Clwyd Pension Fund

Business Plan 2026/2027 to 2028/2029

March 2026

Contents

Introduction

This is the business plan for the Clwyd Pension Fund, which is managed and administered by Flintshire County Council. It was approved at the Clwyd Pension Fund Committee meeting on 25 March 2026 and details our priorities and areas of key focus for 2026/2027, 2027/2028 and 2028/2029.

The business plan is formally reviewed and agreed every year. It is monitored throughout the year, and the Pension Fund Committee may be asked to agree to changes to it.

The purpose of the business plan is to:

- explain the background to and objectives for the management of the Clwyd Pension Fund,
- document the priorities and improvements to be implemented by the pensions service during the next three years to help achieve those objectives,
- enable progress and performance to be monitored in relation to those priorities,
- provide staff, partners and customers with a clear vision for the next three years.

This business plan also includes a budget for expected payments to and from the Clwyd Pension Fund during 2026/2027, the resources required to manage the Fund and expected cashflows over the period of this plan.

At the time of writing, we are awaiting final regulations and guidance relating to the LGPS Fit for the Future reforms. The draft proposals set out significant changes including new investment and governance requirements including to:

- pool all assets within an FCA regulated asset pool
- take “principal” investment advice from the asset pool
- create and appoint to the role of LGPS Senior Officer,
- create and appoint to the role of Independent Person
- Implement greater knowledge and skills requirements for Committee members.

During 2025/2026, the Fund has begun to implement the investment changes, including review of strategies, transition of assets, and participation as a shareholder and client of the Wales Pension Partnership Investment Management Company Limited (WPP IM Co). These changes have contributed to a heightened risk landscape, and impact is likely to be felt across all areas of the Fund.

In addition, key administration project work is expected following recent consultations on access, fairness and protections.

As a result, it is difficult to make definitive plans and budget for 2026/2027 and beyond, as changes may be required as further information is received from both the Government and Asset Pool. We have set out our best estimate of the two years following March 2026, but this may require revision over the course of 2026/2027 as we transition to the new LGPS arrangements.

Philip Latham

Head of Clwyd Pension Fund

Flintshire County Council

About the Clwyd Pension Fund

The Clwyd Pension Fund ("CPF" or "the Fund") is a £2.6bn[1] Local Government Pension Scheme Fund providing death and retirement benefits for employees of local authorities in North-East Wales (other than teachers, police and firefighters) and employees of other qualifying bodies providing similar services. There are currently 52 contributing employers, and around 53,000 members as set out in the table below:

Members	31st December 2024	31st December 2025
Active contributors	17,408	17,421
Retired and survivor members	17,266	18,028
Deferred and other members	17,025	17,242

What We Do

Our work consists of day-to-day activities (summarised below) and additional project work:

- Governing and managing the Fund, including statutory accounting and other statutory and non-statutory reporting.
- Ensuring we receive all the pension contributions paid by active members of the Fund, and ensuring all the employers in the Fund pay their pension contributions
- Maintaining and protecting up to date member data, and calculating and paying pension benefits to or for all our beneficiaries, as prescribed by the LGPS regulations
- Communicating with scheme members and employers about membership of the Fund
- Safeguarding the money in the Fund (the Fund's assets) and investing any Fund assets that are not currently needed to pay benefits
- Monitoring the funding position of the Fund (level of assets compared with liabilities) and acting if necessary
- Working with the actuary to determine, every three years, how much employers need to pay into the Fund to ensure we have enough money to pay pension benefits in the future, whilst working with employers to manage affordability

A further breakdown of what we do and our plan for the year, grouped into governance; finance, investments and funding; and administration and communications, is shown in the Appendices.

[1] Information correct as at 31st December 2025.

Objectives for the Management of the Fund

Our Mission Statement is:

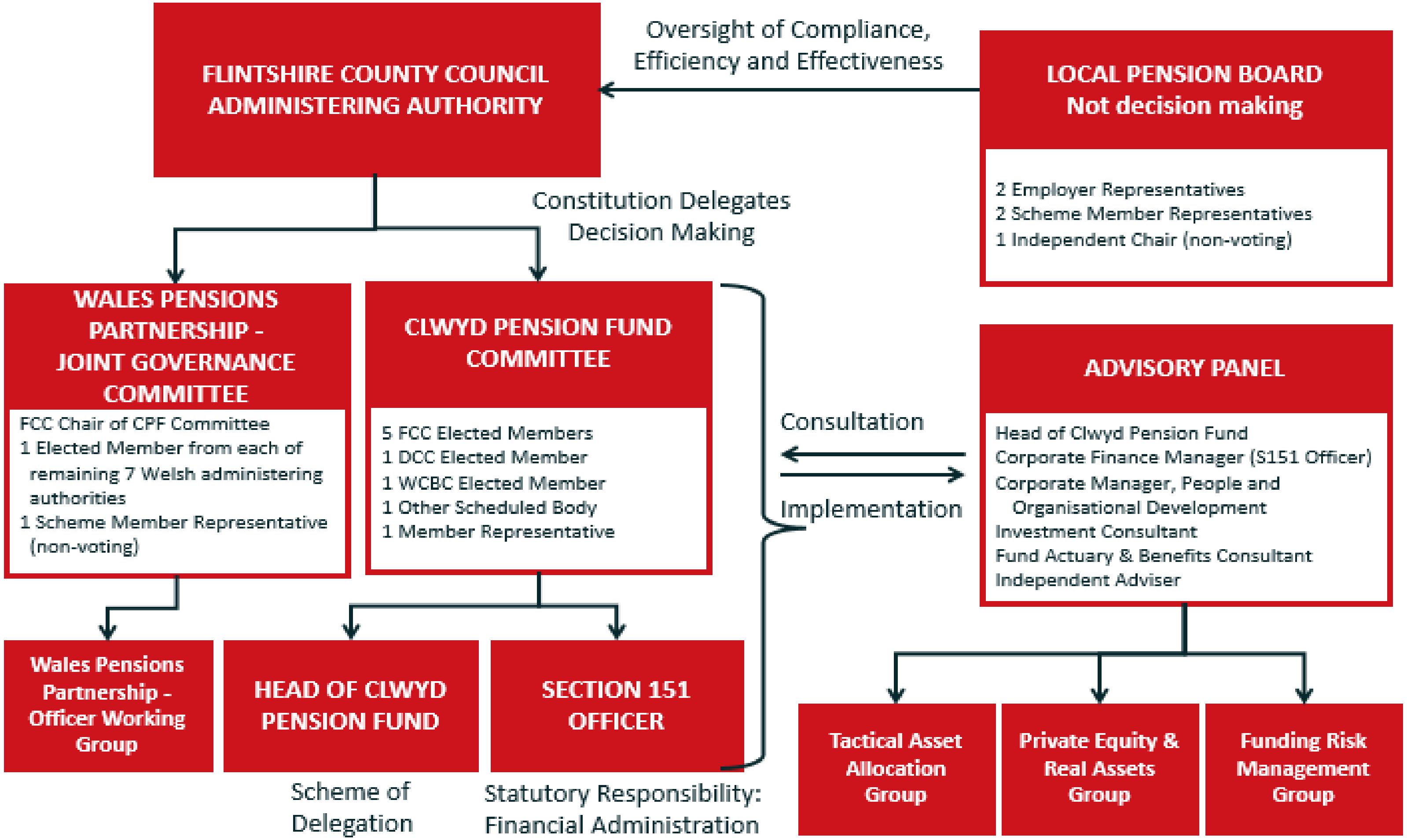
- to be known as forward thinking, responsive, proactive and professional, providing an excellent customer focused, reputable and credible service to all customers
- to have instilled a corporate culture of risk awareness, financial governance, and to provide the highest quality distinctive services within the resource budget
- to work effectively with partners, being solution focused with a ‘can do’ approach

Our key strategies and policies are listed below. Most can be found on our website at **https://www.clwydpensionfund.org.uk/en/Governance/Strategies-and-Policies/home.aspx**

Governance	Finance, Investment and Funding	Administration and Communications
Governance Policy and Compliance Statement	Investment Strategy Statement (ISS)	Administration Strategy
Knowledge and Skills Policy	Responsible Investment Policy (within the ISS)	Communications Strategy
Conflicts of Interest Policy	Funding Strategy Statement	Personal Data Retention Policy
Risk Management Policy	Whilst not technically strategy documents, the Fund Report and Accounts and the Actuarial Valuation Report are also key documents	Statement of Administering Authority Discretionary Policies
Business Continuity Policy		Voluntary Scheme Pays Policy
Recording Breaches of the Law Procedure		Policy on the Overpayment and Underpayment of Pension Scheme Benefits
Anti-Fraud and Corruption Strategy		Policy for Administration and Communication of Tax Allowances to Scheme Members
Cyber Strategy		
Equality, Diversity and Inclusion Policy		

Further details of our objectives across governance; administration and communications; and finance, investments and funding can be found in the Appendices.

Governance and Management of the Fund



As illustrated in the chart above, the key decision-making and management of the Fund is delegated by Flintshire County Council ("the Council") to the Pension Fund Committee ("PFC"), supported by a Pensions Advisory Panel ("AP"). The Corporate Finance Manager is the Section 151 Officer who has statutory responsibility for the proper financial affairs of the Council including Fund matters. The LGPS Senior officer is the Head of the Clwyd Pension Fund. A Local Pension Board is in place to assist in securing compliance of Fund matters and ensuring the efficient and effective governance and administration of the Fund.

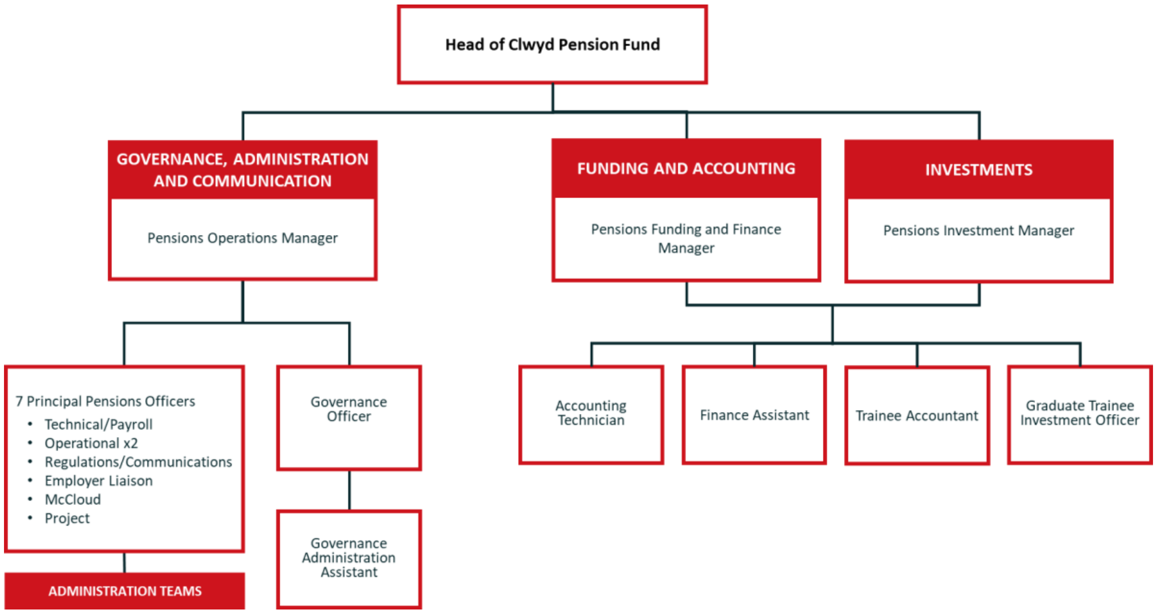
The Joint Governance Committee ("JGC") for the Wales Pension Partnership (WPP: the Wales asset pool) is a joint committee of the eight participating administering authorities and a non-voting scheme member representative. The JGC is advised by an Officer Working Group ("OWG"), which also includes representatives from each of the administering authorities. The WPP has its own suppliers and advisers, and its own business plan, which includes details of the projects required to meet the government's new requirements around the pooling of LGPS assets.

An inter-authority agreement between the eight participating administering authorities delegates certain investment decisions to the JGC. Although we will continue to determine our own investment strategy for the Clwyd Pension Fund, future investment decisions will be made by WPP IMCo.

As the transition to new national requirements develops over the coming years, our internal governance structure as well as the WPP structure will be updated, as noted in the Governance appendix of this Business Plan.

The Pension Fund Management Team

Managing the Fund on a day-to-day basis involves a wide range of processes and procedures, which have been designed around achieving our Fund's objectives and legal requirements. Day-to-day operations are managed by the Head of Clwyd Pension Fund supported by the Clwyd Pension Fund Management Team as set out in the chart below:



- **The Governance, Administration, and Communication Section,** led by the Pensions Operations Manager, is responsible for delivering our Governance, Administration and Communications Strategies. The section is supported by 56 Full Time Equivalent ("FTE") administration and governance roles.
- **The Funding and Accounting Section,** led by the Pensions Funding and Finance Manager is responsible for delivering the Fund's Funding strategies and Funding and Accounting matters.
- **The Investments Section,** led by the Pensions Investment Manager is responsible for delivering the Fund's Investment Strategies, and is responsible for investments. This section, along with the Funding and Accounting section, are supported by 6 FTE finance roles.

The plan for the next three years

Key Risks, Challenges and Influences

Overall, the next few years will be challenging for those involved in the governance, management, and operation of the Fund. A significant number of legislative changes and external influences continue to impact us, not least the Government's LGPS Fit For the Future reforms, which will significantly impact on how we manage the Fund's assets including WPP's operating model, as well as out Governance arrangements. In addition, there are administration changes arising from recent consultations on protections, access and fairness. Thus the management of the Fund continues to become more complex. These, and other priorities for the next three years, are articulated in more detail in the appendices to this business plan.

Risk management is embedded into the governance of the Fund. We have a Risk Management Policy which explains how we manage risk, and we maintain a detailed risk register. Changes to the level of risk are reported at each Pension Fund Committee. Given that many risks are outside of our control, our risk management focusses on measuring the **current** risk against the Fund's agreed **target** risk (which is unlikely to be zero), and identifying the further controls and actions that can be put in place to help manage the risk. This risk management process is integral to identifying actions included in this business plan.

In each of the appendices to this business plan, covering governance; finance, investments and funding; and administration and communications, we have included:

- risks currently identified as red (i.e. with significant consequences that are considered a possible occurrence) where we are not currently on target, or
- where there are no red risks, the risks where we are currently furthest from meeting the target risk exposure

These risks are documented in our risk register which will continue to be updated as circumstances change.

The **current main risks** to the Fund achieving its objectives, and our **key areas of focus** over the next three years to manage these risks are summarised in the following table:

Key Risk	Internal Controls in place
WPP delegated decision-making could ultimately lead to a result which is disadvantageous for the Fund	• Work alongside WPP to ensure a smooth transition to the new structure and in transferring all assets to the pool • Independent oversight and legal advisers provide advice to WPP on governance and related matters
Failure to implement decisions due to resourcing issues, such as retaining Fund Officers with appropriate knowledge, skills, qualification, and experience	• Keeping our governance and senior management structure under review • Succession planning for key positions • Engagement with FCC senior officers
A sustained downturn in global financial markets, reducing the funding position resulting in the potential of increase in cost of the scheme for employers	• Updating and implementing the frameworks for monitoring the funding position and contribution sustainability • Making changes to the investment strategy whilst keeping employers informed on the cost of the scheme, during and after the 2027 funding review and 2028 Actuarial Valuation
The Fund's long term Investment Strategy fails to deliver on our ambition and objectives as a Responsible Investor	• Continuing to work with WPP to ensure the Fund is able to implement the Fund's RI Policy and ambitions, and monitoring progress against our targets in relation to climate risk
Various legislative changes impacting quality of service provided to members and employers	• Implementing the proposed Good Governance changes • Integration with the National Pensions Dashboards • Implementing changes to scheme access, protections and fairness, including survivor benefits and increasing Normal Minimum Pension Age.

Delivering the Business Plan

Monitoring and Reporting

In order to identify whether we are meeting our agreed business plan we will:

- monitor progress of the key priorities and the agreed budgets on an ongoing basis within the Pension Fund Management Team and advisors.
- provide updates on progress against these key priorities on a quarterly basis to the Pension Fund Committee, which will be shared with the Pension Board
- highlight, as part of these quarterly updates:
    - any areas where we are exceeding or failing to achieve our targets and the reasons why, and identify any changes to the planned priorities
    - any significant additional spend or underspend in relation to the agreed budget

Training Plan

Our Knowledge and Skills Policy aims to ensure that the Fund is managed by individuals who have the appropriate levels of knowledge and skills. The following training plan for our Pension Fund Committee and Pension Board members has been developed for 2026/2027 to assist in meeting that aim. Training is complemented by attendance at various external events and conferences, including WPP training. This training plan has been developed following discussions with the Committee.

Title of session	Training Content	Estimated Timescale
Governance Changes and Legislation	An update on regulatory requirements and governance changes arising from ongoing national developments, and how the Fund is meeting the requirements.	June
Funding and Contribution Sustainability Monitoring Frameworks	Ongoing training on changes to the monitoring framework including Investment, Funding and Risk.	September
Responsible and Local Investments	Ongoing training and engagement on responsible investment objectives.	November
Review of WPP IMCo Governance Documents	Ongoing training on key WPP IMCo governance documents and briefing on the planned review of those documents.	February
Dashboard demonstration	A demonstration of the Pension Dashboard once available.	March (or TBC)

2026/2027 Cashflow and Budget

Operating Cost Budget 2026/2027

The following table shows the expected operating costs and investment management expenses to deliver the 2026/2027 section of this business plan. All the costs associated with the management of the Fund are charged to the Fund and not to Flintshire County Council. The investment management expenses, which are the majority of these costs, will rise or fall because the fees are based on the value of the Fund's assets which can rise and fall.

	Actual 2024/2025 £000s	Budget 2025/2026 £000s	Estimate 2025/2026 £000s	Budget 2026/2027 £000s
Oversight and Governance Expenses				
Employee Costs (Direct)	359	460	419	470
Support & Services Costs (Administering Authority)	15	34	29	26
Other Supplies & Services	130	80	96	90
Training	66	82	95	61
Audit Fees	51	50	50	52
Actuarial, Funding & Risk Management Fees				1,176
Actuarial Fees	800	985	1,113	0
Investment & Risk Management Consultant Fees	1,227	1,325	1,188	343
Governance Advisor Fees [a]	827	679	819	684
Legal Fees	36	30	35	35
Pension Board [a]	117	123	132	150
Pension Board Training	26	25	35	22
Pooling Transition & Governance Costs	260	941	876	297
Total Governance Expenses	**3,914**	**4,814**	**4,887**	**3,406**
Investment Management Expenses				
Fund Manager Fees	**23,993**	**27,299**	**27,299**	**23,126**
Custody Fees	155	121	121	183
Performance Monitoring Fees	48	47	47	47
Wales Pension Partnership Investment Costs	2,802	1,339	1,339	4,691
WPP IM Company Fees				1,125
Total Investment Management Expenses	**26,998**	**28,806**	**28,806**	**29,172**
Administration Expenses				
Employee Costs (Direct) [a]	1,733	1,914	1,917	2,017
Support & Services Costs (Administering Authority)	99	228	203	213
IT [a]	615	713	708	714
Other Supplies & Services) [a]	104	140	157	145
Total Administration Expenses	**2,551**	**2,995**	**2,985**	**3,089**

Cronfa Bensiynau CLWYD Pension Fund

	Actual 2024/2025 £000s	Budget 2025/2026 £000s	Estimate 2025/2026 £000s	Budget 2026/2027 £000s
Employer Liaison Team				
Employee Costs (Direct) [a]	**241**	**272**	**257**	**257**
Total Employer Liaison Team	**241**	**272**	**257**	**257**
Total Costs	**33,704**	**36,887**	**36,935**	**35,924**

Notes

1) Items marked "a" include estimates for additional costs relating to McCloud. Please see below for detail.

McCloud Budget 2026/27	£000s
Employee Costs (Direct)	123
Governance Advisor Fees	75
Pension Board	8
IT (Support & Services)	20
Other Supplies & Services)	10
Total	**236**

2) The costs incurred by the Employer Liaison Team will be recovered from the participating employers making use of the service through the employer contribution rate.
3) The actuarial, consultancy and adviser costs include increases in line with the contracts and include specific project work.
4) The above estimates assume pay inflation of 3% where appropriate.

Cash flow projection for 2026/2027 to 2028/2029

We monitor the amount of money coming in and going out of the Fund (the cash flow) monthly to ensure there is sufficient money in the bank account to pay all pension fund expenditure including our private market investment commitments. The payments from the Fund exceed the pension contributions from scheme members and employers, meaning that the shortfall needs to be found from investments and strategic cash. The table below illustrates the projected cash flow over the three-year period.

	Estimated 2025/2026 £000s	Cashflow 2026/2027 £000s	Cashflow 2027/2028 £000s	Cashflow 2028/2029 £000s
Opening Cash	**(48,899)**	**(30,000)**	**(30,000)**	**(30,000)**
Payments				
Pensions	89,808	93,221	96,017	98,898
Lump Sums & Death Grants	24,553	26,000	26,500	27,000
Transfers Out	10,171	10,500	11,000	11,500
Expenses	7,812	6,517	6,713	6,914
Support Services	255	239	245	250
Tax Paid	50	50	50	50
Total Payments	**132,649**	**136,527**	**140,525**	**144,612**
Income				
Employer Contributions	(73,709)	(64,397)	(66,837)	(69,383)
Employee Contributions	(23,141)	(23,836)	(24,551)	(25,287)
Employer Deficit/Surplus	8,408	16,300	16,900	17,500
Transfers In	(11,859)	(12,000)	(12,500)	(13,000)
Pension Strain	(1,253)	(1,500)	(1,500)	(1,500)
Income	(1,154)	(500)	(500)	(500)
Total Income	**(102,708)**	**(85,933)**	**(88,988)**	**(92,170)**
Cashflow Net of Investment Income	**29,941**	**50,594**	**51,537**	**52,442**
Investment Income	(41,808)	(46,000)	(46,000)	(46,000)
Investment Expenses	10,171	11,000	11,000	11,000
Total Net of In House Investments	**(1,696)**	**15,594**	**16,537**	**17,442**
In House Investments				
Draw downs	113,205	93,820	110,495	78,245
Distributions	(84,684)	(80,751)	(101,618)	(108,151)
Net Expenditure /(Income)	**28,521**	**13,069**	**8,877**	**(29,906)**
Total Net Cash Flow	26,825	28,663	25,414	(12,464)
Rebalancing Portfolio	**(7,926)**	**(28,663)**	**(25,414)**	**12,464**
Total Cash Flow	**18,899**	**(0)**	**0**	**(0)**
Closing Cash	**(30,000)**	**(30,000)**	**(30,000)**	**(30,000)**

Contact information

If you require further information about the Fund or this business plan, please contact:

Email: **pensions@flintshire.gov.uk** or **pensionsinvestments@flintshire.gov.uk**

Governance Appendix

This section sets out the Fund's governance aims and objectives, an overview of our business as usual governance activities and key risks, and governance-related business plan tasks for 2026/2027 to 2028/2029.

Aims and Objectives

The following are the aims and objectives from our Governance Policy. There are more specific objectives within the other governance related policies.

- Act in the best interests of the Fund's members and employers
- Have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies
- Ensure the Pension Fund is managed, and its services delivered, by people who have the appropriate knowledge and expertise
- Act with integrity and be accountable to our stakeholders for our decisions, ensuring they are robust and well based
- Understand and monitor risk
- Strive to ensure compliance with the appropriate legislation and statutory guidance, and to act in the spirit of other relevant guidelines and best practice guidance
- Clearly articulate our objectives and how we intend to achieve those objectives through business planning, and continually measure and monitor success
- Ensure the confidentiality, integrity and accessibility of the Fund's data, systems and services is protected and preserved

Business as usual

- Ensuring decisions relating to the management of the Fund are made in accordance with agreed delegated responsibilities
- Setting the agenda, reporting and presenting to the Pension Fund Committee, Local Pension Board and Advisory Panel, and ensuring those bodies carry out their delegated responsibilities
- Implementing and monitoring the achievement of our key governance areas by ensuring that:
  - those managing the Fund have the requisite knowledge and skills by arranging and suggesting training sessions and regularly assessing their training needs
  - those managing the Fund make decisions which are free from conflicts of interest, and noting any declared conflicts within a conflicts of interest register
  - there is a robust framework for the identification and management of risks, including maintaining a risk register and reporting the risks to decision makers quarterly or when the risks are above a certain threshold

    - breaches of law are recorded and reported to the Pensions Regulator where these are deemed to be of material significance to the Pensions Regulator
    - instances of fraud or corruption are prevented as far as possible and where they do occur, they are identified, investigated and reported to the relevant authorities
    - we comply with the requirements of The Pension Regulator's General Code of Practice
    - business continuity arrangements are in place and regularly tested
    - the risk of cybercrime is appropriately managed and ensuring our data, assets and systems are safeguarded
    - the Fund encourages and enables an equitable, diverse and inclusive culture in all its aspects.
- Ensuring the Fund's business plan, including the budget and cashflow, is regularly updated, agreed and delivered
- Ensuring we adhere to Council and legal requirements for procurement, health and safety and data protection
- Procurement of and payment for, advisers and other services
- Assisting internal and external audit in their role
- Replying to Freedom of Information requests
- Participation at the Joint Governance Committee (JGC), Shareholder Forum and Officer Working Group of WPP

Governance Risks

Key:

Colour	Score	Approach	Action
Green	1 to 2	Acceptable	Risks within the Fund's risk appetite.
Yellow	3 to 4	Adequate	Risks within the Fund's risk appetite which need to be monitored by Senior Management, if risk deteriorates
Amber	5 to 10	Tolerable	Risks within the Fund's risk appetite but not at a level which is acceptable.
Red	12 to 25	Unacceptable	Risks outside of the Fund's risk appetite

Risk Event (this [event] could happen)	Risk Impact (...which may result in the following [impact] to our objectives)	Current Risk Status/Score	Target Risk Status/Score	Further Action and Owner
WPP delegated decision making ultimately leads to a result which is disadvantageous for the Fund	• The Fund's legal or fiduciary responsibilities are not met • The Fund is not (seen as) professional providing excellent customer focused, reputable and credible service • Additional costs are incurred beyond the agreed WPP and/or Fund budget • WPP services/deliverables: Service delivery to stakeholders is are adversely affected, Fund risk levels are inappropriate, strategic aims are not met/cannot be achieved, including investment objectives • Fund stakeholders (members and/or employers) lose faith in the Fund's governance/risk management	12	4	1. Finalise CPF structure and review AP sub-groups (for Deputy retirement/investment risk) (PL) 2. Project Snowdon: CPF considering oversight requirements for WPP IM co, required reporting and governance structures.(PL)
Decisions not implemented: resourcing issues	• Poor quality organisation/papers etc for PFC, PB and AP meetings • Risk management not being adequately carried out • Increased pressure/expectations on staff • Additional costs (overtime / external support) • The Fund's legal or fiduciary responsibilities are not met	12	4	1. Finalise CPF structure review (including consideration of impact of pay grades) (PL) 2. Finalise work on succession planning (PL) 3. Carry out knowledge/skills gap analysis and ensure relevant training for new Management Team. (PL) 4. Consider business continuity implications of changes in personnel (PL) 5. Ongoing engagement by PL, IA and PB Chair with FCC (PL) 6. Implement Senior LGPS Officer role within the constitution (including consideration of pay grades and reporting lines) (PL)

Business Plan key tasks

Ref	Key Action: Task	2026/2027 Period				Later Years	
		Q1	Q2	Q3	Q4	2027/ 2028	2028/ 2029
G1	Implementing legislative changes	x	x			x	
G2	Governance Arrangements of WPP and WPP IM Co	x		x	x		
G3	Staffing Structure, Succession Planning and Operational Arrangements	x	x	x	x	x	x
G4	Review of governance related policies	x	x		x	x	x
G5	Review/tender key supplier contracts and Procurement Act changes		x	x		x	
G6	Appointments of Local Pension Board and Pension Fund Committee Members	x	x			x	x

G1: Implementing legislative changes

What is it?

The SAB published its final report on the Good Governance project in February 2021 and made a formal request to the Ministry of Housing, Communities and Local Government (MHCLG) and other bodies to implement the recommendations from the project. Many of these recommendations have been introduced in the draft LGPS (Amendment) 2026 regulations and accompanying statutory guidance which were published for consultation on 20 November 2025 and 8 December 2025 respectively. The consultation on these documents closed in January 2026.

Though the Fund has already begun implementing a large portion of the proposals made in the government's consultation, the draft regulations and statutory guidance does call for some further proposals that need to be considered over the course of this Business Plan. This includes areas such as:

- the introduction of a legal requirement on Pension Fund Committee members to attain and maintain an appropriate level of knowledge for the purposes of enabling Committee members to properly exercise their functions and
- requirements relating to Governance Strategy, Conflicts of Interest Policy and a Training Strategy.

Timescales and Stages

Produce the role description for the Senior LGPS Officer including receiving comments and advice from Flintshire County Council HR colleagues	2026/2027 Q1
Appointment of the Senior LGPS Officer and Deputy Senior LGPS Officer by 30 September 2026	2026/2027 Q2
Produce the specification for the Independent Person ensuring this covers the Fund’s needs and Statutory guidance	2026/2027 Q1
Appointment of an Independent Person to the Pension Fund Committee by 30 September 2026	2026/2027 Q2
Update the Flintshire County Council Constitution to ensure the role of Senior LGPS Officer and Independent Person are correctly captured and appropriate delegations put into place	2026/2027 Q1
Commission and complete the first Triennial Independent Governance Review	2027/2028

Resource and Budget Implications

To be led jointly by the Head of Clwyd Pension Fund and Pensions Operations Manager, with input from the Governance Officer and Independent Adviser. All expected costs are included within the existing budgets.

G2: Governance Arrangements of WPP and WPP IM Co

What is it?

Following the Government’s Pensions Review and LGPS Fit for the Future Consultation. The government have made changes to the way that assets of LGPS funds are invested and investment advice is provided. There new requirements are set out in the LGPS (Pooling, Management and Investment of Fund) Regulations 2026 and accompanying statutory guidance, which now place specific duties on administering authorities in relation to asset pooling, investment strategy and governance.

Under the Regulations, Flintshire County Council, as administering authority for the Clwyd Pension Fund, must participate in a single FCA-authorised asset pool company. For the Fund, this is WPP IM Co, which is now its statutory asset pool company and a key outsourced service provider. WPP IM Co is responsible for delivering regulated investment services on behalf of WPP and its partner funds.

The guidance sets an expectation that administering authorities use their asset pool company where appropriate to help meet any local investment objectives set out in their investment strategy.

As part of the setup of WPP IM Co, the Fund received confirmation from the Joint Governance Committee (JGC) that there would be a review of representation & governance arrangements as part of the 12 month review of the governance documents. It will be important for the Committee to consider their views on the effectiveness of the current governance arrangements and how scheme member and employer views are communicated to the asset pool company. These views should be set out to the JGC in advance of the review being undertaken so that these can be considered and voted on by the JGC.

Timescales and Stages

Update the Fund's risk register to reflect the risks of the new governance arrangements on of WPP IM Co	2026/2027 Q1
Establish an ongoing review process for how the changes, such as provision of principal investment advice by WPP IM Co, are operating	2026/2027 Q1
CPF discussion(s) on WPP governance arrangements	2026/2027 Q2
Establish Cyber Security controls of WPP IM Co	2026/2027 Q3
Liaise with WPP (in advance of the 12 month review of WPP governance documents)	2026/2027 Q3 to Q4
Review the WPP IM Co governance documents	2026/2027 Q4

Resource and Budget Implications

To be led jointly by the Head of Clwyd Pension Fund and Pensions Investments Manager, with input from the Independent Adviser and assistance from the Governance Officer as required. All expected costs are included within the existing budgets.

G3: Staffing Structure, Succession Planning and Operational Arrangements

What is it?

There are a number of ongoing matters that impact (or may impact) staffing structures or other resourcing and operational requirements. In particular:

- A number of our senior staff members (including in the Fund management team) are approaching retirement age or have plans to retire over the period of this business plan.
- Other ongoing retention risk.

- The formation of the Wales Pension Partnership Investment Management Company Limited (WPP IM Co) has impacted on how the Fund's decisions are made and responsibilities carried out.
- The Good Governance changes are also impacting on how the Fund's decision are made and responsibilities carried out.
- Preparation for the launch of the National Pensions Dashboard, which could result in a need for further resource within the Pensions Administration Team.

To address these issues the Fund management team structure has been revised. However, succession plans for the team as a whole are required, to ensure roles can be filled by individuals who have the appropriate level of expertise and skills. The ability to do this relies heavily on retention of staff over time at all levels of the team, and therefore it is anticipated that some benchmarking of the team's pay levels will be performed to highlight any particular roles at risk.

In addition, these changes will require a review of some of the operational arrangements such as the ongoing role of the Advisory Panel, and the Funds' Delegation of Functions to Officers by Pension Fund Committee.

Timescales and Stages

Consider pay benchmarking and job evaluation for roles as required	2026/2027 Q1 to Q2
Review knowledge and skills requirements and capabilities for all teams	2026/2027 Q1 to Q2
Reviewing operational arrangements including role of Advisory Panel and the Delegation of Functions to Officers by Pension Fund Committee	2026/2027 Q1 to Q3
Set out succession plans for all teams focusing on those teams where an individual is expected to leave during the term of this business plan	2026/2027 Q3 to Q4
Consider impact of national and local changes on the resource requirements of the Fund	2026/2027 Q3 to Q4
Complete staff satisfaction survey	2027/2028
Monitor skills and procedures handovers in line with the succession plans	2027/2028 & 2028/2029

Resource and Budget Implications

To be led jointly by the Head of Clwyd Pension Fund and Pensions Operations Manager, with input from the Independent Adviser and Chair of the Pension Board. All expected costs are included within the existing budgets.

G4: Review of governance related policies

What is it?

We have several policies focussing on the governance of the Fund, all of which are subject to a fundamental review, usually at least every three years. The policies due for review in 2026/2027 are the Cyber Strategy, Governance Policy, Knowledge and Skills Policy, Conflicts of Interest Policy, Equality, Diversity and Inclusion Policy and Risk Management Policy.

When reviewing these policies, we will need ensure that they are aligned to the LGPS (Amendment) 2026 Regulations, TPR's General Code and appropriate statutory guidance.

The review of the Governance Policy, Conflicts of Interest Policy and Knowledge and Skills Policy are all driven by the changing requirements set out in the LGPS (Amendment) 2026 Regulations and the corresponding statutory guidance.

Timescales and Stages

Policy	Last reviewed	Next review due	Timescales for review work
Cyber Strategy	February 2025	June 2026 June 2027 June 2028	2026/2027 Q2 2027/2028 2028/2029
Governance Strategy	N/A	June 2026	2026/2027 Q2
Conflicts of Interest Policy	September 2024	September 2027	2026/2027 Q2
Knowledge and Skills Policy	February 2025	February 2027	2026/2027 Q2
Equality Diversity and Inclusion Policy	February 2024	February 2027	2026/2027 Q4
Risk Management Policy	March 2024	March 2027	2026/2027 Q4
Business Continuity Policy	May 2024	May 2027	2027/2028

Procedure for Recording and Reporting Breaches of the Law	February 2025	February 2028	2027/2028
Anti-Fraud and Corruption Strategy	March 2026	March 2029	2028/2029

Resource and Budget Implications

It is expected this will mainly be led by the Pensions Operations Manager taking advice from the Governance Officer and Independent Adviser. Estimated costs are included in the budget.

G5: Review/tender key supplier contracts and Procurement Act changes

What is it?

Outside of the new supplier contract with WPP IM Co, we have a number of key supplier contracts that require ongoing review and procurement as follows:

- The Fund Actuary and benefits consultant contract reached its initial break point on 31 March 2025 but was extended by the Committee for 2 years until 31 March 2027.
- The suitability testing for the Fund’s Administration Software is next due in February 2028. There is a separate contract with the same provider in relation to the Pension Dashboard Integrated Service Provider which is due for review in 31 December 2029. It can be extended for a further period of 3 years.
- The Fund's investment consultancy contract is due for initial review on 31 March 2030. It can be extended for a further period of 2 years.
- The Fund's Independent Adviser and Pension Board Independent Member contract is due for initial review on 31 March 2030, which is outside the period of this business plan. It can be extended for further periods of 3 years and 2 years.

Timescales and Stages

Conduct tender for Actuarial, Benefits and Funding Risk Consultancy	2026/2027 Q2 to Q3
Conduct suitability testing for the Fund’s Administration Software	2027/2028

Resource and Budget Implications

The tender for the Actuarial, Benefits and Funding Risk consultancy will be led by the Pensions Funding and Finance Manager within the existing budget. The suitability testing for the Fund's Administration Software will be led by the Pensions Operations Manager.

G6: Appointment of Local Pension Board and Pension Fund Committee members

What is it?

The Pension Board is made up of 5 members: 2 Employer representatives, 2 Member representatives and 1 Independent member. Members are appointed by the Board Secretary after completion of a selection process.

The employer and scheme member representatives on the **Pension Board** are appointed for a period of three years. This period may be extended to up to five years. The current appointments are subject to review as follows:

- Scheme employer representative: December 2026 (three-year point)
- Scheme employer representative: July 2028 (three-year point)
- Scheme member representative (trade union): October 2027 (three-year point)
- Scheme member representative (non-trade union): March 2028 (three-year point)

The Committee is made up of nine members, five of these members are Flintshire County Council Councillors with the remainder being co-opted members. The co-opted members comprise one Councillor from Wrexham County Borough Council, one Councillor from Denbighshire County Council and two representative members, one for the other Scheme employers and one for Scheme members in the Fund.

The five Flintshire County Council Councillors are appointed annually, and the Councillors from Wrexham County Borough Council and Denbighshire County Council are appointed until the next ordinary local government election. Both groups can be reappointed for further terms.

The representative members (for other scheme employers and scheme members) on the **Pension Fund Committee** are appointed for a period of not more than six years, but may be reappointed for further terms. The existing representative members were appointed in July 2020 so their appointments will need to be reviewed by July 2026.

Timescales and Stages

Review Pension Fund Committee representative members (both other scheme employers and scheme members)	2026/2027 Q1
Review Pension Board scheme employer representative	2026/2027 Q2 to Q3
Review Pension Board scheme member representatives (trade union)	2027/2028
Review Pension Board scheme member representatives (non-trade union)	2027/2028
Review Pension Board scheme employer representative	2028/2029

Resource and Budget Implications

It is expected this will mainly involve the Head of Clwyd Pension Fund, Pensions Operations Manager and Governance Officer taking advice from the Independent Chair of the Pension Board. All costs will be met from the existing budget.

Finance, Funding, Risk and Investment Appendix

This section sets out the Fund's funding and investment aims and objectives, an overview of our business as usual finance, funding and investment activities and key risks, and finance, funding and investment-related business plan tasks for 2026/2027 to 2028/2029.

Aims and Objectives

- Maintain assets equal to at least 100% of liabilities, whilst remaining within reasonable risk parameters
- Determine employer contribution requirements, whilst recognising the constraints on affordability and strength of employer covenants, with the aim of being able to maintain as predictable an employer contribution requirement as possible
- Recognising the constraints on affordability for employers, aim for sufficient excess investment returns relative to the growth of liabilities
- Strike the appropriate balance between long-term consistent investment performance and the funding objectives via an integrated approach between the investment and funding strategies
- Manage employers' liabilities effectively through the adoption of employer specific funding objectives
- Ensure net cash outgoings can be met as/when required
- Ensure the Fund has adequate liquidity for all cashflow needs (in particular payment of pensions, meeting private market commitments, risk management liquidity)
- Minimise unrecoverable debt on employer termination

- Ensure that its future strategy, investment management actions, governance and reporting procedures take full account of longer-term risks and sustainability
- Ensure that the Fund’s investment strategy is aligned with the transition to a low carbon economy through a commitment to achieving a net zero greenhouse gas emission’s target by 2045, whilst being able to achieve our required investment returns for an acceptable level of risk
- Promote acceptance of sustainability principles and work together with others to enhance the Fund’s effectiveness in implementing these
- Use the Wales Pensions Partnership Investment Management Company (WPP IM Co.) for the implementation of the Fund’s investment strategy.

Business as usual

Finance

- Preparing and publishing the Fund’s Annual Report
- Completing the Annual Accounts and assisting external auditors
- Preparing and quarterly monitoring of the Annual Budget
- Preparation of statutory and non-statutory returns as required
- Monthly bank reconciliations
- Quarterly cash flow and treasury management
- Monthly monitoring of income and expenditure including employer and scheme member contributions
- Quarterly invoicing of employers for pensions strain and added years
- Cashflow planning linked to the Fund’s new objectives in line with regulations

Funding and Risk management

- Agreeing the funding strategy with the Actuary every three years, consulting with employers, and annual monitoring of its appropriateness
- Assisting the Actuary with the triennial Actuarial Valuation by providing membership data and presenting results and explanations to employers of future employer contributions and deficit payments
- Arranging through the Actuary, data required by the Government Actuary's Department (GAD)
- Monitoring the employers’ funding positions and covenants including their ability to pay contributions and managing any employers who wish to join or leave the Fund
- Monthly monitoring and reporting on the Fund’s funding and contribution sustainability position and implementation of the cash and risk management strategy (Flight-path) with annual ‘health checks’ on the potential impact on the funding and risk metrics
- Contribution and risk analysis as part of the actuarial and investment strategy review every three years, or more frequently if required
- Review Additional Voluntary Contributions (“AVCs”) provision on a regular basis to ensure it continues to remain appropriate

- Ongoing consideration of Climate Change and other tail risks impact on funding and risk objectives including scenario analysis on a consistent basis with the previous valuation and Climate Governance reporting.

Pooling and Investments

- Carrying out a fundamental review of the investment strategy every three years, or more frequently if considered appropriate (e.g. due to material changes in markets or new investment opportunities)
- Quarterly monitoring and reporting on investment performance
- Ongoing cashflow monitoring of the Fund, taking into account payroll and private market drawdown commitments
- Ongoing liquidity analysis to ensure potential future capital calls can be met
- Working with other LGPS funds in Wales and nationally through our role within the Joint Governance Committee, Officer Working Group and Shareholder Forum.
- Developing, and monitoring the Fund's approach to Responsible Investment
- Work with the WPP & North Wales Corporate Joint Committee (where appropriate) to identify sustainable/ local investments that aim to make a positive social and/or environmental impact, with a commitment to measuring this impact
- Transitioning the Fund’s investment strategy in line with its net-zero targets
- Monitoring of the Fund’s investments in private markets including commitment planning
- Ensuring costs are fully disclosed in line with the LGPS Investment Code of Transparency
- Working with WPP to ensure that it can support the Fund in delivering the Fund’s Responsible Investment and Climate Change beliefs and requirements
- Annual stewardship reporting, reporting to the year ending 31st March, with a submission to the FRC
- Annual climate and nature analysis (including private market manager analysis for climate)
- Annual Climate Governance reporting, reporting to the year ending 31st March
- Annual review of underlying holdings to identify any exposure in breach of agreed exclusion policies

Risks

Key:

Colour	Score	Approach	Action
Green	1 to 2	Acceptable	Risks within the Fund's risk appetite.
Yellow	3 to 4	Adequate	Risks within the Fund's risk appetite which need to be monitored by Senior Management, if risk deteriorates
Amber	5 to 10	Tolerable	Risks within the Fund's risk appetite but not at a level which is acceptable.
Red	12 to 25	Unacceptable	Risks outside of the Fund's risk appetite

Risk Event (this [event] could happen)	Risk Impact (…which may result in the following [impact] to our objectives)	Current Risk Status	Target Risk Status	Further Action
Investment and/or funding objectives and/or strategies are no longer fit for purpose	Increasing deficit / reducing surplus increasing contribution requirements in particular	12 (Red)	8 Yellow	1 Project Snowdon: Officers & advisers to participate in WPP transformation project relating to pensions review (PL)

Business Plan Key tasks: Funding and Risk Management

Ref	Key Action: Task	2026/2027 Period				Later Years	
		Q1	Q2	Q3	Q4	2027/ 2028	2028/ 2029
F1	Implementation of updated Funding and Risk Monitoring Frameworks	x	x	x	x	x	x
F2	Interim Funding Review					x	
F3	Implementation of New Financial System	x	x	x	x	x	x
F4	Funding Strategy Statement Review and Triennial Actuarial Valuation						x

F1: Implementation of Funding and Contribution Sustainability Monitoring Frameworks

What is it?

Central Government, MHCLG and Treasury have consulted on significant changes to the way in which the Fund will operate and manage its investments and receive investment advice via the pool company. It is anticipated that there will be a number of required changes which has a material impact on the funding and risk monitoring framework. This will also have impact on the how the Fund Actuary and Strategic risk adviser work with the pool as provider of investment strategy advice.

This will include (but not limited to):

- Ongoing monitoring of funding, risk and investment metrics versus objectives
- Ongoing monitoring by with the Actuary and Strategic Risk Advisor, testing contribution sustainability at a total Fund and employer level as agreed with employers at the 2025 valuation
- Consideration and integration of framework into reporting by the pool company
- Review of any strategy advice from the pool and the impact on the Funding Strategy Statement (FSS)
- Review and monitoring of Responsible Investment Policy impact on the potential funding and risk outcomes (including scenario testing and input into Climate Governance reporting)
- Setting up and implementation of new working relationships and information flow in order to provide integrated advice to the Fund officers and Pension Fund Committee.

- Training of Pensions Committee/Board monitoring funding and risk objectives framework
- Review and implementation of framework once new regulations and guidance are known
- Review of Funding, Risk and Investment risk register section structure in light of changes and agreed objectives.

Timescales and Stages

Exact timescales and work required is unknown at this stage, but we anticipate ongoing and continual work throughout year and beyond.

The timescales where known is shown below:

Set up of proposed monitoring framework metrics for Fund and employers	Q1 to Q2 2026/2027
Training and Agreement of Committee/Board on proposed framework	Q3 to Q4 2026/2027
Share output of monitoring with Steering Group and other selected employers	Q3 to Q4 2026/2027
Review of Funding. Risk and Investment risk register section structure	Q1 to Q2 2026/2027
Ongoing Annual review of operation of the monitoring framework	2027/2028 and 2028/2029
Review of Investment, Funding and Risk objectives	2028/2029
Set up and implementation of information flow and working relationships with WPP IM Co	Ongoing over the 3 year period

The timing of other items e.g. impact of any strategy advice received from WPP IM co will depend on timing of the any review.

Resource and Budget Implications

The work will be led by Head of Clwyd Pension Fund and Finance and Funding Manager, working with the Fund Actuary/Strategic Risk Adviser. The estimated costs in relation to this exercise are included in the 2026/2027 budget allocated accordingly and will be included in future budgets accordingly.

F2: Interim Funding Review

What is it?

In advance of the 2028 actuarial valuation, the Actuary will assess the funding position using membership data as at 31st March 2027, in order to prepare the Fund and employers for the potential contribution outcomes from the 2028 valuation.

The 2027 interim review will be carried out in the same way as a full actuarial valuation process. It will allow us to update the contribution requirements for some employers where we need to and this is allowed under the LGPS Regulations and Funding Strategy Statement. This will also be used to inform other policies e.g. assumptions (including life expectancy changes) to be used when employers leave the Fund.

This analysis will assist the Fund to understand employer contribution affordability/sustainability and budgets so that plans can be made considering the funding position at that point and the market/economic outlook. The interim valuation and analysis will also involve discussions with our employers and in particular the Steering Group with representatives from the major Councils. It will also include a review of data quality to feed into the 2028 valuation discussions.

Timescales and Stages

Initial engagement with employers to assess affordability and budgeting outlook	2027/2028
Carry out interim funding review (including data quality)	2027/2028
Results and discussion with employers	2027/2028

Resource and Budget Implications

This exercise will be led by the Finance and Funding Manager. It will be performed by the Fund Actuary, with input from both the Clwyd Pension Fund Administration and Finance teams. An allowance will be made in the 2027/2028 budget for the full interim review and associated tasks.

F3: Implementation of New Financial System

What is it?

Flintshire County Council are actively looking to replace their financial software package. Clwyd Pension Fund also uses this software for all its accounting processes, including processing payments and invoices.

The procurement for the new financial system will be going through a Framework known as CCS BOS2. The initial stage involves developing the Council and Fund’s requirements which will be provided to suppliers as part of the procurement process. Potential suppliers evaluated and signed the contract with the new system provider in 2025 with implementation this year and possibly a soft go-live early in 2027.

The main focus of this procurement is on the core finance systems; Accounts Payable and Receivable, General Ledger and the P2P purchase ordering system. They will also be looking to replace the budget monitoring and cash management software, hopefully with the same system. The system being looked at will be hosted and not using on-premise servers, as is currently the case. It is expected that the annual cost will increase, but not by a material amount.

The Council has established a working group and the Finance Manager: Funding and Accounting is representing Clwyd Pension Fund. Some of the key requirements for the Fund include:

- the smooth interfacing with the Altair administration system (including for pension, benefit and other payments),
- access and ease of budget setting and monitoring, and
- the ability of the new system to link outgoing payments directly to Clwyd Pensions Fund's bank account, which the current system is unable to do.

Timescales and Stages

Implementation including testing	2026/2027
Go live with new financial system	2026/2027 to 2027/2028

Resource and Budget Implications

The work will be led by the Finance and Funding Manager, working with the remainder of the Management Team and other Fund officers. In 2026/2027 and future years, there are expected to be additional system costs recharged to the Fund by the Council which may include project implementation costs and a period of parallel running of both the old and new system.

F4: Funding Strategy Statement Review and Triennial Actuarial Valuation

What is it?

The next formal triennial actuarial valuation of the Fund is due to be undertaken as at 31st March 2028. This considers the solvency position and other financial metrics and is a legal requirement of the LGPS Regulations. It determines the contribution rates payable by our employers to fund the cost of benefits including the impact of any shortfall or surplus. This will consider the balance of affordability and sustainability of contributions in conjunction with the employers. These aspects are driven by the contents of our separate Funding

Strategy Statement which is approved by the Committee and reviewed and consulted on with employers as part of the process.

The valuation will also include consideration of the potential impact of climate change in terms of overall investment, funding and demographic risk aspects in line with the agreed principles along with the frequency of review.

The valuation is considered in conjunction with our employer risk management framework – in particular the ongoing monitoring of covenant ratings in conjunction with the Fund Actuary. Our employers will be required to provide financial statements and evidence of affordability and security before contributions can be agreed.

The exercise will also include cash flow projections (of future benefit payments to members and future contributions receivable from members and employers) to input into the Cash and Risk Management policy framework.

Timescales and Stages

Effective date	31 March 2028
Initial whole Fund results (expected)	2028/2029 Q2
Individual Employer results (expected)	2028/2029 Q2 to Q3
Deadline for agreement of all contributions and sign-off valuation report	31 March 2029

Resource and Budget Implications

The exercise will be led by the Finance and Funding Manager and will be performed by the Fund Actuary. It will determine contribution requirements for all participating employers from 1st April 2029 and employers will be formally consulted on the funding strategy as part of the process. As a major exercise for the Fund, it will involve considerable resource from the Administration and Finance teams over 2028/2029. Thee Fund Actuary's estimated costs in relation to this exercise are included in the 2028/2029 budget.

Business Plan Key tasks: Pooling & Investments

Ref	Key Action: Task	2026/2027 Period				Later Years	
		Q1	Q2	Q3	Q4	2027/ 2028	2028/ 2029
I1	Review of Investment Strategy Statement (new regulations)	x	x	x			x
I2	Pooling Transitional Arrangements	x	x	x	x	x	
I3	Responsible & Local Investment		x	x	x	x	

I1: Review of Investment Strategy Statement (new regulations)

What is it?

The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 provide the statutory framework under which the Administering Authority is required to prepare and publish an ISS. The Regulations and accompanying guidance required that Administering Authorities prepared and published their first ISS by 1 April 2017. After this, the requirement is that the ISS is regularly reviewed and updated from time to time; at least every three years.

Draft regulations reflecting the Fit For the Future proposals are nearing finalisation and are expected to be formally enacted within 2026. The Fund will need to produce an updated ISS under the new regulations once these come into force. Under the Fit For the Future reforms, the proposed deadline for updating the ISS to reflect the new regulatory requirements is 30 September 2026.

Review and document all objectives (clearly communicate all requirement of the Fund) including but not limited to:

- Setting objectives within the ISS consistent with regulatory requirements
- Review and update of ISS to ensure it meets statutory requirements
- Establishing additional objectives and clearly articulating the investment strategy of the Fund in a separate document to ISS to aid WPP IM Co in the implementation of the Fund's investment strategy
- Above conducted in conjunction with the Actuary and Strategic Risk Advisor, in order to ensure alignment with FSS as required by regulations
- Review Responsible Investment Policy
- Training of Pensions Committee and Board on legislative outcomes and setting objectives for the pool
- Consider framework for ongoing review of Pool against objectives set by Committee
- Review of the Client Service Agreement

Timescales and Stages

The Fund will need to update the ISS to comply with the various requirement of the new Fit for the Future regulations, once these come into effect. The current working assumption is that these changes will need to be made and formally agreed by 30 September 2026, but this is subject to confirmation.

Monitoring the Pool against these objectives will be finalised once the objectives have been set, this monitoring will move to business as usual once established. This work will also link in with the review of the Client Service Agreement set out in G2.

Enacting ISS legislative requirements	Q1 to Q2 2026/2027
Monitoring framework and CSA review	Q3 2026/2027

Resource and Budget Implications

The work will be led by the Pension Investment Manager and Head of Clwyd Pension Fund, working with the Pool and Fund advisors. The Fund advisor's estimated costs in relation to this exercise are included in the 2026/2027 budget.

I2: Pooling Transitional Arrangements

What is it?

The government launched its Pensions review in July 2024, releasing its interim report of Phase 1 of this review in November 2024. Following the feedback from Phase 1 the government launched the "LGPS Fit for the Future" Consultation. This consultation proposes a number of changes which include requirements for:

- LGPS Funds to pool all of their assets (including legacy illiquid assets) into FCA regulated pools by 31st March 2026.
- Funds to receive their "principal investment advice" from their asset pool
- Pools to develop in house asset management capabilities
- Pools to perform due diligence and investment decisions on Local investments proposed by Funds
- A number of governance changes largely derived from the Good Governance project

From 1 April onwards WPP IM Co will be responsible for providing a number of services to the Fund that the Fund had previously procured itself. Given the infancy of the WPP IM Co, it is anticipated that there will need to be transitional arrangements in place to ensure the continued governance function of the Fund whilst the pooling company scales up its internal functions and offerings to partner funds.

The exact nature of this project is unknown, the Fund will continue to support the Pooling Company whilst continuing to ensure that the Fund's own business plan and governance arrangements are met. The expectation is that a range of business-as-usual functions such as (but not limited to): Private Market Commitment planning, reporting & monitoring, stewardship and engagement, climate governance reporting, Treasury management and cashflows, and private market commitment planning, will all be passed across to WPP.

Timescales and Stages

The Fund will need to maintain its own governance functions indefinitely, the role and nature of the support for these will evolve over time. It is anticipated that the transitional arrangements will occur over the full year ahead. The timescales for these transitional arrangements are subject to change, the Pool could execute its own business plan more quickly than anticipate, or unforeseen events could delay this implementation. As a result the timescales are slightly fluid and could extend beyond a year.

As part of this project additional support may be required from advisors.

Transition of functions across to the Pool	Q1 to Q4 2026/2027

Resource and Budget Implications

The work will be led by the Pension Investment Manager and Head of Clwyd Pension Fund, working with the Investment Officer and Fund's advisors. The Fund advisor's estimated costs in relation to this exercise are included in the 2026/2027 budget.

I3: Responsible & Local Investment

What is it?

The Fund currently has an 8% strategic allocation to Local / Impact investments, with the portfolio split broadly evenly across global, UK and Welsh geographies.

Forthcoming regulations and guidance is set to require all local government pension schemes to set a target range for local investments to be included in the ISS.

To comply with the regulations, the Fund will need to clearly articulate its definition of 'local'. The Fund will also need to establish additional objectives and preferences pertaining to return expectations and target asset classes. Identified asset classes will need to align with local Corporate Joint Committee objectives, in this manner the intention is to align local investments with local needs in order to achieve real world positive impacts in the local community.

The Fund in conjunction with the Pool and the North Wales Corporate Joint Committee (CJC) will seek to establish appropriate mechanisms to ensure local investment opportunities have a set framework through which to seek investments from the Pool.

Additional work on evolving the approach to nature-related risks and opportunities will be explored. Structured engagement with the Pool will be established to ensure nature-related risks are identified and managed throughout the Pool's investment processes and appropriate stewardship arrangements are in place. This work is expected to support public reporting on nature, allocating to solutions and setting nature-related targets.

Timescales and Stages

Local Opportunities mechanism & framework	Q2 to Q4 2026/2027
Nature risk review and structured engagement	Q2 to Q4 2026/2027

Resource and Budget Implications

The work will be led by the Pension Investment Manager, working with the Fund's Advisors and WPP. The Fund advisor's estimated costs in relation to this exercise are included in the 2026/2027 budget.

Administration and Communications Appendix (including the Employer Liaison Team)

This section sets out our administration and communication aims and objectives, an overview of our business as usual administration and communication activities and key risks, and administration and communication-related business plan tasks for 2026/2027 to 2028/2029.

Administration Aims and Objectives

- Provide a high quality, professional, proactive, timely and customer focussed administration service to the Fund's stakeholders
- Administer the Fund in a cost effective and efficient manner utilising technology appropriately to obtain value for money
- Ensure the Fund's employers are aware of and understand their roles and responsibilities under the LGPS[2] regulations and in the delivery of the administration functions of the Fund
- Ensure the correct benefits are paid to, and the correct income collected from, the correct people at the correct time
- Maintain accurate records and ensure data is protected and has authorised use only

Communications Aims and Objectives

- Increase awareness and understanding of the Scheme and provide sufficient information so members can make informed decisions
- Communicate in a clear, concise manner
- Ensure we use the most appropriate means of communication, taking into account the different needs of different stakeholders, but with a default of using electronic communications where efficient and effective to do so
- Look for efficiencies and environmentally responsible ways in delivering communications through greater use of technology and partnership working
- Regularly evaluate the effectiveness of communications and shape future communications appropriately

We also have further specific objectives for communications with scheme members and employers outlined in our Communications Strategy.

Employer Liaison Team Aims and Objectives

- Provide a high quality, professional, proactive, timely and customer focused service to the employer
- Provide the agreed service in a cost effective and efficient manner utilising technology appropriately to obtain value for money

[2] Local Government Pension Scheme.

- Ensure the employer is aware of and understands their role and responsibilities under the LGPS regulations and the Fund's Administration Strategy
- Ensure that accurate member information is provided to the Fund, in the correct format, within the agreed timescales
- Ensure data is protected and has authorised use only

Business as usual

Operations

- Providing relevant individual information to scheme members and their beneficiaries, including:
  - Calculating and notifying entitlement to pension and death benefits
  - Providing quotations of retirement benefits including any additional costs to employers
  - Providing information on how scheme members can increase their pension benefits
- Maintaining scheme member records including:
  - Changes to personal details
  - Changes to employment details
  - Processing transfers of pension rights and aggregations of member records
- Responding to scheme members' enquiries

Pensioners' Payroll

- Calculating and paying monthly pensions to all pensioners and beneficiaries
- Issuing payslips (where net pay has changed)
- Processing annual pensions increases and issuing annual pensions increase statements to pensioners and beneficiaries
- Issuing P60s and Lump Sum Allowance statements
- Investigating returned payments and dealing with any under or overpayment of pensions
- Updating and maintaining accuracy of pensioners' and beneficiaries' details.
- Carrying out existence checking for pensioners' and beneficiaries' payments
- Responding to scheme members' enquiries
- Reporting and making payments to HMRC

Communications

- Providing information to members via newsletters and shorter news alerts
- Maintaining the Fund's website, and promoting use of it and the members' self-service facility
- Management of scheme members' generic email inbox
- Developing the Fund's communications with stakeholders to ensure information is accessible to all
- Gathering regular feedback from the scheme members and employers

- Liaising with employers joining or leaving the Fund and providing them with information about their Fund responsibilities
- Providing ongoing training and technical updates to employers
- Running an Annual Meeting and engagement events with employers and members' representatives
- Administering the Fund's Internal Dispute Resolution Procedure.

Projects

- Annual projects including:
  - providing Annual Pensions taxation information to all affected and at-risk members
  - calculating and paying supplementary pensions increase lump sum payments
- Bulk data cleansing exercises
- Managing ad-hoc projects such as implementing major scheme changes and national initiatives, including national pensions dashboards
- Recalculating benefits following backdated pay awards
- Updating pension records in relation to bulk transfers of staff

Technical

- Preparing and issuing annual benefit statements for all active and deferred scheme members
- Maintaining and updating the pensions software system and member self-service facility, including effective use of system functionality
- Overseeing the monthly employer returns
- Providing guidance on changes in processes following legislation updates
- Developing reports on progress against key performance indicators and daily work management
- Monitoring timescales for employers submitting information in line with the employer escalation process
- Providing information to the Fund's actuary as required for new alternative delivery models for employer services
- Providing reports and extracts for the Fund Actuary and GAD[3]

Employer Liaison Team

On behalf of employers:

- Providing notifications regarding new starters, personal/employment changes and leavers/retirements in the Fund
- Verifying and uploading monthly iConnect files
- Undertaking estimates of benefits for scheme members and the employer
- Responding to outstanding requests for information to cleanse the pension records

[3] Government Actuary's Department

- Undertaking work as necessary to clear outstanding year-end or other data queries
- Managing ad-hoc projects such as implementing major scheme changes and national initiatives
- Providing ongoing support and feedback to employers on data quality.

Administration and Communications Risks

Key:

Colour	Score	Approach	Action
Green	1 to 2	Acceptable	Risks within the Fund's risk appetite.
Yellow	3 to 4	Adequate	Risks within the Fund's risk appetite which need to be monitored by Senior Management, if risk deteriorates
Amber	5 to 10	Tolerable	Risks within the Fund's risk appetite but not at a level which is acceptable.
Red	12 to 25	Unacceptable	Risks outside of the Fund's risk appetite

Risk Event (this [event] could happen)	Risk Impact (…which may result in the following [impact] to our objectives)	Current Risk Score	Target Risk Score	Further Action
Insufficient suitably trained administration and communications staff	• Delays in provision of information to members/calculations of benefits/other processes • Errors in information / calculations/ processes • Increased pressure /expectations on trained staff • Additional unbudgeted costs (overtime / external support) • Complaints / IDRPs, rectification costs & reputational damage • Certain tasks fall behind schedule	12 (Red)	2 (Green)	1. Work ongoing relating to recruitment, retention, succession planning including pay grade benchmarking (KW/RR/AR) 2. Ongoing training of recent recruits (RR/AR) 3. Document all administration processes (including checking) (KW) 4. Continue to engage with HR on outcome of job evaluation exercise and market supplement for Pensions Operations Manager role (PL)

Business Plan key tasks

Ref	Key Action: Task	2026/2027 Period				Later Years	
		Q1	Q2	Q3	Q4	2027/ 2028	2028/ 2029
Essential Regulatory-Driven Areas							
A1	McCloud judgement	x	x	x			
A2	National Pensions Dashboard	x	x	x	x	x	x
A3	Implement Survivor Benefits Changes	x	x	x	x	x	x
A4	Increase in Normal Minimum Pension Age (NMPA)	x	x	x	x	x	x
A5	Inheritance Tax changes		x	x	x		
A6	Benefit changes relating to absences (gender pensions gap)	x	x	x	x		
A7	Opt outs		x	x	x		
A8	Preparation of Member Data for Triennial Valuation	x	x	x	x		
A9	Implementing legislative changes (TBC)						
Priority Fund-Driven Projects							
A10	Review Administration & Communications Related Policies and Strategies	x	x	x		x	x
A10a	Administration Team: implementing the updated Communications Strategy	x	x	x	x		
A10b	Finance Team: implementing the updated Communications Strategy			x	x		

Essential Regulatory Driven Areas

A1: McCloud judgement

What is it?

The McCloud judgement refers to an age discrimination court case where protections for older members, introduced during the Government's reforms of public service pension schemes in 2014 and 2015, were deemed to result in unlawful age discrimination. In the LGPS the protections applied to members in the new career average scheme who were within ten years of their Normal Pension Age (NPA) on 1 April 2012 in the form of a "better of both" promise. This means comparing the benefits payable under the career average and final salary schemes and paying the higher amount. This protection is called the underpin.

To remove the discrimination, the LGPS Regulations were updated with effect from 1 October 2023, providing all qualifying members with protection for the remedy period (1 April 2014 to 31 March 2022). Whilst regulations are in place for the main element of the remedy, as at March 2026, further regulations and some guidance is expected to clarify some technical elements. Whilst most guidance relating to member events (including historic calculations) has now been received, with some changes to calculations received over 2025, this was significantly delayed and therefore we continue to work through the cases that were previously on hold. The administration software still has to be upgraded to incorporate some of the new requirements although these only impact a small number of cases in the overall context of the programme.

Implementing the McCloud remedy has involved a large-scale retrospective data collection exercise, which is largely complete. It has a significant impact on our administration processes and systems and has required regular communications with employers and scheme members. Due to the significant additional resource requirements, we have dedicated McCloud team members.

We have a small number of members where we are still to complete the data collection and validation exercise, however the significant majority of member records have been updated.

For the records where the McCloud data has been uploaded, we have commenced reviewing those scheme member records to update them with any relevant underpin information:

- For active and deferred members, the LGPS legislation and statutory guidance required Administering Authorities to include remedial service information in the 2025 Annual Benefit Statements (ABS). The large majority of members (approximately 97%) received a 2025 ABS with the remedial service information. Therefore, the 2026 ABS will contain the remedial service information for the remaining 3% of scheme members.
- For scheme members who have received payments (mainly pensioner and dependant members) and are in scope, we are in the process of carrying out recalculations to determine if there are any additional payments due. A significant

proportion of the in scope members have been assessed and where applicable an underpin amount has been paid. A plan is in place to complete rectification of the remaining in scope members by the 31 August 2026 deadline.

Timescales and Stages

Data collection, validation and upload to Altair (near completion)	2026/2027 Q1
Identify and update service for members where multiple records are not combined (including concurrent records)	2026/2027 Q1
Finalise and issue annual benefit statements (for the 3% active and deferreds whose 2025 ABS did not include McCloud information)	2026/2027 Q2
Recalculate historic benefits (benefit rectification) for remaining in scope members – process recalculations, prepare letters to members and pay balance of benefits	2026/2027 Q1 to Q2
Ongoing communications to scheme members as required	2026/2027 Q1 to Q3
Assess the impact of final regulations and guidance received	To be confirmed but assumed 2026/2027 Q1 to Q2

Resource and Budget Implications

To be led by the Pensions Operations Manager. The additional internal resource allocated to the dedicated McCloud programme team will continue and will integrate into the Project Team during the year. Although the work is being managed by dedicated McCloud team members, it impacts across all the Administration Team. There continue to be additional costs relating to consultancy (including programme management which is being provided by the Governance Adviser) and incidentals such as postage and printing. There are not expected to be any additional system costs. The budget for 2026/2027 is £254k in total.

A2: National Pensions Dashboard

What is it?

The National Pensions Dashboard is a Government initiative intended to allow all pension savers in the UK access to view the values of all of their pensions online, including state pension, through one central platform. The Pension Schemes Act 2021, The Pensions Dashboards Regulations 2022 and The Pensions Dashboards (Amendment) Regulations 2023 provide the legal framework for implementing the dashboard. There are also various standards issued by the Pensions Dashboards programme (PDP) and The Pensions Regulator (TPR) which must be adhered to (these include data, technical and reporting standards). All pension schemes must connect to the dashboard infrastructure by their "staging date" as determined by the Department for Work and Pensions (DWP) with the dashboards made publicly available at a future date (expected to be during 2027). The staging date for all public sector pension schemes including the LGPS was 31 October 2025.

A formal Fund Pensions Dashboard project was established in 2024/2025. The project is currently on track and we successfully connected to the dashboards via the approved Integrated Software Provider (ISP) before the 31 October 2025 deadline. This marked a significant milestone towards enabling our members to access their pensions information online, securely and all in one place.

The Dashboard Project Management Group (PMG) has agreed what data will be used as the matching criteria to ensure a secure member matching experience. However, the matching criteria will be reviewed as testing and data cleansing continues ahead of the public go live date (which is still unknown). In July 2025 the Minister for Pensions assured funds that 6 months' notice will be given ahead of the launch of the dashboard.

The dashboard requirements also extend to Additional Voluntary Contributions (AVCs). We therefore continue to engage with Prudential and Utmost, our AVC providers, to ensure they will meet the dashboard requirements.

Although we are relying on our Integrated Service Provider (ISP: Heywood), our administration software provider (Heywood) and the AVC providers to carry out the majority of the work relating to the implementation project, there continues to be additional work for us including new processes when the dashboard is up and running. Also, it is our responsibility to ensure the legal requirements relating to dashboards are met. Therefore, there will still be a significant amount of work for us relating to:

- the implementation of the dashboard following the staging date, but before the dashboards are available to the public (where a key ongoing activity relates to data cleansing)
- managing the dashboard including data transmission and member enquiries once it is available to the public.

The Pensions Operations Manager is participating in a PLSA working group on the development of the Dashboard. We have also volunteered to be part of the testing of the pension dashboard enhancements being integrated into the administration software.

Timescales and Stages

Ongoing bulk data cleansing exercise in preparation for submitting view and value data to the dashboard	2026/2027 Q1 to Q4
Testing of matching criteria, including reporting	2026/2027 Q1 to Q4
Develop communications plan, and develop and issue various member and other stakeholder communications (already commenced)	To beyond go live date (estimated to 2027/2028)

Review and update administration processes, and consider impact on future resources/budget (already commenced)	2026/2027 Q1 to Q4
Agree, establish and implement dashboard processes with Additional Voluntary Contribution providers (already commenced)	2026/2027 Q1 to Q2
Review and update matching criteria (if required following testing outcome)	2026/2027 Q3 to Q4

Resource and Budget Implications

To be led by the Pensions Operations Manager and managed by the Projects Team. The proposed 2026/2027 budget is £30kand includes some ongoing initial developmental system costs for the ISP and consultancy costs for technical support; the budget for support from the Projects Team is included within the staffing budget. The biggest uncertainty remains to be the impact on the workload of the Pensions Administration Team once dashboards go live. Ongoing resources will be considered as part of the 2027/2028 budget, or earlier if needed when the go-live date is confirmed.

A3: Implement Survivor Benefit Changes

What is it?

Due to the below court cases, entitlement to survivor benefits for some historical cases need to be revisited. Work has already commenced for the following survivor benefit changes:

- the LGPS (Miscellaneous Amendment) Regulations 2018 (SI2018/1366) that impact on the calculation of and entitlement to **surviving partner pensions in respect of Civil Partners or same sex marriages**
- the outcome of the **Elmes versus Essex case** where the High Court ruled that for any LGPS members who left the scheme between 1st April 2008 and 31st March 2014, and who subsequently died leaving a Cohabiting Partner, a survivor's pension could be paid to that partner without a completed nomination form as long as they meet the eligibility criteria

Furthermore, on 2 February 2026, the Government responded to its 'LGPS in England and Wales: Access and fairness' consultation. The May 2025 consultation sought views on proposed changes to the scheme relating to survivor benefits. The changes relating to survivor benefits are expected to come in from 1 April 2026 cover the following:

- equalising survivor benefits: some calculations will be backdated to 5 December 2005. This includes equalising benefits for survivors of female members in an opposite sex marriage following the 'Goodwin' court case.
- removing the age 75 limit for death grant eligibility: this will be backdated for deaths that took place from 1 April 2014

- removing the requirement for a death grant to be paid to the personal representatives where it is not paid within the two-year period: this will apply to unpaid death grants at the date the regulations take effect
- removing the requirement to nominate a cohabiting partner in the 2008 Scheme
- inserting a requirement that a child's short-term pension, paid under the 1995 and 1997 Regulations, must cease if that child is no longer an eligible child.

Timescales and Stages

Tracing, contacting, verifying entitlement and recalculating benefits for affected surviving partners (already commenced)	2026/2027 Q1 to Q4
Tracing, contacting, verifying entitlement and recalculating benefits relating to the equalisation of survivor benefits	2026/2027 Q1 to Q4
Reviewing and identifying deaths that have occurred since 1 April 2014 where the deceased member was over age 75 to establish a beneficiary and pay a death grant	2026/2027 Q1 to Q4

Resource and Budget Implications

To be led by the Pensions Operations Manager. These projects will be carried out by the Project Team and Operations Team to ensure benefits for all surviving partners and other death grant beneficiaries are reviewed and amended where applicable. Costs will be met from existing budgets.

A4: Increase in normal minimum pension age

What is it?

The Finance Act 2022 implements previous proposals to increase the normal minimum pension age from 55 to 57 in April 2028. This change is designed to maintain a 10 year gap between normal minimum pension age and state pension age, as confirmed as part of Government policy in 2014. The Finance Act does provide for protected pension ages for members meeting certain conditions, but for this protection to apply the LGPS regulations must be amended.

Government issued their LGPS: Scheme Improvements (Access and Protections) Consultation in October 2025 to introduce this protection. Regulations have been promised later this year and it is understood that identifying categories of protected members will be administratively complex.

Timescales and stages

Communicate the changes to members as part of newsletters, website and member self-service (already commenced)	2026/2027 Q1 to Q4 and 2027/2028
Monitor protected retirement ages and update administration procedures and carry out testing of updated software	2027/2028 and 2028/2029

Resources and Budget implications

To be led by the Pensions Operations Manager. This work will be carried out by the Communications team, Operations team and Employer Liaison team and costs are expecting to be managed within existing budgets.

A5: Inheritance Tax Changes

What is it?

On 30 October 2024 the Government launched a consultation on changes to the rules around inheritance tax (IHT); in particular that death grants would be included in the deceased's estate and may therefore be subject to IHT, which the pension scheme administrator would be responsible for paying. Currently, as LGPS administering authorities have the discretion to decide who should receive any death grant payable from the scheme, it does not form part of the deceased member's estate and therefore is not subject to any IHT. Following concerns raised by industry regarding the administrative burden this would put on pension scheme administrators for reporting and paying any IHT to HMRC, the Government's response to the consultation issued in July 2025 confirmed that personal representatives will be responsible for reporting and paying IHT, supported by pension scheme administrators.

Government intends to publish tools and guidance to support pension scheme administrators and personal representatives and beneficiaries ahead of implementation in April 2027. Once more is known consideration will need to be given to any changes required to administration procedures as well as considering any communications that should be issued to members.

Timescales and stages

Communicate the changes to members and employers as part of newsletters, website and member self-service (once further information and guidance is available)	Unclear but estimated from 2026/2027 Q2
Implement changes to administration processes as required and carry out testing of updated software	Unclear but estimated from 2026/2027 Q2

Resources and Budget implications

To be led by the Pensions Operations Manager. This work will be carried out by the Communications team, Operations team and Pensions Payroll team and delivered within existing budgets.

A6: Benefit Changes Relating to Absences (Gender Pensions Gap)

What is it?

Work undertaken by the Scheme Advisory Board in 2024 identified that women generally have lower pension outcomes from the LGPS compared to men. Analysis carried out by the Government Actuary's Department on LGPS data as at 31 March 2020 has shown that in the LGPS in England and Wales the average CARE pension accrued by active female members (who make up 74% of the active membership) is 34.7% lower than the average pension accrued by an active male member.

The Government's LGPS in England and Wales: Access and Fairness consultation published in May 2025 outlined proposals to address the gender pensions gap with a focus on improving access to scheme benefits for women. The response on 2 February 2026 confirmed the following key changes:

- making authorised absences of less than 15 days automatically pensionable and extending the time limit for members to buy back lost pension from 30 days to one year or when the member leaves employment (whichever is sooner)
- aligning the cost of buying back lost pension for authorised absences with the standard member contribution rates (the current arrangement is based on age and gender)
- Making all types of unpaid child-related leave pensionable

Timescales and stages

Communicate to members and employers regarding the changes to authorised absences of less than 15 days	2026/2027 Q1 and Q2
Communicate to members and employers the changes relating to authorised absences greater than 15 days (both the longer timeframe for members to buy back lost pension and the revised method of how employers calculate the missed contributions)	2026/2027 Q1 and Q2
Communicate to members and employers the changes relating to all types of unpaid child related leave being automatically pensionable	2026/2027 Q1 and Q2

Test and implement software changes (including liaising with employers relating to payroll system changes)	2026/2027 Q1 and Q2

Resources and Budget implications

To be led by the Pensions Operations Manager. This work will be carried out by the Communication, Technical and Operations teams and costs are expected to be met within existing budgets.

A7: Opt outs

What is it?

MHCLG previously stated they are focused on improving fairness in the LGPS and are looking at a reform project on opt outs. The Gender Pensions Gap, and other "gaps" in pension benefits between groups with other characteristics, may partly be explained by those who are more likely to "opt-out" of LGPS membership when they are automatically enrolled.

As part of the February 2026 consultation response, it has been determined that it will become mandatory for administering authorities to collect and report data on the rate of members opting out of the scheme, and for these numbers to be published in their Annual Report (from 2026 to be published in the Annual Report due by December 2027). It is hoped that communication exercises we have already undertaken, and those proposed to be undertaken via employers, will assist in reducing the number of opt outs. Furthermore, the consultation response confirmed that updated annual report guidance will be issued, and we will consider this new guidance and liaise with our employers accordingly.

Timescales and stages

Develop and issue communications for members who have opted out of the scheme where these are not known to the Fund (liaise with employers accordingly)	2026/2027 Q2 to Q3
Communicate with employers regarding the new requirements and their legislative obligation to provide opt-out data	2026/2027 Q3 to Q4

Resources and Budget implications

To be led by the Pensions Operations Manager. This work will be carried out by the Communications team with support from the Operations Team. All costs are expected to be met within existing budgets.

A8: Preparation of Member Data for Interim Valuation and Triennial Valuation (including Gender Pensions Gap reporting)

What is it?

We will carry out an interim valuation (as at 31 March 2027) during 2027/2028 which will require us to provide data to the actuary. This will highlight any initial data validation to be completed ahead of the formal triennial valuation.

The next formal triennial valuation will be as at 31 March 2028 and requires us to provide data to the Fund Actuary. This involves an additional year-end data cleansing exercise post 31 March 2028 to ensure the data is of sufficient quality for the formal valuation and to then rectify any anomalies discovered during the valuation process.

Furthermore, Gender Pension Gap reporting will become mandatory with a limited form of reporting to be included within Funds' 2025 Actuarial Valuation reports and full reporting for the 2028 valuation.

Timescales and Stages

Preparation of data for 31 March 2027 interim valuation, and investigating and responding to data queries from Fund Actuary	2027/2028
Preparation of data for 31 March 2028 valuation and investigating and responding to data queries from Fund Actuary	2028/2029

Resource and Budget Implications

This work will be carried out by the Technical Team in the main with assistance from the rest of the Project and Operations Teams depending on the requirements. All internal costs are being met from the existing budget. The work by the Fund Actuary for the valuation will be included in proposed budget for 2027/2028.

A9: Implementing legislative changes (TBC)

What is it?

On 13 October 2025, MHCLG launched a consultation "Scheme improvements (Access and Protections)", the consultation closed on 22 December 2025, and a response is being waited on. Part of this consultation was in respect of Fair Deal, and proposed changes to the way employees would be provided with continued access to membership of the LGPS when services are outsourced from local government bodies. Another part of the consultation was around the process for an employer to substitute their current Administering Authority with another to aid efficiency and unnecessary costs that may arise to the employer.

Timescales and Stages

Consider the implications of the final Access and Protections legislation.	TBC

Resource and Budget Implications

To be led jointly by the Head of Clwyd Pension Fund and Pensions Operations Manager, with input from the Pensions Funding and Finance Manager. All expected costs are included within the existing budgets.

Priority Fund Driven Projects

A10: Review Administration and Communication Related Policies and Strategies

What is it?

There are a number of administration and communications related policies that need to be reviewed regularly as shown in the table below. It is possible that some of these policies may require reviews prior to their review date as a result of new or changing legislation or guidance. For example, legislation and guidance is expected during 2026/2027 in relation to the production of Pensions Administration Strategies as result of the good governance elements of HMT's Fit for the Future Consultation. As of November 2025 the outcomes from the consultation in relation to the Pensions Administration Strategy was that this should be reviewed triennially with guidance issued by the Secretary of State, which is awaited. It is hoped it won't significantly impact our existing Strategy but it is uncertain at the time of writing. Furthermore, it may be necessary to make changes to the Administering Authority's Discretionary Policy earlier than November 2026, as a result of the Access and Fairness legislative changes effective from 1 April 2026.

Timescales and Stages

Policy	Last reviewed	Next review due	Timescales for review work
Review of Pensions Administration Strategy	March 2025 (light touch)	June or September 2026 (but subject to statutory guidance)	2026/2027 Q1 to Q3 (estimated)
Review of Voluntary Scheme Pays Policy	October 2023	October 2026	2026/2027 Q2 to Q3

Policy for Administration and Communications of Tax Allowances to Scheme Members	October 2023	October 2026	2026/2027 Q2 to Q3
Administering Authority Discretionary Policy	November 2023	November 2026 (or potentially earlier due to regulation changes)	2026/2027 Q2 to Q3
Review of Communications Strategy	September 2025	September 2028	2027/2028
Review of Under / Overpayment Policy	October 2024	October 2027	2027/2028
Review of Data Quality Policy	March 2025	March 2028	2027/2028

Resource and Budget Implications

This will be led by the Pensions Operations Manager. All costs are being met from the existing budget.

A10a: Implement the Communications Strategy

What is it?

Our Communications strategy was reviewed in 2025/2026. It has remained consistent with the fundamental update that took place in 2022 to be more focussed on encouraging stakeholder engagement and providing positive experiences including through embracing technology for greater accessibility (as well as delivering efficiencies).   These initiatives have largely remained unchanged and have become “business as usual”. During the previous year we launched the new website and Member Self Service portal. We also continue to develop a suite of online content to make information more accessible to employers and scheme members. There are some actions outstanding to ensure that all communication materials across all areas of Fund business are updated to make them clearer and more concise.

The ongoing work involved in completing the implementation of the strategy is outlined in the table below. It is split between work relating to the Administration Team and the Finance Team.

Timescales and Stages

A10b: Administration Team implementing the Communications Strategy

Review and update suite of member letters from a Plain English and readability perspective e.g. lower reading age (website, forms and booklets already completed)	2026/2027 Q1 to Q3
Videos and webcasts: create suite of administration and communication videos and webcasts	2026/2027 Q1 to Q3
Incorporate equality, diversity and inclusion (EDI) questions into scheme member and employer surveys	2026/2027 Q2 to Q4
Liaise with Flintshire County Council to improve telephony user experience (delayed due to Council investigating a new system)	To be confirmed

A10b: Non-administration (governance, investments and funding/finance) implementing the Communications Strategy

Review and update the structure and content of the non-administration areas of the website	2026/2027 Q3 to Q4
Videos and webcasts: agree plan and create suite of non-administration videos and webcasts	2026/2027 Q3 to Q4

Resource and Budget Implications

This work is led by the Pensions Operations Manager and is mainly being delivered from internal resource, particularly the Communications, Technical, Operations and Finance Team. The internal costs are included in the existing budget. The Governance Adviser is providing a small element of ongoing external guidance which is included in their budget. There may be additional costs relating to new or updated telephony systems, or communications software, but the costs are unknown at this point in time.

Employer Liaison Team

Understanding the continuing pressure on resources and budgets for employers, we offer a service to our employers where we carry out their Fund related duties on their behalf. These duties are carried out by our Employer Liaison Team (ELT). The service mainly consists of providing notifications regarding new starters, personal/employment changes and leavers/retirements in the LGPS. We can also complete outstanding requests for information in order to cleanse the pension records. All ELT costs are recharged to employers using the ELT service through their employer contribution rate.

During 2026/2027 ELT work will be mainly business as usual, with a focus on supporting the employers with improvements in their internal procedures for pension scheme data.

Cronfa Bensiynau
CLWYD
Pension Fund

clwydpensionfund.org.uk

Clwyd Pension Fund, Tŷ Dewi Sant, St. Davids Park, Ewloe, Flintshire, CH5 3FF