPACT ASSESSMENTS

Assessment	Outcome
Integrated Impact Assessment	No assessment required. I can confirm this has been discussed and agreed with Jonathan Belford, Chief Officer-Finance on 2 nd December 2025.
Data Protection Impact Assessment	Not required
Other	N/A

10. BACKGROUND PAPERS

10.1 None

11. APPENDICES

- 11.1 Appendix I Copy of Risk Register (November 2025)
Appendix II, Consultation Response
Appendix III, Overpayment Request for Write-Off – Exempt/Confidential
Appendix IV, Data Quality Improvement Plan
Appendix V, PAS Q2 Report

12. REPORT AUTHOR CONTACT DETAILS

Name	Laura Colliss Mairi Suttie
Title	Pensions Manager Governance & Communication Manager
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North East Scotland Pension Fund

nespf

Strategy Report

Quarterly Reporting December 2025

1. Background

1.1 Quarterly Report to December 2025

The Pensions Committee will be comprehensively informed via this report as to the current position and any variances to the Fund's strategy and recommendations.

In line with the structural review of the Pension Fund, six specific areas were identified to fully address the strategic management of the Fund;

- Investment
- Accounting
- Benefit Administration
- Systems
- Governance
- Employer Relations

The roles and responsibilities within these areas have been very clearly defined to ensure accountability across the Pension Fund.

To support this, support services updates covering the six strategic areas will also be available via the secure website at <http://www.nespf.org.uk/TheFund/Governance/fundgovernance.aspx>.

Also available on the Pension Fund website are all the policy documents that govern the Pension Fund including its various strategies.

2. Investment

2.1 Asset & Investment Manager Performance Report Investment Strategy Update Report

Separate reports, provided

2.2 Local Authority Pension Fund Forum (LAPFF)

Copies of the latest e-bulletins, quarterly engagement and annual reports are available at <http://www.lapfforum.org>.

3. Accounting

3.1 N/A

4. Benefit Administration

4.1 Pension Fund Annual Benefit Statements

Following on from the update to Committee in September (PC/SEPT25/STRAT), the annual benefit statement project has now been successfully completed.

Active benefit statements were issued electronically to members through My Pension+ by the statutory deadline of 31 August. Letters and emails were issued in advance to active members advising them that their statements were available to be viewed online and activation keys were issued to those members not already registered for My Pension+.

The Fund recorded 99.83% compliance for all benefit statements in 24/25 (active, deferred and Councillors). This is a decrease from the reported figure of 99.92% in 23/24. In terms of calculating the final percentage for reporting:

- 100% for deferred ABS were issued;
- 100% of ABS were issued for Councillors (both active and deferred); and
- 99.73% of active ABS were issued;

By the 31 August deadline.

For the active members 63 errors were reported in total, 44 of those were for members who joined the Scheme before 1 April 2025 but had not paid any pension contributions, i.e. joined mid March but didn't receive their first salary payment until the April payroll, therefore no CARE pay was held on the Altair benefit administration system. The other errors were mainly related to software limitations and incorrect information provided from employers.

In line with our Breaches Policy, the ABS result will be recorded on the Breaches Register but not reported to the Pensions Regulator as we do not deem the breach to be of material significance. Officers have already investigated the members' records which did not generate an annual benefit statement as per the above summary.

At present 546 (down 50 from 23/24) active and 564 (down 7 from 23/24) deferred members have opted in to receive traditional paper statements and letters will still be sent to members not registered for My Pension+. The cost of each ABS letter is approximately £1.53 compared to an email notification which is generally included in the hours provided by Radiator within the base annual cost. Overall the move to online benefit statements has delivered a cost saving for the Fund, we anticipate costs to continue to reduce as the process is streamlined and more members register for My Pension+.

With the move to the new online platform, the Fund required all members already registered for My Pension to complete a migration process in order to access their account on the new site. As of 31st

October 2025, 16,536 active members were registered, with 13,370 (79.14%) migrated to My Pension+ and 11,116 deferred members registered, with 7,875 (68.48%) successfully migrated.

A full review of the ABS project will be carried out by Officers in the coming months to guide future improvements.

4.2 Regulatory Updates

Amendments to the Local Government Pension Scheme (Scotland) Regulations 2018

As a follow on from the update to the September meeting regarding the consultation by the Scottish Public Pensions Agency (SPPA) on amendments to the Local Government Pension Scheme (Scotland) Regulations 2018, Officers have prepared a response on behalf of the Pension Fund and will submit this prior to the deadline on 25th November 2025. The amendments cover a number of proposals relating to pension benefits for scheme members, including forfeiture, opt outs, removal of the age 75 limit for death benefit payments, gender pension gap reporting, McCloud and other technical amendments.

A copy of the draft response is attached at **Appendix II**.

4.3 Overpayment Write-off Request

Appendix III, attached (Exempt/Confidential)

5. Systems

5.1 Performance Reporting

Performance is reported using new business intelligence and analytics software (Insights).

In addition to quarterly performance, the new PAS reporting also includes comparison against the previous quarter, information on data quality and progress on large scale exercises required by regulations e.g. McCloud and Pension Dashboards.

Appendix IV, Pension Administration Strategy Report

6. Governance

6.1 Scheme Advisory Board

Copies of the latest bulletins and meeting are available at <http://lgpsab.scot>.

6.2 Document Updates

- **Breaches of Law Policy** (*information on tPR's Traffic Light System included within main body of Policy for greater clarity when determining material significance, updated example breaches register*).
- **Data Quality Improvement Plan** (*The DQIP has been reviewed for the period to 31 March 2026. It includes updated quality scores for 2024 & 2025 and an update on the intention to carry out a tracing exercise for "gone away" members in early 2026. The Plan will be reviewed again at the end of 2026. A copy is attached at **Appendix V***).

Copies of the draft policy documents can be found in the secure member area of the website (www.nespf.org.uk) or copies can be requested from the Governance Team. Any significantly revised or new documents will be included as appendices to this report.

6.3 Overseas Travel

With the Pension Fund's increasing allocation to alternatives which usually come in the form of Funds/Fund of Funds there is a requirement for greater due diligence and scrutiny given the nature of these investments being privately owned. Following the Fund's continued commitment to the likes of HarbourVest and Blackrock, overseas travel has been previously authorised and will be required going forward as these companies continue to be global investors, globally headquartered and with global clients.

The vast majority of private investment funds have limited partner advisory committees, these committees are composed of representatives of the limited partners, usually significant institutional limited partners/clients, dealing with a number of issues regarding conflicts, investment restrictions, general oversight and using the committee as a sounding board for other matters.

As stated due to increased allocation from the Pension Fund to alternatives, depending on the level of commitment, the Fund will request or be invited to accept a position on the Advisory Committee.

Advisory Committees are officer lead and by invitation/request only, managers seek to appoint officers from their clients that have significant experience with the industry to ensure meaningful scrutiny and challenge.

Officers and elected members have clear statutory responsibilities for the management and investment of the Pension Fund, part of those responsibilities is to monitor and review external managers' performance. This is usually achieved by means of regular reporting, presentations to officers/members and attending client conferences.

The Advisory Committee is additional to the above and provides the Pension Fund with greater access to the Manager and the management of those investments and access to the

General Partners (underlying assets). Given the increased value of commitments within this asset class, this type of forum strengthens the governance arrangements for the Fund together with the Fund Manager.

Officers recommend the approval for overseas travel to the following Advisory Committees:

1. Partners Group, 14-17 April 2026 - Abu Dhabi
2. HarbourVest, 11-13 May 2026 - Boston
3. RCP, 13 May 2026 - Chicago
4. Blackrock, June 2026 - New York
5. Unigestion, 24-26 June 2026 - Zurich
6. Blackrock, September 2026 - Europe
7. IFM, 19-21 October 2026 - Houston
8. Capital Dynamics, Date and Location **TBC**

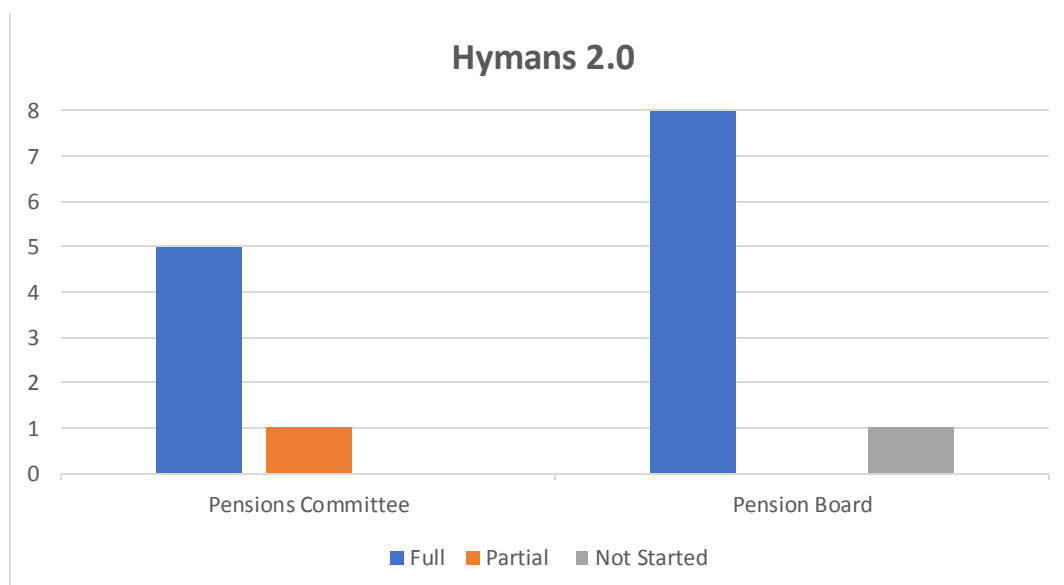
Approval is requested for one appointed Advisory Committee Officer (Pension Fund Manager or suitable experienced officer substitute) to attend.

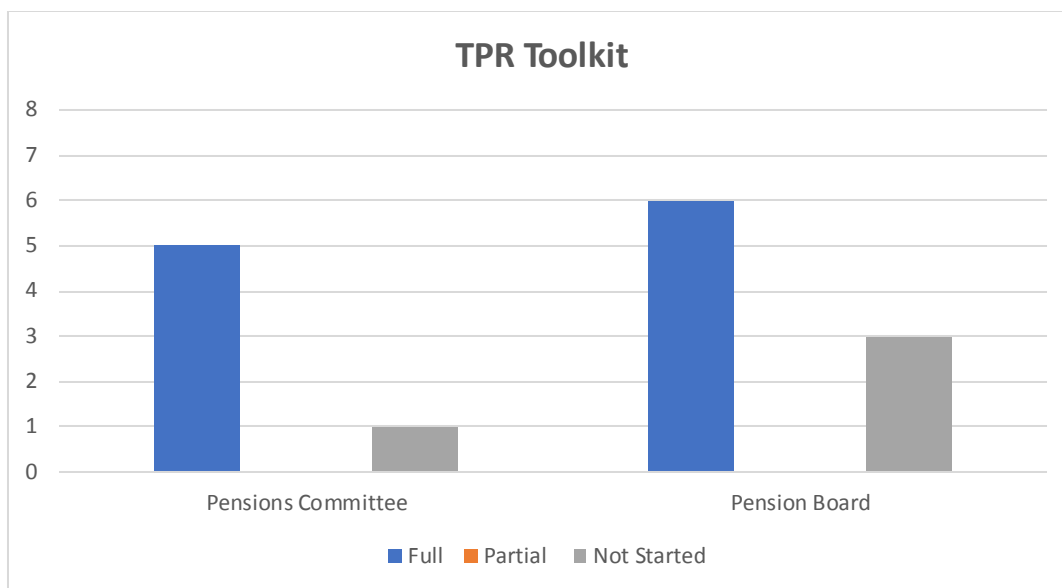
Most travel costs are covered by the individual Fund Managers, these Committees are perceived to be of great value by the Fund Managers providing additional governance and transparency, some are also rotated to the UK to deliver a balance to all global clients.

6.4 Training Update

At the September Pensions Committee and Board meeting, Audit Scotland presented their Annual Audit Report 2024/2025. One of the Key Messages from this report, carried over from last year's report, was around members' training to support good scrutiny.

In terms of an update on mandatory training, the below summaries for both Hymans LOLA and the Pensions Regulator's Toolkit, chart the number of individuals who have fully completed the training, partially completed or are yet to start:





The below tables provide a further breakdown by individual member as at 03/10/2025:

Board Member	Hymans 2.0	TPR Public Service Toolkit
Cllr David Cameron	✓	✓
Cllr Stephen Smith	✓	✓
Morag Lawrence	✓	✓
Alan Walker	✓	✓
Gordon Walters	✓	X
Neil Stirling	✓	✓
Stuart Thompson	✓	X
Cllr David Gordon	✓	X
Kenny Luke (Sub)	X	✓

Committee Member	Hymans 2.0	TPR Public Service Toolkit
Cllr John Cooke	✓	✓
Cllr Neil MacGregor	✓	✓
Cllr Dell Henrickson	✓	✓
Cllr Duncan Massey	✓	✓
Cllr Kairin van Sweeden	✓	✓
Cllr Derek Davidson	<i>Partial</i>	X

Fund Officers regularly seek feedback from Committee and Board on both Hymans LOLA and tPR's Public Service Toolkit. This feedback assists Officers in making decisions around mandatory training and during contract reviews.

Most recently, a training session was organised on 12th August 2025, with a representative from the Pensions Regulator for Committee and Board members. This informative session covered the role and approach of tPR in relation to public sector schemes, the General Code and breach reporting.

6.5 Operating Model Review, Short Term Recommendations, Delivery Plan and Objectives

Background

A business case was approved in February/March 2024 to procure an Operating Model Review via direct award to ensure Aberdeen City Council, as the Administering Authority of the North East Scotland Pension Fund, can meet its statutory duty to deliver a regulatory compliant and efficient Local Government Pension Scheme (LGPS).

The Fund set out a scope for the review and a comprehensive report was prepared by Hymans Robertson in September 2024.

Outcome

Executive Summary (Hymans Robertson)

Summary of findings, conclusions and next steps

North East Scotland Pension Fund (“the Fund”) requested an in-depth review of their operating model and its effectiveness. Our analysis is based on interviews with stakeholders, review of Fund documents, comparison with operating models in the LGPS and analysis of performance metrics to answer the question: - is the operating model sustainable?

The Fund’s existing operating model¹ allows it to deliver against its primary objective of providing a high-quality service to its Local Government Pension Scheme (LGPS) members. There was strong agreement from everyone we interviewed that the Fund delivers a good standard of service to both members and employers and current KPI’s provide the evidence that this is the case.

However, the Officers advised that a higher standard of service could be achieved through innovation and addressing core interactions between the Council and the Fund. Concerns were raised about the sustainability of service levels if the Fund’s operating model is not adjusted.

We recommend the immediate next steps for the Fund:

- 1. Increasing the autonomy and accountability for specific functions, including:*
 - a. HR support e.g. recruitment and employee contracts*
 - b. Procurement*

¹ The current operating model is a traditional LGPS fund operating model i.e. the Fund operations are held within the Finance department of the Council and requisite support operations are initially sourced from other Council departments e.g. Legal, HR, IT. It is also tied to the ‘host’ Council HR, salary and procurement decisions.

- c. *Legal support*
 - d. *IT / Technology / Systems*
2. *Developing bespoke internal policies and/or procedures that are tailored to the Fund to better meet its needs, instead of Council-wide policies i.e. travel policy, procurement, mandatory training.*

(delivery plan objective – 4 & 7)

3. *Separation from the Council pay scales and salary banding, particularly for more senior staff, to aid recruitment and retention of staff.*

(delivery plan objectives – 1)

4. *Educating other Council departments to ensure that the specialist nature of the work done by Officers and the Fund is recognised and understood. This also means ensuring the Committee and Board are aware of any issues which could be addressed to help the Officers administer the Fund more effectively.*

(delivery plan objectives – 5 & 6)

5. *Conducting a workforce planning exercise, to include succession planning over the longer term, and allowing for the anticipated delivery requirement over the coming years.*

(delivery plan objectives – 1 & 2)


Delivery Plan, Objectives.

1. Improve HR Support and Recruitment Processes.

- a. Meet with HR to review and streamline recruitment process.
- b. Propose a dedicated HR liaison/resource for the Fund.
- c. Explore exemption from internal redeployment.
- d. Propose longer notice periods for senior Fund staff.

- e. Support workforce planning and succession review (Restructure).
- f. Support the review of all JP and re-evaluations.

Success Indicators;

Regular meetings  , reduce recruitment time, dedicated HR resource, restructure implemented, revised T&C's

2. Enhance Training and Development.

- a. Review and update induction training.
- b. Identify future skills requirements (AI, Cyber, Risk).
- c. Develop tailored training plans.
- d. Introduce continuous learning pathways.


Success Indicators;

New training plan implemented, positive feedback, aligned with future requirements.

3. Strengthen Legal and Procurement Support.

- a. Propose in house and external legal advisors.
- b. Develop Fund specific procurement guidance.
- c. Dedicated procurement contact.
- d. Deliver training to procurement on Fund requirements.

Success Indicators;

External legal tender completed  , Legal support response time improved, Legal & Procurement SLA's.

4. Increase Fund Autonomy in Policy and Operations.

- a. Identify Council wide policies that hinder Fund operations.
- b. Draft Fund specific policies, (travel, IT, training).
- c. Delegated authority for IT and travel.


Success Indicators;

Fund specific policies, delegated authority  , cyber risk plan adopted.

5. Improve IT support.

- a. Schedule regular meetings.
- b. Improve the knowledge and understanding of the Fund and the council's requirements and capabilities.
- c. Review cyber risk strategy tailored to the Fund.

Success Indicators;

Regular/quarterly meetings  , education, revised tailored policies and procedures.

6. Build stronger relationships with the Council.

- a. Schedule regular cross function/cluster meetings.
- b. Develop understanding of the Fund's self-funding model.
- c. Establish service level expectations.
- d. Promote Fund's strategic priorities and challenges.

Success Indicators;

Quarterly meetings, escalation protocols, management reporting, KPI's.

7. Review and update Fund policies.

- a. Audit current Fund policies.
- b. Identify gaps, outdated and update.
- c. Assign policy owners and review cycles.

Success Indicators;

Policies reviewed and updated, policies ownership assigned, review schedule implemented.

Recommendation

To note the short term recommendations and delivery plan.

7. Employer Relationship

7.1 National Dashboards

In accordance with the requirements of the Pensions Dashboard Programme the Pension Fund, as a public sector pension arrangement, connected to the dashboards on 31 October 2025 using our

Integrated Service Provider, Heywoods. In addition, our AVC providers Prudential and Standard Life confirmed that their connection was established and the AVC contracts for the Pension Fund were connected using our registration codes.

Administratively, there will be no real impact of connecting to the dashboards until there is increased testing by the wider public. However, we are 'ready' for both the testing phase and the dashboard available point which will be announced 6 months in advance of the launch.

7.2 Tracing Exercise – “Gone Away” Members

Having last undertaken a tracing exercise in 2023, the numbers of untraceable members known as 'Gone Aways' has been steadily increasing. Ahead of the implementation of National Dashboards, and in accordance with governance requirements we are looking to carry out another exercise to trace our gone aways and ensure our data is as accurate as possible.

We currently have 1444 individual members who are marked as Gone Away which includes 459 members with unclaimed refunds with a combined total of £303,511 to be paid out to them.

The 2023 exercise where we used Target as the provider had a success rate of around 60%. As part of this exercise all addresses were required to be verified before we could update the member records. Around 460 members 'traced' by Target remain unverified as a result of there being no response from the member during the verification process. These members are included in the 1444 gone aways.

We are therefore proposing a two stage tracing exercise:

The first step would be for the Fund to carry out another targeted mailing to the members who did not reply last time around. By providing targeted communications we aim to provide comfort and confidence to the members to reduce the risk of any assumptions around scams and increase the level of engagement.

Once this has been completed, we will move to stage two where a provider will be selected from the Framework for a direct award based on service requirements and cost. The cost of this exercise is estimated to be up to £17,000, depending upon the response rate to Stage 1. This would be a standard training exercise to include any verification requirements.

Risk Register



Pensions Dashboard

In line with best practice and the Pensions Regulator (tPR) Code of Practice, NESPF maintains a risk register to ensure the risks the Fund faces are properly understood, and risk mitigation actions are in place.

This Risk Register is reviewed and updated quarterly, with reporting to the Pensions Committee.

The Pensions Committee is responsible for receiving assurance on the effectiveness of NESPF risk management arrangements as per their Terms of Refence.

Risk Scoring Process

In order to apply an assessment rating (score) to a risk, NESPF implements a 4 x 6 matrix. The 4 scale represents the impact of a risk and the 6 scale represents likelihood of a risk event occurring.

4	Very Serious	4	8	12	16	20	24
3	Serious	3	6	9	12	15	18
2	Marginal	2	4	6	8	10	12
1	Negligible	1	2	3	4	5	6
Impact		1	2	3	4	5	6
	Likelihood	Almost Impossible	Very Low	Low	Significant	High	Very High

Current Heat Map (where risks NESPF001 through 029 fall)

4	Very Serious						
3	Serious						
2	Marginal						
1	Negligible						
Impact		1	2	3	4	5	6
	Likelihood	Almost Impossible	Very Low	Low	Significant	High	Very High

- Red = High Priority (urgent action required)
- Orange = Medium Priority (assess adequacy of current controls, consider further action required to mitigate risk)
- Green = Low Priority (no immediate action subject to exceptions, continue to review)

Last Update: November 2025

Code	Risk Description	Mitigating Controls	Current Risk				Approach	Additional Actions/Latest Notes	Owner & Timescale
			Impact	Likelihood	Score	Movement			
Pension Fund Level									
NESPFO01	Risk: Lack of effective risk controls	<ul style="list-style-type: none"> NESPF risk register is reviewed and updated quarterly by senior management team Consideration by Pensions Committee & Board at quarterly meetings NESPF specific Risk Management Policy in place and reviewed annually 	4	1	4	↔	TREAT		Ongoing
	Causes: Failure to implement risk management framework								
	Potential Impact: Operational, financial and reputational issues								
NESPFO02	Risk: Poor Governance	<ul style="list-style-type: none"> Annual review of Funds Governance Compliance Statement and supporting policies and procedures Adherence to Council’s Scheme of Governance Committee Effectiveness Service Update to support good governance 	3	2	6	↔	TREAT	ACC Scheme of Governance annual review approved by Council April 2025.	Ongoing
	Causes: Lack of robust and effective governance framework and supporting policies and procedures								
	Potential Impact: Regulatory compliance issues, inability to determine policies and make effective decisions leading to poor service delivery and reputational risk								
NESPFO03	Risk: Lack of performance measures	<ul style="list-style-type: none"> Statutory and local KPI’s Pension Administration Strategy published quarterly Investment performance (against benchmark) 	3	2	6	↔	TREAT	PAS reporting review underway.	M Suttie, Apr’26
	Causes: Failure to develop performance reporting framework								
	Potential Impact: Lack of transparency, poor								

Code	Risk Description	Mitigating Controls	Current Risk				Approach	Additional Actions/Latest Notes	Owner & Timescale
			Impact	Likelihood	Score	Movement			
	performance could go unaddressed	reported to Committee quarterly in AIMP report							
NESPFO04	Risk: Failure of Pensions Committee and Pension Board to operate effectively	<ul style="list-style-type: none"> Publication of Pension Board Annual Report Training Policy reviewed annually and training register in place Nomination & Appointment procedure Annual Committee Effectiveness Service Update Quarterly Committee & Board Bulletin Monthly Hymans LOLA Progress Report 	3	4	12	↔	TREAT	Pension Board Annual Report and Training Policy approved June 2025. 2 long term Committee vacancies and 1 vacancy x Independent. Risk score remains static.	Ongoing
	Causes: Poor attendance/commitment to role, high turnover of members, lack of training								
	Potential Impact: Non-compliance with regulatory requirements, inability to make decisions or policies, reputational risk								
NESPFO05	Risk: Operational Disaster; unable to access the workplace	<ul style="list-style-type: none"> ACC Disaster Recovery policy in place NESPF Business Continuity Plan to address loss/disruption to benefit administration system 	3	2	6	↔	TOLERATE	Disaster Recovery Testing ongoing.	Ongoing
	Causes: Major incident, natural disaster								
	Potential Impact: Loss of service delivery, staff downtime								
NESPFO06	Risk: Failure to recruit, retain and develop staff	<ul style="list-style-type: none"> All staff have individual development plans, reviewed regularly through CR&D Training register to monitor 	3	2	6	↔	TREAT	Structure review ongoing, reviewing existing and anticipating future requirements of the Fund, with particular focus on retention of key	Ongoing
	Causes: Limited pool of resources/competition with private sector, lack of training/development opportunities, resource drain from wider priorities								

Code	Risk Description	Mitigating Controls	Current Risk				Approach	Additional Actions/Latest Notes	Owner & Timescale
			Impact	Likelihood	Score	Movement			
	Potential Impact: Loss of service delivery, risk to succession planning	<ul style="list-style-type: none"> 3 dedicated training & development staff Internal 2 year training programme for benefit admin staff Future-focused staffing structure, subject to ongoing review TEC Module adopted in Altair 						staff and succession planning. Update to Dec'25 meeting.	
NESPFO07	Risk: Pay and price inflation valuation assumptions either higher or lower	<ul style="list-style-type: none"> Quarterly funding updates to Committee (using FRM) Tri-ennial valuation Individual employer contribution rates 	2	3	6	↔	TOLERATE	Healthy funding position, prudent assumptions in 2023 valuation led to decreased risk score at last review.	Ongoing
	Causes: Economic factors								
	Potential Impact: Potential increase in employer contribution rates and liabilities								
NESPFO08	Risk: Over reliance on services provided by the Administering Authority (e.g. HR, Payroll, Legal, IT)	<ul style="list-style-type: none"> Internal controls including policies and procedures Pensions Administration Strategy in place Communication between Pensions Manager and ACC Chief Officers 	4	4	16	↔	TREAT	Operating Model review by Hymans ongoing. Short term recommendations agreed. Update to Dec'25 meeting.	Ongoing
	Causes: VS/ER exercise leading to loss of knowledge and expertise, recruitment freeze, poor service provision, cost constraints								
	Potential Impact: Ability to meet regulatory and tPR requirements, staff downtime, loss of service delivery/delays and staff								

Code	Risk Description	Mitigating Controls	Current Risk				Approach	Additional Actions/Latest Notes	Owner & Timescale
			Impact	Likelihood	Score	Movement			
	time, cyber and IT risk, legal and reputational risk								
Governance									
NESPFO09	Risk: Failure to adhere to relevant pensions legislation and guidance	<ul style="list-style-type: none"> Six monthly compliance review, with annual reporting to Pensions Committee and Board Active participation at LGPS events, Testing Working Party for administration software updates Established processes for staff training Oversight by Pensions Board Regular benefit admin team meetings to share knowledge Participations in consultations 	3	2	6	↔	TREAT	<p>Six monthly compliance review completed Dec'25 including review against TPR's General Code.</p> <p>Onboarded with Dashboards in advance of 31st October deadline.</p> <p>Wider central Government pensions reform progressing and Scottish Elections in 2026.</p>	Ongoing
	Causes: Political and legislative changes, increased administrative complexity, staff training issue								
	Potential Impact: Audit criticism, legal challenge, reputational risk, financial loss and tPR action								
NESPFO10	Risk: Failure to comply with FOI or SAR requests	<ul style="list-style-type: none"> Internal written procedures in place FOI/SAR log to record & monitor Online process through GovServices 	3	1	3	↔	TREAT		Ongoing
	Causes: Missed statutory deadlines due to training or resource issues								
	Potential Impact: Audit criticism, legal challenge, reputational risk								
NESPFO11	Risk: Conflicts of Interest		2	3	6	↔	TREAT		Ongoing

Code	Risk Description	Mitigating Controls	Current Risk				Approach	Additional Actions/Latest Notes	Owner & Timescale
			Impact	Likelihood	Score	Movement			
	Causes: Competing professional and personal interests of staff, Committee and Board members Potential Impact: Audit criticism, legal challenge, reputational risk	<ul style="list-style-type: none"> • Standing agenda item at meetings • Regular discussions between CO-Finance and Pension Fund Manager • Conflicts policy & register in place, with conflicts declarations issued annually 						Annual COI review underway .	
Benefit Administration									
NESPF012	Risk: Fraud/Negligence Causes: Dishonesty or human error by staff, scheme members Potential Impact: Overpayment/unauthorised payments, system corruption, audit criticism, legal challenge, reputational risk	<ul style="list-style-type: none"> • Segregation of duties for benefits staff authorising/submitting lump sum payments • Pension payments signed off by benefits senior • Enhanced Admin to Pay and Arrears Modules to provide calculation checks • Participation in National Fraud Initiative exercise • Overseas pensioner existence checking • Breaches Policy & register • Internal Audit control reviews 	3	2	6	↔	TREAT	Internal Audit Pension Fund Payroll and participation in NFI exercise completed 2025.	Ongoing
Investments									

Code	Risk Description	Mitigating Controls	Current Risk				Approach	Additional Actions/Latest Notes	Owner & Timescale
			Impact	Likelihood	Score	Movement			
NESPFO13	Risk: Insufficient assets to meet the Funds long term liabilities	<ul style="list-style-type: none"> Quarterly assessment of investment performance and funding updates Tri-ennial valuation and investment strategy review Diversification of assets Due diligence of fund managers External advisor for specialist guidance on strategy 	4	1	4	↔	TREAT	Planning underway for 2026 valuation with the Scheme Actuary.	Ongoing
	Causes: Failure of investment strategy or fund managers to produce expected returns								
	Potential Impact: Increase in employer contribution rates, investment risk, audit criticism, financial loss								
NESPFO14	Risk: Failure to monitor investment managers and assets	<ul style="list-style-type: none"> Quarterly assessment and reporting of asset performance Regular meetings with investment managers 	3	2	6	↔	TREAT		Ongoing
	Causes: Lack of internal procedures								
	Potential Impact: Audit criticism, legal challenge, reputational risk								
NESPFO15	Risk: Failure of world stock markets	<ul style="list-style-type: none"> Diversification of Scheme assets Tri-ennial valuation Investment strategy review alongside valuation 	4	2	8	↔	TOLERATE	Next tri-ennial valuation will be carried out by the new scheme actuary, Hymans, with effect from 31 March 2026.	Ongoing
	Causes: Systemic								
	Potential Impact: Increase in employer contribution rates, financial loss								
NESPFO16	Risk: Negligence/Fraud/Default	<ul style="list-style-type: none"> Due diligence on appointment and appropriate clause in legal agreements 	2	1	2	↔	TOLERATE		Ongoing
	Causes: Dishonesty by fund managers, lack of care or human error								

Code	Risk Description	Mitigating Controls	Current Risk				Approach	Additional Actions/Latest Notes	Owner & Timescale
			Impact	Likelihood	Score	Movement			
	Potential Impact: Financial loss, reputational damage	<ul style="list-style-type: none">Fund management monitoringSAS 70 reports							
NESPFO17	Risk: Failure of Global Custodian	<ul style="list-style-type: none">Regular meeting with custodian	4	2	8	↔	TOLERATE	Global Custodian tender process underway.	Ongoing
	Causes: Financial market crisis, regulatory/political	<ul style="list-style-type: none">Service Level Agreement in place							
	Potential Impact: Loss of assets or control of assets	<ul style="list-style-type: none">Receipt of SAS 70 reports and monitoring							
NESPFO18	Risk: Failure to implement ESG policy	<ul style="list-style-type: none">Member training on roles and fiduciary duties	3	2	6	↔	TREAT		Ongoing
	Causes: Lack of skills/knowledge, lack of transparency on practices or clear policy	<ul style="list-style-type: none">Policy incorporated within SIP							
	Potential Impact: Reputational damage	<ul style="list-style-type: none">PRI membership, annual signatory assessmentMonitor impact of climate changeAdoption of TCFDQuarterly reporting to Committee/Board on voting, carbon footprinting and engagement work.Risk assessments with Fund Managers and Investment Consultant including Climate Scenario Analysis							
Accounting									

Last Update: November 2024

Code	Risk Description	Mitigating Controls	Current Risk				Approach	Additional Actions/Latest Notes	Owner & Timescale
			Impact	Likelihood	Score	Movement			
NESP019	Risk: Poor financial reporting	<ul style="list-style-type: none">Comprehensive policies and procedures in place and review of <i>the Code</i>Attending CIPFA meeting and reviewsRegular reconciliations e.g. fund managers, custodianInternal/External Audits	3	2	6	↔	TREAT	Annual accounts approved at September 2025 meeting.	Ongoing
	Causes: Lack of internal policies and procedures, failure to keep up to date with changes in the Code of Practice and other overriding changes, training issues								
	Potential Impact: Qualified accounts								
Systems									
NESP020	Risk: Failure to secure and manage personal data in line with data protection requirements	<ul style="list-style-type: none">Annual information governance training for staffPolicies and procedures in place and reviewed regularly (Breaches, Data Protection, Systems Access, Retention Schedule, Cyber Incident Response Plan)Secure physical storage measuresAdmin system providers implement range of protections against cyber threats including encryption, firewalls, annual 3rd party penetration testing etc	4	2	8	↔	TREAT	Information governance 2025 refresher underway Cyber training for Committee & Board and Cyber Incident Tabletop Exercise completed end of 2024/early 2025.	Ongoing
	Causes: Cyber-attack, human processing error								
	Potential Impact: Audit criticism, legal challenge, reputational risk, financial penalties								

Code	Risk Description	Mitigating Controls	Current Risk				Approach	Additional Actions/Latest Notes	Owner & Timescale
			Impact	Likelihood	Score	Movement			
	Potential Impact: Orphaned liabilities could fall on remaining employers	and Monitoring Policy (within FSS) • Online liability monitor which tracks funding levels and liabilities for each individual employer							
ESPF024	Risk: Changes in early retirement strategies by employers	• Management through Covenant Assessment and Monitoring Policy (within FSS)	2	3	6	↔	TREAT	Increasing budget constraints are leading more employers to redundancy/early retirement exercises. Employers are aware of cost implications. Strain on Fund factors reviewed by scheme actuary in 2023.	Ongoing
	Causes: Public service cuts to funding								
	Potential Impact: Pressure on cash flows								
NESP025	Risk: Employers leaving Scheme or closing to new members	• Management through Covenant Assessment and Monitoring Policy (within FSS) • Cost Cap mechanism introduced in LGPS regulations • Termination Policy reassessed in line with the 2023 Fund Valuation	2	4	8	↔	TREAT	New flexibilities, guarantors in place, new Termination Policy and current funding position.	Ongoing
	Causes: Public service cuts to funding, increased pension contribution costs								
	Potential Impact: Orphaned liabilities could fall to remaining employers								
NESP026	Risk: Longevity		2	2	4	↔	TOLERATE		Ongoing

Code	Risk Description	Mitigating Controls	Current Risk				Approach	Additional Actions/Latest Notes	Owner & Timescale
			Impact	Likelihood	Score	Movement			
	Causes: Increasing life expectancy rates Potential Impact: Increase in employer contribution rates and liabilities	<ul style="list-style-type: none"> • Tri-ennial valuation undertakes scheme specific analysis including review of life expectancy/mortality assumptions which are set with some allowance for increases 						Demographic assessment carried out by the scheme actuary in 2022/23 which was fed into 2023 valuation. Hymans will use Club Vita to feed into next valuation.	
NESPFO27	Risk: Employer contributions not received, collected or recorded accurately	<ul style="list-style-type: none"> • Internal escalation procedures • Breaches policy and register • Monthly data submission reconciled by ERT • Quarterly PAS reporting to Committee & Board • Ongoing training provided by dedicated ERT to scheme employers • Employer Briefings 	2	3	6	↔	TREAT	LGPS (Scotland) Regulations delivered Summer 2022 to help manage risk.	Ongoing
	Causes: Lack of staff resources, training issues							New employer contribution rates put in place following 2023 valuation. All employer contribution requirements reduced for inter-valuation period 2024-27.	
	Potential Impact: Orphaned liabilities could fall to remaining employers								
NESPFO28	Risk: Failure to maintain member records; data incomplete or inaccurate	<ul style="list-style-type: none"> • Monthly data from employers which is reconciled by ERT 	3	2	6	↔	TREAT	Legacy Team clearing backlogs to ensure records are as up to date as possible in	Ongoing
	Causes: Lack of staff resources, training issues								

Code	Risk Description	Mitigating Controls	Current Risk				Approach	Additional Actions/Latest Notes	Owner & Timescale
			Impact	Likelihood	Score	Movement			
	Potential Impact: Incorrect pension payments, incorrect assessment of actuarial liabilities, reputational damage, tPR action	<ul style="list-style-type: none"> Quarterly PAS reporting to Committee & Board Data quality improvement plan implemented Data readiness assessment for Pensions Dashboard Project 						readiness for Pensions Dashboard connection by 2026 and valuation	
NESPFO29	Risk: The Fund is unable to adequately comply with required administrative processes owing to McCloud judgement	<ul style="list-style-type: none"> SAB and other industry guidance Early and ongoing communication with employers McCloud project team created 	2	2	4	↔	TREAT	Now "Live" with McCloud. Majority of historic recalculations completed.	Ongoing
	Causes: Not having the required historic data, adequate resources, sufficient guidance								
	Potential Impact: Breaches and potential action by tPR, increase in liabilities, incorrect pension entitlements, damage to Fund reputation								

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CONSULTATION RESPONSE FORM

These Regulations will amend the Local Government Pension Scheme Regulations 2018 to bring the Scottish scheme in line with scheme changes in England & Wales, and Northern Ireland. It also proposes minor changes to the Local Government Pension Scheme (Remediable Service) (Scotland) Regulations 2023 ("the 2023 regulations").

These amendments cover a number of proposals relating to pension benefits for scheme members, including forfeiture, opt outs, removal of the age 75 limit for death benefit payments, gender pension gap reporting, McCloud and other technical amendments.

It also provides for the transfer of Scottish Fire and Rescue Staff to the Strathclyde Pension Fund, and the addition of Neonatal care leave to the definition of child related leave.

1. Name/Organisation

Organisation Name

North East Scotland Pension Fund

Title

Miss

Surname

Suttie

Forename

Mairi

2. Postal Address

Level 1, 2 Marischal Square

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Aberdeen

Postcode AB10 1LP

Phone 01224045045

Email pensions@nespf.org.uk

3. Permissions - I am responding as... (please complete either sections (a), (b) and (d) or sections (c) and (d):

Individual or Group/Organisation

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please state yes to one of the following:

Yes, make my response,
name and address all
available

or

Yes, make my response
available, but not my name
and address

or

Yes, make my response and
name available, but not my
address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please state yes or no: ...Yes...

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please state yes or no:Yes.....

ABOUT YOU

I am responding ...

- ☐ as a scheme member
- ☐ on behalf of an Employer Organisation
- ☐ on behalf of a Trade Union
- ☒ other (please specify) Local Government Pension Scheme

CONSULTATION COMMENTS

Please use this space to provide any comments on the amendments.

Question 1: Do you have any comments on Scottish Ministers' proposals to remove the upper age limit of 75 for death grants from the LGPS Regulations, backdated to 6 April 2011?

We agree with removing the upper age limit of 75 for death grants, but there needs to be clear Statutory Guidance provided for how to deal with revisiting cases, including what is to be done if no beneficiaries can be identified or made contact with.

The administrative impact of this additional work should also be acknowledged, with clarification if there will be a deadline for revisiting cases.

Note that under Amendment Regulation 46(d) (Amendments to regulation 17 and transitional protection), Regulation 35(4) of the Benefit Regulations should also be repealed.

Question 2: Do you agree that all authorised unpaid absences over 30 days should be automatically pensionable?

Regulations have not been amended to allow for this.

Question 3: Do you agree with the proposal to change the time-limit for buying back unpaid leave pension absences from 30 days to 1 year, or when the employment ends?

Yes, we fully support the increase of the time limit for buying back unpaid leave pension absences to 1 year. 30 days is not long enough for members returning from an extended period of leave to make a decision. Especially those returning from child-related leave who may be on an extended period of annual leave and are not actually back to work within 30 days.

However, we do believe members should only be able to make this election while still active, so the regulations should be reworded to allow for this.

The suggested changes in relation to Question 4 would vastly reduce the number of instances where a member would look to buy back “lost” pension – where an employer would be required to pay 2/3rds of the cost.

For administration purposes, more clarity is needed on whether members to which new regulation 16(8A) applies can pay by regular instalments (as is currently done with SCAPCs). If so, how is this calculated and what happens if the member leaves before completing all payments? It would also be beneficial if there was clear terminology for this, rather than SCAPC, since payment of SCAPCs is calculated using age related factors and not lost contributions.

Question 4: Do you agree with updating the definition of child-related leave to include all periods of additional maternity, additional adoption and shared parental leave when on reduced or no pay?

Yes we feel that this will make steps towards addressing the Gender Pensions Gap. However, it will also potentially have a large impact on employers, especially smaller ones, through increased costs.

This would be one step that could be taken to improve the adequacy of the LGPS for women.

It would be up to employers to respond on whether or not they had concerns about costs.

Question 5: Do you agree that the contribution cost of this should be met by LGPS employers?

That seems the most reasonable approach, as what other alternatives would there be? The cost should not fall to the members. Again, it will have an impact on employers, especially smaller ones, through increased pension costs.

Again, it would be up to employers to respond on concerns regarding costs. Although this be a significant obstacle to overcome.

Question 6: Do you agree that gender pension gap reporting should be mandatory in the LGPS?

Yes, reporting on gender pension gap should be mandatory with guidance provided to ensure that data can be compared across Funds and geographical areas.

The data may not currently be held by the Fund and it would therefore require us to work with employers and/or system providers to gather the information that we require going forward. Clarification would be required on whether this would be a requirement for the 2026 valuation and if so, could guidance be produced in enough time?

Question 7: Do you agree with the threshold of 100 LGPS members for defining which employers must report on their gender pension gap?

For reporting purposes we would like the requirement to include all scheduled bodies but we do not have an opinion on where the threshold would be set for other employer types.

It is important that this is comparable and meaningful across the scheme and other pieces of work e.g. Gender Pay Gap.

Question 8: Do you agree with the definition of 'gender pension gap' and 'gender pensions savings gap'?

As long as there is appropriate guidance and consistency around reporting requirements Funds will be able to work with the definitions outlined.

Question 9: Do you agree that the annual report is the best method for reporting on participation and opt out data?

Although this is pensions related information, the Fund does not hold the information required to report on this. Since it is the employer who holds this data, and the Fund is not required to hold data of members who opt out within 3 months, it may make more sense for the employers to report the information directly for centralised reporting.

Question 10: Do you foresee any issues with AA's ability to gather data on opt-outs?

Yes, if the AA needs to gather the data, it is entirely dependent on the employers providing the information. Will the Regulations be updated to

require employers to provide this information by a certain date each year? What will be the consequences for employers or the AA if the data is not provided by employers? There needs to be clear guidance.

Members who are opting-out of the scheme are less likely to be willing to engage in providing further information as to their reasons for opting-out and additional information, so if low number respond to the information request the results could be skewed.

Question 11: When updating the annual report guidance to reflect opt-out data collection, what information would be most useful to include?

Clear guidance will be needed on how employers should obtain the information to ensure consistency and what will happen if they don't provide the information to the AA.

Question 12: *Do you have any comments on the collection of additional information?*

The additional information should be provided directly to the Scottish Government (or a central body) in an anonymised manner, to ensure people feel comfortable providing the information.

Question 13: Do you agree that the three-month time limit for an LGPS employer to make an application for a forfeiture certificate should be removed?

Yes, this will allow more time to gather the relevant information and complete the application. It is appropriate to bring the LGPS(S) in line with other public pension schemes on this matter.

Question 14: Do you agree with or have any comments on these technical remedy amendments?

Please provide clarification on Pension Debit Members – there has been no amendment to the regulations to require a recalculation of pension debit (for a member qualifying for underpin protection, where the PSO took effect between 01/04/2015 and 30/09/2023 and the recalculated CEV exceeds the original amount). Is this the intention? If this is the intention, we agree with the regulations.

Other than the above, we are in agreement with these amendments.

Question 15: Do you agree with these changes to allow those who left the scheme prior to 1 April 2015 to commute small pensions?

Yes we agree with these changes to address the inequality between the different regulations.

However, it appears that only the 1998 Regulations have been amended for this, so members who left before 01/04/1998 or between 01/04/2009 and 31/03/2015 will continue to not be able to take a de minimis payment. Pension Credit members under the 2009 Scheme are also not covered by the amendments.

Question 16: Do you agree with the changes proposed to the Lifetime allowance regulations?

Yes.

Question 17: Do you agree with the proposed amendments to the Regulations?

Yes we agree with the proposal to remove the need for a refund to be paid out on the expiry of 5 years from date of leaving. This will allow for easier administration and will allow aggregation to proceed when a member re-joins after 5 years but hasn't taken the refund. We believe the regulations should apply for all refunds not yet paid under the 2015 Regulations.

Not allowing a refund to members over age 75 will allow records to be tidied

up for those members we have been unable to contact or haven't returned forms to take the refund, helping valuation data. However, if the right to a refund is to be lost, it is important that members are aware this could happen. Therefore, we would need a period of time to inform members and take reasonable steps to obtain the necessary information for those members who met age 75 before the implementation date.

Clear guidance is needed on what will be considered reasonable steps to obtain the information necessary to pay the refund on the day before the member attains age 75, to ensure consistency and fairness for all members.

Question 18: Do you agree with adding the definition of 'local government service' to Schedule 1?

Yes.

Question 19: Do you agree with the change to part 2 of schedule 4 transferring all SFRS staff to Glasgow City Council?

Yes.

However, wording needs amended in draft amendment regulation 36(b). "Dundee" should instead be "Dundee City" and "Aberdeen" should be "Aberdeen City".

Question 20: Do you agree to the addition of Neo-natal care to the definition of child related leave?

Yes.

Question 21: Do you agree with the proposed amendment to Regulation 10(8)?

Yes.

Other comments:

The Cohabiting partner definition inserted by draft amendment regulation 2(2)(d) (*adding Reg 42(5B) to the Local Government (Discretionary Payments and Injury Benefits) (Scotland) Regulations 1998*) is not consistent with the current definition of a cohabiting partner under Schedule 1 of the 2018 Regulations. It appears to be based on the old definition which required the member and partner to be able to marry or form a civil partnership for at least 2 years prior to the date of death. This requirement was removed from the 2018 Regulations, so shouldn't be required in these regulations.

There seems to be contradictory information relating to the newly amended Regulation 11(5) in the 2018 Regulations and whether 'notional' or 'lost' pay should be used for CARE, employee and employer contributions.

Draft amendment regulation 45 introduces new regulations 15(6) to 15(10) into the LGPS (Transitional Provisions and Savings) (Scotland) Regulations 2014. These allow deferred members who left the scheme between 1 April 1998 and 31 March 2015 to use all or part of their AVCs to purchase additional LGPS pension. Please provide clarity on whether survivor's pension is provided automatically, not at all, or if the member can choose (per 2015 Regs). Is it intentional that leavers before 01/04/1998 and Pension Credit members under the 1998 and 2009 Schemes are not being given the ability to buy additional LGPS pension with AVCs?

Draft amendment regulation 54 amends regulation 14 of LGPS (Remediable Service) (Scotland) Regulations 2023 to include regulation 12(5A)(b). This regulation does not exist. I assume this is a drafting error and should perhaps be 12(5)(b).

Please e-mail your response to SPPAPolicyConsultationResponses@gov.scot
or send via post to:

LGPS Policy Team
SPPA Policy
7 Tweedside Park
Tweedbank
Galashiels
TD1 3TE

The closing date for receipt of comments is 25 November 2025.

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Data Quality Improvement Plan 2025

1. Introduction

The quality of data held by the North East Scotland Pension Fund (NESPF) impacts directly on scheme administration. Inaccurate information leads to inaccurate calculations, administrative delays and poor customer service. In addition, holding incorrect or incomplete data could affect all aspects of the Fund including having financial, legal, operational and reputational impacts.

It is therefore essential that measuring and improving the accuracy of the information held on an ongoing basis is an administrative priority of the Fund.

In addition to the above, the Pensions Regulator (tPR) is responsible for ensuring that Funds meet their legal requirements around maintaining data quality. Within the public sector environment, tPR have focused on this issue over the last few years. The tPR General Code of Practice came into force from 28 March 2024. The Code requires Funds to monitor their data on an ongoing basis for accuracy and completeness. In addition it requires data held to be reviewed at least annually with a data quality improvement plan to be put in place to address any issues found.

2. Data Collection

The NESPF collects data from employers in respect of active members on a monthly basis through our secure online facility i-Connect. This system, which is currently being used by all participating employers, ensures that member data is received in a timely manner and is provided in a valid and accurate format. Collecting data in this way has had a huge impact on the quality of the data held by the Fund and will ensure it remains a high quality into the future.

The high quality of data held by the Fund had a direct impact on the triennial valuation carried out as at 31 March 2023. The valuation was carried out well within the agreed timelines and with very few queries received from the actuary on the data provided. The quality of the data held by the Fund enabled both the Pension Fund and the actuarial team to have confidence in not only being able to deliver the exercise in a timely manner, but also in the accuracy of the results received.

As a result of changes to the scheme following recent legal proceedings (McCloud Judgement) and the imminent requirement to participate in the national pension dashboard the Fund continues to face challenges in administration. At the core of both of these large scale exercises is data and the success of meeting these requirements depends on the quality of the data held.

To meet the requirements of the additional projects, as well as the ongoing objectives of the NESPF and tPR, the following data improvement plan is to be implemented.

3. NESPF Objectives

1. To maintain the accuracy of members records to ensure that benefits held and paid are correct;
2. To meet the regulatory requirements of pension administration including the Pension Regulator's General Code;
3. To provide comfort to the administering authority and participating employers in the accuracy of the actuarial results based on the quality of the data provided; and
4. To ease the administrative burden of incomplete or inaccurate records.

4. Data Types

Data held by a Fund can be split into two different categories for measurement of quality:

1. **Common Data:** These data items are prescribed by tPR guidance and are the identifying fields for members.
2. **Scheme Specific Data (Conditional Data):** These fields are relevant to the calculation of member benefits and there is currently no prescribed list of scheme specific data fields for the Local Government Pension Scheme (LGPS).

5. Measuring Data Quality

From September 2021, the Fund have assessed the quality of the data held on the system using the data quality dashboard available through Altair Insights. Insights uses a suite of tests against the data held to determine the validity of the information held for each members record. Missing or invalid data is available to the Fund through the dashboard and the accompanying reports.

It is important to understand that although the data quality tests can identify missing, incomplete or invalid information it is not able to test this data for accuracy. Accuracy of data held on the system is reliant upon the system calculations, Fund officer training and checking of member records as part of the administration and processing.

6. Data measured by NESPF

Common Data	Scheme Specific Data
NI Number (includes temporary National Insurance numbers (TN) which are classed as missing data)	Active members with zero actual pay
Surname	Active members with missing or invalid member contribution rate
Forenames/initials	Active members with inconsistency between member status and exit data
Sex	Deferred members with no date of leaving
Date of birth	Deferred members with zero pension
Date started pensionable service	Deferred members with inconsistency between member status and exit data
Retirement date	Deferred members with Guaranteed Minimum Pensions (GMP) expected based on service
Membership status	Undecided leavers with zero pension
Last status event	Undecided leavers with inconsistency between member status and exit data
Address (includes Gone Away which are classed as missing data)	Pensioner members with no retirement date
Postcode	Pensioner members with zero pension
	Pensioner members with GMP expected based on service
	Dependant members with zero pension

7. Data Score

From 2018 both Common and Scheme Specific Data scores were required to be included in the Pensions Regulator’s annual scheme return. The scores declared by the NESPF for the last few years are as follows:

Data Type	2023	2024	2025	Target
Common Data	98.7%	98.7%	98.7%	100%
Scheme Specific Data	99.12%	98.9%	98.9%	100%

The 2025 common data score has remained stable since 2023 at 98.7%. However, there is an increase in the number of ‘gone away’ members that are held on the administration database. A large scale tracing exercise with an external tracing agency took place between September and November 2023, which

helped the Fund to make contact with a number of 'lost' members but this has steadily increased since the exercise was finished. A new tracing exercise is due to take place in early 2026 by selecting a provider from the national address tracing framework.

The score for scheme specific data remains high with only a slight reduction to the overall score.

The Employer Relationship Team will seek to improve the scores in the forthcoming year by investigating and fixing the errors identified as part of the suite of Insight reports.

8. Reporting

The data quality improvement plan is approved at Committee level with scores being reported as part of the Pension Administration Strategy updates.

The scores are reported to the Pension Regulator as part of the Annual Return requirements

This plan is updated annually.

DATA QUALITY IMPROVEMENT PLAN

Objective	Action	Timetable	Area of responsibility & resource requirements	Financial implications
Address Tracing	Tracing exercise for all 'gone away' members to be undertaken by calling off from the address tracing framework	To be completed by 31 March 2026	Employer Relationship Team	Up to £17,000
Insights Data Quality Dashboard	<p>Altair Insights reporting tool and the standard tests set up to create the dashboard will be used to provide data quality scores for the Annual Scheme Return.</p> <p>The detailed reports list any errors found and will be used to cleanse the data held on an ongoing basis ensuring that both current and historical data is valid.</p>	<p>Ongoing requirement for data scores to be provided to tPR (annual return) every year</p> <p>Project to improve historic data and data scores to be part of the ERT remit going forward</p>	Employer Relationship Team	No additional costs expected (Insights is used for all administrative reporting and is used across the Fund)
National Insurance Database Exercise	<p>Using the NI database the Fund will identify where members have benefits with other Scottish LGPS Funds resulting in transfer/joining of records.</p> <p>This initial exercise will be used to tidy up historical issues and prepare for becoming "dashboard ready". On an ongoing basis</p>	October 2025	Benefits Team	No additional cost expected (will result in increased transfers in and out between Scottish Funds)

	the use of the database is being incorporated into administration procedures and under constant monitoring.			
Undecided Leavers (Status 2 records) Concurrent and Joins (backlog)	Actively addressing the backlog of unprocessed cases in advance of the 2026 valuation. To include process review.	April 2025 – December 2026	Legacy Team	Staff seconded from Teams within the Fund to prioritise this exercise
Arrears (backlog)	Following the pay award in November/December 2023, to recalculate pensions and deferred benefits as well as refunds, to take into account the additional contributions and pay received.	March 2026	Employer Team & Benefits Team	No additional staffing costs.
Frozen Leaver Exercise (Status 9 records)	Following completion of the tracing exercise an ongoing exercise will be carried out by the trained assistants to contact members with unclaimed refunds on an annual basis. Exercise will be carried out using Insights reporting	October - ongoing	Systems Team	No additional staffing costs.
Dashboard Preparation	With the introduction of the national UK pensions dashboard, which the LGPS schemes are expected to connect the “eco-system” to by end September 2025, there will be a requirement for data to be of a high quality to ensure that pensions are	January 2025 – September 2026	Systems Team/Employer Relationship Team/ Benefits Team	Data rectification costs unknown. No further staff resources required at this time.

	found and accurate figures are provided via the dashboards.			
McCloud Project (rectification)	<p>Following the comprehensive review to identify missing service data and process the McCloud information onto Altair, further work to be carried out to apply guaranteed benefits to any affected retirements, deaths, divorces and transfers.</p> <p>The majority of work has been undertaken with day to day processing having went 'live'. Small amount of rectification work outstanding</p>	<p>Regulations effective from October 2023</p> <p>Rectification to be completed by August 2026</p> <p>Transfer work to be undertaken once system development is carried out.</p> <p>Work on future leavers is ongoing</p>	All operational teams	In house staff used for all aspects of the regulatory requirements including systems testing, data checking and processing of McCloud tranche/rectification data view and underpin.
AVC Reconciliation	<p>Reconciliation of AVC contracts with Prudential and Standard Life in line with year end.</p> <p>Since 2020 Prudential have experienced issues with providing fund values as at 31 March as part of the year end process. The issues were caused by implementing a new system. Work is ongoing to rectify, however this has impacted on the ability to reconcile to data held by NESPF. The ongoing use of i-Connect within the Fund</p>	July 2025– March 2026	Employer Relationship Team	No additional costs expected.

	ensures that the data is as accurate as possible.			
Mortality tracing	Monthly mortality tracing, carried out in conjunction with ATMOS data services is to be revised from late 2023 to include additional checks by the provider.	Ongoing	Operations Manager	Cost of ATMOS tracing is £0.20 per member. Mortality tracing is carried out monthly and is part of the requirements of scheme administration and the insurance 'buy in' with Rothesay Life.
Start Date Exercise	In accordance with an audit requirement (2021/22) all start dates for members on the database system prior to the introduction of i-Connect will be checked against the scanned documents or checked with the employer for accuracy.	Deadline - December 2026	Systems Team	No additional cost – large scale exercise to be completed by Pension Assistants

Claire Mullen – Employer Relationship Manager – October 2024 – Version 1.5



Pension Administration Strategy

Quarterly Reporting to 30 September 2025

1. NESPF performance from 1st April to 30th September

1.1 Key administration tasks

Measuring performance is essential to evidence the efforts made by both the Pension Fund and Scheme employers to comply with statutory requirements and deliver a high-quality pension administration service.

Measurement and Target	Cases completed	Within target	Percentage achieved	Outwith target	Average days over target	Previous Quarter percentage	Percentage movement
Death In Service notification within 5 working days	17	17	100.0%	0	0	100.0%	0.0%
Death of Deferred/Pensioner notification within 5 working days	160	157	98.1%	3	27	96.7%	1.4%
Deferred Benefit Care Only within 2 months	764	711	93.1%	53	20	95.6%	-2.5%
Deferred Benefit Final Salary within 2 months	325	289	88.9%	36	25	90.8%	-1.9%
Deferred Benefit notification within 10 working days	948	935	98.6%	13	68	100.0%	-1.4%
Refund within 10 working days	215	198	92.1%	17	3	87.5%	4.6%
Retirement Benefit within 10 working days	852	563	66.1%	289	7	70.9%	-4.8%
Retirement Estimate within 10 working days	195	193	99.0%	2	27	100.0%	-1.0%
Transfer In quotation within 10 working days	77	63	81.8%	14	25	80.9%	0.9%
Transfer Out quotation within 10 working days	87	84	96.6%	3	10	96.0%	0.6%
Totals	3640	3210	88.2%			89.9%	-1.7%

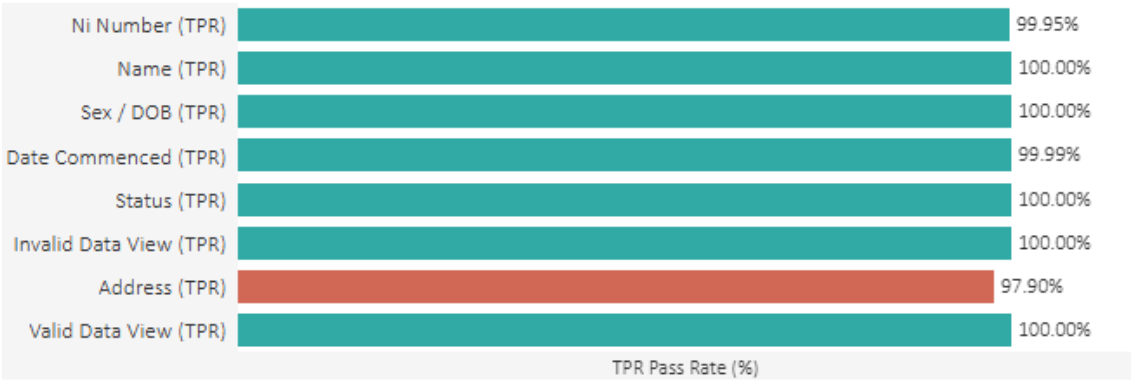
Percentage Analysis

- Overall percentage achieved within target at 88.2% is down 1.7% on previous quarter but overall cases completed is significantly higher than previous quarter (3640 vs 1789)
- Percentage decrease of 4.8% for retirement benefits was caused by issues applying pension increase at year end that resulted in processing delays which has had a knock-on effect this quarter as backlogs were addressed during September.
- Percentage increase again this quarter for Refunds which demonstrates the new process which was implemented has been successful.

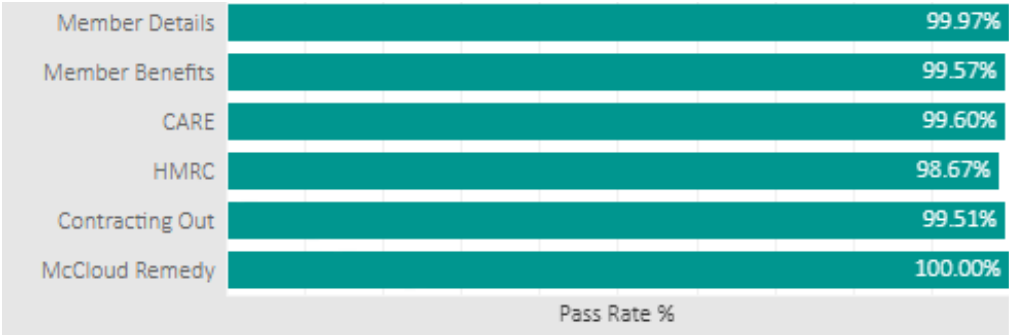
1.2 Data quality

The Pension Regulator (TPR) requires Common and Scheme Specific data to be measured and reported annually in October.

Common Data Score = 98.7% (TPR target 100%)



Scheme Specific Data Score = 98.9% (TPR target 100%)

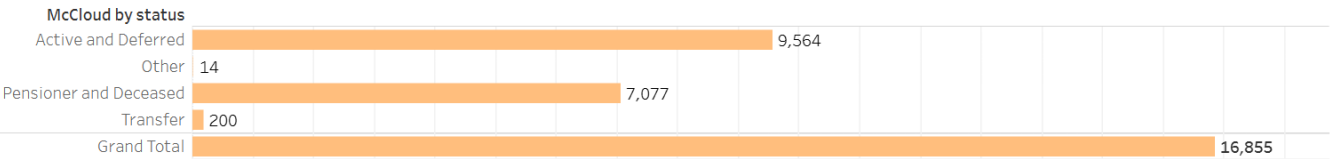


1.3 McCloud remedy

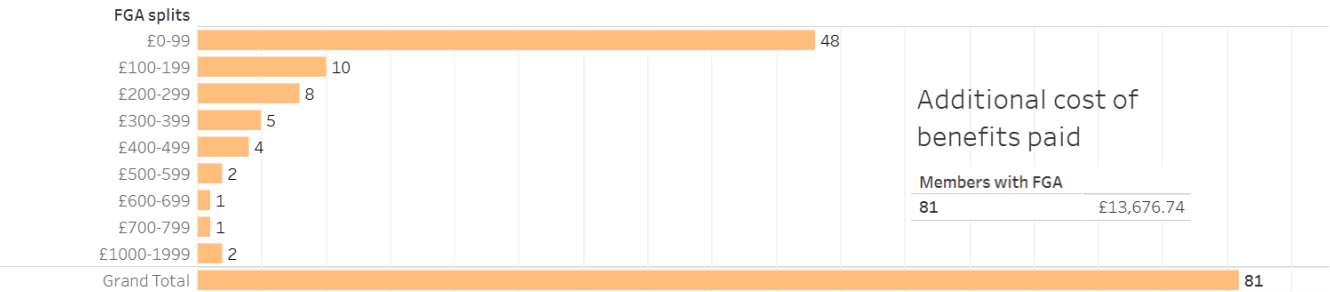
In December 2018 the Court of Appeal ruled in McCloud v Ministry of Justice that “transitional protection” offered to some members as part of pension reform amounted to unlawful discrimination. In July 2019 following employment tribunal Government stated difference in treatment would be remedied across all public sector schemes.

This dashboard provides results of extending protections by recalculating benefits for all eligible members in accordance with the Local Government Pension Scheme (Remediable Service)(Scotland) Regulations 2023.

Recalculations



Cost Analysis

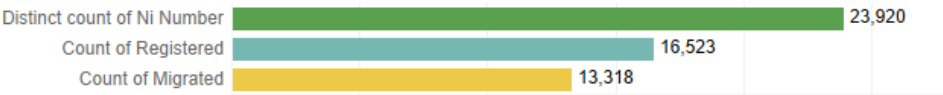


1.4 Members online

My Pension+

This dashboard shows members that have registered for online self service and those that have migrated to *My Pension+* which went live on 26 June 2023.

Actives



Percentages

Registered members	69.1%
Migrated members	80.6%

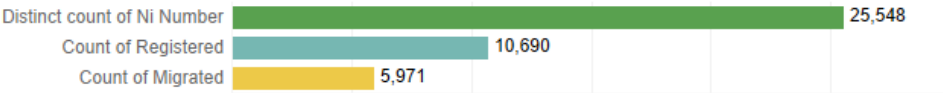
Deferreds



Percentages

Registered members	65.2%
Migrated members	70.5%

Pensioners & Dependants



Percentages

Registered members	41.8%
Migrated members	55.9%

Undecided Leavers



Percentages

Registered members	65.4%
Migrated members	78.4%

Activation Key requests

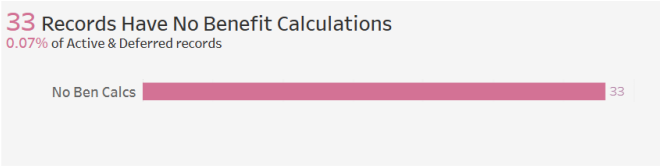
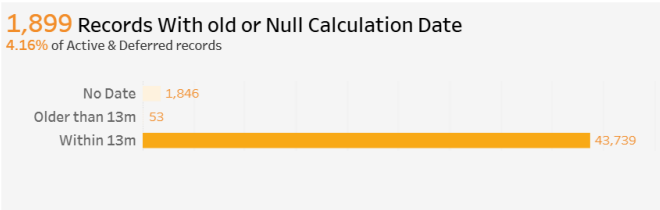
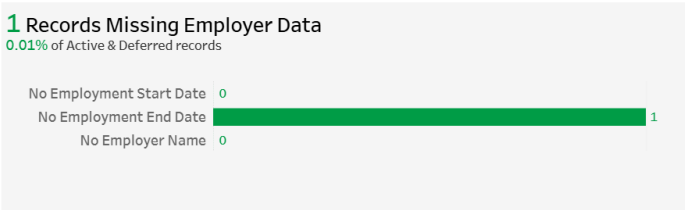
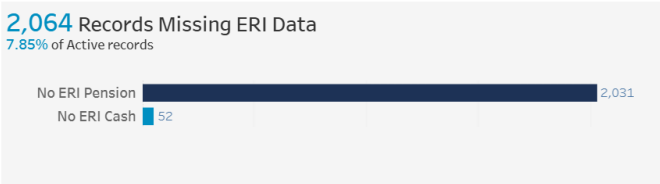
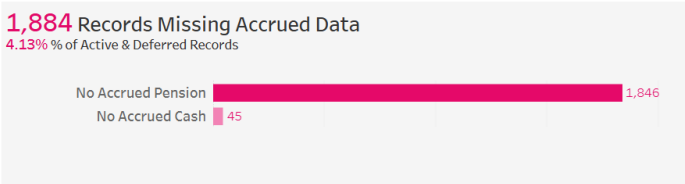


1.5 Pension dashboards

This dashboard shows current position with data transferred into our ISP Test environment that will be used for onboarding to the governments ecosystem later this year which is a requirement for all public sector pension schemes. The NESPF will be required to provide Pension Data for all active and deferred pensioners within the Fund.

Member Records	Active	Deferred
45,638	26,309	19,329

The charts below help to identify possible gaps or errors in your data. [Please click on any chart to go to the member record level data, or use the tabs at the top of the screen to navigate.](#)



Exempt information as described in paragraph(s) 6 of Schedule 7A of the Local Government (Scotland) Act 1973.

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