

PENSION FUND BOARD



Friday, 25 July 2025

Democratic and Members' Services
Emma Duncan
Service Director: Legal and Governance

10:00

New Shire Hall
Alconbury Weald
Huntingdon
PE28 4YE

Virtual Meeting
[Venue Address]

AGENDA

Open to Public and Press

1	Membership Report	5 - 8
2	Election of Chair Verbal item	
3	Election of Vice-Chair Verbal item	
4	Apologies for Absence and Declarations of Interest <i>Guidance on declaring interests is available in Chapter 6 of the Council's Constitution (Members' Code of Conduct)</i>	
5	Cambridgeshire Pension Fund Board Public Minutes 4 April 2025	9 - 22
6	Governance and Compliance Report	23 - 32
7	KPMG Audit Plan for Cambridgeshire Pension Fund 2024-25	33 - 66

8	Administering Authority Discretions Policy	67 - 86
9	Cambridgeshire Pension Fund Equality, Equity, Diversity and Inclusion (EEDI) Policy	87 - 104
10	Administration Report	105 - 154
11	Cambridgeshire Pension Fund Board Agenda Plan	155 - 156
12	Exclusion of Press and Public <i>To resolve that the press and public be excluded from the meeting on the grounds that the agenda contains exempt information under Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972, as amended, and that it would not be in the public interest for this information to be disclosed information relating to the financial or business affairs of any particular person (including the authority holding that information)</i>	
13	EXEMPT Cambridgeshire Pension Fund Board Minutes 4 April 2025 <ul style="list-style-type: none"> • Information relating to the financial or business affairs of any particular person (including the authority holding that information); 	
14	EXEMPT Valuation Update <ul style="list-style-type: none"> • Information relating to the financial or business affairs of any particular person (including the authority holding that information); 	
15	EXEMPT ACCESS Update <ul style="list-style-type: none"> • Information relating to the financial or business affairs of any particular person (including the authority holding that information); 	

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The Pension Fund Board comprises the following members:

Councillor Peter Fane Val Limb Councillor Ross Martin Mr Barry O'Sullivan and
Councillor Denis Payne

Clerk Name:	Sophie Rankine
Clerk Telephone:	01223728170
Clerk Email:	Sophie.Rankine@cambridgeshire.gov.uk

CAMBRIDGESHIRE PENSION FUND

To: Pension Fund Board

Meeting date: 25 July 2025

Report by: Sophie Rankine
Democratic Services Assistant
sophie.rankine@cambridgeshire.gov.uk

Subject: Membership Update Report

Purpose of report: To note the appointment of the new Scheme Member Representative.

Recommendations: The Board is asked to:

Note the appointment of Tom Humphrey for a four-year term as a Scheme Member Representative on the Pension Fund Board.

Enquiries to: Sophie Rankine
Democratic Services Assistant
sophie.rankine@cambridgeshire.gov.uk

1. Background

- 1.1 The Board consists of three Employer and three Scheme Member Representatives. Two Employer Representatives are Cambridgeshire County Council councillors who are appointed by Full Council. One Employer Representative and three Scheme Member Representatives are appointed by an open and transparent selection process, as per the Board's Terms of Reference.
- 1.2 There was a vacancy for a Scheme Member Representative, and a recruitment process was recently successfully undertaken to fill this vacancy.

2. Executive Summary

- 2.1 This report seeks to note the appointment of Tom Humphrey as a Scheme Member Representative.

3. Appointment of Scheme Member Representative

- 3.1 Interviews were conducted by a panel comprising the Chair, Vice-Chair, Democratic Services Officer and Democratic Services Assistant, following the advertisement and a shortlisting process. Tom Humphrey was selected as the successful candidate to be appointed to the Board as a Scheme Member Representative. The Monitoring Officer has been consulted. The appointment will run from 25 July 2025 to 25 July 2029.

4. Terminating Membership

- 4.1 When a member is nearing the end of their term or, for a particular reason, decides to step down from the Board, providing prior confidential notice to Democratic Services is beneficial. This enables time to prepare to recruit, to avoid long standing vacancies on the Board.

5. Relevant Pension Fund Objectives

To ensure compliance with the LGPS Regulations and other legislation and guidance, including the Pensions Regulator's Code of Practice.
To manage the Fund in a fair and equitable manner and be accountable to the Fund's stakeholders.
To ensure individuals responsible for managing the Fund and delivering its services have the appropriate knowledge and expertise.

6. Risk Management

- 6.1 The risks associated with not having appropriate representation have been captured in the Fund's risk register as detailed below.

Risk	Residual risk
Those charged with governance are unable to fulfil their responsibilities effectively.	Green
Failure to provide relevant information to the Pension Committee/Pension Board to enable informed decision making.	Green

6.2 The risk register can be found [here](#).

7. Finance & Resource Implications

7.1 None.

8. Communication Implications

8.1 None.

9. Legal Implications

9.1 Not applicable.

10. Consultation with Key Advisers

10.1 Democratic Services Manager, Democratic Services Officer and the Governance and Regulations Manager.

11. Alternative Options Considered

11.1 There were no alternative options considered.

12. Background Papers

12.1 The Constitution [Council Constitution | Cambridgeshire County Council](#)

12.2 Local Government Pension Scheme (LGPS) Guidance on the creation and operation of the Local Pension Boards in England and Wales
[LGPS Local Pension Boards Guidance](#)

Cambridgeshire Pension Fund Board Minutes (Public)

Date: 4 April 2025

Time: 10.00 a.m. – 12.47 p.m.

Venue: Virtual

Present: Employer Representatives: Councillor Denis Payne [Chair],
Councillor Geoffrey Seeff

Employee Representatives: Val Limb and Barry O’Sullivan [Vice
Chair]

External Auditor: A Iqbal, KPMG

199. Apologies for Absence and Declarations of Interest

The Chair thanked Dawn Graham for their attendance on the Board.

Apologies were received from Councillor Simon King.

There were no declarations of interest.

200. Minutes and Action Log 7 February 2025

The minutes of the meeting held on the 7 February 2025 were approved as a correct record.

While noting the action log, a member queried if the overpayment mentioned in a previous Administration Report had been recovered. An update would be sent to Board members outside of the meeting – **action required**.

201. Internal Audit Report

The Board received the Internal Audit review of Benefit Administration for the period 2023-24. Members were asked to review and provide input to the proposed three-year plan Internal Audit Strategy and Plan for the Cambridgeshire and Northamptonshire LGPS for the financial years 2025/26 – 2027/28. Members learnt that the three-year plan was flexible and could adapt to emerging risks.

While discussing the report, Members:

- established that the Internal Audit Strategy and Plan had been approved by management. It was requested that this was clearly stated in the executive summary – **action required**.
- noted that some actions listed in the Internal Audit Strategy and Plan should be undertaken immediately.

- learnt that if the Pension Fund Committee or the Pension Fund Board disagreed with Internal Audit regarding a policy, concerns would be raised with management, and it would be a risk-based issue. The Head of Internal Audit and Risk Management highlighted the importance of risks being mitigated at an appropriate level and reassured Members that proposed changes would have to be approved by the appropriate Committee or Board.
- highlighted a formatting issue in the management action plan in Appendix 2. Officers agreed to review this – **action required.**
- questioned if the actions that were due to be implemented by 31 March 2025 had been completed. The Head of Pensions stated the actions were a mixture of advisory and medium/high level actions. The medium/high level actions were tracked and sent to Internal Audit. An update on the actions would be circulated to Members – **action required.**
- asked for more information about the expertise of the Internal Audit Team in relation to pensions. The Head of Internal Audit and Risk Management informed Members that there were a variety of qualifications within the Internal Audit Team including Chartered Accountants and Chartered Internal Audit Professionals. All internal auditors were either qualified or training for their qualifications. There was no specific pensions expertise, however the Internal Audit Team was able to deliver the audit plan. If specific pensions expertise was required, appropriate expertise would be sought.
- sought further clarification on the reliance on other assurance providers. Members learnt that External Audit reports were reviewed for the Pension Fund. There was a mix of external work, such as the desktop exercise from Hymans Robertson, and internal work, such as the self-assessment of compliance. Members learnt that best practice for assurance exercises involved independence, however the importance of internal quality assurance was emphasised. A Member stated that the Audit and Accounts Committee had raised similar concerns at a previous meeting and was satisfied with the response.

Following the agreement of the Board, it was agreed to include risk management in the first-year audit - **action required.**

A Member had questions which related to the confidential appendix. The Chair offered the option of moving into confidential session so these questions could be answered by the Head of Internal Audit and Risk Management, but the Member was content to pose the questions outside of the meeting for written response – **action required.**

It was resolved unanimously to:

- a) note the internal audit work covering the period 2023-24;
- b) review and input to the proposed 3-year Internal Audit Strategy & Plan.

202. Administration Performance Report

The Cambridgeshire Pension Fund Board received the Administration Performance Report for the period 1 January to 28 February 2025. The Board learnt that 321 member surveys were issued, and scheme members rated the Fund's administration an average rating between 3.73 - 4.45 out of 5.

Eight of the fourteen key performance indicators (KPIs) had not been met: four were amber and four were red. These were due to system workflows not being utilised effectively, sickness levels and an increase in workflow volumes. Since April 2021, casework volumes within the Service had increased by 100% for members retiring from either a deferred or active status. The structure of the service would undergo a review to ensure resources were distributed effectively. The Pension Fund Committee had approved the recruitment of two individuals within the Operations team.

An error was highlighted in Appendix 3: '% of Employers Paid on Time'. The average for the period should state 99.7%.

The presenting officer drew Members' attention to the customer journey KPIs, receipt of employee and employer contributions, a significant overpayment of pensions, Cambridgeshire Pension Fund data improvement plan, and the employers' admissions and cessations.

While discussing the report, Members:

- learnt that the Service set the targets for the KPIs. The Head of Pensions informed Members that there would be a change in the KPIs from April 2025 to align with the annual reporting guidance from the Chartered Institute of Public Finance and Accountancy (CIPFA).
- queried if the late employer contributions were from the same employers each time of reporting. Members learnt they were not the same employers and that, if an employer had paid late contributions three times in a year, they would be reported to the Pensions Regulator. The Investments and Fund Accounting Manager stated that most late employer contributions were usually received a few days after the deadline.
- noted in Appendix 2 that in 'Inform members who leave the scheme at or after retirement age of the benefits due', 80% of the failures were due to the employer. The Member queried the remaining 20%. The Head of Pensions stated sometimes the delay could be due to the

individual. The Governance and Regulations Manager informed Members that the KPIs were in the process of being analysed.

It was resolved unanimously to:

note the Administration Performance Report.

203. Governance and Compliance Report

The Board received an update on the McCloud remedy, activities of the Scheme Advisory Board, activities of the Pensions Regulator, LGPS England and Wales, Cambridgeshire Pension Fund representation, and skills and knowledge opportunities.

The Governance and Regulations Manager stated that there were 140 pensioner records within the Cambridgeshire Fund in scope for a final guaranteed amount as part of the McCloud remedy; 31 were in payment as the retirement was processed after October 2023, and 109 cases were to be rectified. Pre-conversion, the average amount per individual was £161.77 per annum, with the range of 5p and £1710. Extra due diligence would be undertaken to ensure the correct value was to be paid. Members learnt that verifications were still underway which may identify more individuals to be rectified.

While discussing the report a Member asked if the Annual Benefit Statements would have a section on the McCloud remedy. The Governance and Regulations Manager stated this would be investigated when the final template had been received in May from the software supplier.

It was resolved unanimously to:

note the Governance and Compliance Report.

204. Business Plan and Medium-Term Strategy 2025-26

The Head of Pensions presented the Cambridgeshire Pension Fund Business Plan and Medium-Term Strategy 2025/26 to 2027/28 and the Climate Action Plan. Members noted the activities which were RAG rated amber, as listed in section 2.2 of the report. The Head of Pensions stated some activities in the business plan, related to Fit for the Future, were uncertain as they were only consultation proposals at the current time, and there had not been a response from government. The Head of Pensions explained the increase in staff related costs and the County Council overhead recovery.

The length of agendas was acknowledged, and Members learnt the intention was to streamline some reports.

While discussing the report, Members:

- noted that the local government reorganisation was being appropriately considered. The Head of Pensions stated that Northamptonshire County Council had previously undergone the reorganisation process and noted the upcoming reorganisation was expected to be within the existing boundaries of Cambridgeshire. If the reorganisation was not within those boundaries, the process would become more complex.
- confirmed that the increasing complexities listed in section 3.3 of the report were due to external pressures.
- highlighted that the number of undecided leavers differed in the report to the Administration Performance report. Officers agreed to correct this – **action required.**

It was resolved unanimously to:

- a) note the status of the 2024/25 year-end Business Plan activities (section 2.1-2.5 & appendix 1).
- b) note the year-end position of the cyber action plan (section 2.6 & appendix 2 exempt).
- c) note the contents of the Business Plan and Medium-Term Strategy 2025/26 and associated budget, including the 2024/25 year-end financial position and revised objectives for the Fund (section 3.1-3.7 & appendices 3 & 4).
- d) note the 2025/26 Climate action plan (section 3.6 & appendix 5).

205. Training Strategy

The Training Strategy had been reviewed to ensure compliance with the Pension Regulator's General Code of Practice and in anticipation of expected requirements from the Pension Review, which incorporated the Good Governance Review recommendations. To ensure Members had an appropriate level of knowledge and understanding, Members would participate in the 2026 National Knowledge Assessment to identify any knowledge gaps. Members learnt that the assessment would be 15-20 minutes long and would be open for a few weeks.

The Governance and Regulations Manager acknowledged the risk to the appropriate skills and knowledge on the Pension Fund Board and Pension Fund Committee due to the upcoming election. To help mitigate the risk there was scheduled induction training and a networking event in June. Additionally, the LGPS Online Learning Academy (LOLA) modules were expected to be completed within 6 months to align with the Pensions Regulator expectations. Members were surveyed on the training platform and the results were provided to Hymans. Members learnt there was one other comparable training

site that was in the early stages of development, so the officers were currently satisfied with the LOLA platform.

While discussing the report, Members:

- learnt that additional training would be provided if a member did not pass the assessment. If a member did not undertake the necessary training, there would be the issue of non-compliance. This would be highlighted to the relevant chair, however any non-compliance would also be reported to Cambridgeshire County Council's Monitoring Officer.
- noted the LOLA training modules were for all members, regardless of their previous experience or knowledge.
- questioned what would happen if someone joined the Committee or Board a few months prior to the assessment. Members were advised that this would be reviewed appropriately if the situation arose.
- learnt that members were able to attend additional training as listed in section 11.5 of the strategy.
- noted that the Hymans Robertson Online Training Academy included the role of the Cambridgeshire Pension Fund Board, as well as the Committee. The Governance and Regulations Manager stated the training and networking event in June would outline the roles of the Pension Fund Board and Pension Fund Committee. It was agreed to share the PowerPoint slides from the session – **action required**.
- noted that the Fund was recognised as a professional investor.
- highlighted that 11.5 of the Training Strategy should state 'Northamptonshire Pension Fund' – **action required**.
- noted the incorrect numbering in the strategy. Officers agreed to update this – **action required**.

It was resolved unanimously to:

review the Cambridgeshire Fund Training Strategy

206. Communications Strategy and Plan

The Board received the Communications Strategy and Plan. Attention was drawn to the updates to the strategy and plan which included the Pensions Regulator 'General principles for members communications and the introduction of artificial intelligence (AI).

While discussing the report, Members:

- questioned if there were any national initiatives for AI and communications. Members learnt that chat bots were being reviewed within West Northamptonshire Council Digital and officers were keen to learn from this to potentially help members on the website. However, officers were currently unaware of any national initiatives. Another Member asked for the option to request to speak to a human rather than AI. Officers noted the point and agreed to consider this view if they looked to implement a chat bot in the future.
- queried the communication and engagement with employers. Members learnt that employer engagement was an issue with other funds. The Governance and Regulations Manager informed Members that some employers attend forums representing several employers, for example one member could represent ten academies.
- learnt that people could opt out of electronic communications by email.
- highlighted 'Cambridgeshire' was incorrectly spelt on the final page of Appendix 1. Officers agreed to correct this – **action required**.

It was unanimously resolved to:

note the Communications Strategy and Plan.

207. Risk Strategy

The Board received the risk strategy and the risk register template which were reviewed as a result of the Pensions Regulator's General Code of Practice. The Governance and Regulations Manager stated the changes were listed at section 6.2 of the report. The Pension Fund Committee would review the risk register at every meeting, compared to twice a year. The new risk register template was included in Appendix 3 and there would be the ability to have a public risk register with a confidential appendix, which was previously requested by Members.

While discussing the report, Members:

- questioned if the Board received the report without the ability to approve actions to mitigate a risk as stated in Appendix 2. The Governance and Regulations Manager stated that the Board would be able to highlight any issues and there would be a mechanism to ensure dialogue between the Board and Committee. It was agreed to review the wording at 10.9 of the Risk Strategy to reflect this – **action required**.
- asked for the roles and responsibility of West Northamptonshire Council (WNC) and Cambridgeshire County Council (CCC) to be clearly stated. Officers agreed to review this – **action required**.

It was unanimously resolved to:

review the Risk Strategy and note the new Risk Register format which came into effect from 1 April 2025.

[The Board adjourned for a short break from 11.59 a.m. to 12.04 p.m.]

208. Payment of Employee and Employer Pension Contribution Policy Review

The Board reviewed Payment of Employee and Employer Pension Contribution Policy. The Investment and Fund Accounting Manager highlighted the changes, as listed in section 3.1 of the report, were to align with the latest General Code of Practice issued by the Pensions Regulator.

The Investment and Fund Accounting Manager informed Members that 99.7% of contributions were received on time.

A Member asked for the roles and responsibilities of WNC and CCC to be clearly defined. Officers agreed to review this – **action required**.

It was resolved unanimously to:

note the changes to the Payment of Employee and Employer Pension Contributions Policy.

209. General Code of Practice Compliance Best Practice

The Board received a report on the compliance of the Cambridgeshire Pension Fund against the General Code of Practice (best practice). The Fund was largely compliant, with one area of partial compliance in relation to risk management. An action plan was included in Appendix 3 and the Board would receive a progress report in Autumn. An annual assessment would be undertaken to ensure the Fund was compliant with the Code.

While discussing the report, Members learnt that the appendices referred to in Appendix 2 linked to the General Code of Practice. Officers agreed to circulate this outside of the meeting – **action required**.

It was resolved unanimously to:

note the best practice compliance check against the General Code of Practice.

210. Pension Fund Annual Report and Statement of Accounts

The Board received the final Annual Report and Statement of Accounts, and the audit findings report for 2023-24. The Annual Report had been approved in November 2024 by the Pension Fund Investment Sub-Committee and the

Statement of Accounts had been approved at the Audit and Accounts Committee in January 2025.

The Investment and Fund Accounting Manager informed Members it was a clean audit which was clear of any material or non-material misstatement and there were no unadjusted items.

The KPMG representative informed Members that the two audit risks were management override of controls and valuation of Cambridge and Counties Bank and no significant issues were identified. Whilst introducing the key accounting estimates, as detailed in Appendix 1, Members learnt that there was an adjustment for Level 3 pooled investment vehicles as the final valuation figures were not available when the financial statements were drafted. Following the figures becoming available, management agreed to adjust the financial statements. Attention was drawn to the other audit risks listed in Appendix 1 and further comment was made on the independence of KPMG.

While discussing the report, Members were reassured that there were no concerns regarding controls, but this was a process improvement point which was raised with management. There were no transactions with related parties.

It was resolved unanimously to:

note the contents of the report.

211. Pensions Dashboard Update

The Board received an update on the progress made by the Fund to connect the Pension Dashboard infrastructure for the deadline of 31 October 2025. The Head of Pensions informed Members that there had already been a connection to the Integrated Service Provider (ISP) console and the next stage was to connect to the Dashboard ecosystem which was expected to be in Summer 2025. The draft matching criteria, attached in Appendix 1, had previously been delayed to undergo user access testing. Data quality improvement work had been undertaken with the Additional Voluntary Contribution (AVC) providers. The Fund had two AVC suppliers, both of whom would send data to the Service, however the software supplier needed to develop a solution on how to hold the data.

While discussing the report, Members:

- noted the draft matching criteria referenced surname and last name. The Head of Pensions stated this was for the situation where a different, or former, surname was retained. It was agreed to clarify the point in the draft policy – **action required**.
- asked for the roles and responsibilities of WNC and CCC to be clearly defined. It was agreed to review this and the potential option of these being clearly defined in each policy – **action required**.

It was resolved unanimously to:

note the contents of the report, including the draft Matching Criteria Policy (appendix 1).

212. Cambridgeshire Pension Fund Board Agenda Plan

While noting the agenda plan, Members:

- were informed that the agenda plan would be populated with the agreed Business Plan activities.
- learnt that a valuation update would be provided at the July meeting.
- acknowledged officers were looking at streamlining reports.
- queried the purpose of receiving items post-scrutiny from the Pension Fund Committee. The Governance and Regulations Manager stated the intention was for the Board to note the report, but any suggested changes could be brought to the attention of the Pension Fund Committee.

213. Exclusion of Press and Public

To resolve that the press and public be excluded from the meeting on the grounds that the agenda contains exempt information under Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972, as amended, and that it would not be in the public interest for this information to be disclosed information relating to the financial or business affairs of any particular person (including the authority holding that information).

214. CONFIDENTIAL Minutes – 7 February 2025

The confidential minutes of the meeting held on 7 February 2025 were approved as a correct record.

215. ACCESS Update - CONFIDENTIAL

The Board received an ACCESS update report.

It was unanimously resolved to:

Note the recommendations as set out in the report.

Chair

Cambridgeshire Local Pension Board Minutes Action Log

This is the updated action log as at 17 June 2025 and captures the actions arising from the most recent Cambridgeshire Local Pension Board meeting and updates Members on the progress on compliance in delivering the necessary actions.

Minutes 4 April

Minute number	Report Title	Action for	Action	Comment	Status
200.	Minutes and Action Log 7 February 2025	Michelle Oakensen	A member queried if the overpayment mentioned in a previous Administration Report from 7 February 2025 had been recovered. Officers to circulate an update.	In progress. The repayment of the overpaid amount remains outstanding. The executor has been contacted, and the matter is currently being monitored by the appropriate team.	
201.	Internal Audit Report	Mark Whitby	To ensure that the executive summary of the report is updated to establish that the Internal Audit Strategy and Plan have been approved by management.	Completed. It has been confirmed that the Strategy and Plan were approved by management before they were presented to the Committee and Board.	
201.	Internal Audit Report	Mark Whitby	A member highlighted a formatting issue in the management action plan in Appendix 2. Officers to update.	Noted. The action plan will be updated for future reports.	
201.	Internal Audit Report	Mark Whitby	Officers to circulate an update on the audit action plan.	In progress.	
201.	Internal Audit Report	Mark Whitby	Following the agreement of the Board, it was agreed to include risk management in the first-year.	Completed.	

201.	Internal Audit Report	Mark Whitby	A Member had questions which related to the confidential appendix. The Chair offered the option of moving into confidential session so these questions could be answered by the Head of Internal Audit and Risk Management, but the Member was content to pose the questions outside of the meeting for written response. Officer to ensure a response it's provided.	Completed.	
204.	Business Plan and Medium-Term Strategy 2025-26	Mark Whitby	A member highlighted that the number of undecided leavers differed in the report to the Data Improvement Plan. Officers agreed to correct this.	Completed.	
205.	Training Strategy	Michelle Oakensen	Officers to share the PowerPoint slides from the June training and networking event once they become available.	Future action.	
205.	Training Strategy	Michelle Oakensen	Officers to amend section 11.5 of the Training Strategy to say "Northamptonshire Pension Fund"	Completed.	
205.	Training Strategy	Michelle Oakensen	Officers to correct the numbering in the Training in the Training Strategy.	Completed.	
206.	Communications Strategy and Plan	Sharon Grimshaw	Officers to correct the spelling error on the final page of Appendix 1.	Completed.	
207.	Risk Strategy	Michelle Oakensen	Officers to review the wording in section 10.9 of the Risk Strategy.	Completed. Pension Fund Board oversight has been included.	
207.	Risk Strategy	Michelle Oakensen	Officers to review the strategy to ensure that the roles and responsibility of West Northamptonshire Council (WNC) and Cambridgeshire County Council (CCC) are clearly stated.	Completed. The introductory section defines the partnership arrangements between Cambridgeshire County Council and West Northants Council.	

208.	Payment of Employee and Employer Pension Contribution Policy Review	Ben Barlow	Officers to review the policy to ensure that the roles and responsibility of West Northamptonshire Council (WNC) and Cambridgeshire County Council (CCC) are clearly stated.	Completed. The introductory section defines the partnership arrangements between Cambridgeshire County Council and West Northants Council.	
209.	General Code of Practice Compliance Best Practice	Madalina Bratec	Officers to circulate additional information regarding the appendices mentioned in Appendix 2.	Completed.	
211.	Pensions Dashboard Update	Michelle Oakensen	Officers to review the draft matching criteria policy to clarify the section referring to the former surname.	Completed. The partial match section has been updated to remove the secondary reference (last name). The amended version was presented to the Committee on 18 June 2025.	
211.	Pensions Dashboard Update	Michelle Oakensen	Officers to review the policy to ensure that the roles and responsibility of West Northamptonshire Council (WNC) and Cambridgeshire County Council (CCC) are clearly stated.	Completed.	
215.	ACCESS Update	Ben Barlow	Officers to circulate the government's response on the ACCESS proposal.	Completed	

Minutes 7 February 2025

Minute number	Report Title	Action for	Action	Comment	Status
196.	Cyber Strategy	Michelle Oakensen	To investigate if additional assurances can be provided to the Board on cyber detection and prevention activities.	This has been raised with Head of Cyber Security and a full response will be provided in due course.	Ongoing

CAMBRIDGESHIRE PENSION FUND

To: Pension Fund Board

Meeting date: 25 July 2025

Report by: Michelle Oakensen
Governance and Regulations Manager
michelle.oakensen@westnorthants.gov.uk

Subject: Governance and Compliance Report

Purpose of the report: To provide the Pension Fund Board with information on:

- LGPS England and Wales (3.1-3.12)
- McCloud (3.13-3.14)
- Pension Dashboards (3.15-3.21)
- Scheme Advisory Board (SAB) (3.22-3.24)
- The Pensions Regulator (TPR) (3.25-3.27)
- Wider landscape (3.28-3.31)
- Skills and knowledge opportunities (3.32-3.36)

The report also provides details of immaterial amendments made to policies or strategies as a result of Officer reviews (section 4).

Recommendations: The Pension Fund Board is asked to note the Governance and Compliance Report.

Enquiries to: Michelle Oakensen
Governance and Regulations Manager
michelle.oakensen@westnorthants.gov.uk

1. Background

- 1.1 This report provides an update on developments and issues that impact the Local Government Pension Scheme (LGPS) that members of the Pension Committee need to be aware of to fulfil their responsibilities to the Fund's key stakeholders.

2. Executive summary

- 2.1 This report provides the Board with information on the following significant current issues which have an impact on the governance, management and administration of the Cambridgeshire Pension Fund.

- LGPS England and Wales
- McCloud
- Pension Dashboards
- Scheme Advisory Board
- The Pensions Regulator
- Wider landscape
- Skills and knowledge opportunities

- 2.2 The report also provides details of immaterial amendments made to policies or strategies as a result of Officer reviews.

3. LGPS Landscape

LGPS England and Wales

Ministry of Housing, Communities and Local Government (MHCLG) plans change to revision of employer contribution rate rules

- 3.1 MHCLG intends to consult on changes to the regulations that cover mid-valuation cycle changes to employer contribution rates. This was set out in an MHCLG letter to all administering authorities in England and Wales dated 10 March 2025.
- 3.2 In the letter, Michelle Warbis, Deputy Director for the LGPS at MHCLG, confirms the Government's view of when the provisions of regulation 64A of the LGPS Regulations 2013 should be exercised. Their view is that a review is appropriate in response to changes in an employer's liabilities, or its ability to meet its obligations. Amending the employer contribution rate mid-valuation cycle is not intended as a way of managing surpluses or deficits.
- 3.3 The Government will consult on tightening up the rules covering when the provisions of regulation 64A can be exercised and the fund actuary's role in that process. The consultation is expected to be launched after the local government elections on 1 May 2025.

LGPS 'Access and fairness' consultation launched

- 3.4 On 15 May 2025, the Ministry of Housing, Communities and Local Government (MHCLG) launched a consultation on changes to the Local Government Pension Scheme (LGPS) in

England and Wales. The proposed changes are intended to improve fairness in and access to the LGPS. The proposals include:

- Survivor benefits and death grants
- Gender pensions gap benefits
- Gender pensions gap reporting
- Opt outs
- Forfeiture
- McCloud remedy
- Abolition of LTA changes

3.5 The consultation also includes questions on the potential administrator burden and the Government's duty under Public Sector Equality Duty.

3.6 The consultation closes on 7 August 2025 and can be located [here](#).

Government's response to LGPS 'Fit for the future' consultation published

3.7 On 29 May 2025, the Government published its response to the 'Local Government Pension Scheme: Fit for the future' consultation.

3.8 The Fit for the future consultation response confirms that the core proposals included in the consultation will be taken forward, including those on investment pooling. It confirms there are no plans to reduce the number of pools below six. The Government will take powers to direct administering authorities to participate in a specific pool if necessary.

3.9 The consultation response can be found [here](#).

Pension Schemes Bill

3.10 The Pension Schemes Bill was laid before Parliament on 5 June 2025 and the LGPS aspects are summarised below:

- Defines asset pool companies in statute, and LGPS Regulations will require LGPS administering authorities to participate in a pool, which must manage all their assets, and the Regulations will set out specific considerations which must be met by those pool companies.
- LGPS administering authorities can be required to invest in a particular pool.
- Implements the proposals focusing on local investment, by requiring that LGPS Regulations for England and Wales include a duty for LGPS administering authorities to work with strategic authorities in their local area to identify appropriate opportunities.
- Sets the requirements for LGPS administering authorities to carry out a governance review. The detail will be included in Regulations. An administering authority can be directed to carry out a governance review at any time.
- Modifies the Procurement Act 2023 as it applies to the LGPS. This is so that if an asset pool company carries out investment management activities for or on behalf of another asset pool company, or the Administering Authorities of another asset pool company, the relevant contracts will be regarded as exempt from the requirements of the Procurement Act 2023.

3.11 The Bill also covers other pensions related topics, such as:

- Defined Contribution (DC) schemes to offer clear default options for turning savings into retirement income.
- A new Value for Money framework to show how well DC pension schemes are performing and measures to combine small DC pots.
- New rules creating multi-employer DC megafunds of at least £25 billion.
- Increased flexibility for Defined Benefit (DB) schemes to safely release surplus and flexibility to enable Pension Protection Fund (PPF) levies to be reduced.

3.12 Details of the Bill can be found [here](#).

McCloud

McCloud member webinars feedback

3.13 Affinity Connect has been delivering webinars on McCloud to LGPS members in England and Wales. Feedback from members who have attended a session has been very positive. Since March 39 webinars have been delivered and 768 members attended these events. A significant majority of attendees would recommend the webinar to a colleague – this scored 4.7/5.

3.14 News articles for both members and employers have been published on the pension service website to encourage participation. The webinars can be found [here](#).

Pension Dashboards

Connecting to dashboards

3.15 On 18 March 2025, the Pensions Dashboards Programme (PDP) published a blog about what you need to do to connect to the dashboards ecosystem.

3.16 The LGPS connect by date is 31 October 2025. This is set out in the guidance published by the Department for Work and Pensions (DWP) in March 2024. Whilst this date is not statutory, administering authorities should seek to connect in line with the date set out in the guidance.

3.17 The route to connection and AVC approach should have been decided.

Volunteer participants complete connection journey

3.18 In March 2025, the PDP confirmed that three organisations have passed through the stages to connect to the pensions dashboards ecosystem. This opens the way for the first schemes to connect in April 2025. Information on the first participants connecting to the pensions dashboards ecosystem is located on the PDP website.

3.19 The organisations that have passed the final stage are Heywood, Legal and General and Pension Fusion.

PDP progress update report May 2025

3.20 On 15 May 2025, the Pensions Dashboards Programme (PDP) published its latest progress update report. This half yearly report sets out PDP's ongoing work across a range of programme areas including updates on the standards and the latest information about the MoneyHelper pensions dashboard.

3.21 The progress report can be found [here](#).

Scheme Advisory Board (SAB)

Further advice on fiduciary duty in the context of the LGPS

3.22 In January 2025, the Board received Nigel Giffin KC's updated opinion on the fiduciary duty in the LGPS.

3.23 The Board is considering whether further advice on specific points would be helpful. The Board's Secretariat is reviewing additional questions related to conflicts of interest and fiduciary duty. This review aims to determine the need for further legal advice for the Board and administering authorities.

SAB Chair writes welcome letter to new Pensions Minister Torsten Bell

3.24 The Board Chair, Cllr Roger Phillips has written to the new Pensions Minister Torsten Bell to welcome him to his role. The letter makes three recommendations to the Minister:

- to provide clarity for the LGPS on the impact of the judgment made in the dismissed appeal of the Virgin Media Ltd v NTL Ltd case in July 2024
- to increase the limit in the Administration of Estates (Small Payments) Act 1965 to allow for more small payments to be made without the need for grant of probate or letters of administration
- to set the timetable for Phase 2 of the Pensions Review.

The Pensions Regulator (TPR)

Warning members about pension scams

3.25 The Pensions Regulator (TPR) has updated its two-page pension scams leaflet and the letter to be issued to members when transferring benefits out of a defined benefit scheme. Both documents can be found on the Warn members about pension scams page of the TPR website. The generic letter for a member transferring out of a defined benefit scheme is not appropriate for members of a public service pension scheme.

TPR publishes data strategy

3.26 TPR's data strategy challenges pension schemes to raise data standards which will in turn improve outcomes, increase efficiency, enhance innovation and reduce the regulatory burden. It provides an overview of TPR's data vision for the coming years, expected changes at TPR and how these will affect pension scheme administrators and managers.

3.27 The strategy can be found [here](#).

Wider landscape

Inquiry on AI in banking, pensions and other financial services

3.28 The Treasury Committee has launched an inquiry into the use of artificial intelligence (AI) in banking, pensions and other financial services. This inquiry aims to understand the potential benefits and risks, including its impact on employment, financial stability and consumer protection.

The Neonatal Care Leave and Pay (Consequential Amendments to Subordinate Legislation) Regulations 2025

- 3.29 On 24 February 2025, the Department for Business and Trade laid the Neonatal Care Leave and Pay (Consequential Amendments to Subordinate Legislation) Regulations 2025.
- 3.30 The regulations came into force on 6 April 2025 and make changes related to neonatal care leave (NCL) and pay. This is a new statutory entitlement for employed parents whose child receives neonatal care starting within 28 days of birth and goes on to spend seven or more continuous days in care. Eligible parents will be entitled to up to 12 weeks of NCL in addition to existing entitlement such as maternity, adoption and paternity leave. The leave must be taken within 68 weeks of the baby's birth. The entitlement applies to children born after 5 April 2025.
- 3.31 The regulations amend regulations 15(4)(b), 16(17)(a) and the definition of 'child-related leave' in schedule 1 of the LGPS (England and Wales) Regulations 2013, treating neonatal care leave similarly to most other types of child-related leave. Members on paid neonatal care leave are treated as receiving assumed pensionable pay. Members on unpaid neonatal care leave can choose to buy back the lost pension through a shared-cost additional pension contract.

Skills and knowledge opportunities

- 3.32 The Public Services Pensions Act 2013 and the Pensions Regulator's Code of Practice (Governance and administration of public service pension schemes) require all members of the Pension Committee to maintain the necessary skills and knowledge to undertake their role effectively.
- 3.33 In order to facilitate the acquisition of skills and knowledge for members of the Pension Committee, members are expected to complete the online training modules and in addition appendix 1 lists the main events that are deemed useful and appropriate.
- 3.34 If members of the Pension Committee would like to attend any of the events listed in appendix 1, please contact a member of the Fund's governance team who will make the necessary arrangements if an invitation has not already been sent.
- 3.35 The Training Strategy was last approved at the March 2025 meeting of the Pension Committee. Please find the Training Strategy [here](#).
- 3.36 Reminder emails were sent to members that had not completed the training by the deadline and subsequent emails were sent to the Chair of the Committee and Board to highlight non-compliance. Any training not undertaken has been reflected in the Fund's Risk Register.
- ## 4. Cambridgeshire Pension Fund Policy/Strategy updates
- 4.1 In March 2023 the Pension Fund Committee agreed for all policies and strategies to be reviewed by the Committee on a three-year cycle (unless stated otherwise) with Officer reviews to be conducted on an annual basis or as deemed necessary.
- 4.2 For the period no officer reviews were conducted.

4.3 The below table provides an update of upcoming reviews:

Policy/Strategy	Review reason	Comments/amendments made
Cessations Policy	Annual officer review due	A comprehensive review is required in conjunction with the review of the Funding Strategy Statement. An update on proposed revisions will be provided later in the year as part of the valuation reporting.
Data Improvement Policy	Annual officer review due	The policy will be presented for a full Committee review during 2025/26 in line with the pending Dashboard developments.
Governance Policy and Compliance Statement	Annual officer review due	Confirmation that the Officer review has been undertaken will be included in the October 2025 Governance and Compliance Report. This may be delayed depending upon the outcome of the pension review and associated timescales.
Overpayment of Pension and Debt recovery Policy	Annual officer review due	Confirmation that the Officer review has been undertaken will be included in the October 2025 Governance and Compliance Report.
Administration Strategy	Annual officer review due	The Strategy was approved in June 2024 with further immaterial changes applied in December 2024 via the Governance and Compliance Report. The annual review will therefore be conducted in December 2025.

5. Relevant Pension Fund objectives

- To ensure compliance with the LGPS Regulations and other legislation and guidance, including the Pensions Regulator’s Code of Practice.
- To ensure individuals responsible for managing the Fund and delivering its services have the appropriate knowledge and expertise.
- To manage the Fund in a fair and equitable manner and be accountable to the Fund’s stakeholders.
- To ensure robust processes, controls and risk management are in place.
- To continually measure and monitor success against the Fund’s objectives.

6. Implications (including financial implications)

6.1 Resources and financial

6.1.1 There are no resources or financial implications arising from the report.

6.2 Legal

6.2.1 No material issues have been identified which may give rise to legal liability and/or risk from an administering authority perspective.

6.2.2 The Fit for the Future consultation proposes a number of changes that may lead to changing responsibilities between the administering authority and its asset pool, as well as significant evolution of pool models/structures. The consultation also includes further proposals regarding such matters as fund governance.

6.3 Risk management

6.3.1 The Constitution Section 4.8 para 1.3 states that the Pension Committee has “Authority to develop and maintain a skills and knowledge framework for all Pension Committee and Investment sub-committee members and for all officers of the Fund including;

- (i) Determining the Fund’s knowledge and skills framework;
- (ii) Identifying training requirements;
- (iii) Developing training plans; and
- (iv) Monitoring attendance at training events.

6.3.2 This report ensures on-going compliance with the above and that the Pension Committee is up to date with:

- New or amending legislation affecting the LGPS;
- Relevant activities of the LGPS Scheme Advisory Board and the Pensions Regulator that concern the governance of the (LGPS) on a national and local basis; and
- Skills and knowledge opportunities.

6.3.3 The risks associated with the Pension Committee and Board not having the required level of knowledge and understanding have been captured in the Fund’s risk register as detailed below.

6.3.4 The Fund’s risk register can be found [here](#).

Risk	Residual risk rating
Those charged with governance are unable to fulfil their responsibilities effectively	Green
Failure to administer the scheme in line with regulations and guidance.	Green
Failure to provide relevant information to the Pension Fund Committee/Pension Board to enable informed decision making	Green

6.4 Consultation

6.4.1 The Fund is kept updated with developments and consultations via various sources such as the Local Government Association, The Pensions Regulator and Scheme Advisory Board. No consultation was required for this report.

6.5 Consultation with Key Advisers

6.5.1 None.

7. Background papers

7.1 None.

8. Appendices

8.1 Appendix 1 - Cambridgeshire Pension Fund Training Plan

Training plan 2025

Date	Training	Method of delivery	Delivered by	Target audience	Additional Information
JULY	LAPFF Mid-Year Conference	Conference – face to face	Local Authority Pension Fund Forum	Officers	9 July 2025 (MID YEAR CONFERENCE 2025 - LAPFF)
SEPTEMBER	Investment and Pensions Summit	Conference – face to face	Local Government Chronicle (LGC)	Committee, Board & Officer	10-12 September 2025 (LGC Investment & Pensions Summit 2025 - Home Page)
OCTOBER	DAY 1 Pension Fundamentals training course	Face to Face/Virtual	Local Government Association (LGA)	Committee & Board	8 October (London) 14 & 21 October (virtual)
NOVEMBER	DAY 2 Pension Fundamentals training course	Face to Face/Virtual	Local Government Association (LGA)	Committee & Board	5 November (London) 13 & 20 November (virtual)
DECEMBER	DAY 3 Pension Fundamentals training course	Face to Face/Virtual	Local Government Association (LGA)	Committee & Board	3 December (London) 9 & 16 December (virtual)
	LAPFF conference	Conference	Local Authority Pension Fund Forum	Officers	TBC

**CAMBRIDGESHIRE
PENSION FUND**

To: Pension Fund Board

Meeting date: 25 July 2025

Report by: Ben Barlow
Investments and Fund Accounting Manager
Ben.Barlow@westnorthants.gov.uk

Subject: KPMG Audit Plan for Cambridgeshire Pension Fund
2024-25

Purpose of the report: To present the Audit Plan from KPMG

Recommendations: The Pension Fund Board is asked to note the Audit
Plan 2024-25.

Enquiries to: Ben Barlow
Investments and Fund Accounting Manager
Ben.Barlow@westnorthants.gov.uk

1. Background

- 1.1 The Pension Fund's Statement of Accounts (SOA) form part of Cambridgeshire Council's Statement of Accounts. These are audited by the Council's external auditor KPMG. The auditor confirms whether, in their opinion, the SOA reflect a true and fair view of the financial position of the authority (and the Fund within it) for the financial year 1 April to 31 March and that the SPA is free from material mis-statement.

2. Executive summary

- 2.1 KPMG act as the Cambridgeshire Pension Fund's external auditors. As the external auditors they have produced a plan of the 2024-25 audit of the Cambridgeshire Pension Fund.
- 2.2 The significant risks and areas of focus for KPMG are management override of controls and the valuation of Cambridge and Counties Bank.
- 2.3 Other audit risks being considered by KPMG are:
 - 2.3.1 Level 1, 2 and 3 investments are not complete, do not exist or are not accurately recorded;
 - 2.3.2 Valuation of Level 1, 2 and 3 investments is misstated;
 - 2.3.3 The actuarial position of the scheme is not appropriately presented in the financial statements.
- 2.4 Materiality for the financial statements is £48m, 1% of total of draft total assets as at 31 March 2025. Materiality misstatements to be reported is £2.4m
- 2.5 The total audit fees for the year are £98,000, excluding IAS 19 letters for employer body auditors

3. Content, Responsibilities and Timeline

- 3.1 KPMG have been appointed as Independent External Auditors to provide an audit opinion on:
 - 3.1.1 whether the financial statements of Cambridgeshire Pension Fund give a true and fair view of the financial transactions of the Pension Fund during the year ended 31 March 2025 and the amount and disposition of the Fund's assets and liabilities as at 31 March 2025; and
 - 3.1.2 the consistency of the Pension Fund financial statements within the Pension Fund annual report with the published financial statements of Cambridgeshire County Council.

KPMG have produced an audit plan, setting out identified audit risks, expected materiality levels, the scope of their audit, the team, and the planned delivery of the audit process.

- 3.2 Page 6 of the accompanying report identifies the key risks and areas of auditor focus, details the Auditor's planned approach to these risk areas. These, along with the Fund's approach are summarised in the following table.

Risk/area of focus	Audit approach	Fund approach
Management override of controls	<ul style="list-style-type: none"> • Assess accounting estimates for biases. • Evaluate selection and application of accounting policies. • Assess the appropriateness of changes compared to the prior year to the methods and underlying assumptions used to prepare accounting estimate. • Assess the business rationale and the appropriateness of the accounting for significant transactions. • Evaluate the design and implementation of controls over journal entries and post-closing adjustments. • Test the operating effectiveness of controls over journal entries and post-closing adjustments. • Using the high-risk criteria to identify the journals for any further investigation. 	<ul style="list-style-type: none"> • Ensure process notes include identified risks • Provide written process notes which detail controls • Make copy journals available • Provide working papers demonstrating the value used for the journals
Valuation of Cambridge and Counties Bank (CCB)	<ul style="list-style-type: none"> • Obtain copies of the CCB valuation report completed by a third-party specialist (Grant Thornton). • Assess Grant Thornton's competency as a valuation expert and their work. • Engage KPMG specialists to review the valuation methodology and assumptions. • Challenge the valuer on the valuation inputs. • Identify and evaluate the design and implementation of controls in place for management to review the valuation. 	<ul style="list-style-type: none"> • Instruct Grant Thornton to provide a valuation report for Cambridge and Counties Bank and make this, and supporting information, available to the auditor. • Provide working papers demonstrating the value used at the year end and the valuation methodology. • Provide evidence of management review control to the valuation.
Level 1, 2 and 3 investments are not complete, do not exist or are not accurately recorded	<ul style="list-style-type: none"> • Gain an understanding of the control environment at all the investment managers and custodian by reviewing their internal controls • Obtain direct confirmations from the custodian and investment managers. • Vouch purchases and sales to investment manager and custodian reports. 	<ul style="list-style-type: none"> • Provide working papers demonstrating the value used at the year end and the valuation methodology. • Provide quarterly reconciliation reports and performance reports • Liaise with Investment Managers and custodian to provide information to auditors on a timely basis.

Risk/area of focus	Audit approach	Fund approach
	<ul style="list-style-type: none"> Recalculate change in market value and compare to overall investment return. 	
Valuation of Level 1, 2 and other level 3 investments are misstated.	<ul style="list-style-type: none"> Use of the in-house investment valuation team, iRADAR – approach differs per investment type and is set out on Page 8 of the audit plan. Obtaining unaudited Net Asset Value (NAV) statements for Level 3 pooled investment vehicles. 	<ul style="list-style-type: none"> Provide working papers demonstrating the value used at the year end and the valuation methodology. Provide quarterly reconciliation reports and performance reports Liaise with Investment Managers and custodian to provide information to auditors on a timely basis.
The actuarial position of the Fund is not appropriately presented in the financial statements	<ul style="list-style-type: none"> Understand the processes in place to set the assumptions used in the valuation. Evaluate the competency, objectivity of the actuaries to confirm their qualifications and the basis for their calculations. Perform inquiries of the accounting actuaries to assess the methodology and key assumptions made. Test the data provided used within the scheme valuation. Evaluate the key assumptions applied against externally derived data. 	<ul style="list-style-type: none"> Ensure process notes include identified risks. Provide written process notes which detail controls. Liaise with Hymans to provide information to the auditors on a timely basis,

3.3 Page 3 of the accompanying report sets out the materiality levels for the audit, based on 1% of draft net assets of £4.75bn, which are planned to be:

Audit Area	Materiality
Materiality for the Financial statements as a whole	£48m
Procedure designed to detect individual errors at this level	£36m
Audit Differences	£2.4m

3.4 Page 16 and 17 of the accompanying report sets out the proposed timeline for delivery of the audit. The key planned milestones are:

Milestone	Planned dates	Status
Planning and Interim fieldwork	April 2025	Completed
Presenting audit plan to the Board.	July 2025	Completed

Milestone	Planned dates	Status
Year end Audit	July -September 2025	Ongoing
Audit Results Report	September 2025	To be completed
Sign off	November 2025	To be completed

3.5 Page 18 sets out the audit fees for the year. £98,000 is the fee for auditing the financial statements. For comparison, the 2023-24 fee was £98,600 (excluding fee for the IAS19 assurance letters). The scale fee does not include the impact of ISA315, which may increase audit hours by 10% to 20%. External audit fees are agreed with Public Sector Audit Appointments (PSAA).

4. Relevant Pension Fund objectives

- 4.1 To ensure compliance with the LGPS Regulations and other legislation and guidance, including the Pensions Regulator's Code of Practice.
- 4.2 To ensure individuals responsible for managing the Fund and delivering its services have the appropriate knowledge and expertise.
- 4.3 To manage the Fund in a fair and equitable manner and be accountable to the Fund's stakeholders.
- 4.4 To ensure robust processes, controls and risk management are in place.
- 4.5 To continually measure and monitor success against the Fund's objectives.
- 4.6 To deliver clear, inclusive, accessible communications to stakeholders, including up-to-date information in order that informed decisions can be made.

5. Implications (including financial implications)

5.1 Resources and financial

5.1.1 The proposed costs of external audit by KPMG is set out in the paragraph 3.3.

5.2 Legal

5.2.1 No material issues have been identified which may give rise to legal liability and/or risk from an administering authority perspective..

5.2.2 Squire Patton Boggs have reviewed the paper for legal implications.

5.3 Risk management

5.3.1 The mitigated risks associated with this report has been captured in the Fund's risk register as detailed below –

Risk No.	Risk	Residual risk rating
3a	Those charged with governance are unable to fulfil their responsibilities effectively	Amber
3b	Contributions to the Fund are not received on the correct date and/or for the correct amount	Amber
4b	Fund assets are not sufficient to meet obligations and	Amber

Risk No.	Risk	Residual risk rating
	liabilities.	
2a	Information may not be provided to stakeholders as required	Green
8a	Failure to administer the scheme in line with regulations and guidance.	Green
11a	Incorrect production of accounts, notices, publications and management reports leading to possible financial and reputational damage.	Green
4c	Custody arrangements may not be sufficient to safeguard Pension Fund assets.	Green
5c	Pension Fund investments may not be accurately valued.	Green
6c	Investment decisions and portfolio management may not achieve the return required or be performed in accordance with instructions provided.	Green

5.3.2 The Fund's full risk register can be found on the Fund's website at the following link:

<https://pensions.cambridgeshire.gov.uk/information/about-us/key-documents-cambridgeshire/governance-policies/#main>

5.4 Consultation

5.4.1 The Pension Fund Annual Report is produced utilising information and advice provided by Investment Managers, the Fund's Custodian, Northern Trust, and the Fund's Actuary, Hymans Robertson.

6. Background papers

6.1 None

7. Appendices

7.1 Appendix 1 – External Audit Plan & Strategy for Cambridgeshire Pension Fund 2024-25

Cambridgeshire Pension Fund

Report to the Pensions Fund Committee

External Audit Plan & Strategy for the year ended 31
March 2025

22 July 2025

Introduction

To the Pensions Fund Committee of Cambridgeshire County Council

We are pleased to have the opportunity to meet with you on 22 July 2025 to discuss our audit of the financial statements of Cambridgeshire Pension Fund for the year ended 31 March 2025.

This report provides the Pensions Fund Committee with an opportunity to review our planned audit approach and scope for the 2024/25 audit. The audit is governed by the provisions of the Local Audit and Accountability Act 2014 and is carried out in compliance with the NAO's 2024/25 Code of Audit Practice, auditing standards and other professional requirements.

This report outlines our risk assessment and planned audit approach. Our planning activities are still on-going, and we will communicate any significant changes to the planned audit approach.

We provide this report to you in advance of the meeting to allow you sufficient time to consider the key matters and formulate your questions.

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Audit Risks and our audit approach	6
Mandatory communications	12
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The engagement team

Sarah Brown, is the engagement partner on the audit. She has over 20 years of public sector audit experience and is responsible for the audit opinion.

Asim Iqbal is the senior manager on the audit. He has over 11 years of public sector audit experience.

Other key members of the engagement team include Japneet Kaur with 5 years of audit experience.

Yours sincerely,



Sarah Brown,
Partner, KPMG LLP

22 July 2025

How we deliver audit quality

Audit quality is at the core of everything we do at KPMG and we believe that it is not just about reaching the right opinion, but how we reach that opinion. We consider risks to the quality of our audit in our engagement risk assessment and planning discussions.

We define 'audit quality' as being the outcome when audits are:

- Executed consistently, in line with the requirements and intent of applicable professional standards within a strong system of quality controls and
- All of our related activities are undertaken in an environment of the utmost level of objectivity, independence, ethics and integrity.

We depend on well planned timing of our audit work to avoid compromising the quality of the audit. This is also heavily dependent on receiving information from management and those charged with governance in a timely manner.

We aim to complete all audit work no later than 2 days before audit signing. As you are aware, we will not issue our audit opinion until we have completed all relevant procedures, including audit documentation.

We are committed to providing you with a high-quality service. If you have any concerns or are dissatisfied with any part of KPMG's work, in the first instance you should contact Sarah Brown (sarah.brown1@kpmg.co.uk), the engagement lead to the Authority, who will try to resolve your complaint. If you are dissatisfied with the response, please contact the national lead partner for all of KPMG's work under our contract with Public Sector Audit Appointments Limited, Tim Cutler (tim.culter@kpmg.co.uk). After this, if you are still dissatisfied with how your complaint has been handled you can raise your complaint as per the following process [Complaints](#)

Overview of planned scope including materiality

Our materiality levels

We determined materiality for the entity financial statements at a level which could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements. We used a benchmark of total assets which we consider to be appropriate given the sector in which the entity operates, its ownership and financing structure, and the focus of users.

We considered qualitative factors such as stability of legislation, concentration of ownership and other sensitivities such as changes in stake holder when determining materiality for the financial statements as a whole.

To respond to aggregation risk from individually immaterial misstatements, we design our procedures to detect misstatements at a lower level of materiality £36.4m / 75% of materiality, driven by our expectations of increased level of undetected or uncorrected misstatements in the period.

We also adjust this level further downwards for items that may be of specific interest to users for qualitative reasons, such as benefit payments during the year.

We will report misstatements to the Pensions Fund Committee including:

- Corrected and uncorrected audit misstatements above £2.4m.
- Errors and omissions in disclosure (corrected and uncorrected) and the effect that they, individually in aggregate, may have on our opinion.
- Other misstatements we include due to the nature of the item.

Control environment

The impact of the control environment on our audit is reflected in our planned audit procedures.

Entity Materiality		
	Pension Fund	
	2024/2025	2023/2024
Materiality for the financial statements as a whole	£48m (1% of draft total Assets £4,751m as at 31 March 2025)	£42.3m (1% of Total Assets £4,238m as at 31 March 2024)
Performance Materiality	£36m (75% of Materiality)	£27.4m (65% of Materiality)
Misstatements reported to the Pensions Fund Committee	£2.4m (5% of Materiality)	£2.1m (5% of Materiality)

The materiality for the 2024/ 2025 audit has been calculated at 1% of the draft total assets as at 31 March 2025, and is subject to change when the final trial balance/ draft TB for the year ended 31 March 2025 are received.

Overview of planned scope including materiality (cont.)

Timing of our audit and communications

- We will maintain communication led by the engagement director and senior manager throughout the audit. We set out below the form, timing and general content of our planned communications:
- Kick-off meeting with management in June 2025 where we present our draft audit plan outlining our audit approach and discuss management’s progress in key areas;
- Pensions Fund Committee meeting on 22 July 2025 where we present our final audit plan;
- Status meetings with management throughout the audit where we communicate progress on the audit plan, any misstatements, control deficiencies and significant issues;
- Closing meeting with management in September 2025 where we discuss the auditor’s report and any outstanding deliverables;
- Pensions Fund Committee meeting on 30 September 2025 where we communicate audit misstatements and significant control deficiencies; and
- Biannual private meetings can also be arranged with the Pensions Fund Committee chair, if there is interest.

Using the work of others and areas requiring specialised skill

We outline below where, in our planned audit response to audit risks, we expect to use the work of others or require specialised skill/knowledge to perform planned audit procedures and evaluate results.

Others	Extent of planned involvement or use of work
iRADAR	Our in-house investment team, iRADAR, will review the valuation of Level 1 and 2 assets held to identify any potential material pricing issues.
KPMG Corporate Finance	KPMG will engage in-house Corporate Finance Team whose services will be used to determine the appropriateness of the valuations of the Pension Fund’s holding in Cambridge and Counties Bank.
IT specific team member	We will be utilising our IT team to gain an understanding of the key financial systems and processes within the Fund.
Actuarial Specialist	KPMG will engage an Actuarial Specialist to determine the compliance of the disclosure of the promised retirement benefits liability of the pension fund with the requirements of IAS26.

Significant risks and Other audit risks

Our risk assessment draws upon our understanding of the applicable financial reporting framework, knowledge of the business, the sector and the wider economic environment in which Cambridgeshire Pension Fund operates.

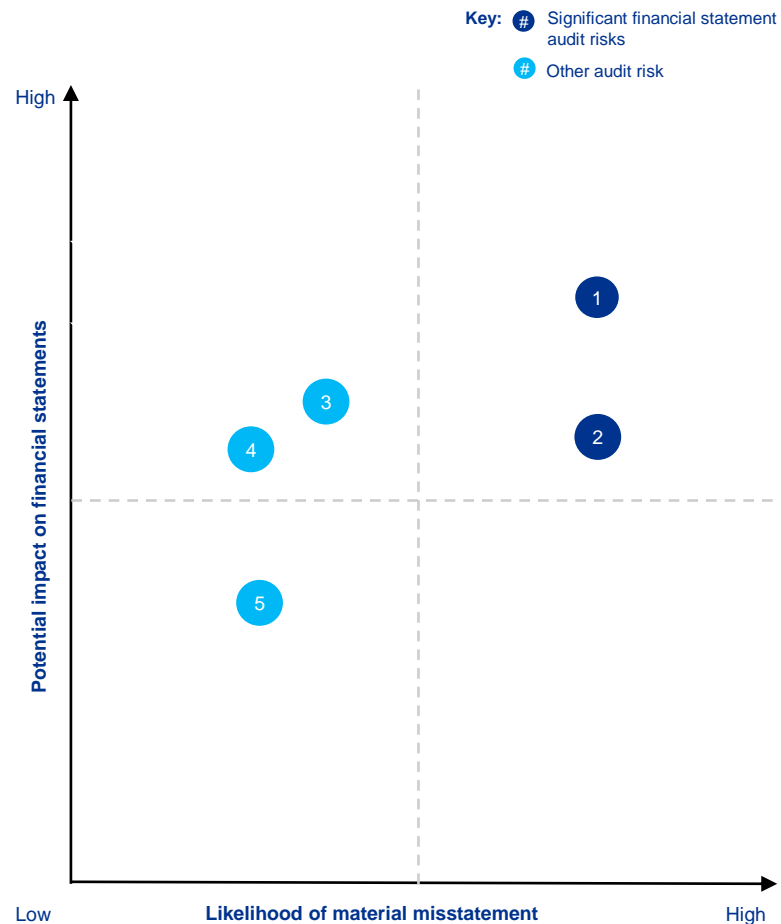
We also use our regular meetings with senior management to update our understanding and take input from internal audit reports.

Significant risks

1. Management override of controls
2. Valuation of Cambridge and Counties Bank

Other audit risks

3. Valuation of Level 1, Level 2 and Level 3 Investments
4. Level 1, Level 2 and Level 3 investments are not complete, do not exist or are not accurately recorded
5. The actuarial position of the Fund is not appropriately presented in the financial statements



Audit risks and our audit approach

1 Management override of controls (a)

Fraud risk related to unpredictable way management override of controls may occur



Significant audit risk

- Professional standards require us to communicate the fraud risk from management override of controls as significant.
- Management is in a unique position to perpetrate fraud because of their ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively.
- We have not identified any specific additional risks of management override relating to this audit.

Note: (a) Significant risk that professional standards require us to assess in all cases.



Planned response

Our audit methodology incorporates the risk of management override as a default significant risk.

- Assess accounting estimates for biases by evaluating whether judgements and decisions in making accounting estimates, even if individually reasonable, indicate a possible bias.
- Evaluate the selection and application of accounting policies.
- Assess the appropriateness of changes compared to the prior year to the methods and underlying assumptions used to prepare accounting estimates.
- Assess the business rationale and the appropriateness of the accounting for significant transactions that are outside the component's normal course of business or are otherwise unusual.
- In line with our methodology, evaluate the design and implementation of controls over journal entries and post closing adjustments.
- In line with our audit plan, test the operating effectiveness of controls over journal entries and post closing adjustments.
- Using the high-risk criteria to identify the journals for any further investigation.

Audit risks and our audit approach (cont.)

2 Valuation of Valuation of Cambridge and Counties Bank



Significant audit risk

- The Fund is joint owner, along with Trinity Hall, Cambridge, of Cambridge and Counties Bank (CCB). The Fund has no controlling interest in the Bank and it is included within the Fund's financial statements as a minority interest. The investment is valued at £102.7m as at 31 March 2025.
- An inappropriate amount is estimated for the value of CCB due to inappropriate assumptions, errors in the underlying data or inaccurate computation of the valuation estimate.
- There is a significant risk of material misstatement relating to fair value of CCB due to estimation uncertainty resulting from unobservable inputs used in the valuation of the properties, complexities in valuation and impact of macro-economic conditions on the valuation.



Planned response

- Cambridgeshire Pension Fund appoints a third-party specialist (Grant Thornton) to value the holding in CCB. We will obtain the valuation reports produced by the third-party valuer as at 31st March 2025.
- We will assess Grant Thornton as a management valuer and assess their competency as a valuation expert and their work for use as audit evidence.
- We will engage KPMG Corporate Finance Team who will undertake a review of the valuation model provided by Grant Thornton considering appropriateness of assumptions and inputs used in determining the valuation
- The KPMG Corporate Finance team will challenge the valuer on the valuation inputs, including the historical performance along with assessing the dividend discount model used for the valuation.
- Under the International Standards of Auditing, we are required to identify and evaluate the design and implementation of an internal control in relation to significant risks. Whilst the Trustee appoints a third party (Grant Thornton) to value the Cambridge and Counties Bank investment, our work over the valuation of Cambridge and Counties Bank valuation in the prior year found this management review control to be ineffective.

Audit risks and our audit approach (cont.)

3

Valuation of Level 1, Level 2 and Level 3 investments is misstated



Other risks

- Investments are held to pay benefits of the Fund. They are held with 21 investment managers. The investments are material to the financial statements (99.6% of the Statement of Net Assets) and therefore there is a risk of material misstatement.
- There is a base risk of material misstatement relating to fair values of Level 1 and 2 assets, due to the estimation uncertainty resulting from the pricing of these investments.
- There is an elevated risk of material misstatement relating to fair values of Level 3 pooled investments, due to the estimation uncertainty resulting from unobservable inputs to these investments.



Planned response

Our approach in relation to valuation for different types of investments is as follows:

- Level 1 & 2 assets: We will recalculate the value of the Level 1 and 2 assets using published pricing of the pooled investment vehicles at the year end. Our in-house investment valuation team, iRADAR, will be engaged to independently reprice these positions.
- Level 3 pooled investment vehicles: For each Level 3 pooled investment vehicle investment manager, we will obtain the unaudited Net Asset Value ('NAV') Statement at (or closest to) the measurement date and vouch the valuation to this. For a sample of Level 3 pooled investment vehicles, we will further assess the reliability of the NAV statement by:
 - Obtaining and inspecting the latest audited financial statements for the underlying funds where available;
 - Inspecting the audit report to confirm that it is unqualified and that the audit has been carried out by a reputable audit firm; and
 - Comparing the unaudited pricing information at the year end to the audited financial statements valuation. Where the audited financial statements are not as at the Fund year end date, we will agree them to unaudited pricing information at that date and reconcile significant movements to the Fund year end date agreeing movements to quarterly NAV/transaction statements.

Audit risks and our audit approach (cont.)

4 Level 1, Level 2 and Level 3 investments are not complete, do not exist or are not accurately recorded



Other risks

- Level 1, Level 2 and Level 3 investments are not complete, do not exist or are not accurately recorded.
- Investments are held to pay benefits of the Fund. They are held with 21 investment managers across a number of asset classes. The investments are material to the financial statements (99.6% of the Statement of Net Assets) and therefore there is a risk of material misstatement.
- There is a risk of material misstatement relating to completeness, existence and accuracy as there has been a number of investment transitions in the year between investment managers.



Planned response

- As part of our audit procedures, we will gain an understanding of the processes over the completeness, existence and accuracy of Level 1, Level 2 and Level 3 investments. This will include gaining an understanding of the control environment at all the investment managers and the custodian by reviewing their internal controls reports to identify any control deficiencies that would impact our audit approach.
- We will obtain direct confirmations from your custodian and all your investment managers to vouch the holdings and valuation of assets at the year end.
- We will vouch purchases and sales to investment manager and/or custodian reports.
- We will recalculate change in market value and compare this to the overall investment return stated in the Pension Fund Committee's report for consistency with the amounts reported in the financial statements. We will investigate any material deviations.

Audit risks and our audit approach (cont.)

5 The actuarial position of the Fund is not appropriately presented in the financial statements



Other risk

- The actuarial position of the Fund is not appropriately presented in the financial statements
- The actuarial position is not recognised on the Statement of Net Assets but is disclosed in the Notes
- The value of the liability is an estimate involving the selection of appropriate actuarial assumptions, most notably the discount rate applied to the Fund liabilities, inflation rates and mortality rates. The selection of these assumptions is inherently subjective.



Planned response

We will perform the following procedures:

- Understand the processes in place to set the assumptions used in the valuation;
- Evaluate the competency, objectivity of the actuaries to confirm their qualifications and the basis for their calculations;
- Perform inquiries of the accounting actuaries to assess the methodology and key assumptions made, including actual figures where estimates have been used by the actuaries, such as the rate of return on pension fund assets;
- Test the data provided used within the calculation of the Fund valuation; and
- Evaluate, with the support of our own actuarial specialists, the key assumptions applied, being the discount rate, inflation rate and mortality/life expectancy against externally derived data.

Audit risks and our audit approach (cont.)

Revenue – rebuttal of significant risk

Professional standards require us to make a rebuttable presumption that the fraud risk from revenue recognition is a significant risk.

Revenue in a pension fund equates to contributions receivable. This revenue is recognized based on specific instructions as set out in the appropriate schedule(s). There are no subjective issues concerning when contributions need to be recognised. Amounts involved cannot easily be manipulated through accounting policies, issue of credit notes, timing or other policies. There is little incentive for the Fund management to manipulate the financial reporting of contributions.

Therefore, in the absence of specific fraud risk factors, the presumption that fraudulent revenue recognition is a significant risk is rebutted for pension fund audits.

Expenditure – rebuttal of significant risk

Practice Note 10 states that the risk of material misstatement due to fraudulent financial reporting may arise from the manipulation of expenditure recognition is required to be considered.

Expenditure in a pension Fund equates to payments to members and management expenses. There are no subjective issues concerning when expenses need to be recognised. Amounts involved cannot easily be manipulated through accounting policies, timing or other policies. There is little incentive for the Fund to manipulate the financial reporting of expenses.

Therefore, in the absence of specific fraud risk factors, there is no risk of fraudulent financial reporting arising from the manipulation of expenditure recognition for the Fund.

Mandatory communications - additional reporting

Going concern




We will assess the risk relating to management’s judgement on the use (or otherwise) of the going concern basis and the adequacy of related disclosures, including any possible material uncertainty. Under NAO guidance, including Practice Note 10 - A local authority’s financial statements shall be prepared on a going concern basis; this is, the accounts should be prepared on the assumption that the functions of the authority will continue in operational existence for the foreseeable future. Transfers of services under combinations of public sector bodies (such as local government reorganization) do not negate the presumption of going concern.

Additional reporting

Your audit is undertaken to comply with the Local Audit and Accountability Act 2014 which gives the NAO the responsibility to prepare an Audit Code (the Code), which places responsibilities in addition to those derived from audit standards on us. We also have responsibilities which come specifically from acting as a component auditor to the NAO. In considering these matters at the planning stage we indicate whether:

Work is completed throughout our audit and we can confirm the matters are progressing satisfactorily 	We have identified issues that we may need to report 	Work is completed at a later stage of our audit so we have nothing to report 
--	--	--

We have summarised the status of all these various requirements at the time of planning our audit below and will update you as our work progresses:

Type	Status	Response
Our declaration of independence		No matters to report. The engagement team and others in the firm, as appropriate, have complied with relevant ethical requirements regarding independence.
Issue a report in the public interest		We are required to consider if we should issue a public interest report on any matters which come to our attention during the audit. We have not identified any such matters to date.
Certify the audit as complete		We are required to certify the audit as complete when we have fulfilled all of our responsibilities relating to the accounts and use of resources as well as those other matters highlighted above.

Mandatory communications

Type	Statements
Management’s responsibilities (and, where appropriate, those charged with governance)	<p>Prepare financial statements in accordance with the applicable financial reporting framework that are free from material misstatement, whether due to fraud or error.</p> <p>Provide the auditor with access to all information relevant to the preparation of the financial statements, additional information requested and unrestricted access to persons within the entity.</p>
Auditor’s responsibilities	<p>Our responsibilities set out through the NAO Code (communicated to you by the PSAA) and can be also found on their website, which include our responsibilities to form and express an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance. The audit of the financial statements does not relieve management or those charged with governance of their responsibilities.</p>
Auditor’s responsibilities – Fraud	<p>This report communicates how we plan to identify, assess and obtain sufficient appropriate evidence regarding the risks of material misstatement of the financial statements due to fraud and to implement appropriate responses to fraud or suspected fraud identified during the audit.</p>
Auditor’s responsibilities – Other information	<p>Our responsibilities are communicated to you by the PSAA and can be also found on their website, which communicates our responsibilities with respect to other information in documents containing audited financial statements. We will report to you on material inconsistencies and misstatements in other information.</p>
Independence	<p>Our independence confirmation at page 19 discloses matters relating to our independence and objectivity including any relationships that may bear on the firm’s independence and the integrity and objectivity of the audit engagement director and audit staff.</p>

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Audit team and rotation

Your audit team has been drawn from our specialist local government and pensions audit department and is led by key members of staff who will be supported by auditors and specialists as necessary to complete our work. We also ensure that we consider rotation of your audit director and firm.



Sarah Brown is the partner responsible for our audit. They will lead our audit work, attend the Audit and Governance Committee and be responsible for the opinions that we issue.



Asim Iqbal is the senior manager responsible for our audit. He will co-ordinate our audit work, attend the Pension Fund Committee and ensure we are co-ordinated across our accounts work.



Japneet Kaur is the in-charge responsible for our audit. She will be responsible for our on-site fieldwork. GB will complete work on more complex sections of the audit.

To comply with professional standard we need to ensure that you appropriately rotate your external audit director. There are no other members of your team which we will need to consider this requirement for:



This will be Sarah Brown's second year as your engagement lead.

She is required to rotate every five years, extendable to seven with PSAA approval.

Audit timeline

We have developed our audit timeline based on management’s financial reporting timetable. If we need to make significant changes to the audit timeline below, then we will communicate the reasons to you on a timely basis.

	2025							
Activity	Apr	May	Jun	July	August	Sept	Oct	Nov
Risk assessment and planning		Inquiries of those charged with governance from April 2025						
Audit complex accounting estimates								
Year-end audit fieldwork								
Procedures on financial statements/annual report		Audit findings report issued in September 2025						
Consistency opinion on Pension Fund Annual Report							TBC	

* Dates for issuing deliverables are preliminary and based on information available at planning. They are therefore subject to change.

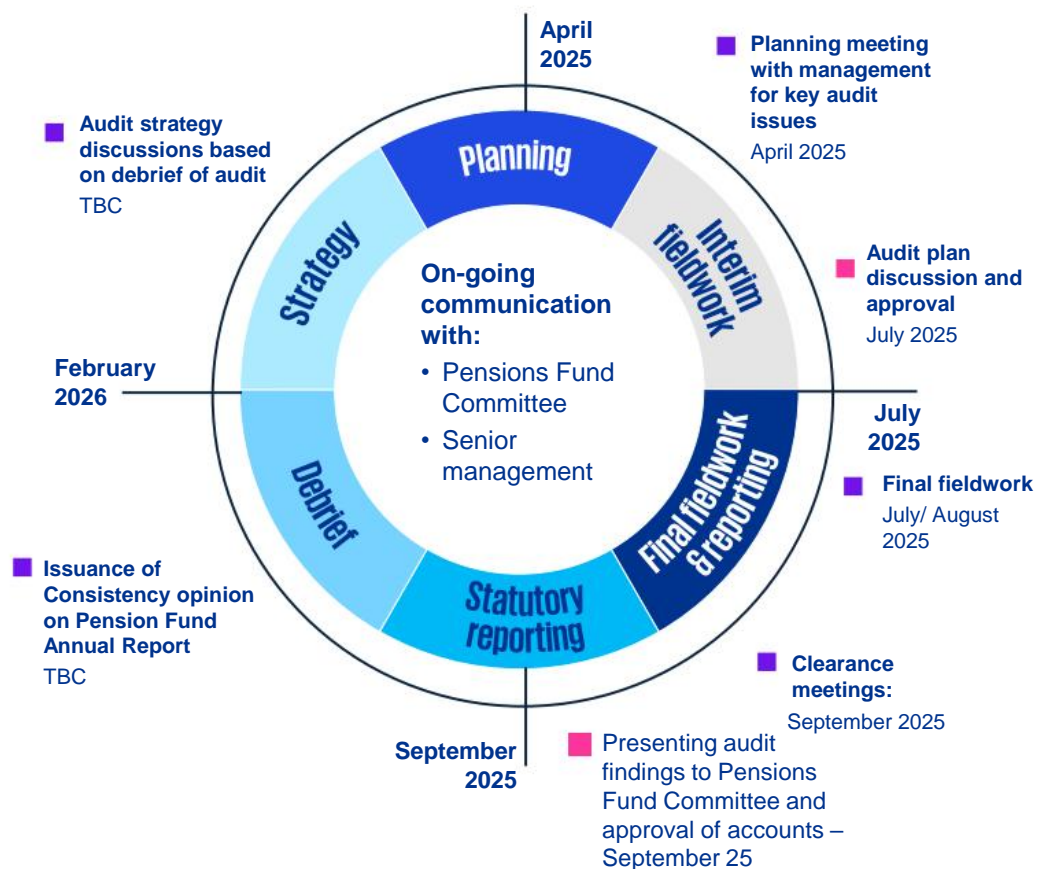
Audit cycle & timetable

Our schedule April 2025 – February 2026

We have worked with management to generate our understanding of the processes and controls in place at the Cambridgeshire Pension Fund in its preparation of the Statement of Accounts.

We have agreed with management an audit cycle and timetable that reflects our aim to finalise our audit by 30 September 2025. Signing of the opinion will be dependent on the Council audit timetable and is likely to be between November 2025 and February 2026 (the backstop date).

Given the ongoing consultation happening in regard to the scope and timing of local government audit this **schedule may be subject to change** due to the link with the audit of the administering authority.



Key:

- Timing of AC communications
- Key events

Fees

Audit fee

Our fees for the year ended 31 March 2025 are set out in the PSAA Scale Fees communication and are shown below.

Entity	2024/25 (£'000)	2023/24 (£'000)
Statutory audit	98	87
ISA 315 (R) *	-	4.3
Other assurance services (IAS19 Assurance letters) **	TBC	48
Additional fee for opening balances confirmation and valuation of CCB	-	7.3
TOTAL	TBC	146.6

**The scale fees agreed with the PSAA do not take into account the impact of ISA315 (Revised). We expect compliance with ISA315R to increase audit hours by between 10% and 20% for our pension fund audits. We will agree a fee variation in respect of ISA351R with you once we have a clearer idea of the impact for your audit.*

***The Code of Audit Practice also sets the expectation that local auditors will co-operate where it is possible and efficient to do so. As part of this, auditors have agreed a voluntary protocol with each other and the NAO that covers the agreement of timescales for requesting and providing assurances and keeping auditors informed of potential delays. Consistent with this principle, the provision of IAS 19 assurances to auditors of relevant authorities under the Act and in accordance with the protocol should be considered work undertaken under the Code of Audit Practice." If we are requested by other schedule/ admitted bodies auditors to provide these IAS 19 assurance letters, fee for these letters will be charged as per the PSAA fee variation arrangements.*

Additional fees in relation to these areas will be subject to the fees variation process as outlined by the PSAA.

Billing arrangements

Fees will be billed in accordance with the milestone completion phasing that has been communicated by the PSAA.

Basis of fee information

Our fees are subject to the following assumptions:

- The Cambridgeshire Pension Fund's audit evidence files are completed to an appropriate standard (we will liaise with you separately on this);
- Draft statutory accounts are presented to us for audit subject to audit adjustments;
- Supporting schedules to figures in the accounts are supplied;
- The Cambridgeshire Pension Fund's audit evidence files are completed to an appropriate standard (we will liaise with management separately on this);
- A trial balance together with reconciled control accounts are presented to us;
- All deadlines agreed with us are met;
- We find no weaknesses in controls that cause us to significantly extend procedures beyond those planned;
- Management will be available to us as necessary throughout the audit process; and
- There will be no changes in deadlines or reporting requirements.

We will provide a list of schedules to be prepared by management stating the due dates together with pro-formas as necessary.

Our ability to deliver the services outlined to the agreed timetable and fee will depend on these schedules being available on the due dates in the agreed form and content.

Any variations to the above plan will be subject to the PSAA fee variation process.

Confirmation of Independence

We confirm that, in our professional judgement, KPMG LLP is independent within the meaning of regulatory and professional requirements and that the objectivity of the Director and audit staff is not impaired.

To the Pensions Fund Committee members

Assessment of our objectivity and independence as auditor of Cambridgeshire Pension Fund

Professional ethical standards require us to provide to you at the planning stage of the audit a written disclosure of relationships (including the provision of non-audit services) that bear on KPMG LLP's objectivity and independence, the threats to KPMG LLP's independence that these create, any safeguards that have been put in place and why they address such threats, together with any other information necessary to enable KPMG LLP's objectivity and independence to be assessed.

This letter is intended to comply with this requirement and facilitate a subsequent discussion with you on audit independence and addresses:

- General procedures to safeguard independence and objectivity;
- Independence and objectivity considerations relating to the provision of non-audit services; and
- Independence and objectivity considerations relating to other matters.

General procedures to safeguard independence and objectivity

KPMG LLP is committed to being and being seen to be independent. As part of our ethics and independence policies, all KPMG LLP partners/directors and staff annually confirm their compliance with our ethics and independence policies and procedures including in particular that they have no prohibited shareholdings. Our ethics and independence policies and procedures are fully consistent with the requirements of the FRC Ethical Standard. As a result we have underlying safeguards in place to maintain independence through:

- Instilling professional values.
- Communications.
- Internal accountability.
- Risk management.
- Independent reviews.

The conclusion of the audit engagement Director as to our compliance with the FRC Ethical Standard in relation to this audit engagement and that the safeguards we have applied are appropriate and adequate, is subject to review by an engagement quality control reviewer, who is a Partner not otherwise involved in your affairs.

We are satisfied that our general procedures support our independence and objectivity.

Independence and objectivity considerations relating to the provision of non-audit services

Summary of non-audit services

No non-audit services are being provided to the Fund during the year ended 31 March 2025 and we have not committed to providing any such services. We will provide further detail to the Pension Fund Committee in future reporting.

Confirmation of Independence (cont.)

Independence and objectivity considerations relating to other matters

There are no other matters that, in our professional judgment, bear on our independence which need to be disclosed to the Pensions Fund Committee.

Confirmation of audit independence

We confirm that as of the date of this letter, in our professional judgment, KPMG LLP is independent within the meaning of regulatory and professional requirements and the objectivity of the director and audit staff is not impaired.

This report is intended solely for the information of the Pensions Fund Committee of the Pension Fund and should not be used for any other purposes.

We would be very happy to discuss the matters identified above (or any other matters relating to our objectivity and independence) should you wish to do so.

Yours faithfully

Sarah Brown

KPMG LLP

KPMG's Audit quality framework

Audit quality is at the core of everything we do at KPMG and we believe that it is not just about reaching the right opinion, but how we reach that opinion.

To ensure that every partner and employee concentrates on the fundamental skills and behaviours required to deliver an appropriate and independent opinion, we have developed our global Audit Quality Framework.

Responsibility for quality starts at the top through our governance structures as the UK Board is supported by the Audit Oversight Committee, and accountability is reinforced through the complete chain of command in all our teams.

■ Commitment to continuous improvement

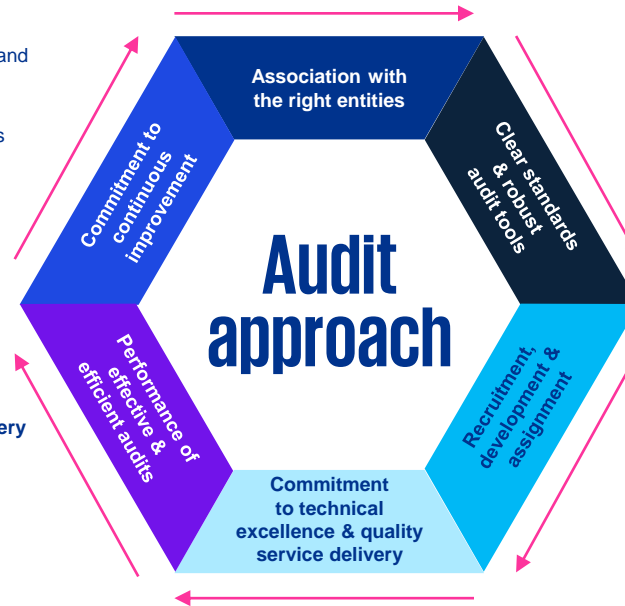
- Comprehensive effective monitoring processes
- Significant investment in technology to achieve consistency and enhance audits
- Obtain feedback from key stakeholders
- Evaluate and appropriately respond to feedback and findings

■ Performance of effective & efficient audits

- Professional judgement and scepticism
- Direction, supervision and review
- Ongoing mentoring and on the job coaching, including the second line of defence model
- Critical assessment of audit evidence
- Appropriately supported and documented conclusions
- Insightful, open and honest two way communications

■ Commitment to technical excellence & quality service delivery

- Technical training and support
- Accreditation and licensing
- Access to specialist networks
- Consultation processes
- Business understanding and industry knowledge
- Capacity to deliver valued insights



■ Association with the right entities

- Select entities within risk tolerance
- Manage audit responses to risk
- Robust client and engagement acceptance and continuance processes
- Client portfolio management

■ Clear standards & robust audit tools

- KPMG Audit and Risk Management Manuals
- Audit technology tools, templates and guidance
- KPMG Clara incorporating monitoring capabilities at engagement level
- Independence policies

■ Recruitment, development & assignment of appropriately qualified personnel

- Recruitment, promotion, retention
- Development of core competencies, skills and personal qualities
- Recognition and reward for quality work
- Capacity and resource management
- Assignment of team members and specialists

Statement on the Effectiveness of our system of quality management

Based on the annual evaluation of the Firm's System of Quality Management as of 30 September 2023, the System of Quality Management provides the Firm with reasonable assurance that the objectives of the System of Quality Management are being achieved.

Our full Statement on the effectiveness of the System of Quality Management of KPMG UK LLP as at 30 September 2023 can be found [here](#).

The extract below is the Statement on the Effectiveness of our system of quality management taken from our Transparency Report:

As required by the International Auditing and Assurance Standards Board (IAASB)'s, International Standard on Quality Management (ISQM1), the Financial Reporting Council (FRC)'s International Standard on Quality Management (UK) 1 (ISQM (UK) 1), and KPMG International Limited Policy, KPMG UK LLP (the "Firm" and/or "KPMG UK") has responsibility to design, implement and operate a System of Quality Management for audits or reviews of financial statements, or other assurance or related services engagements performed by the Firm.

The objectives of the System of Quality Management are to provide the Firm with reasonable assurance that:

- a) The Firm and its personnel fulfil their responsibilities in accordance with professional standards and applicable legal and regulatory requirements, and conduct engagements in accordance with such standards and requirements; and
- b) Engagement reports issued by the Firm or engagement partners are appropriate in the circumstances.

KPMG UK outlines how its System of Quality Management supports the consistent performance of quality engagements in the 2023 Transparency Report.

Integrated quality monitoring and compliance programmes enable KPMG UK to identify and respond to findings and quality deficiencies both in respect of individual engagements and the overall System of Quality Management.

If deficiencies are identified when KPMG UK performs its annual evaluation of the System of Quality Management, KPMG UK evaluates the severity and pervasiveness of the identified deficiencies by investigating the root causes, and by evaluating the effect of the identified deficiencies individually and in the aggregate, on the System of Quality Management, with consideration of remedial actions taken as of the date of the evaluation.

Based on the annual evaluation of the Firm's System of Quality Management as of 30 September 2023, the System of Quality Management provides the Firm with reasonable assurance that the objectives of the System of Quality Management are being achieved.



Understanding of IT

Effect on audit effort



Summary

The release of ISA 315 (UK) revised brought an increased focus on Understanding of IT in the audit, and it continues to be an area of focus.

Stakeholders now expect auditors to not only understand IT in detail, but also to consider the impact of the findings from their risk assessment procedures on their planned audit approach.

Why is Understanding of IT so important?

Businesses continue to embrace increasingly complex and sophisticated IT systems and place more and more reliance on automated IT processing not simply for a competitive advantage, but also for "business as usual" operations.

This increased reliance means that to effectively audit accounts, balances and transactions, auditors are required to understand and challenge more around how those IT system and process work.

Therefore, Understanding of IT is a crucial building block of our audit strategy and influences our planned audit approach at every stage.

This is true regardless of whether controls reliance is planned or the audit is expected to be fully substantive in nature.

What kind of things might we identify?

As part of our risk assessment procedures, we perform:

- An assessment of the formality, or otherwise, of certain financially relevant IT processes
- An evaluation of the design and implementation of related general IT controls
- An evaluation of the design and implementation of automated process level controls

As a result of these procedures, we may identify IT control deficiencies or IT process informalities that may have an impact on our planned audit approach.

Additionally, we may identify findings related to the wider control environment or threats to the accuracy or completeness of the information used by both entity management and auditors alike.

What does this mean for our audits?

Auditors are being asked to consider the findings from their risk assessment procedures over IT in relation to the planned audit approach.

The findings may impact any area of the audit, however there are three main areas of focus where we anticipate that most impact as a result of identifying IT deficiencies or IT process informality;

- Increased risk to data integrity
- Additional fraud risk factors
- Additional high-risk criteria to be used in journals analysis

It is important to understand that these findings may have an impact regardless of planned reliance on automated controls and general IT controls.

FRC's areas of focus

The FRC released their [Annual Review of Corporate Reporting 2023/24](#) ('the Review') in September 2024 having already issued three thematic reviews during the year.

The Review and thematic identify where the FRC believes companies can improve their reporting. These slides give a high level summary of the key topics covered. We encourage management and those charged with governance to read further on those areas which are significant to their entity.



Key expectations for 2024/25 annual reports

Overview

The Review identifies that the quality of reporting across FTSE 350 companies has been maintained this year, but there is a widening gap in standards between FTSE 350 and non-FTSE 350 companies. This is noticeable in the FRC's top two focus areas, 'Impairment of assets' and 'Cash Flow Statements'. 'Provisions and contingencies' has fallen out of the top ten issues for the first time in over five years. This issue is replaced by 'Taskforce for Climate-related Financial Disclosures (TCFD) and climate-related narrative reporting'.

The FRC re-iterates that companies should apply careful judgement to tell a consistent and coherent story whilst ensuring the annual report is clear, concise and company-specific.

Pre-issuance checks and restatements

The FRC expects companies to have in place a sufficiently robust self-review process to identify common technical compliance issues. The FRC continues to be frustrated by the increasing level of restatements affecting the presentation of primary statements. This indicates that thorough, 'step-back' reviews are not happening in all cases.

Risks and uncertainties

Geopolitical tensions continue and low growth remains a concern in many economies, particularly with respect to going concern, impairment and recognition/recoverability of tax assets and liabilities. The FRC continue to push for enhanced disclosures of risks and uncertainties. Disclosures should be sufficient to allow users to understand the position taken in the financial statements, and how this position has been impacted by the wider risks and uncertainties discussed elsewhere in the annual report.

Financial reporting framework

The FRC reminds preparers to consider the overarching requirements of the UK financial reporting framework in determining the information to be presented. In particular the requirements for a true and fair view, along with a fair, balanced, and comprehensive review of the company's development, position, performance, and future prospects.

The FRC does not expect companies to provide information that is not relevant and material to users, and companies should exercise judgement in determining what information to include.

Companies should also consider including disclosures beyond the specific requirements of the accounting standards where this is necessary to enable users to understand the impact of particular transactions or other events and conditions on the entities financial position, performance and cash flows.



FRC's areas of focus (cont.)



Impairment of assets

Impairment remains a key topic of concern, exacerbated in the current year by an increase in restatements of parent company investments in subsidiaries.

Disclosures should provide adequate information about key inputs and assumptions, which should be consistent with events, operations and risks noted elsewhere in the annual report and be supported by a reasonably possible sensitivity analysis as required.

Forecasts should reflect the asset in its current condition when using a value in use approach and should not extend beyond five years without explanation.

Preparers should consider whether there is an indicator of impairment in the parent when its net assets exceed the group's market capitalisation. They should also consider how intercompany loans are factored into these impairment assessments.

Cash flow statements

Cash flow statements remain the most common cause of prior year restatements.

Companies must carefully consider the classification of cash flows and whether cash and cash equivalents meet the definitions and criteria in the standard. The FRC encourage a clear disclosure of the rationale for the treatment of cash flows for key transactions.

Cash flow netting is a frequent cause of restatements and this was highlighted in the '[Offsetting in the financial statements](#)' thematic.

Preparers should ensure the descriptions and amounts of cash flows are consistent with those reported elsewhere and that non-cash transactions are excluded but reported elsewhere if material.

Climate

This is a top-ten issue for the first time this year, following the implementation of TCFD.

Companies should clearly state the extent of compliance with TCFD, the reasons for any non-compliance and the steps and timeframe for remedying that non-compliance. Where a company is also applying the Companies Act 2006 Climate-related Financial Disclosures, these are mandatory and cannot be 'explained', further the required location in the annual report differs.

Companies are reminded of the importance of focusing only on material climate-related information. Disclosures should be concise and company specific and provide sufficient detail without obscuring material information.

It is also important that there is consistency within the annual report, and that material climate related matters are addressed within the financial statements.

Financial instruments

The number of queries on this topic remains high, with Expected Credit Loss (ECL) provisions being a common topic outside of the FTSE 350 and for non-financial and parent companies.

Disclosures on ECL provisions should explain the significant assumptions applied, including concentrations of risk where material. These disclosures should be consistent with circumstances described elsewhere in the annual report.

Companies should ensure sufficient explanation is provided of material financial instruments, including company-specific accounting policies.

Lastly, the FRC reminds companies that cash and overdraft balances should be offset only when the qualifying criteria have been met.

Judgements and estimates

Disclosures over judgements and estimates are improving, however these remain vital to allow users to understand the position taken by the company. This is particularly important during periods of economic and geopolitical uncertainty.

These disclosures should describe the significant judgements and uncertainties with sufficient, appropriate detail and in simple language.

Estimation uncertainty with a significant risk of a material adjustment within one year should be distinguished from other estimates.

Further, sensitivities and the range of possible outcomes should be provided to allow users to understand the significant judgements and estimates.

FRC's areas of focus (cont.)



Revenue

Disclosures should be specific and, for each material revenue stream, give details of the timing and basis of revenue recognition, and the methodology applied. Where this results in a significant judgement, this should be clear.

Presentation

Disclosures should be consistent with information elsewhere in the annual report and cover company-specific material accounting policy information.

A thorough review should be performed for common non-compliance areas of IAS 1.

Income taxes

Evidence supporting the recognition of deferred tax assets should be disclosed in sufficient detail and be consistent with information reported elsewhere in the annual report.

The effect of Pillar Two income taxes should be disclosed where applicable.

Strategic report and Companies Act

The strategic report must be 'fair, balanced and comprehensive'. Including covering all aspects of performance, economic uncertainty and significant movements in the primary statements.

Companies should ensure they comply with all the statutory requirements for making distributions and repurchasing shares.

Fair value measurement

Explanations of the valuation techniques and assumptions used should be clear and specific to the company.

Significant unobservable inputs should be quantified and the sensitivity of the fair value to reasonably possible changes in these inputs should provide meaningful information to readers.

Thematic reviews

The FRC has issued three thematic reviews this year: 'Reporting by the UK's largest private companies' (see below), 'Offsetting in the financial statements', and 'IFRS 17 Insurance contracts – Disclosures in the first year of application'. The FRC have also performed Retail sector research (see below).

UK's largest private companies

The quality of reporting by these entities was found to be mixed, particularly in explaining complex or judgemental matters. The FRC would expect a critical review of the draft annual report to consider:

- internal consistency
- whether the report as a whole is clear, concise, and understandable; notably with respect to the strategic report
- whether it omits immaterial information, or
- whether additional information is necessary for the users understanding particularly with respect to revenue, judgments and estimates and provisions

Retail sector focus



Retail is a priority sector for the FRC and the research considered issues of particular relevance to the sector including:

- Impairment testing and the impact of online sales and related infrastructure
- Alternative performance measures including like for like (LFL) and adjusted e.g. pre-IFRS 16 measures
- Leased property and the disclosure of lease term judgements, particularly for expired leases.
- Supplier income arrangements and the clarity of accounting policies and significant judgements around measurement and presentation of these.

2024/25 review priorities

The FRC has indicated that its 2024/25 reviews will focus on the following sectors which are considered by the FRC to be higher risk by virtue of economic or other pressures:

 Industrial metals and mining
 Retail

 Construction and materials
 Gas, water and multi-utilities

 Food producers
 Financial Services



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Some or all of the services described herein may not be permissible for KPMG audited entities and their affiliates or related entities.

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1. Background

- 1.1 There are a number of areas within Local Government Pension Scheme (LGPS) legislation that provide either the administering authority (i.e. Cambridgeshire County Council as guardian of the Fund) or individual employers participating in the Fund with flexibility over how the particular provision is exercised.
- 1.2 The policy ensures that decisions are made fairly, transparently and in line with relevant regulations.

2. Executive Summary

- 2.1 Cambridgeshire County Council as administering authority to the Cambridgeshire Pension Fund are required to formulate policy decisions for areas where the Local Government Pension Scheme legislation allows it the exercise of discretion.
- 2.2 The Pension Committee previously approved a comprehensive “Administering Authority Discretions Policy” in June 2022 and since this time two Officer reviews have been undertaken. In line with the policy approval schedule a full Committee review was due.
- 2.3 The Committee subsequently approved the revised policy on 18 June 2025, details of which can be located in section 3.2 of the report and in Appendix 1.

3. Proposed update of the Administering Authority Discretions Policy

- 3.1 Overall, administering authority discretions have little risk attached to them and relate to day-to-day operational matters.
- 3.2 The following policy changes have been applied as a result of the review:

Regulation no	Recommended update	Significance of change
Throughout	To update all references to the new website throughout the policy.	Minor
R 3(1A), R 3(5) and R Sch 2, Part 3, Para 1 Admission Body agreements	To update the Admission Bodies, Scheme Employer and Bulk Transfer Policy to Admissions and Bulk Transfer Policy.	Minor
R 4(2)(b) Admission Body agreements		
R Sch 2, Part 3, para 12(a) Admission Body agreements		
R 69(1) Employer Payments	Reference to the Payment of employer and employee pension contribution policy has been included.	Minor

<u>R 32(7)</u> Voluntary early retirement and Flexible retirement time limit	Voluntary early retirement added to the regulation description as a clarification point.	Minor
	Extensions permitted under exceptional circumstance to the notice required on a case-by-case basis, delegated to the Operations and Technical Manager has been added.	Moderate

4. Relevant Pension Fund Objectives

To ensure compliance with the LGPS Regulations and other legislation and guidance, including the Pensions Regulator's Code of Practice.
To ensure individuals responsible for managing the Fund and delivering its services have the appropriate knowledge and expertise.
To manage the Fund in a fair and equitable manner, and be accountable to the Fund's stakeholders.
To ensure robust processes, controls and risk management are in place.

5. Risk Management

5.1 The risks associated with the Fund not having in place an Administering Authority Discretions Policy have been captured in the Fund's risk register as detailed below.

Risk	Residual risk rating
Those charged with governance are unable to fulfil their responsibilities effectively.	Green
Failure to administer the scheme in line with regulations and guidance.	Green
Failure to provide relevant information to the Pension Committee/Pension Board to enable informed decision making.	Green
Information may not be provided to stakeholders as required	Green

5.2 The Fund's risk register can be found on the Pensions website at the following link: [Governance policies - West Northants Pensions](#).

6. Communication Implications

Website	The Administering Authority Discretions Policy is published on the Fund's website
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7. Finance & Resources Implications

7.1 There are no financial and resource implications associated with this report.

8. Legal Implications

8.1 No material issues have been identified which may give rise to legal liability and/or risk from an administering authority perspective.

9. Consultation with Key Advisers

9.1 None.

10. Alternative Options Considered

10.1 Not applicable

11. Background Papers

11.1 Not applicable

12. Appendices

12.1 Appendix 1 Statement of Administering Authority Discretions

Statement of policy on Administering authority discretions
Key strategies and policies

Regulation no.	Description of discretion	Administering authority policy
<p>R 55 Governance compliance statement</p>	<p>Governance Compliance Statement must state whether the administering authority delegates its function or part of its function in relation to maintaining a pension fund to a committee, a sub-committee or an officer of the administering authority.</p> <p>If the administering authority does so delegate, the statement must include:</p> <ul style="list-style-type: none"> - the terms, structure and operational procedures appertaining to the delegation; - the frequency of any committee or sub-committee meetings, whether such a committee or sub-committee includes representatives of Scheme employers or members and, if so, whether they have voting rights; - the extent to which a delegation, or the absence of a delegation, complies with Secretary of State guidance and, to the extent it does not so comply, state the reasons for not complying; and - the terms, structure and operational procedures appertaining to the local pension board. 	<p>See our latest Governance Compliance Statement in the Governance policies section of the key documents pages of our website.</p>
<p>R 58 Funding strategy</p>	<p>Decide on Funding Strategy for inclusion in funding strategy statement.</p>	<p>See our latest Funding Strategy Statement in the Funding and investment policies section of the key documents pages of our website.</p>
<p>R 59(1) and (2) Pension administration strategy</p>	<p>Whether to have a written pension administration strategy and, if so, the matters it should include.</p>	<p>The Fund has a pension Administration Strategy which will be reviewed on a regular basis. Performance of the administering authority and the employers in the Fund will also be monitored against the targets and standards in the strategy and reported to the Pension Fund Board.</p> <p>See our latest version in the Employer policies section of the key documents pages of our website.</p>

Regulation no.	Description of discretion	Administering authority policy
R 61 Communication policy	Communication policy must set out the policy on provision of information and publicity to, and communicating with, members, representatives of members, prospective members and Scheme employers; the format, frequency and method of communications; and the promotion of the Scheme to prospective members and their employers.	The Fund's communications strategy is available in the Business plan and communications policies section of the key documents pages of our website .

Scheme management

Regulation no.	Description of discretion	Administering authority policy
R 105(2) Delegations	Whether to delegate any administering authority functions under the Regulations.	The administering authority does delegate certain functions to senior officers and to the Pension Fund Committee as appropriate. Details of these are set out in Cambridgeshire County Council's Constitution and summarised in the Governance Policy and Compliance Statement which is available in the Governance policies section of the key documents pages of our website .
R 106(3) Local Pension Board	Whether to establish a joint local pension board (if approval has been granted by the Secretary of State).	The Administering Authority did not establish a joint pension board.
R 106(6) Local Pension Board	Decide procedures applicable to the local pension board.	Procedures have been decided, and are detailed in the local pension board's terms of reference, which can be provided upon request.
R 107(1) Local Pension Board	Decide appointment and removal procedures, terms of appointment, and membership of the local pension board.	The appointment procedures and terms have been decided, and are detailed in the local pension board's terms of reference. The membership of the local pension board is set out in the Local Pension Board section of the How we manage Cambridgeshire Pension Fund pages of our website .

Disputes

Regulation no.	Description of discretion	Administering authority policy
R 74(1) Internal Dispute Resolution Procedure	Appoint a person for dealing with applications under Stage One of the dispute resolution procedures (IDRP) in relation to any disputes relating to the role as Administering Authority.	The Head of Pensions is appointed as the Stage 1 adjudicator.
R 74(4) and TP 23 Internal Dispute Resolution Procedure	Whether to extend six month period to lodge a stage one IDRP appeal.	Decision delegated to the Head of Pensions, as the Stage 1 adjudicator, to consider each case on its own merits.
R 74(6) and TP 23 Internal dispute resolution procedure	Decide procedure to be followed by adjudicator when exercising stage one IDRP functions and decide the manner in which those functions are to be exercised.	The Head of Pensions is appointed as the Stage 1 adjudicator. Procedure set out in the Fund's: - A Guide To Resolving Disputes About An Administering Authority Pension Decision in the Disputes section of the Forms & guides for members pages of our website.
R 76(4) and TP 23 Internal Dispute Resolution Procedure	Decide procedure to be followed by administering authority when exercising its stage two IDRP functions and decide the manner in which those functions are to be exercised.	Procedure set out in the Fund's: - A Guide To Resolving Disputes About An Employer's Pension Decision, and - A Guide To Resolving Disputes About An Administering Authority Pension Decision both of which are in the Disputes section of the Forms & guides for members pages of our website. Stage 2 adjudicator is Cambridgeshire County Council's Monitoring Officer.
R 79(2) and TP23 Internal Dispute Resolution Procedure	Whether administering authority should appeal to the Secretary of State against employer decision (or lack of a decision).	Decision delegated to the Head of Pensions to consider each case on its own merits.

Admission agreements and employer management

Regulation no.	Description of discretion	Administering authority policy
R 3(1A), R 3(5) and R Sch 2, Part 3, Para 1 Admission Body agreements	Whether to agree to an admission agreement with a body applying to be an admission body.	See separate Admissions and Bulk Transfer Policy in the Employer policies section of the key documents pages of our website.

Regulation no.	Description of discretion	Administering authority policy
R 4(2)(b) Admission Body agreements	Whether to agree to an admission agreement with a Care Trust, NHS Scheme employing authority or Care Quality Commission.	See separate Admissions and Bulk Transfer Policy in the Employer policies section of the key documents pages of our website.
R Sch 2, Part 3, para 9(d) Admission Body agreements	Whether to terminate an admission agreement in the event of <ul style="list-style-type: none"> • insolvency, winding up or liquidation of the body. • breach by that body of its obligations under the admission agreement. • failure by that body to pay over sums due to the Fund within a reasonable period of being requested to do so. 	See separate Admissions and Bulk Transfer Policy in the Employer policies section of the key documents pages of our website.
R Sch 2, Part 3, para 12(a) Admission Body agreements	Employees of a contractor are only entitled to remain in the LGPS whilst they continue to be employed in connection with the original services that were transferred. Define what the term “ in connection with ” means in the context of “only employees of the body who are employed in connection with the provision of the service or assets referred to in that sub-paragraph may be members of the Scheme”.	See separate Admissions and Bulk Transfer Policy in the Employer policies section of the key documents pages of our website.
R Sch 2, Part 3, para 14 Admission Body agreements	The start date of an admission agreement may be set to be earlier than the date the admission agreement is executed.	The decision whether to backdate an admission will be made by the Head of Pensions taking into consideration the advice of the Fund Actuary.
R 54(1) Separate admission agreement fund	Whether to set up a separate admission agreement fund.	Separate admission agreement funds will not be set up as normal practice. Any such decision would need to be agreed by the Pension Fund Committee taking into consideration guidance from the Fund Actuary.
R 64(2A) Exiting employers	Whether to suspend (by way of issuing a suspension notice), for up to 3 years, an employer’s obligation to pay an exit payment where the employer is again likely to have active members within the specified period of suspension.	This will be decided by the Employer Services and Communications Manager taking into consideration the advice of the Fund Actuary.
R 64(2ZAB) Exit credit amount	Determine the amount of an exit credit, which may be zero, when an employer becomes an exiting employer in the Fund with a funding surplus.	Determining the amount of an exit credit delegated to the Employer Services and Communications Manager, and to be agreed in co-operation with the Fund Actuary. See separate Funding Strategy Statement in the Funding and investment policies section of the key documents pages of our website.

Regulation no.	Description of discretion	Administering authority policy
<p>R 64(2ZAB)(b) Timing of payment of exit credit to exiting employer</p>	<p>If there is an exit credit payable to an exiting employer, decide whether to extend the period by which to pay it beyond 6 months from the date an employer ceases to be a Scheme Employer.</p>	<p>This will be decided by the Employer Services and Communications Manager taking into consideration the advice of the Fund Actuary and by agreement with the exiting employer.</p>
<p>R 64(4) Revised Rates and Adjustment Certificates</p>	<p>Whether to obtain revision of employer's contribution rate if there are circumstances which make it likely a Scheme employer will become an exiting employer.</p>	<p>Delegated to the Employer Services and Communications Manager, and to be agreed in co-operation with the Fund Actuary See separate Admissions and Bulk Transfer Policy in the Employer policies section of the key documents pages of our website.</p>
<p>R 68(2) TP Sch 2, Para 2(3) L 80(5) Employer strain payments</p>	<p>Whether to require any strain on Fund costs to be paid "up front" by an employer following redundancy / business efficiency, flexible retirement, or the waiver (in whole or in part) of any actuarial reduction on voluntary or flexible retirement, or the waiver of an actuarial reduction on compassionate grounds under TP Sch 2, para 2(1).</p>	<p>The administering authority will recharge all strain on the fund costs in accordance with the Rates and Adjustment Certificate and guidance produced by the Fund Actuary. Payment should normally be made within 12 months of the effective date in the form of lump sum. This may be extended to up to three years if agreed by the Employer Services and Communications Manager.</p>
<p>R 80(1)(b) TP 22(1) TP 23 Provision of Information by Employers</p>	<p>Specify information to be supplied by employers to enable administering authority to discharge its functions.</p>	<p>The Head of Pensions will specify the information to be provided by employers. Some information requirements may also be contained within the Administration Strategy in the Employer policies section of the key documents pages of our website</p>
<p>R 69(1) Employer Payments</p>	<p>Decide frequency of payments to be made over to Fund by employers and whether to make an administration charge for late receipt.</p>	<p>Payments must be made in accordance with Pensions Act (made monthly by 19th of the month following payroll) in accordance with the Payment of employee and employer pension contributions policy. Any administration charge will be in accordance with the Fund's Administration Strategy. The above policy and strategy documents are available in the Employer policies section of the key documents pages of our website.</p>
<p>R 69(4) Employer Payments</p>	<p>Decide form and frequency of information from employers to accompany payments to the Fund.</p>	<p>Information should be provided on a monthly basis unless a less frequent basis is agreed with the Head of Pensions.</p>

Regulation no.	Description of discretion	Administering authority policy
R 70 TP 22(2) Employer Payments	Whether to issue employer with notice to recover additional costs incurred as a result of the employer's level of performance.	See the Fund's Administration Strategy in the Employer policies section of the key documents pages of our website .
R 71(1) Employer Payments	Whether to charge interest on payments by employers which are overdue.	The Fund will charge employers interest for persistently making late payments to the Fund. Delegated authority is given to the Head of Pensions to apply a charge on a case by case basis, taking into consideration the administrative cost involved in raising the charges.

Payments relating to death

Regulation no.	Description of discretion	Administering authority policy
R 17(12) , 40(2) , 43(2) and 46(2) TP 17(5) to (8) B 23(2) , 32(2) and 35(2) T Sch1 L 38(1) and 155(4) R95 E8 Payments on death	The Administering Authority may, at its absolute discretion, pay any death grant due (including AVCs, SCAVCs and life assurance relating to AVCs) to or for the benefit of the deceased member's nominee, personal representatives or any person appearing to the authority to have been a relative or dependent of the member. This also relates to councillor members.	<p>Delegated authority has been given to the Head of Pensions to determine the recipient of death grants. Details of prospective recipients will be sought and considered in all cases.</p> <p>Payment will <i>normally</i> be made:</p> <ul style="list-style-type: none"> • in accordance with the member's expression of wish, or • where no expression of wish was made, to the member's surviving spouse, civil partner or 'cohabiting partner' (as defined in Schedule 1 to the LGPS Regulations 2013). <p>Where the above payment options appear inappropriate based on the details of prospective recipients received, the Head of Pensions will determine whether payment will be made to, or divided in whatever proportions(s) they see fit between, the deceased's personal representative (in that capacity), one or more surviving nominees, and any person appearing to have been a relative or dependant of the deceased member. Cambridgeshire County Council will ensure the details of current nominees will be included on annual benefit statements so that scheme members are given opportunity to revise nominations as part of the annual benefit statement exercise.</p>

Regulation no.	Description of discretion	Administering authority policy
R 82(2) A 52(2) L 95 Benefits due in respect of deceased persons	Whether to pay sums due to personal representatives or anyone appearing to be beneficially entitled to the estate without need for grant of probate / letters of administration where payment is less than amount specified in s6 of the Administration of Estates (Small Payments) Act 1965.	Where the total of the sums payable from the Scheme falls below the amount specified in s6 of the Administration of Estates (Small Payments) Act 1965 (£5,000 since 1984) sight of grant of probate or letters of administration is not required for payment. The decision as to the beneficiary is made on a case by case basis by the Head of Pensions.
R Sch 1 TP 17(9)(b) Cohabiting partner	Decide evidence required to determine financial dependence of cohabiting partner on scheme member or financial interdependence of cohabiting partner and scheme member.	Where a member dies and a potential cohabiting partner is identified, delegated authority is given to the Head of Pensions to decide on a case by case basis by taking account of the LGPS regulatory requirements, what evidence the partner will be asked to provide by the way of appropriate documents and paperwork to prove either dependency or interdependency.
TP 3(6), 4(6)(c), 8(4), 10(2)(a) and 17(2)(b) B 10(2) Final Pay	Where member to whom B10 applies (use of average of 3 years pay within the period of 13 years ending with the last day of active membership for final pay purposes) dies before making an election, whether to make that election on behalf of the deceased member.	The pay figure that will provide the greatest benefit will be applied in all cases.
TP 3(6), 4(6)(c), 8(4), 10(2)(a) and 17(2)(b) T Sch1 L 23(9) Certificate of protection	Make election on behalf of deceased member with a certificate of protection of pension benefits i.e. determine best pay figure to use in the benefit calculations (pay cuts / restrictions occurring pre 1.4.08.).	The most advantageous final pay period for the member will be used in all cases.
R Sch 1 "Eligible Child" TP 17(9)(a) Child in education	Decide to treat child (who has not reached the age of 23) as being in continuous education or vocational training despite a break	A break of 1 academic year or less should be ignored. Authority is delegated to the Head of Pensions to extend this period in exceptional circumstances
L 47(1) R95 G11(1) Children's pensions	Apportionment of children's pension amongst eligible children.	Payment will be apportioned equally amongst the eligible children unless there are exceptional circumstances, when authority is delegated to the Head of Pensions to determine an appropriate apportionment.

Regulation no.	Description of discretion	Administering authority policy
B 27(5) L 47(2) R95 G11(2) Children's pensions	Whether to pay the whole or part of an eligible child's pension to another person for the benefit of the child.	<p>Payment will be made to a parent or guardian where the eligible child is aged below 18.</p> <p>Once the eligible child has attained age 18 any payment due will normally be made direct to them UNLESS they are incapable of managing their affairs, in which case delegated authority has been given to the Head of Pensions to determine who to pay the whole or part of that eligible child's pension to for their benefit.</p> <p>In all cases where payment is not made direct to the eligible child, the parent, guardian or other person being paid the eligible child's pension must sign a written statement confirming that the pension will be used for the benefit of that eligible child.</p>
R95 F7 Survivors pension	Suspension of spouses' pensions during remarriage or cohabitation.	Resolved that spouse's pensions are not ceased on re-marriage or cohabitation that took place or commenced on or after 1 April 1998 but are payable for life. This brought equity with post 31 March 1998 retirees/leavers with deferred benefits.

Transferring or linking benefits

Regulation no.	Description of discretion	Administering authority policy
R 98(1)(b) Bulk Transfer	Agree to bulk transfer payment.	See separate Admissions and Bulk Transfer Policy in the Employer policies section of the key documents pages of our website .
R 100(6) Transfer in time limit extension	Extend normal time limit for acceptance of a transfer value beyond 12 months from joining the LGPS.	This will be on a case by case basis with delegated authority given to the Head of Pensions. The member's employer must also agree to any extension.
R 100(7) Transfer of pension rights	Allow transfer of pension rights into the Fund.	Transfers into the Fund will be permitted.

Regulation no.	Description of discretion	Administering authority policy
TP 10(9) Concurrent aggregation choice	Where there are multiple ongoing employments, in the absence of an election from the member within 12 months of ceasing a concurrent employment, decide to which record the benefits from the ceased concurrent employment should be aggregated.	The power to determine this is delegated to the Head of Pensions. (The assessment will be based on which of the concurrent employments continuing immediately after leaving the employment in question is considered the main ongoing employment. This assessment being made based on which employment has the greatest annual rate of pensionable pay based on pay that would be pensionable under Regulation 20 of the LGPS Regulations 2013).
L 118 Contributions Equivalent Premium	Retention of CEP where member transfers out.	Where HMRC will accept payment of the CEP, this should be made. If they will not for any reason the CEP should be retained.

Other miscellaneous discretions

Regulation no.	Description of discretion	Administering authority policy
L 106A(5) Annual Deferred Benefit Statement	Date to which benefits shown on annual deferred benefit statement are calculated.	Calculated as at first Monday in each tax year so as to coincide with the effective date of the Pensions Increase Review Order

Regulation no.	Description of discretion	Administering authority policy
<p>TP 3(13) A 70(1) and 71(4(c)) Abatement on re-employment</p>	<p>Decide policy on abatement of pre 1 April 2014 element of pensions in payment following re-employment.</p>	<p>Members who are in receipt of an augmented pension or annual compensation (where additional pension, additional membership or a credited period has been awarded by their former employer) due to early retirement on the grounds of redundancy or in the interests of efficiency should have any pension based on pre 1 April 2014 membership assessed for reduction or suspension on re-employment that offers membership of the LGPS.</p> <p>The pension in respect of any pre 1 April 2014 membership will be reduced by the excess of the annual rate of pay on commencing the new job, or at any material change, plus the annual rate of pension in payment at that date in respect of any pre 1 April 2014 membership over the annual rate of pay of the former employment on the last day used in calculating the Final Pay that the pension was based on (revalued by pension increase); where the excess is greater than the annual rate of pension in respect of pre 1 April 2014 membership in payment, that pension will be suspended. The reduction or suspension will continue until the employment ends or there is a reassessment due to a material change.</p>
<p>R 22(3)(c) Pension Account</p>	<p>Pension account may be kept in such form as is considered appropriate.</p>	<p>Pension accounts will be held electronically using the Altair pension administration software.</p>
<p>R 83 Person entitled to benefits is unable to deal with their own affairs</p>	<p>Whether, where a person is incapable of managing their affairs, to pay the whole or part of that person's pension benefits to another person for their benefit.</p>	<p>This will be on a case by case basis with delegated authority given to the Head of Pensions.</p>
<p>A 52A Person entitled to benefits (other than an eligible child) is unable to deal with their own affairs</p>	<p>Whether, where a person (other than an eligible child) is incapable of managing their affairs, to pay the whole or part of that person's pension benefits to another person for their benefit.</p>	<p>This will be on a case by case basis with delegated authority given to the Head of Pensions.</p>

Regulation no.	Description of discretion	Administering authority policy
<p>R 16(1) Minimum Additional Pension Contributions / Shared Cost Additional Pension Contributions</p>	<p>Whether to turn down a request to pay an APC/SCAPC over a period of time where it would be impractical to allow such a request (e.g. where the sum being paid is very small and could be paid as a single payment).</p>	<p>There is no minimum monthly payment required for entering into an APC/SCAPC contract.</p>
<p>R 16(10) Request medical for APC/SCAPC</p>	<p>Whether to require a satisfactory medical before agreeing to an application to pay an APC / SCAPC.</p>	<p>A scheme member wishing to pay APC/SCAPC should be required to complete a declaration, countersigned by their General Practitioner, that they are in reasonably good health, prior to being permitted to commence payment, EXCEPT where the payments are to purchase pension no more than that which is to cover a period of absence, when no such declaration shall be required.</p>
<p>R 16(10) Proof of good health for APC / SCAPC</p>	<p>Whether to turn down an application to pay an APC / SCAPC if not satisfied that the member is in reasonably good health.</p>	<p>Where a scheme member wishing to pay APC/SCAPC does not provide a declaration, countersigned by their General Practitioner, that they are in reasonably good health, their application to pay APC/SCAPC will be turned down, UNLESS</p> <ul style="list-style-type: none"> (i) the payments are to purchase pension no more than that which is to cover a period of absence, when no such declaration shall be required OR (ii) there are exceptional circumstances that prevent such a declaration being countersigned by the scheme member's General Practitioner, when a decision to allow the application to pay an APC/SCAPC will be considered on a case by case basis with delegated authority given to the Head of Pensions.

Regulation no.	Description of discretion	Administering authority policy
<p>R 32(7) Voluntary early retirement and Flexible retirement time limit</p>	<p>Whether to extend the time limits within which a member must give notice of the wish to draw benefits before normal pension age or upon flexible retirement.</p>	<p>The advance notice required for payment of benefits before normal pension age will generally be shortened from 3 months to 1 month.</p> <p>A notice that benefits are to be paid on flexible retirement should generally be given no more than 1 month after the reduction in hours and/or grade, i.e. the period will generally not be extended.</p> <p>In both cases, however, in exceptional circumstances an extension will be considered on a case by case basis with delegated authority given to the Operations & Technical Manager.</p>
<p>R 36(3) A 56(2) L 97(10) Approved medical advisors for ill health retirements.</p>	<p>Approve medical advisors used by employers (for ill health benefits)</p>	<p>Delegated powers have been given to the Head of Pensions to determine in advance of a referral whether an employer can use an alternative Occupational Health Provider to Cambridgeshire County Council's own provider, and where approval is granted whether it is reasonable to use the practitioner proposed as the Independent Registered Medical Practitioner (IRMP) for pension purposes.</p>
<p>TP 15(1)(c) T Sch1 L 83(5) Added years contributions</p>	<p>Extend time period for capitalisation of remaining contributions to an added years contract in cases of redundancy.</p>	<p>This will be considered on a case by case basis with delegated authority given to the Head of Pensions.</p>
<p>R 34(1)(a), (b) and (c) B 39(1)(a), (b) and (c) T 14(3) L 49(1) Small Pension Commutation</p>	<p>Decide whether to trivially commute a member's pension under section 166 of the Finance Act 2004; whether to trivially commute a lump sum death benefit under section 168 of the Finance Act 2004; or whether to pay a commutation payment under regulations 6 (payment after relevant accretion), 11 (de minimis rule for pension schemes) or 12 (payments by larger pension schemes) of the Registered Pension Schemes (Authorised Payments) Regulations 2009.</p>	<p>Members and beneficiaries who meet the criteria for commutation will normally be offered commutation as an option.</p>
<p>R 49(1)(c) B 42(1)(c) Double entitlement</p>	<p>Decide, in the absence of an election from the member, which benefit is to be paid where the member would be entitled to a benefit under 2 or more regulations in respect of the same period of Scheme membership.</p>	<p>The power to determine and notify the member of the provision under which benefits are to be awarded will be delegated to the Head of Pensions and will be considered on a case by case basis.</p>

Regulation no.	Description of discretion	Administering authority policy
L 147 Pension Credit	Discharge Pension Credit liability.	These cases will be considered on a case by case by the Head of Pensions, taking consideration of the national LGPS guidance issued by Local Government Pensions Committee.
L 50 and 157 Exceptional ill health commutation	Decide whether to commute benefits due to exceptional ill-health (includes. Pension Credit members where the effective date of the Pension Sharing Order was pre 1 April 2014 or where the effective date of the Pension Sharing Order is after 31 March 2014 but the debited member had no post 31 March 2014 membership of the 2014 Scheme).	Members who meet the criteria for commutation on grounds of exceptional ill health will be offered commutation as an option.
L 91(6) Employer payments	Timing of pension increase payments by employers to fund (pre 1 April 2008. leavers).	Will generally be recharged quarterly; however Head of Pensions given delegated authority to agree alternative frequency.

Discretions relating to employers which are no longer scheme employers

Regulation no.	Description of discretion	Administering authority policy
R 38(3) and (6) B 31(4) and (7) Deferred Beneficiary – Payment on ill health grounds	Where the question arises of whether a deferred beneficiary meets criteria for being permanently incapable of former job because of ill health and is unlikely to be capable of undertaking gainful employment before normal pension age or for at least three years, whichever is the sooner but the member’s employer is no longer a ‘scheme employer’, the decision falls to the administering authority. This also applies to a scheme member who was formerly in receipt of Tier 3 ill-health benefits.	Decision delegated to the Head of Pensions to consider each case on its own merits.
TP Sch 2, Paras 1(2) and 1(1)(aa), (c) and (f) and R 60 Waiver of actuarial reductions	Waiving of actuarial reduction where former employer has ceased to be a ‘Scheme employer’, including whether to ‘switch on’ the 85 year rule for a member voluntarily drawing benefits on or after age 55 and before age 60. This can also apply to former Tier 3 Ill-Health members.	The waiving of any actuarial reduction decision will be made in line with Cambridgeshire County Council’s own employer policy in this area.
TP 3(1), TP Sch 2, Paras 2(1) and 2(2) B 30(5) and B 30A(5) L 31(5) Waiving reductions	Where the question arises of whether to waive any actuarial reduction on pre and/or post April 2014 benefits but the member’s employer is no longer a ‘Scheme employer’, the decision falls to the administering authority.	The waiving of any actuarial reduction decision will be made in line with Cambridgeshire County Council’s own employer policy in this area.

Regulation no.	Description of discretion	Administering authority policy
R 30(8) Waiving reductions	Where the question arises of whether to waive, in whole or in part, actuarial reduction on benefits paid on flexible retirement, but the member's employer is no longer a 'scheme employer', the decision falls to the administering authority.	The waiving of any actuarial reduction decision will be made in line with Cambridgeshire County Council's own employer policy in this area.
R 30(8) Waiving reductions	Where the question arises of whether to waive, in whole or in part, actuarial reduction on benefits which a member voluntarily draws before normal pension age other than on the grounds of flexible retirement but the member's employer is no longer a 'scheme employer', the decision falls to the administering authority.	The waiving of any actuarial reduction decision will be made in line with Cambridgeshire County Council's own employer policy in this area.
TP 3(5A)(vi), TL 4, L 106(1) and R95 D11(2)(c) Early payment of deferred benefits on compassionate grounds	Where the question arises of whether to grant on compassionate grounds an application of early payment of deferred benefits on or after age 50 for a scheme member who ceased active membership before 1 April 1998 but the member's employer is no longer a 'scheme employer', the decision falls to the administering authority.	The early payment on compassionate grounds decision will be made in line with Cambridgeshire County Council's own employer policy in this area.
TP 12(6) Ill health certificate	Where the question arises of whether to use a certificate produced by an IRMP under the 2008 Scheme for the purposes of making an ill health determination under the 2014 Scheme but the member's employer is no longer a 'scheme employer', the decision falls to the administering authority.	A 2008 Scheme ill health certificate will not be accepted for ill health determinations.

Discretions under the Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2000 (as amended) in relation to awards of compensation made to pre 1 April 2007 leavers

Regulation no.	Description of discretion	Administering authority policy
31(2) Compensation	Decide whether to agree to pay annual compensation on behalf of fund employer and recharge payments to employer.	Annual compensation payments already being paid on behalf of employers, and recharged, will continue to be paid, and in the event of new survivors' compensation becoming payable, these payments will similarly be paid on behalf of employers and recharged. The power to determine the frequency and terms of recharge for each employer is delegated to the Employer Services and Communications Manager, notwithstanding that in accordance with Regulation 31(4) payments must be recovered within 2 months of them being made.

Discretion under the Registered Pension Schemes (Modification of Scheme Rules) Regulations 2011

Regulation no.	Description of discretion	Administering authority policy
<p>2 Voluntary Scheme Pays</p>	<p>To decide whether it is legally able to offer voluntary scheme pays and, if so, to decide the circumstances (if any) upon which it would do so</p>	<p>Voluntary Scheme Pays will be permitted where the member has incurred an annual allowance charge greater than £2,000 and is affected by the Tapered Annual Allowance, or where Mandatory Scheme Pays would have applied but the member is out of time.</p> <p>Decisions on applications for Voluntary Scheme Pays to apply in other circumstances will be considered on a case by case basis with delegated authority given to the Head of Pensions.</p>

Key to Regulation References:

R	The Local Government Pension Scheme Regulations 2013
TP	The Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014
A	The Local Government Pension Scheme (Administration) Regulations 2008
B	The Local Government Pension Scheme (Benefits, Membership and Contributions) Regulations 2007
T	The Local Government Pension Scheme (Transitional Provisions) Regulations 2008
L	The Local Government Pension Scheme Regulations 1997
TL	The Local Government Pension Scheme (Transitional Provisions) Regulations 1997
R95	The Local Government Pension Scheme Regulations 1995

Note that references to old provisions (e.g. L) generally apply in relation to scheme members who left under those provisions.

Cambridgeshire County Council, as administering authority to the Cambridgeshire Pension Fund, has determined its discretionary policies in accordance with the Local Government Pension Scheme Regulations 2013 (as amended), and related legislation, and these are outlined in this statement. We will apply these policies to all members of the Pension Fund, regardless of who their employer is. Where relevant, these policies equally apply to members who left pensionable service prior to 1 April 2014 (albeit only in relation to discretions exercised since the effective date of these policies), to councillor members and to pension credit members.

The Policy was most recently approved by the Pension Fund Committee on 18 June 2025 and was effective from 19 June 2025. The Policy has been subject to the following reviews prior:

Date of review	Strategy effective date	Review type
10 June 2022	11 June 2022	Committee Review
8 June 2023	9 June 2023	Officer Review
6 June 2024	7 June 2024	Officer Review

We retain the right to change these policies at any time as long as we republish the amended policy within at least one month of when the change(s) we are introducing came into effect.

These policies do not give, nor shall they be deemed to give, any contractual rights to any member of the Pension Fund, or to any other person whatsoever. Nothing in this document will cause the Administering Authority's capacity to exercise its discretionary powers to be unlawfully fettered or restricted in any way.

We will exercise these discretions in line with the provisions of the various LGPS Regulations and other legislation. Nothing within this statement can overwrite the legal requirements within those provisions.

This Policy will be reviewed by the Pension Fund Committee every three years, and if necessary, more frequently to ensure it remains accurate and relevant. Officer reviews will be conducted on an annual basis.

CAMBRIDGESHIRE PENSION FUND

To: Pension Fund Board

Meeting date: 25 July 2025

Report by: Michelle Oakensen
Governance and Regulations Manager
michelle.oakensen@westnorthants.gov.uk

Subject: Cambridgeshire Pension Fund Equality, Equity, Diversity and Inclusion (EEDI) Policy.

Purpose of the report: To provide the Pension Board with the Cambridgeshire Pension Fund Equality, Equity, Diversity and Inclusion Policy for review.

Recommendations: The Pension Board is asked to review the new Cambridgeshire Pension Fund Equality, Equity, Diversity and Inclusion Policy.

Enquiries to: Michelle Oakensen
Governance and Regulations Manager
michelle.oakensen@westnorthants.gov.uk

1. Background

- 1.1 The Pensions Regulator issued guidance in March 2023 on Equality, Diversity and Inclusion, which outlined principles for how scheme managers should approach EDI issues, and practical ideas about how to implement them.
- 1.2 The Pensions Regulator's (TPR) EDI guidance covers areas such as the role of the chair, performance assessment, inclusive culture, recruitment and diversity of thought but also links to investment decisions and communications issued by the fund.
- 1.3 In January 2024 TPR published the new General Code which brings further focus onto EDI issues.
- 1.4 An action plan was approved by the Committee in June 2024, some actions have fallen behind schedule due to the need to meet statutory requirements as priority.

2. Executive summary

- 2.1 This is a new policy as a result of the EDI actions that were approved by the Pension Committee in June 2024. The policy is best practice based on the Pension Regulator's EDI principles.
- 2.2 The intention of the policy is to set out the commitment and approach of the Cambridgeshire Pension Fund to EEDI, ensuring where possible, those involved in managing the Fund are comprised of individuals with a broad range of characteristics, life experiences, expertise and skills leading to improved customer journey experiences for our members.
- 2.3 The approved policy can be located in Appendix 1, which also contains previously agreed actions.

3. Why EEDI is important for the Fund.

- 3.1 There has been a steady increase in membership within the Cambridgeshire Pension Fund and EEDI considerations are importantly becoming good practice to ensure Funds are administered in a way that works for everyone.
- 3.2 A diverse and inclusive Committee and Board with a broad range of characteristics, life experiences, expertise and skills will lead to:
 - Wider discussion encouraging new thinking and approaches.
 - More effective decision making that reflects members needs and values.
 - Improved value for money for members.
 - Deeper understanding of issues that have a real influence on members incomes.
 - Better decision making that impacts quality of life for a wide range of individuals.
 - Greater understanding, insight and empathy for scheme beneficiaries (such as discretionary death benefits and ill health decisions).
 - Improved communications with scheme members.
- 3.3 Wider than advantages for the governing body, consideration has also been given to communications, investments decisions and managing advisors and suppliers.

4. The Cambridgeshire Pension Fund Equality, Equity, Diversity and Inclusion Policy

- 4.1 The policy focuses on creating a climate and culture which recognises the importance of diversity. The Fund will not discriminate against anyone because of: age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race, religion or belief, sex, or sexual orientation as specified by law. In addition, the Fund also recognises the importance of diversity in the following areas (this list may not be exhaustive), culture, working style, thought, education, social background, special needs, neurodiversity or any other circumstance of those involved in the Fund's governance.
- 4.2 The Fund will ensure that all Committee and Board meetings, and Fund operations take place in a spirit of inclusion, namely a positive culture that is tolerant, respectful to all and encourages all to participate fully in their role and have access to career development opportunities, without concern that any perceived differences will inhibit them doing so.
- 4.3 The policy also aims to align with the Cambridgeshire County Council Equality, Diversity and Inclusion Strategy 2023-2027. The strategy sets out three themes:
1. Our workforce: Foster an inclusive, supportive and safe working environment that attracts and retains diverse people who feel valued, respected, and empowered.
 2. Our communities: Further understand and work with our diverse communities across Cambridgeshire, developing local solutions which address the needs of our communities.
 3. Our services: Ensure people who use our services and residents have good quality public services that meet the diverse needs of our communities
- 4.4 Equality, equity, diversity and inclusion are defined in the policy as per the Pensions Regulator expectations and contains the approach to delivery, monitoring and reporting.
- 4.5 Throughout the policy, the acronyms 'EEDI' and 'EDI' are used interchangeably, particularly in the context of the Pensions Regulator's guidance. The Fund has introduced 'Equity' into this policy as it believes that equity is an important aspect of achieving the objectives of this policy and that promoting equity will be a key theme in the developing agenda in the LGPS and Public Sector environment.
- 4.6 A copy of the EEDI Policy was provided to the Cambridgeshire County Council's Equalities team for review and a equality impact assessment was completed.
- 4.7 The policy was approved by the Pension Committee on 18 June 2025.

5. Relevant Pension Fund objectives

The following objectives are relevant for this report:

- To ensure compliance with the LGPS Regulations and other legislation and guidance, including the Pensions Regulator's Code of Practice.
- To manage the Fund in a fair and equitable manner and be accountable to the Fund's stakeholders.
- To promote the scheme and ensure members understand the benefits provided.

- To deliver clear, inclusive, accessible communications to stakeholders, including up-to-date information in order that informed decisions can be made.
- To seek regular feedback from stakeholders and use that feedback to help shape Fund administration.

6. Implications (including financial implications)

6.1 Resources and financial

6.1.1 Hymans Robertson reviewed the policy in line with the Pension Regulator guidance.

6.2 Legal

6.2.1 No material issues have been identified which may give rise to legal liability and/or risk from an administering authority perspective.

6.3 Consultation with Key Advisers

6.3.1 Squire Patton Boggs, the Fund's legal advisers, conducted a review of the Committee paper for legal implications with no material issues raised.

6.4 Risk management

6.4.1 The mitigated risks associated with this report has been captured in the Fund's risk register as detailed below –

Risk	Residual risk rating
Those charged with governance are unable to fulfil their responsibilities effectively.	Green
Failure to administer the scheme in line with regulations and guidance	Green
Failure to provide relevant information to the Pension Fund Committee to enable informed decision making.	Green

6.4.2 The Fund's full risk register can be found on the Fund's website at the following link: [Cambridgeshire Risk Register](#)

6.5 Consultation

6.5.1 Not applicable.

7. Background papers

7.1 PLSA Diversity and Inclusion guide - [Diversity-and-Inclusion-Made-Simple.pdf \(plsa.co.uk\)](#)
 TPR EDI overview [EDI overview | The Pensions Regulator](#)
 Cambridgeshire Pension Fund – Equality, Diversity and Inclusion (EDI) approach [Council and committee meetings - Cambridgeshire County Council > Meetings Calendar](#)

7. Appendices

7.1 Appendix 1 – Cambridgeshire Pension Fund Equality, Equity, Diversity and Inclusion Policy.

Equality, Equity, Diversity and Inclusion (EEDI) Policy

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1. Introduction and overriding principles

- 1.1 This is the Equality, Equity, Diversity and Inclusion (EEDI) Policy of Cambridgeshire Pension Fund managed by Cambridgeshire County Council as the Administering Authority.
- 1.2 Cambridgeshire County Council and West Northamptonshire Council work in partnership to administer the Cambridgeshire Pension Fund. Under this arrangement West Northamptonshire Council is the lead authority shared service partner.
- 1.3 The Committee, Board and Officers of the Cambridgeshire Pension Fund are committed to integrating best practice in EEDI in the governance of the Fund.
- 1.4 The Committee, Board and Officers of the Cambridgeshire Pension Fund believe that the consideration of EEDI issues is key to successful governance and ensuring the objectives of the Fund are met, particularly to ensure:
 - Quality decision making
 - Services for members, including communications, take into account the diversity and differing needs of the membership
- 1.5 This policy focuses on creating a climate and culture which recognises the importance of diversity. The Fund will not discriminate against anyone because of: age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race, religion or belief, sex, or sexual orientation as specified by law. In addition, the Fund also recognises the importance of diversity in the following areas (this list may not be exhaustive), culture, working style, thought, education, social background, special needs, neurodiversity or any other circumstance of those involved in the Fund's governance.
- 1.6 The Fund will ensure that all Committee and Board meetings, and Fund operations, take place in a spirit of inclusion, namely a positive culture that is tolerant, respectful to all, and encourages all to participate fully in their role and have access to career development opportunities, without concern that any perceived differences will inhibit them doing so.
- 1.7 This policy is mindful of the requirements of the Pension Regulator's Equality and Diversity Guidance issued in March 2023. The guidance outlines principles for how Equality, Diversity and Inclusion (EDI) issues should be approached. In addition, the publication of the Pension Regulator's General Code of Practice in January 2024 brought further focus to EDI issues.
- 1.8 This policy also aligns with the Cambridgeshire County Council Equality, Diversity and Inclusion Strategy 2023-2027.
- 1.9 Throughout the policy, the acronyms 'EEDI' and 'EDI' are used interchangeably, particularly in the context of the Pensions Regulator's guidance. The Fund has introduced 'Equity' into this policy as it believes that equity is an important aspect of achieving the objectives of this policy and that promoting equity will be a key theme in the developing agenda in the LGPS and Public Sector environment.

2. Objectives

Fund:

2.1 The Funds' objectives related to this policy are as follows:

- To ensure compliance with the LGPS Regulations and other legislation and guidance, including the Pensions Regulator's Code of Practice.
- To ensure individuals responsible for managing the Fund and delivering its services have the appropriate knowledge and expertise.
- To manage the Fund in a fair and equitable manner, and manner and be accountable to the Fund's stakeholders.
- To continually measure and monitor success against the Fund's objectives.
- To promote the scheme and ensure members understand the benefits provided.
- To deliver clear, inclusive, accessible communications to stakeholders, including up-to date information in order that informed decisions can be made.
- To seek regular feedback from stakeholders and use that feedback to help shape Fund administration

Policy:

2.2 The EEDI objectives related to this policy are as follows:

- To promote awareness and understanding.
- To promote transparency.
- To promote engagement through inclusive communications.
- To seek a diverse and inclusive Pension Committee, Investment Sub Committee and Local Pension Board.
- To ensure Fund documentation aligns with the EEDI principles of the Fund.
- To ensure that Environmental, Social and Governance (ESG) factors, including EEDI, are considered in investment decision-making, whilst maintaining fiduciary duty.

3. Purpose of this Policy

3.1 The purpose of the policy is to set out the commitment and approach of the Cambridgeshire Pension Fund to EEDI, ensuring where possible, those involved in managing the Fund are comprised of individuals with a broad range of characteristics, life experiences, expertise and skills leading to improved customer journey experiences for our members.

4. Scope

4.1 The policy applies to:

- officers of the Fund.
- members of the Pension Committee.
- members of the Pension Board.
- employers of the Fund.
- service providers.
- professional advisors.

5. Effective date

5.1 This policy was first approved by the Pension Fund Committee on 18 June 2025.

6. Review

6.1 This policy will be reviewed by Fund Officers annually and by the Pension Fund Committee every three years, and if necessary, more frequently to ensure it remains accurate and relevant.

Date of review	Effective Date	Type of review
Due June 2026		Officer

7. Legislative and related context

Equality Act 2010

7.1 The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. Within the Act there is a public sector Equality Duty that came into force across Great Britain on 5 April 2011. It means that public bodies have to consider all individuals when carrying out their day-to-day work – in shaping policy, in delivering services and in relation to their own employees.

7.2 It also requires that public bodies have due regard to the need to:

- eliminate discrimination.
- advance equality of opportunity.
- foster good relations between different people when carrying out their activities.

The Pensions Regulator

7.3 The Pensions Regulator guidance on EDI suggests that the administering authority should develop and maintain an EDI policy which includes:

- an agreed definition of EDI.
- the EDI aims of the Fund.
- an EDI training plan for the Fund.

7.4 The Pensions Regulator General Code of Practice also includes expectations where it is practical to do so within the governance arrangements of local authority pension scheme funds. The Cambridgeshire Pension Fund will review these in line with compliance against the Code.

Cambridgeshire County Council Equality, Diversity and Inclusion (EDI) Strategy

- 7.5 The EDI strategy enables the council to achieve its vision and ambitions so that Cambridgeshire can become greener, fairer, and more caring for the people and communities we serve and support.
- 7.6 The strategy sets out three themes:
1. Our workforce: Foster an inclusive, supportive and safe working environment that attracts and retains diverse people who feel valued, respected, and empowered.
 2. Our communities: Further understand and work with our diverse communities across Cambridgeshire, developing local solutions which address the needs of our communities.
 3. Our services: Ensure people who use our services and residents have good quality public services that meet the diverse needs of our communities
- 7.7 This policy aims to support these themes in relation to activities undertaken by the Cambridgeshire Pension Fund where possible.

8. Cambridgeshire Pension Fund definitions

Equality

- 8.1 Equality is about ensuring that every individual has an equal opportunity to make the most of their lives and talents. No one should have poorer life chances because of the way they were born, where they come from, what they believe, or whether they have a disability. The Fund will seek to ensure that all scheme members, employers and those involved in managing the Fund have equal access to appropriate information and support.

Equity

- 8.2 Equity and equality are interconnected concepts. Equity involves recognising that different people have different needs, experiences, and challenges, and that treating everyone the same is not sufficient to achieve fairness.
- 8.3 The Fund will seek to identify barriers and biases and take targeted action where viable to overcome specific inequalities, discrimination, disadvantages and marginalisation experienced by certain groups and individuals, including the protected characteristics under the Equality Act 2010. In some circumstances, people need to be treated differently to achieve meaningful equality of opportunity.

Diversity

- 8.4 Diversity means variety. A diverse group is heterogenous, which means its component parts are different.

In the UK, it is illegal to discriminate against someone on the basis of certain protected characteristics. The Equality Act 2010 prohibits less favourable treatment on the basis of nine protected characteristics - Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation. It is also worth noting that everyone is different in a variety of visible and non-visible ways therefore 'diversity' captures differences which may not be immediately apparent upon meeting someone, for instance, sexual orientation, care experience, religion or belief, neurodiversity, socio-economic background and many forms of disability, including mental health conditions, albeit not all listed above would be classed as a protected characteristic.

- 8.5 The Fund will seek to recognise, respect and value differences in people leading to improved customer journey outcomes.

Inclusion

- 8.6 Inclusion refers to an individual's experience within their workplace and in society, and the extent to which they feel respected, valued, and included. Inclusion means capturing the voices of all, allowing people to fully participate, irrespective of their individual characteristics. Inclusion is positively embracing differences to create a group where different perspectives and opinions are valued and encouraged.
- 8.7 The Fund will seek to ensure that a culture of inclusiveness is applied across the Committee and Board to enable effective decision making leading to improved customer journey outcomes.

9. Delivery

- 9.1 The EEDI action plan sets out the Funds approach in the following areas:

- Training.
- Fund documentation – EEDI specific.
- Fund documentation – review to ensure align with EEDI approach.
- Fund appointments.
- Role of the Chair.
- Member communications.
- Investment decisions.
- Managing advisors and suppliers.

- 9.2 Details against each action can be found in Annex 1.

10. Monitoring

- 10.1 Progress against the plan will be presented to the Pension Fund Committee and Pension Fund Board via Business Plan Updates at each meeting or where required as a separate report.

11. Reporting

- 11.1 Full Council will have oversight of the EEDI outcomes via the Pension Committee & Local Pension Board Annual Reports.

12. Contact

- 12.1 If you require further information about anything in or related to this EEDI Policy, please contact:

Michelle Oakensen
Governance & Regulations Manager
Michelle.oakensen@westnorthants.gov.uk

Annex 1 - Equality, Equity, Diversity and Inclusion Actions.

Area	CPF Action
<p>Training</p> <ul style="list-style-type: none"> - Support Pension Fund Committee, Investment Sub-Committee and Local Pension Board Members and Fund Officers to build and develop their EDI knowledge and understanding through regular training. 	<ol style="list-style-type: none"> 1. Introductory EDI training for all Pension Fund Committee/Investment Sub Committee members, Local Pension Board members. 2. Fund Officer training – identify what Administering Authority provide Officers. 3. Identify what additional training requirements (specific to the Fund) are needed for Officers (e.g., supplement with relevant training from item 1 above where required). 4. Identify approach to EDI training going forward in terms of how often to add to training plan and also consider what information needs to be added to induction training plans.
<p>Fund documentation – EDI specific</p> <ul style="list-style-type: none"> - EDI definition. - EDI principles leading to EDI objectives. - Incorporating those objectives in a Fund-specific EDI policy. 	<ol style="list-style-type: none"> 1. Agree a definition of EDI for CPF 2. Devise a list of EDI principles for CPF 3. Build EDI principles into EDI objectives for a Fund-specific EDI Policy 4. Determine timeline to develop a Fund-specific EDI Policy
<p>Fund documentation – review to ensure aligns with EDI approach</p> <ul style="list-style-type: none"> - Terms of Reference for Committees and Board (e.g., consider appointment decision makers/any appointment panel role, terms of office, reappointments etc with EDI lens). - Communications Strategy and Communication Plan (e.g., consider EDI requirements are being embedded in Fund’s communication approach). - Administering Authority Discretions Policy (e.g., considering EDI definition/principles aligns with Fund approach to making discretionary decisions). 	<ol style="list-style-type: none"> 1. Review Terms of references in line with EDI principles and determine if review needed ahead of regular review cycle. 2. Review Communication Strategy and Communication Plan against EDI principles. 3. Review Discretions Policy against EDI principles. 4. Review ISS/RI beliefs against EDI principles.

Annex 1 - Equality, Equity, Diversity and Inclusion Actions.

<ul style="list-style-type: none"> - Investment Strategy Statement (ISS) and RI Beliefs (i.e., considering EDI definition/principles aligns with Fund ISS and RI beliefs). 	
<p>Fund appointments</p> <ul style="list-style-type: none"> - Encourage and maintain a diverse and inclusive Pension Fund Committee, Investment Sub-Committee and Local Pension Board, through open recruitment and the identification and removal of potential barriers to become a member of these Committees and Board. - Consider EDI from a Fund perspective when recruiting Officers. 	<ol style="list-style-type: none"> 1. Regularly review the Committees and Board membership to ensure a diverse spread of members with varied skills and experience by including questions on EDI in effectiveness reviews or training needs assessments carried out for Committees and Board. 2. Consider whether EDI is embedded within WNC processes and training.
<p>Role of the Chair</p> <ul style="list-style-type: none"> - Be able to demonstrate elements of skills in debating, challenging, and negotiating with a particular ability to gather and understand diverse views. - Whilst displaying a balanced approach by treating members with respect and taking into consideration different viewpoints to reach a consensus. 	<ol style="list-style-type: none"> 1. Consider additional training for Chair. 2. Consider any relevant requirements that might need to be reflected in Terms of Reference (aligns with review above).
<p>Member communications</p> <ul style="list-style-type: none"> - Encourage member engagement through the development of inclusive communications. - Where possible, ensure that web content follows Web Content Accessibility Guidelines (WCAG) 2.2. - Obtain and review feedback from scheme members and scheme employers on Fund communication. 	<ol style="list-style-type: none"> 1. Regularly test communications against a scheme specific definition of EDI (and aligns with review of Strategy and Plan above). 2. Check alignment with web requirements. 3. Asking members and employers for their views on how the fund reflects its EDI values in the communications we provide to them.

Annex 1 - Equality, Equity, Diversity and Inclusion Actions.

<p>Investment decisions</p> <ul style="list-style-type: none"> - Consider Environmental, Social and Governance aspects of investment decisions. - Awareness of diversity and inclusion good practice such as if scheme investments are aligned with member’s responsible investment preferences or religious beliefs. 	<ol style="list-style-type: none"> 1. Report against the principles of the UK Stewardship Code (Principle 2; explain governance and workforce resourcing) 2. Consider collecting member views on responsible investment issues. 3. Review AVC offerings periodically.
<p>Managing advisers and suppliers</p> <ul style="list-style-type: none"> - Consider the EDI policies of advisers and other third parties the Fund work with 	<ol style="list-style-type: none"> 1. Further engagement with LGPS pool (ACCESS) and asset managers. 2. Include questions on EDI for potential suppliers in procurement processes.

CAMBRIDGESHIRE PENSION FUND

To: Pension Fund Board

Meeting date: 25 July 2025

Report by: Mark Whitby
Head of Pensions
mark.whitby@westnorthants.gov.uk

Subject: Administration Performance Report

Purpose of the report: To present the Administration Performance Report to the Pension Fund Board for the period 1 March to 31 May 2025.

Recommendations: The Pension Fund Board is asked to:

- 1) Note the contents of the report.
- 2) Review the Risk Register located in appendices 5 and 7 (**exempt**).
- 3) Note the admission of the following transferee admission bodies to the Cambridgeshire Pension Fund:
 - ABM Catering Limited (Fulbourn Primary School)
 - Compass Group UK and Ireland Limited (Four C's Multi Academy Trust)
 - Innovate Services Limited (Astrea Multi Academy Trust)
 - KGB Cleaning South West Limited (The Active Learning Trust)
 - ServiceMaster Limited (Heltwate School)
- 4) Note one employer joining Cambridgeshire Pension Fund as a resolution body:
 - Littleport Town Council
- 5) Note the cessation of following admission agreements:
 - Caterlink Limited (The Active Learning Trust)
 - Edwards & Blake Limited (Bassingbourn Primary School)

- Hertfordshire Catering Limited (Hauxton Primary School)
 - ServiceMaster Limited (The Active Learning Trust)
- 6) Note the updates to two previously reported cessations relating to:
- Aspens Services Limited (St John the Baptist Catholic Academy Trust)
 - Burwell Parish Council

Enquiries to:

Mark Whitby, Head of Pensions

Mark.whitby@westnorthants.gov.uk

1. Background

- 1.1 The report outlines key areas of administration performance for the Cambridgeshire Pension Fund, focusing on:

Administration: The Pension Committee and Board are responsible for the governance and administration of the Cambridgeshire Pension Fund. This report highlights several key areas of the Fund's administration performance for the Committee to review.

Business Plan Updates: The Pension Committee approved the Business Plan and Medium-Term Strategy for 2025/26 on 20 March 2025, and the report provides updates on its progress.

Risk Monitoring: The Cambridgeshire Risk Strategy was reviewed and approved on 20 March 2025. The Local Pension Board and Pension Committee monitor risks quarterly to keep the risk register current, supporting the Pension Regulator's General Code of Practice requirement.

Admissions and Cessations: The report updates on admissions to and cessations from the Pension Fund, including the assessment of funding positions and the handling of exit debits and credits as per the Local Government Pension Scheme Regulations 2013.

2. Executive Summary

- 2.1 This report sets out the administration performance of the Cambridgeshire Pension Fund for the period 1 March to 31 May 2025.
- 2.2 For March 2025, 2 out of 9 KPIs were not met. From April 2025, a new suite of CIPFA KPIs has been implemented, 9 of 28 were not met.
- 2.3 For February 2025 and April 2025, 100% of contribution payments were received on time and for March 2025, 99.8% of contribution payments were received on time. The current yearly average for payments made on time is 99.7% and schedules being received on time is 99.4%. Details of late contribution payments for the reporting period can be found in appendix 2 (**exempt**).
- 2.4 3 business plan activities have a RAG status of amber, with the remaining activities being green. The main contributor to the position of the investment activities is the Fit for the Future consultation and its impact on ACCESS pooling plans. Although progress has been positive since the beginning of the financial year, the status of the unprocessed undecided leaver record is maintained as amber due to the conflicting project priorities within the Service.
- 2.5 3 new risks have been added to the Fund's risk register, with the overall risk score increasing from 229 to 248 and the total number of risks increasing from 32 to 35. A key risk is the current levels of workplace sickness absence within the service.
- 2.6 There were six new employers admitted to the Fund over the reporting period including one resolution body. Four employers exited the Fund and there were two updates on previous cessations, as set out in the recommendations.

3. Issues and Choices

Administration

Administration Performance

- 3.1 During the period 1 March to 31 May 2025, 6 complaints were managed informally by the Operations Manager, for the same period 2 compliments were received. For context, over the same period 7,605 calculation tasks were completed in connection with the Cambridgeshire Fund.
- 3.2 The Fund issues member surveys to scheme members where a check task has been completed on the workflow system. During the period, 441 surveys have been issued to members with response rates varying from 5.88% to 14.62%. Scheme members have given the Fund's administration an average rating of between 3.33 and 3.76 out of 5.00. All feedback is analysed, and changes implemented where necessary.

Pension Service performance against Key Performance Indicators

- 3.3 For March 2025, 2 out of 9 KPIs were not met. From April 2025, a new suite of CIPFA KPIs has been implemented, 9 of 28 were not met.
- 3.4 For the reporting period there was 1 amber KPI and 10 red KPIs. For the majority of missed KPIs the reason for the delays was workflows not being utilised effectively which has been addressed with the individuals concerned and additional training requirements which have also been addressed within the team.
- 3.5 The volume of active retirement quotations is low compared to the volume of actual retirement cases (circa 10%) which can greatly impact the KPI RAG status if individual cases are missed.
- 3.6 In March and April the sickness levels remained higher than desired.
- 3.7 A number of KPIs introduced in April reported on new areas, such as retirement quotations and refunds. Overall performance improved in May when compared to the April.

Customer Journey Key Performance Indicators

- 3.8 The customer journey KPIs for the reporting period are detailed in appendix 1.
- 3.9 Reporting has been developed from March 2025 to analyse employer failures for providing leavers with their rights and options when leaving before retirement age. A total of 80 failures were identified across 20 employers; a failure is where either the employer or the payroll provider sent the leaver notification late. Employers who send late notifications will be monitored and managed by the Employers team as required.
- 3.10 For informing members who retire before their normal pension age and for members who retire on or after their normal pension age, systemic employer failures will be monitored from April onwards. Support will be provided to employers that consistently submit incorrect or late data as improvements in this area would lead to more timely benefit payments to scheme members.

Receipt of employee and employer contributions

- 3.11 Scheme employers have a statutory obligation to arrange for the correct deduction of employee and employer contributions and to ensure payment reaches the Pension Fund by the 19th of the month following the month of deduction. Employers must also provide an associated monthly statement/schedule in an acceptable format.
- 3.12 The table in appendix 1 shows the percentage of employers in the Cambridgeshire Pension Fund who paid their employee and employer contributions and/or submitted their schedules on time or late for the payroll periods May 2024 to April 2025. For February 2025 and April

2025, 100% of contribution payments were received on time and for March 2025, 99.8% of contribution payments were received on time. Details of the late contribution payments are detailed in appendix 2 (**exempt**).

Breaches of the Law

- 3.12 There are many laws relating to the Local Government Pension Scheme, with various individuals, including the Pension Committee and Local Pension both (collectively and as individuals) having a statutory duty to report material breaches of those laws to the Regulator. The Cambridgeshire Pension Fund maintains a record of both material breaches that are reported to the Pensions Regulator as well breaches that are deemed not to be of material significance and so are not reported to the Pensions Regulator.
- 3.13 Immaterial breaches for the reporting period are detailed in appendix 1. There were no material breaches.

Details of any Internal Dispute Resolution Procedure (IDRP) cases

- 3.14 Members, prospective members, and beneficiaries may not always agree with pension decisions that are made or may be unhappy that decisions have not been made, by either an administering authority or a scheme employer. The Internal Dispute Resolution Procedure (IDRP) is the route by which they may raise their concerns and challenge such decisions.
- 3.15 Disputes that are upheld at stage 1 may still progress to stage 2 if the scheme member or their representative remains unsatisfied with the overall outcome. The outcome may not fully meet the complainant's expectations – particularly if their perception is that their financial loss was greater than any compensation awarded, or the level of non-financial injustice award was not consistent with their expectation.
- 3.16 For any dispute that is upheld or partially upheld, an internal review is carried out to minimise the risk of reoccurrence, the review is conducted by a quality assurance board to ensure appropriate oversight.
- 3.17 Details of any stage 1 and stage 2, IDRP cases are detailed in appendix 1. For the reporting period there was 2 new stage 1 disputes and 1 stage 2 dispute.

Material data breaches

- 3.18 No material data breaches occurred during the period.

Significant overpayments

- 3.19 No significant overpayments occurred during the period.

Business Plan activities

- 3.20 All activities are currently green with the exception of 3 ambers. The reasons for the ambers are outlined below:

Processing of undecided leaver records – This continues to be held at amber due to the conflicting project priorities within the Service over the short and medium-term. The target for the 2025-26 financial year is to clear at least 1,000 backlog cases. As at April 2025 the

backlog had reduced by a further 241 from the previously reported number to 6,270 cases. This activity is targeting reducing backlog cases to a baseline of <1,000 by 31 March 2028 at the latest.

Support the build of the ACCESS Financial Conduct Authority (FCA) and regulated entity - Activity being reviewed and reprofiled following Government's response to ACCESS build proposals. Further information provided in ACCESS update at this meeting.

Finalise the transfer of legacy assets into the ACCESS pool - The key asset pooling proposals outlined in the consultation require the Fund to transfer legacy assets to the management of the pool. This activity is also impacted by Government's response to the ACCESS build proposal.

- 3.21 Updates against all the key business plan activities for the reporting period can be found in appendix 3.
- 3.22 The tables in appendix 4 provide an update of the Fund account, investment and administration income and expenditure against the cash flow projection outlined in the Annual Business Plan as agreed by the Pension Committee in March 2025.
- 3.23 There is no update to the 2025-26 forecast. The final position for 2024-25 will be presented in the Fund's statement of accounts.

Risk Monitoring

- 3.24 The risk register has been moved to a new format and can be located in appendices 5 and 7 (**exempt**).
- 3.25 The June review introduced 3 new risks to address. Mitigations have also been updated where appropriate across the risk register.
- 3.26 Proposed changes to individual risks are set out below:

Risk No.	Risk	Risk category	Proposed change(s)
1a	The Pension Fund and its members may become a target for fraudsters and criminals.	Governance	<u>Mitigations updated.</u> Risk likelihood has been increased to reflect the current cost of living crisis and the increased risk to members becoming victims to fraud as highlighted by the Financial Conduct Authority (FCA) and the Pensions Regulator. <u>Risk removed</u> - the previous risk of fraud and error has been removed and is encompassed within risk 1a.
8a	Failure to administer the scheme in line with regulations and guidance.	Governance	<u>Mitigations updated</u> – mitigation 6,7,11,12 have been re-worded.
13a	The operations of the Pension Fund and that of its suppliers	Governance	<u>Action updated.</u> Children's privacy notices are currently being drafted to be aligned with Information

	are interrupted as a result of a cyber-attack		Commissioner's Office (ICO) requirements.
7b	Failure to operate strict financial controls.	Funding	<u>New risk added.</u>
8b	Failure to recover all significant overpayments and debts.	Funding	<u>New risk added.</u>
1c	The ACCESS asset pool does not have the sub-fund choices available to enable the Fund to fulfil its strategic and tactical asset allocation requirements in a timely manner.	Investment	<u>Mitigations updated</u> – all mitigations have been condensed into one, subject to the outcomes of the 'Fit for Future' consultation
2c	As long-term investors, the Fund believes climate risk has the potential to significantly alter the value of the Fund's investments.	Investment	<u>Mitigations updated</u> - all mitigations have been amended to the 2025/26 climate action plan
6c	Investment decisions and portfolio management may not achieve the return required or be performed in accordance with instructions provided.	Investment	<u>Mitigations updated</u> - mitigation 7 now covers two previous mitigations relating to the climate action plan
8c	Government may wish the Fund/ACCESS pool to merge with another pool, which appears contrary to the Fund's best interests and may lead to legal recourse	Investment	<u>New risk added.</u>
2d	Unable to deliver pension services due to an inadequate business continuity plan.	Administration & Communications	<u>New mitigation added</u> – Business Impact assessment now completed
5d	Failure to process all casework in line with service standards and statutory deadlines.	Administration & Communications	<u>Risk wording has been updated.</u>

- 3.27 The Fund's risk assurance table can be located in appendix 6 (**exempt**). High levels of workplace sickness absence continue to pose a risk to the delivery of pension services. All sickness continues to be managed in accordance with HR policy.
- 3.28 The Fund's risk management dashboard can be located in appendix 8. The risk management dashboard now reflects the changes in the number of risks and total risk index, the overall risk score increasing from 229 to 248 and the total number of risks increasing from 32 to 35 due to the addition of 3 new risks.

Employers Admissions and Cessations

- 3.29 Six employers have joined the Fund since the last meeting of the Committee. Details of the admissions are contained in appendix 9.

New admission bodies:

- ABM Catering Limited (Fulbourn Primary School)
- Compass Group UK and Ireland Limited (Four Cs Multi Academy Trust)
- Innovate Services Limited (Astrea Multi Academy Trust)
- KGB Cleaning South West Limited (The Active Learning Trust)
- ServiceMaster Limited (Heltwate School)

New resolution body:

- Littleport Town Council

- 3.30 The admission agreement has ceased for the following admitted bodies. Details of each cessation are contained in appendix 9.

New cessations:

- Caterlink Limited (The Active Learning Trust)
- Edwards & Blake Limited (Bassingbourn Primary School)
- Hertfordshire Catering Limited Hauxton Primary School)
- ServiceMaster Limited (The Active Learning Trust)

- 3.31 Exit credit determinations have been made for the following exiting employers. The result of each determination is contained in appendix 9.

Update on previously reported cessations:

- Aspens Services Limited (St John the Baptist Catholic Academy Trust)
- Burwell Parish Council

4. Relevant Pension Fund Objectives

To ensure compliance with the LGPS Regulations and other legislation and guidance, including the Pensions Regulator's Code of Practice.
To manage the Fund in a fair and equitable manner and be accountable to the Fund's stakeholders.
To ensure individuals responsible for managing the Fund and delivering its services have the appropriate knowledge and expertise.
To continually measure and monitor success against the Fund's objectives.
To ensure robust processes, controls and risk management are in place.
To put in place performance standards for the Fund and its employers and ensure these

are monitored and developed as necessary.
To administer the Fund in a professional, effective and cost-efficient manner, utilising technological solutions and collaboration.

5. Risk Management

- 5.1 The Fund's Administration Strategy sets out the performance standards of both the scheme employer and the administering authority. The Pension Fund Committee and Pension Fund Board are expected to monitor performance standards through information contained within the Administration Report which is presented at each meeting.
- 5.2 The mitigated risks associated with this report have been captured in the Fund's risk register as detailed below –

Risk	Residual risk rating
Information may not be provided to stakeholders as required.	Green
Those charged with governance are unable to fulfil their responsibilities effectively	Green
Failure to provide relevant information to the Pension Fund Committee/Pension Board to enable informed decision making	Green
The operations of the Pension Fund and that of its suppliers are interrupted as a result of a cyber-attack.	Amber
Investment decisions and portfolio management may not achieve the return required or be performed in accordance with instructions provided	Green
Unable to deliver pension services due to inadequate recruitment/retention processes and inadequate skills and knowledge to undertake the role effectively.	Amber
Information may not be provided to stakeholders as required.	Amber
As long-term investors, the Fund believes climate risk has the potential to significantly alter the value of the Fund's investments.	Amber
Fund assets are not sufficient to meet obligations and liabilities.	Amber
Failure to respond to changes in economic conditions.	Amber
Failure to provide relevant information to the Pension Committee/Pension Board to enable informed decision making.	Green
The ACCESS asset pool does not have the sub-fund choices available to enable the Fund to fulfil its strategic and tactical asset allocation requirements in a timely manner.	Amber
Pension Fund systems and data may not be secure and appropriately maintained, whether in situ or in transit.	Amber
Failure to administer the scheme in line with regulations and guidance.	Green
The Fund does not meet the proposed timeframe to pool assets, by March 2025, and/or is unable to adequately "comply or explain"	Green

why assets remain outside the pool.	
The Pension Fund and its members may become a target for fraudsters and criminals.	Amber
The Pension Fund fails to comply with legal duties in connection with Pension Dashboards	Green
Unable to deliver pension services due to high levels of workplace sickness absence	Amber

5.3 The Fund's executive summary risk register can be found on the Pensions website at the following link: [Cambridgeshire Pension Fund Risk Register](#).

6. Communication Implications

Direct communications	The Fund publishes performance against the key performance indicators in the regular reports to the Pension Fund Committee and Pension Fund Board and in the Fund's Annual Report. Employers of the Fund are guided through the admission process and directly kept up to date with requirements and progress. Members who enter the Internal Dispute Resolution Procedure are kept informed of progress within the statutory timescales.
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7. Finance & Resources Implications

7.1 There are no financial and resource implications associated with this report.

8. Legal Implications

8.1 No material issues have been identified which may give rise to legal liability and/or risk from an administering authority perspective.

9. Consultation with Key Advisers

9.1 None.

10. Alternative Options Considered

10.1 Not applicable

11. Background Papers

11.1 Not applicable

12. Appendices

12.1 Appendix 1 Administration performance

12.2 Appendix 2 Late payment of employer contributions **exempt**

12.3 Appendix 3 Business Plan updates

12.4 Appendix 4 Business Plan financials

12.5 Appendix 5 Risk register public

- 12.6 Appendix 6 Risk Assurance Table exempt
- 12.7 Appendix 7 Risk register exempt
- 12.7 Appendix 8 Risk Dashboard
- 12.8 Appendix 9 Admissions and Cessations

1. Pension Service Administration Key Performance Indicators – 1 March to 31 March 2025

Function/Task	Indicator	Minimum Service Level	Month	Total cases completed	Cases completed within the minimum Service Level	Cases completed under the minimum Service Level	% completed within the minimum Service Level	RAG	Comments
Notify leavers of deferred benefit entitlement.	Notify leavers of deferred benefit entitlements or concurrent amalgamation within 15 working days of receiving all relevant information.	90%	March April	292	273	19	93	Green	SLA target met
Payment of retirement benefits from active employment.	Notify employees retiring from active membership of benefits award, from date payable or date of receiving all necessary information if later within 10 working days.	95%	March	44	36	8	81	Red	SLA target not met
Payment of pension benefits from deferred membership status.	Notify members retiring from deferred membership status of benefits award, from date payable or date of receiving all necessary information if later within 10 working days.	90%	March	87	84	3	96	Green	SLA target met
Award dependant benefits.	Issue award within 5 working days of receiving all necessary information.	95%	March	20	20	0	100	Green	SLA target met
Provide a maximum of one estimate of benefits to employees per	Estimate in agreed format provided within 10 working days from receipt of all information.	80%	March	45	26	19	57	Red	SLA target not met

year on request.									
Provide transfer-in quote to scheme member.	Letter issued within 10 working days of receipt of all appropriate information.	95%	March	50	48	2	96	Green	SLA target met
Payment of transfer out.	Process transfer out payment – letter issued within 10 working days of receipt of all information needed to calculate transfer out payment.	90%	March	39	37	2	94	Green	SLA target met

Green: Equal to or above Service Level Agreement (SLA) target.

Amber: Below SLA target, but number completed within target is within 10% of the SLA target.

Red: Below SLA target and number completed within target is not within 10% of the SLA target.

- For the reporting period there were two red KPIs. The missed KPIs were primarily due to the system workflows not being utilised effectively, which has been addressed with the individuals concerned through performance management. Additionally, both the retirements team and the transfers team were affected by sickness at both Officer and Team Leader Level. For March 2025 the sickness levels were higher than desired.
- Since April 2021, casework volumes within the Service have increased by 100% for members retiring from either a deferred or active status. These cases are processed within a single team as other teams have different fundamental pressures to manage, including meeting statutory targets. To alleviate some of the pressure, a Team Leader had started to be trained in the retirements area but due to a substantive team leader having a period of absence this has not progress at the desired rate. Nationally the industry is seeing increased casework volumes across many areas of administration.

2. Pension Service Administration Key Performance Indicators – 1 April 2025 – 31 May 2025

Function/Task	Indicator	Minimum Service Level	Month	Total cases completed	Cases completed within the minimum Service Level	Cases completed under the minimum Service Level	% completed within the minimum Service Level	RAG	Comments
Deaths recorded of active, deferred, pensioner and dependent members.	Communication issued with acknowledgement of death of active, deferred, pensioner and dependent member within 5 working days.	95%	April May	48 44	48 44	0 0	100 100	Green Green	SLA target met SLA target met
Deferred member retirements	Communication issued to deferred member with pension and lump sum options (quotation) within 15 working days of receiving all relevant and accurate information	90%	April May	41 325	32 303	9 22	78 93	Red Green	SLA target not met SLA target met
Deferred benefits	Communication issued to deferred member with confirmation of pension and lump sum options (actual) within 15 working days of receiving all relevant and accurate information	90%	April May	83 88	76 86	7 2	91 97	Green Green	SLA target met SLA target met
Active member retirements	Communication issued to active member with pension and lump sum options (quotation) within 15 working days of receiving all relevant and accurate information	90%	April May	5 4	1 3	4 1	20 75	Red Red	SLA target not met SLA target not met

Active benefits	Communication issued to active member with confirmation of pension and lump sum options (actual) within 15 working days of receiving all relevant and accurate information	95%	April May	48 36	48 33	0 3	100 91	Green Amber	SLA target met SLA target not met
New dependent member benefits	Communication confirming the amount of dependents pension issued within 10 working days of receiving all relevant and accurate information	95%	April May	28 15	28 15	0 0	100 100	Green Green	SLA target met SLA target met
Member estimates requested either by scheme member and employer	Provide member estimates requested by scheme member and employer within 15 working days of receiving all relevant and full information	90%	April May	42 99	26 64	16 35	61 64	Red Red	SLA target not met SLA target not met
Transfers in (including interfunds in, club transfers)	Communication issued to scheme member with completion of transfer in within 15 working days of receiving full information	90%	April May	27 61	26 56	1 5	96 91	Green Green	SLA target met SLA target met
Transfers out (including interfunds out, club transfers)	Communication issued to scheme member with completion of transfer out within 15 working days of receiving full information	90%	April May	11 46	11 45	0 1	100 97	Green Green	SLA target met SLA target met
Refunds	Payment of refund is approved within 10 working days of receiving relevant and accurate information	90%	April May	69 39	50 36	19 3	72 92	Red Green	SLA target not met SLA target met
Divorce quotations issued	Issue divorce quotation within 45 working of receiving all relevant and accurate information	90%	April May	4 24	4 17	0 7	100 70	Green Red	SLA target met SLA target not met

Actual divorce cases	Communication issued following actual divorce proceedings i.e application of a Pension Sharing Order within 15 working days of receiving full information	90%	April May	1 2	1 1	0 1	100 50	Green Red	SLA target met SLA target not met
New joiner notifications	Communication issued to new starters within 40 working days of receiving all relevant information.	90%	April May	404 554	404 554	0 0	100 100	Green Green	SLA target met SLA target met
Notify leavers of deferred benefit entitlement	Notify leavers of deferred benefit entitlement within 30 working days of receiving all relevant information.	90%	April May	248 263	236 250	12 13	95 95	Green Green	SLA target met SLA target met

Green: Equal to or above Service Level Agreement (SLA) target.

Amber: Below SLA target, but number completed within target is within 10% of the SLA target.

Red: Below SLA target and number completed within target is not within 10% of the SLA target.

3. Customer Journey Key Performance Indicators (statutory) for the Period 1 March to 31 May

Function/Task	Indicator	Month	Completed	Within Minimum Service Level	Under Minimum Service Level	% Within Minimum Service Level	Comments
Provide basic scheme information to new joiners.	2 months from date of joining or member's request.	March April May	442 406 598	440 404 554	2 2 44	99 99 92	<p>During the period, there were 5 failures across 2 employers due to data being submitted late with no legitimate reason identified. Late submission of data will continue to be monitored, and persistent occurrences will be managed by the Employers team.</p> <p>32 failures occurred due to data being submitted late due to a payroll provider change related to 1 employer.</p> <p>11 failures impacting 3 employers occurred due to Pension Service reporting errors where the reports haven't been uploaded to the system in a timely manner or incorrect data has been uploaded to the record. All issues identified have been addressed by the Systems Team.</p>
Provide transfer details for transfer in.	2 months from date of request.	March April May	50 87 27	42 66 22	8 21 5	84 76 81	<p>Reasons why the cases would not be completed within the statutory target are:</p> <ul style="list-style-type: none"> • Interfund in - Further information is required from the previous LGPS pension fund. • Transfer in – Further information is required from the member, the previous scheme, or the employer.
Provide details of transfer value for transfer out.	3 months from date of request.	March April May	48 42 45	38 32 34	10 10 11	79 76 76	<p>Reasons why the cases would not be completed within the statutory target are:</p> <ul style="list-style-type: none"> • Interfund out - Further information is required from the employer prior to finalising the deferred benefit. • Transfer out– Further information is required from the employer prior to finalising the deferred benefit.

Function/Task	Indicator	Month	Completed	Within Minimum Service Level	Under Minimum Service Level	% Within Minimum Service Level	Comments
Provide a CETV quotation for divorce purposes.	Within 3 months of the request (or shorter deadline as specified in a court order).	March April May	9 4 24	6 3 20	3 1 4	67 75 83	The reasons for the delays were as result of both service and third-party processes, such as additional information being required from employers and outstanding interfund transfers to finalise benefits etc.
Inform members who leave the scheme before retirement age of their rights and options.	As soon as practical and no more than 2 months of leaving.	March April May	266 219 358	266 200 300	10 19 58	96 91 83	<p>The Pension Service is 100% within target for meeting the SLA of 2 months of the member leaving service.</p> <p>The analysis of the failures for this KPI commenced in March 2025.</p> <p>For the period 1 March to 31 May there were:</p> <p>80 failures across 20 employers due to late leaver notifications.</p> <p>7 failures across 1 employer due to incorrectly reported adjustments/backpay.</p>
Inform members who leave the scheme at or after retirement age of the benefits due.	Within 2 months of retirement date where the member retires before normal pension age.	March April May	24 31 25	12 21 19	12 10 6	50 68 76	<p>Multiple factors contribute to the member experience for this indicator, this includes the type of information required (e.g. leavers details, certificates, forms) and the party responsible for supplying the information (employer, payroll provider, member). There is also the processing time required for the administrator to issue the award once all the information is received.</p> <p>In March, within the 50% outside of target, 75% of the failures were due to employer delays.</p> <p>In April, within the 32% outside of target, 80% of the failures were due to employer delays.</p> <p>In May, within the 24% outside of target, 67% of the failures were due to employer delays.</p>

Function/Task	Indicator	Month	Completed	Within Minimum Service Level	Under Minimum Service Level	% Within Minimum Service Level	Comments
							<p>From April 2025, analysis has been undertaken to identify the reason for failures. Any information received which does not allow the Pension Service 10 working days to process in line with SLA targets is classified as an employer failure.</p> <p>For the period April to May 2025, 12 failures occurred due to late information provided by 11 employers and 4 failures were due to delays in the Pension Service issuing options to members.</p>
Inform members who leave the scheme at or after retirement age of the benefits due.	Within 1 month of retirement date where the member retires on or after normal pension age.	March April May	17 14 8	6 8 4	11 6 4	35 57 50	<p>Multiple factors contribute to the member experience for this indicator, this includes the type of information required (e.g. leavers details, certificates, forms) and the party responsible for supplying the information (employer, payroll provider, member). There is also the processing time required for the administrator to issue the award once all the information is received.</p> <p>In March, within the 65% outside of target, 73% of the failures were due to employer delays. In April, within the 43% outside of target, 83% of the failures were due to employer delays. In May, within the 50% outside of target, 100% of the failures were due to employer delays.</p> <p>From April 2025, analysis has been undertaken to identify the reason for failures. Any information received which does not allow the Pension Service 10 working days to process in line with SLA targets is classified as an employer failure.</p>

Function/Task	Indicator	Month	Completed	Within Minimum Service Level	Under Minimum Service Level	% Within Minimum Service Level	Comments
							For the period April to May 2025, 9 failures occurred due to late information provided by 7 employers and 1 failure was due to delays in the Pension Service issuing options to members.
Calculate and notify dependant(s) of amount of death benefits.	As soon as possible, but in any event no more than 2 months of date or becoming aware of death.	March April May	- - -	- - -	- - -	- - -	The new death process will be drafted by 31 August 2025.
Notify implementation information after receiving a pension sharing order (and no outstanding information)	Within 21 days of the later of, the date of receipt of the pension sharing order or the day on which the order takes affect or the date of receipt of the relevant documents / information.	March April May	- 1 2	- 0 0	- 1 2	- 0 0	<p>Where there is no outstanding information, the Service has a period of 4 months to implement the order from the later of:</p> <ul style="list-style-type: none"> • The day on which the relevant Order or provision comes into effect; or • The day in which the administering authority is in receipt of the relevant “Matrimonial Documents” <p>A letter must be sent within 21 “days” of the later of the above two dates notifying the relevant parties of the implementation deadline. New process to be developed by 30 September 2025 to ensure that this notification is issued within the 21 days of receiving an actual pension sharing order.</p>

4. Timeliness of payment of scheme employer and member pension contributions

Month/Year	% of Employers Paid on Time	% of Employers Paid Late	% of Employers that Submitted Schedule on Time	% of Employers that Submitted Schedule Late
May 2024	99.8	0.2	99.8	0.2
June 2024	100	0	98.4	1.6
July 2024	99.8	0.2	98	2
August 2024	99.3	0.7	99.6	0.4
September 2024	100	0	100	0
October 2024	100	0	100	0
November 2024	100	0	100	0
December 2024	99.8	0.2	100	0
January 2025	99.4	0.6	100	0
February 2025	100	0	99.8	0.2
March 2025	99.8	0.2	100	0
April 2025	100	0	97.5	2.5
Average for period	99.7	0.3	99.4	0.6

5. Occurrences of breaches of the law

There are many laws relating to the Local Government Pension Scheme, with various individuals, including the Pension Committee and Local Pension both (collectively and as individuals) having a statutory duty to report material breaches of those laws to the Regulator. The Northamptonshire Pension Fund maintains a record of both material breaches that are reported to the Pensions Regulator as well breaches that are deemed not to be of material significance and so are not reported to the Pensions Regulator.

For the period 1 March to 31 May 2025 the following breaches of the law occurred:

Type of breach	Detail of breach	Course of action
Material	None	None
Non-material	7 refund of contribution payments were paid outside of the statutory 5-year period.	No further action at this stage, it is likely that the legislation surrounding this will be amended to remove the 5-year requirement.
	1 refund of contribution payment paid to a member over the age of 75.	Unauthorised payment made with the member electing to self- declare to the HMRC.
	Missed statutory targets against Key Performance Indicators.	Customer journey KPIs are reliant on multiple parties in order to meet statutory requirements. The Pensions Service is only in control of its own processes and therefore breaches may occur where responsibility lies outside of the service.

6. Details of any Internal Dispute Procedure cases

Stage 1:

Nature Dispute	Date Dispute Received	Date Decision Due	Stage 1 Decision: Member complaint upheld/not upheld/partially upheld (Head of Pensions)	Date of Adjudication
Unable to trace transfer of pension rights from previous scheme	23/01/2025		Not Upheld	25/04/2025
Delay in providing a retirement estimate together with incorrect information	29/04/2025	28/06/2025		Ongoing
Delays in providing retirement information and delays in paying AVCs	29/04/2025	28/06/2025		Ongoing

Stage 2:

Nature Dispute	Date Dispute Received	Date Decision Due	Stage 2 Member complaint upheld/not upheld/partially upheld (Monitoring Officer)	Date of Adjudication
Appeal against Stage 1 dispute where member received delays in providing Flexible Retirement estimate and that CPF should honour a quotation that produced zero pension strain costs.	05/03/2025	04/05/2025 extended to 14/05/2025	Upheld stage 1 partial adjudication	Ongoing

The below table provides the progress made against each activity for this reporting period:

For full details the Cambridgeshire Business Plan can be accessed here: <https://pensions.westnorthants.gov.uk/wp-content/uploads/2024/07/CPF-Annual-business-plan-medium-term-strategy-2025-2028.docx>

Procurement Services:

Activity	Key milestones for the reporting period.	Dates for completion	On target for completion? (RAG status)	Updates
National LGPS Framework for Overseas Address Tracing and Mortality Screening Services Review.	Consider framework offerings.	April – June 2025	Green	Framework documentation has been received and a high-level review has been conducted. A more in-depth review of the offerings is currently underway.
National LGPS Framework for Additional Voluntary Contribution Services (AVC) Review.	-	-	Green	No activity for reporting period.
Consider an extension for Global Custody Services.	-	-	Green	No activity for reporting period.
Consider an extension for Legal Services.	-	-	Green	No activity for reporting period.

Governance activities:

Activity	Key milestones for the reporting period.	Dates for completion	On target for completion? (RAG status)	Updates
Implement recommendations from the LGPS Scheme Advisory Board's 'Good Governance Project'.	-	-	Green	No activity for reporting period.
Implement actions identified in the Pension Regulator's General Code of Practice Review.	Enact the previously identified actions.	April 2025 – September 2025	Green	Officers are in the process of carrying out actions identified from the review and are on target for meeting the deadline. The Committee will receive a report confirming that the actions are complete in October 2025.
Continue to prepare for the implementation of Pension Dashboards.	Undertake project plan activities to enable connection to the Pensions Dashboard infrastructure by 31 October 2025.	April 2025 – October 2025	Green	Officers are continuing to undertake relevant activities to ensure connection to the Pensions Dashboard Infrastructure by 31/10/2025.
Continue to implement equality, diversity and inclusion (EDI) best practices.	Enact the activities in the previously approved EDI action plan.	April 2025 – March 2026	Green	Actions are currently being carried out against the plan and the EEDI policy was approved by the Committee in June. The approved policy is being presented at this meeting.
Rectify survivor benefit cases.			Green	No activity for reporting period.

Scheme member and data projects:

Activity	Key milestones for the reporting period.	Dates for completion	On target for completion? (RAG status)	Updates
McCloud remedy rectification	Recalculation and award of benefits requiring remediation (pensions in payment).	April 2025 to August 2025	Green	Pensioner members who are entitled to the remedy are being contacted to claim their additional payments. The collection of information on additional membership that will put members in scope of the remedy continues with any pensions in payment requiring remedy being processed accordingly.
	Identification and remediation of further cases as further public service pension schemes and LGPS unaggregated service disclosed.	April 2025 to March 2026		The necessary update of the Pensions Administration System has been received. Following successful testing, McCloud-compliant benefit statements will be issued to members. For a subset of members, the issuance of annual benefit statements will be temporarily withheld to allow for further investigation. This is to ensure that accurate and compliant statements are provided. The revised statements are expected to be issued by August 2026.

Activity	Key milestones for the reporting period.	Dates for completion	On target for completion? (RAG status)	Updates
	Preparation for McCloud compliant annual benefit statements to be issued by 31 August 2025.	April 2025 to June 2025		
Processing of undecided leaver records.	Reduce the backlog of 6,511 cases by 1,000 by 31 March 2026	April 2025 – March 2026	Amber	The backlog of cases as at 9 June 2025 was 6,421, which had reduced from 6,511 at previous reporting date.
Implement the upgraded member self-service portal, Heywood Engage.	Complete fact-finding documentation to inform project documentation and Implementation Study.	May 2025 – June 2025	Green	Work commenced early on the project documentation and at the time of writing officers are waiting to receive the Implementation Study following information supplied.

Investment related activities

Activity	Key milestones for the reporting period.	Dates for completion	On target for completion? (RAG status)	Updates
Support the build of the ACCESS FCA regulated entity.	Support the pool to: Identify the cost/performance benefits of different models	January 2025- March 2025	Amber	The activity is currently under review and being reprofiled in response to the Government's feedback on the ACCESS build proposals. Further details are provided in the ACCESS update paper presented at this meeting.
	Approval from Government of submitted transition plan for build option.	January 2025- March 2025		

Activity	Key milestones for the reporting period.	Dates for completion	On target for completion? (RAG status)	Updates
	Implementation planning & regulatory applications.	April 2025-June 2025		
	Approval of shareholder agreement by Council.	April 2025-June 2025		
Implement the governance structure to support local investment decisions	-	-	Green	No activity for reporting period.
Finalise the transfer of legacy assets into the ACCESS pool	Review final legacy asset proposals arising from consultation.	January 2025-March 2025	Amber	The key asset pooling proposals outlined in the consultation require the Fund to transfer legacy assets to the management of the pool. As a result of the Fit for the Future Consultation all investment activities have been postponed.
	Share details of the Fund's legacy assets with ACCESS.	April 2025-June 2025		
Survey members to identify the sustainability issues they consider most important in relation to Fund investments and responsible investment practices.	Discuss scope with Consultants.	February 2025	Green	The survey will be taken to July Pension Committee for approval of content and means of circulation.
	Agree timeline and questions.	February 2025		
	Issue Survey to scheme members including pensioner/deferred/active	July 2025		

Activity	Key milestones for the reporting period.	Dates for completion	On target for completion? (RAG status)	Updates
	members.			
	Review survey responses and discuss findings with consultants.	August 2025		

Scheme member projects

Activity	Key milestones for the reporting period.	Dates for completion	On target for completion? (RAG status)	Updates
Complete the 2025 Fund Valuation.	Develop and seek approval for Funding Strategy Statement and associated funding policies.	April to June 2025	Green	The Funding Strategy Statement and associated funding policies have been rescheduled for approval in October to provide chance for new Committee members to receive appropriate training and because a number of policies are reliant on work scheduled for later in the year.

Activity	Key milestones for the reporting period.	Dates for completion	On target for completion? (RAG status)	Updates
Undertake specific modelling of potential options for implementing multiple investment strategies.	Initial meeting with Fund Actuary and investment advisors to agree scope and strategies to be modelled.	April – May 2025	Green	A kick off meeting has been held with the Fund Actuary and the Fund's investment advisors to agree the scope and investment strategy options to be modelled. The investment advisors are going to consider the scope of the work and advise on a timeline for completing the further analysis.
	Agreed strategies to be modelled.	May – June 2025		

Variances against the forecast of investments and administration expenses based on original setting of assumptions.

The following tables provide budgets of the Fund account, investment and administration income and expenditure for the next three years.

	2024/25 Budget	2024/25 Forecast	2025/26 Budget	2026/27 Budget	2027/28 Budget
	£000	£000	£000	£000	£000
Contributions ¹	155,000	161,000	169,000	161,000	166,000
Transfers in from other pension funds ²	18,000	15,700	14,600	15,000	15,400
TOTAL INCOME	173,000	176,700	183,600	176,000	181,400
Benefits payable ³	(149,000)	(155,000)	(159,000)	(167,000)	(176,000)
Payments to and on account of leavers ²	(13,000)	(15,900)	(14,900)	(15,300)	(15,700)
TOTAL PAYMENTS	(162,000)	(170,900)	(173,900)	(182,300)	(191,700)
Net additions/(withdrawals) from dealings with members	11,000	5,800	9,700	(6,300)	(10,300)
Management expenses (Invoiced)	(5,903)	(5,924)	(6,642)	(6,987)	(7,296)
Management expenses (Non-invoiced) ⁴	(21,300)	(21,700)	(22,100)	(23,200)	(24,300)
TOTAL MANAGEMENT EXPENSES	(27,203)	(27,624)	(28,742)	(30,187)	(31,596)
TOTAL INCOME LESS EXPENDITURE	(16,203)	(21,824)	(19,042)	(36,487)	(41,896)
Investment income ⁵	48,000	72,400	84,000	88,000	92,000
Taxes on income		(64)	-	-	-
Profit and (losses) on disposal of investments and changes in the market value of investments ⁶	219,000	240,000	235,000	246,000	258,000
NET RETURN ON INVESTMENTS	267,000	312,336	319,000	334,000	350,000
Net increase/(decrease) in net assets available for benefits during the year	250,797	290,512	299,958	297,513	308,104

Management Expenses

	2024/25 Budget	2024/25 Forecast	2025/26 Budget	2026/27 Budget	2027/28 Budget
	£000	£000	£000	£000	£000
Total administration expenses	(3,546)	(3,269)	(3,748)	(3,950)	(4,108)
Total governance expenses	(1,072)	(1,249)	(1,408)	(1,478)	(1,552)
Total investment expenses	(1,285)	(1,406)	(1,486)	(1,559)	(1,635)
TOTAL MANAGEMENT EXPENSES	(5,903)	(5,924)	(6,642)	(6,987)	(7,296)

Administration Expenses

	2024/25 Budget	2024/25 Forecast	2025/26 Budget	2026/27 Budget	2027/28 Budget
	£000	£000	£000	£000	£000
Staff related	(2,458)	(2,444)	(2,783)	(2,872)	(2,964)
Altair administration and payroll system	(413)	(430)	(488)	(505)	(523)
Data Assurance	(22)	(19)	(15)	(16)	(17)
Communications	(87)	(81)	(37)	(39)	(41)
Other non-pay and income	15	286	279	221	212
County Council overhead recovery	(581)	(581)	(704)	(739)	(776)
TOTAL ADMINISTRATION EXPENSES	(3,546)	(3,269)	(3,748)	(3,950)	(4,108)

¹ Contributions have been calculated using the Employer contribution rate and salary increase assumptions of 3.2% set by the actuary at the 2022 Valuation. Contributions in 2026/27 and 2027/28 are subject to change due to the 2025 valuation. However, 2% reduction p.a. in ER's contributions is included for prudence with anticipation of reductions in rate from 2025 valuation. The 2024/25 forecasted variance is due to actual salary increases being much higher than the actuarial salary increase assumption used from the 2022 valuation.

² Transfers in/out have been calculated using an average of 3-5 years (excluding group transfers).

³ 2025/26 benefits payable have been calculated using average membership increases, estimated PI of 1.7% and pension increases assumptions of 2.7% set by the actuary in subsequent years.

- ⁴ Management expenses (non-invoiced) have been calculated using investment managers actual fees plus the actuarial assumption of investment growth +4.9% per annum.
- ⁵ Investment income have been calculated based on the 2024/25 forecast by applying the actuarial assumption of investment growth +4.9% per annum.
- ⁶ Return on Investments have been calculated by applying the actuarial assumption of investment growth +4.9% per annum.

B	C	D	E	F	G	H	I	J	K	L	M
Risk Number	Description of Risk	Cause of risk	Impact if this risk occurs	Strategic objective(s) linked to	Current Impact	Current Likelihood	Current Risk rating (Red, Amber, Green)	Target Impact	Target Likelihood	Target Date	Treatment of risk
2											
3 Governance											
2a	Information may not be provided to stakeholders as required.	Complex regulatory environment. Inadequate oversight. Lack of expertise. Poor communication.	Moderate	To deliver clear, inclusive, accessible communications to stakeholders, including up-to-date information in order that informed decisions can be made.	3	2	Green	3	2		retention/tolerance
5											
3a	Those charged with governance are unable to fulfil their responsibilities effectively.	Complex regulatory environment. Inadequate oversight. Lack of expertise.	Moderate	To ensure individuals responsible for managing the Fund and delivering its services have the appropriate knowledge and expertise. To ensure robust processes, controls, and risk management are in place	3	4	Amber	3	3		reduction
6											
4a	Failure to understand and monitor risk compliance.	Human error. Resource constraints. Complex regulatory environment. Insider threats.	Moderate	To ensure robust processes, controls, and risk management are in place. To continually measure and monitor success against the Fund's objectives.	3	2	Green	2	1		reduction
7											
5a	Lack of understanding of employer responsibilities which could result in statutory and non-statutory deadlines being missed.	Human error. Inadequate training. Complex regulatory environment. Lack of resources. Inadequate policies and procedures.	Minor	To prudently set employer contributions that are as stable as possible whilst recognising the characteristics, circumstances, and affordability constraints of each employer. To put in place performance standards for the Fund and its employers and ensure these are monitored and developed as necessary.	2	3	Green	2	2		reduction
8											
6a	Failure to recognise and manage conflicts of interest.	Human error. Inadequate training. Inadequate policies and procedures. Poor communication.	Minor	To manage the Fund in a fair and equitable manner, and be accountable to the Fund's stakeholders.	2	3	Green	2	2		reduction
9											
8a	Failure to administer the scheme in line with regulations and guidance.	Data inaccuracies. Delayed data updates. Technological limitations. Operational inefficiencies. Communication gaps. Lack of knowledge and inadequate training.	Major	To ensure compliance with the LGPS Regulations and other legislation and guidance, including the Pensions Regulator's Code of Practice.	4	1	Green	4	1		reduction
11											
9a	Failure to provide relevant information to the Pension Committee/Pension Board to enable informed decision making.	Human error. Inadequate training. Inadequate policies and procedures. Poor communication.	Minor	To deliver clear, inclusive, accessible communications to stakeholders, including up-to-date information in order that informed decisions can be made.	2	2	Green	2	1		reduction
12											
10a	Failure to act appropriately upon expert advice and/or risk of poor advice.	Human error. Inadequate training. Inadequate policies and procedures. Lack of engagement with professional advisors.	Minor	To ensure individuals responsible for managing the Fund and delivering its services have the appropriate knowledge and expertise.	2	2	Green	2	1		reduction
13											
11a	Incorrect production of accounts, notices, publications and management reports leading to possible financial and reputational damage.	Human error. Inadequate training. Inadequate policies and procedures. Poor communication. Resource constraints. Lack of quality control. Time pressures.	Moderate	To administer the Fund in a professional, effective, and cost-efficient manner, utilising technological solutions and collaboration.	3	1	Green	3	1		retention/tolerance
14											
14a	The Pension Fund fails to comply with legal duties in connection with Pension Dashboards.	Inadequate data quality Complexity of regulations Insufficient resources Failure to engage third-party providers	Moderate	To ensure compliance with the LGPS Regulations and other legislation and guidance, including the Pensions Regulator's Code of Practice.	3	2	Green	3	2		retention/tolerance
17											

B	C	N	O	P	Q	R	S	T	U
Risk Number	Description of Risk	Internal controls/mitigations for risk	Status of Internal controls/mitigations for risk	Further Action and who has responsibility	Date for completion of action	Risk Manager	Next review date	Exempt	Further comments
2									
3	Governance		Governance						
2a	Information may not be provided to stakeholders as required.	1. Officers keep up to date with disclosure regulations and distribute knowledge to teams accordingly using resources such as relevant websites, seminars, professional bodies and working groups. 2. Letters are generated through task management for consistency and are checked before being sent out. 3. Communications Officer in place. 4. Membership of the LGA Communications Working Group. 5. Membership of the Regional Joint Communications Group. 6. Communication and Digital Communication Strategy in place. 7. To produce and implement an Equality, Diversity and Inclusion action plan to comply with TPR principles.	1. Implemented 2. Implemented 3. Implemented 4. Implemented 5. Implemented 6. Implemented 7. Implemented	All actions are implemented.		All managers	01/06/2025		
3a	Those charged with governance are unable to fulfil their responsibilities effectively.	1. Training Strategy in place to facilitate the continual development of both Committee and Board members. 2. New members are provided with relevant documentation to assist them in their roles. 3. The Fund subscribes to relevant professional bodies such as the Local Authority Pension Funds Forum (LAPFF) and the Pension and Lifetime Savings Association (PLSA). 4. Hymans Online Training Platform providing core mandatory training and hot topics in a flexible and efficient manner. 5. Complementary training via external sources and ad hoc internal training when required. 6. Governance Policy and Compliance Statement in place. 7. To produce and implement an Equality, Diversity and Inclusion action plan to comply with TPR principles. 8. Actively anticipating potential membership changes and reacting in a timely manner. 9. Participation in the National Knowledge Assessment to identify any skills and knowledge gaps.	1. Implemented 2. Implemented 3. Implemented 4. Implemented 5. Implemented 6. Implemented 7. Implemented 8. Implemented 9. In progress	9. Officers will liaise with the Fund governance advisors to progress this action. (Michelle Oakensen) - Sign up to the exercise in 2025 for 2026 participation.	9.31/08/2025	Governance and Regulations Manager	01/06/2025		Tolerate this risk short term due to upcoming elections.
4a	Failure to understand and monitor risk compliance.	1. Business Continuity plan in place and is reviewed at least annually. 2. Active risk register in place, the Committee and Board are updated if there are any risk movements between scheduled reporting timescales. 3. The Local Pension Board has oversight of risk monitoring to assist the Pensions Committee on decision making. 4. Risk Assurance table provides key information on the highest risks facing the Fund. 5. Risk dashboard in place to track the movement of risks. 6. Specific Incident Response Plan in place.	1. Implemented 2. Implemented 3. Implemented 4. Implemented 5. Implemented 6. Implemented	All actions are implemented.		Governance and Regulations Manager	01/06/2025		
5a	Lack of understanding of employer responsibilities which could result in statutory and non-statutory deadlines being missed.	1. Employers are made aware of their responsibilities upon admission via the Pension Service website and direct employer communication. 2. Training is provided to employers by a dedicated Employers Team as required. 3. The importance of a statutory deadlines is emphasised to employers through regular communications and events such as the Employer Forum. Support is also available through the website; dedicated employers help line and templates issued where applicable. 4. An Administration Strategy is in place setting out employer performance targets, which is reviewed annually. 5. Escalation pathways have been agreed with the Fund's major providers of member data. 6. An internal escalation policy is in place to help address specific issues with employers.	1. Implemented 2. Implemented 3. Implemented 4. Implemented 5. Implemented 6. Implemented	All actions are implemented.		Employer Services and Communications Manager	01/06/2025		
6a	Failure to recognise and manage conflicts of interest.	1. Declaration of interests are made at the beginning of all statutory meetings where not held on the Councillor declaration register. 2. Committee and Board members are encouraged to undertake the Pension Regulator's Toolkit which includes a conflicts of interest module. 3. Governance and legal advice sought as required. 4. Conflicts of Interest Policy in place. 5. Conflicts of Interest training delivered. 6. Fund Conflicts of Interest Register in place. 7. The Chair of the respective Committee/Board to be notified of any declarations that have not been received.	1. Implemented 2. Implemented 3. Implemented 4. Implemented 5. Implemented 6. Implemented 7. Implemented	All actions are implemented.		Governance and Regulations Manager	01/06/2025		Risk heightened due to all COI declarations not being received by the deadline.
8a	Failure to administer the scheme in line with regulations and guidance.	1. Officers attend regional Pension Officer working groups, subscribes to relevant professional bodies and consult with professional advisors where appropriate. 2. Compliant with the Pension Regulator's General Code of Practice. 3. Actively anticipating potential membership changes and react in a timely manner. 4. Participation in the National Knowledge Assessment to identify any skills and knowledge gaps and associated action plans. 5. Anti-Fraud and Corruption policy in place and regularly reviewed, including a money laundering process. 6. Aspects of the control environment are tested by Internal Audit and External Audit (including separation of duties). 7. Working practices have been amended to ensure compliance with the Pensions Regulator Scams Strategy and the Pension Industry Scams Group guidance. 8. Quality assurance board in place to discuss operational failures and associated resolutions.	1. Implemented 2. In progress 3. Implemented 4. In progress 5. Implemented 6. Implemented 7. Implemented 8. Implemented	4. The General Code of Practice review has been completed, an action plan is in place with actions currently in progress. (Michelle Oakensen) 7. Officers will liaise with the Fund governance advisors to progress this action. (Michelle Oakensen)	During 2025.	All managers	01/06/2025		
9a	Failure to provide relevant information to the Pension Committee/Pension Board to enable informed decision making.	1. Committee and Board papers are provided for each scheduled meeting, providing relevant information to inform decision making. 2. Papers are subject to appropriate approvals including that of the Monitoring Officer and Section 151 Officer (for Pensions Committee papers) and Head of Pensions. 3. Yearly effectiveness reviews for Committee and Board members are carried out to identify if any changes need to be made to the information delivered (currently in line with the GGR). 4. Specialist advice is sought and delivered to members where appropriate. 5. Training and support is available for all members as appropriate.	1. Implemented 2. Implemented 3. Implemented	All actions are implemented.		All managers	01/06/2025		
10a	Failure to act appropriately upon expert advice and/or risk of poor advice.	1. Pension Committee decisions are reviewed by the Local Pension Board. 2. Investment consultants and independent advisors appointed via a robust appointment process. 3. Members are encouraged to participate in Skills & Knowledge training and attend relevant industry conferences. Detailed training records are maintained. 4. Continually keeping up to date with evolving developments ensure robust cyber resilience in conjunction with specialist advice, via Business Plan updates and additional papers where required.	1. Implemented 2. Implemented 3. Implemented 4. Implemented	All actions are implemented.		All managers	01/06/2025		
11a	Incorrect production of accounts, notices, publications and management reports leading to possible financial and reputational damage.	1. Automated extraction of data where viable and agreed procedures for reporting. 2. Robust authorisation protocols in place. 3. Internal and External audit reviews. 4. Contributions are reconciled against employer monthly reports and the bank account, which is subject to both internal and external audit review as part of the year end process. 5. Membership year end reconciliation and investigate variations from the accounting valuations. 6. Management and administration are maintained in accordance with the SORP and the Financial Regulations. 7. Data Improvement Policy and Plan in place, reviewed annually. 8. Anti-Fraud and Corruption Policy in place and reviewed annually.	1. Implemented 2. Implemented 3. Implemented 4. Implemented 5. Implemented 6. Implemented 7. Implemented 8. Implemented	All actions are implemented.		All managers	01/06/2025		
14a	The Pension Fund fails to comply with legal duties in connection with Pension Dashboards.	1. Keeping up to date with latest information and developments. 2. Ensuring that stakeholders are up to date with the latest information. 3. Project plan in place that encompasses all the key actions for the implementation of Pension Dashboards (based on LGA guidance), with monthly project meetings. 4. To develop a RAID log for the management of risks, actions, issues and decisions. 5. Data Matching Policy to be reviewed by the Board and approved by the Committee.	1. Implemented 2. Implemented 3. Implemented 4. In progress	All actions are implemented.		Governance and Regulations Manager	01/06/2025		

B	C	D	E	F	G	H	I	J	K	L	M
Risk Number	Description of Risk	Cause of risk	Impact if this risk occurs	Strategic objective(s) linked to	Current Impact	Current Likelihood	Current Risk rating (Red, Amber, Green)	Target Impact	Target Likelihood	Target Date	Treatment of risk
2	Funding										
19	1b	Employers unable to pay contribution rates.	Financial difficulties. Poor financial management. Administrative errors. Lack of awareness. Poor fund performance.	Major	To prudently set employer contributions that are as stable as possible whilst recognising the characteristics, circumstances, and affordability constraints of each employer. To manage employer liabilities effectively, taking account of employer covenant, putting in place mitigations of adequate strength to protect the Fund.	4	2	Amber	4	2	retention/tolerance
20	2b	Failure to respond to changes in economic conditions.	Lack of economic forecasting. Inadequate risk management. Poor investment diversification. Resource constraints. Inadequate stakeholder communication and oversight. Dependency on external advisors.	Major	To maximise investment returns over the long term within agreed risk tolerances. To ensure the long-term solvency of the Fund, so that sufficient funds are available to meet benefit payments as they fall due.	4	3	Amber	4	2	reduction
21	3b	Contributions to the Fund are not received on the correct date and/or for the correct amount.	Financial difficulties. Poor financial management. Administrative errors and delays. Lack of awareness. Technological issues. Third-party risks. Lack of monitoring.	Major	To ensure an appropriate cash management strategy is in place and cash flows are timely and of the correct amount. To administer the Fund in a professional, effective, and cost-efficient manner, utilising technological solutions and collaboration.	4	2	Amber	4	2	retention/tolerance
22	4b	Fund assets are not sufficient to meet obligations and liabilities.	Investment losses. Economic downturns. Inadequate contributions. High liabilities. Poor asset management. Demographic changes. Lack of diversification	Major	To ensure the long-term solvency of the Fund, so that sufficient funds are available to meet benefit payments as they fall due. To maximise investment returns over the long term within agreed risk tolerances.	4	2	Amber	4	1	reduction
23	5b	Actual experience materially differs from actuarial assumptions used at each valuation.	Demographic changes. Economic fluctuations. Inaccurate data.	Minor	To prudently set employer contributions that are as stable as possible whilst recognizing the characteristics, circumstances, and affordability constraints of each employer. To manage employer liabilities effectively, taking account of employer covenant, putting in place mitigations of adequate strength to protect the Fund.	2	2	Green	2	2	retention/tolerance
24	6b	Failure to assess and monitor the financial strength of an employer covenant to ensure employer liabilities are met in conjunction with the Fund Actuary/specialist advisors.	Human error. Inadequate training. Poor communication. Lack of policies and procedures. Third party dependency.	Minor	To manage employer liabilities effectively, taking account of employer covenant, putting in place mitigations of adequate strength to protect the Fund.	2	2	Green	2	2	retention/tolerance
25	7b	Failure to recover all significant overpayments and debts.	Human error. Inadequate training. Lack of policies and procedures. Inadequate stakeholder communication and oversight.		To maintain accurate records and ensure data is protected and used for authorised purposes only. To administer the Fund in a professional, effective, and cost-efficient manner, utilising technological solutions and collaboration. To ensure the long-term solvency of the Fund, so that sufficient funds are available to meet benefit payments as they fall due. To ensure an appropriate cash management strategy is in place and cash flows are timely and of the correct amount.	2	2	Green	2	2	retention/tolerance
26											

B	C	N	O	P	Q	R	S	T	U
Risk Number	Description of Risk	Internal controls/mitigations for risk	Status of Internal controls/mitigations for risk	Further Action and who has responsibility	Date for completion of action	Risk Manager	Next review date	Exempt	Further comments
2									
19	Funding		Funding						
1b	Employers unable to pay contribution rates.	1.Provisional contribution rates are consulted on with each scheme employer as part of the valuation process. 2.Review of employer covenant, looking at the terms of the admission agreement and bond/guarantor arrangements. 3.Negotiate terms of deficit recovery whilst keeping employer contribution rates as stable and affordable as possible.	1.Implemented 2.Implemented 3.Implemented	All actions are implemented.		Employer Services and Communications Manager	01/06/2025		
20									
2b	Failure to respond to changes in economic conditions.	1.The Fund has established a quarterly Investment Sub Committee dedicated to focus on investment matters. 2.The Fund receives quarterly performance reports which consider operational and strategic investment issues. 3.A formal review of the strategic asset allocation is undertaken on at least a triennial basis. 4.The Fund publishes an Investment Strategy Statement, incorporating a Responsible Investment Policy, which is regularly reviewed. 5.The Fund has currency hedging and equity protection arrangements in place. 6.Increased engagement with investment managers and monitoring of asset movements.	1.Implemented 2.Implemented 3.Implemented 4.Implemented 5.Implemented 6.Implemented	All actions are implemented.		Investments and Accounting Manager	01/06/2025		
21									
3b	Contributions to the Fund are not received on the correct date and/or for the correct amount.	1.Employer contributions are set as stable as possible and the Fund works with employers closely to ensure pragmatic solutions if an employer is unable to meet monthly contributions. 2.A procedure is in place to identify non-payment and late payment of contributions as defined in the Employee and Employer Late Payment Policy. The Policy includes a reporting process to report late payments to Committee and the Pensions Regulator. 3.Internal Audit reviews take place on an annual basis and external audit review the accounts annually.	1.Implemented 2.Implemented 3.Implemented	All actions are implemented.		Investments and Accounting Manager	01/06/2025		
22									
4b	Fund assets are not sufficient to meet obligations and liabilities.	1.The Funding Strategy Statement is reviewed every 3 years or more often as required. 2.The Fund Actuary considers asset valuations and the Fund Investment Strategy in setting employer contributions rates. 3.The Fund has currency hedging arrangements in place.	1.Implemented 2.Implemented 3.Implemented	All actions are implemented.		Investments and Accounting Manager	01/06/2025		
23									
5b	Actual experience materially differs from actuarial assumptions used at each valuation.	1.Assumptions and actual experience are analysed through triennial valuations to ensure assumptions remain appropriate. 2.Officers in partnership with Fund advisers report asset allocation performance quarterly to the Investment Sub Committee. 3.Investment performance is reported quarterly to the Fund Actuary. 4.A specialist longevity service is employed to provide accurate Fund specific longevity analysis. 5.Probability based/stochastic modelling techniques are used by the Fund Actuary to reduce the reliance on deterministic assumptions, ensuring numerous possible financial scenarios are modelled.	1.Implemented 2.Implemented 3.Implemented 4.Implemented 5.Implemented	All actions are implemented.		Investments and Accounting Manager	01/06/2025		
24									
6b	Failure to assess and monitor the financial strength of an employer covenant to ensure employer liabilities are met in conjunction with the Fund Actuary/specialist advisors.	1.Assessment of the strength of individual employer covenants in conjunction with the actuary and what bond/guarantor arrangements are in place. 2.Close liaison with employers in managing exit strategy in line with the Admitted bodies, Scheme employers and Transfer Policy. 3.Ensure individual employers are monitored closely to pre-empt when they are likely to cease and put in arrangements to fund cessation on an appropriate basis.	1.Implemented 2.Implemented 3.Implemented	All actions are implemented.		Employer Services and Communications Manager	01/06/2025		
25									
7b	Failure to recover all significant overpayments and debts.	1. Preventing benefits overpayments from occurring by providing Officers with adequate training at both processing and checking stages 2. Monitoring and managing workflow tasks in a timely manner. 3. Tracing and Mortality Screening provider in place and providing regular reports. 4. Officers are monitoring debts and chasing them regularly as a monthly cycle. 5. Escalation process to chase outstanding debt. 6. Overpayment of pension entitlement and debt recovery policy in place.	1.Implemented 2.Implemented 3.Implemented 4.Implemented 5.Implemented 6.Implemented	All actions are implemented.		Investments and Accounting Manager	01/06/2025		
26									

B	C	D	E	F	G	H	I	J	K	L	M
Risk Number	Description of Risk	Cause of risk	Impact if this risk occurs	Strategic objective(s) linked to	Current Impact	Current Likelihood	Current Risk rating (Red, Amber, Green)	Target Impact	Target Likelihood	Target Date	Treatment of risk
2	Investment										
1c	The ACCESS asset pool does not have the sub-fund choices available to enable the Fund to fulfil its strategic and tactical asset allocation requirements in a timely manner.	Limited sub-fund options. Regulatory constraints. Market conditions. Operational delays.	Moderate	To ensure an appropriate cash management strategy is in place. To maximise investment returns over the long term within agreed risk tolerances.	3	4	Amber	3	3		reduction
2c	As long-term investors, the Fund believes climate risk has the potential to significantly alter the value of the Fund's investments.	Economic transition. Environmental changes. Regulatory changes. Market fluctuations. Reputational damage.	Major	To invest sustainably to achieve better long-term outcomes for the Fund and its stakeholders.	3	3	Amber	2	3		reduction
3c	The Investment Strategy's Risk Reward profile does not match the requirements of the Fund.	Misalignment with investment goals. Investor risk tolerance. Market conditions. Regulatory constraints.	Moderate	To maximise investment returns over the long term within agreed risk tolerances.	3	2	Green	3	1		reduction
4c	Custody arrangements may not be sufficient to safeguard Pension Fund assets.	Failure to meet regulatory requirements. Operational inefficiencies. Unfavourable market conditions. Communication issues.	Major	To ensure robust processes, controls, and risk management are in place. To maintain accurate records and ensure data is protected and used for authorised purposes only.	4	1	Green	3	1		reduction
5c	Pension Fund investments may not be accurately valued	Valuation methodology. Regulatory changes. Timing issues.	Minor	To maximise investment returns over the long term within agreed risk tolerances. To administer the Fund in a professional, effective, and cost-efficient manner, utilising technological solutions and collaboration.	2	2	Green	2	2		retention/tolerance
6c	Investment decisions and portfolio management may not achieve the return required or be performed in accordance with instructions provided.	Timing issues. Misaligned investment strategy. Operational inefficiencies. Communication gaps.	Moderate	To maximise investment returns over the long term within agreed risk tolerances. To administer the Fund in a professional, effective, and cost-efficient manner, utilising technological solutions and collaboration.	3	1	Green	3	1		retention/tolerance
7c	Geopolitical risks may adversely affect global markets in which the Pension Fund invests.	International conflicts Trade disputes Political instability Economic sanctions	Moderate	To maximise investment returns over the long term within agreed risk tolerances. To administer the Fund in a professional, effective, and cost-efficient manner, utilising technological solutions and collaboration.	4	3	Amber	4	2		reduction
8c	Government may wish the Fund/ACCESS pool to merge with another pool, which appears contrary to the Fund's best interests and may lead to legal recourse.	Misalignment with investment goals. Market conditions. Regulatory constraints. Timing issues.		To ensure robust processes, controls, and risk management are in place.	3	4	Amber	3	3		reduction

B	C	N	O	P	Q	R	S	T	U
Risk Number	Description of Risk	Internal controls/mitigations for risk	Status of Internal controls/mitigations for risk	Further Action and who has responsibility	Date for completion of action	Risk Manager	Next review date	Exempt	Further comments
2									
28	Investment		Investment						
1c	The ACCESS asset pool does not have the sub-fund choices available to enable the Fund to fulfil its strategic and tactical asset allocation requirements in a timely manner.	1.The Fund will take part in the ACCESS Pool sub-fund review scheduled for 2025, subject to the outcomes of the "Fit for the Future" consultation and the Fund's ongoing assessment of its implications.	1. In progress	Timely analysis of merge/build options by ACCESS (Ben Barlow) Local analysis of merge/build options (Ben Barlow)	During 2025	Investments and Accounting Manager	01/06/2025		The Government's response to the ACCESS pool's plan is still being absorbed and the implications worked through. New strategic needs may not be able to be filled through pooling in the short-term.
29									
2c	As long-term investors, the Fund believes climate risk has the potential to significantly alter the value of the Fund's investments.	1.Chair on decision making Joint Committee. 2.Officers embedded in Pool groups including s151 Officer Group and Officer Working Group 3.Non-listed asset programme planned. 4.Pipeline of further ACS sub-funds planned. 5.Ability to exceptionally invest outside of Pool and explain to Government.	1.Implemented 2.Implemented 3.Implemented 4.Implemented 5.Implemented	All actions are implemented.		Investments and Accounting Manager	01/06/2025		Amber risk tolerated due to balancing the need to transition to a sustainable portfolio with being able to meet Pension Fund obligations. Target 6 due to actions being implemented from the climate action plan.
30									
3c	The Investment Strategy's Risk Reward profile does not match the requirements of the Fund.	1.The Fund follows a structured, TCFD-aligned approach using the Analytics for Climate Transition (ACT) tool to support its net-zero by 2050 ambition. 2.ESG factors are integrated into the Fund's investment decision-making processes. 3.The Fund engages collaboratively with the ACCESS Pool and investment managers to align strategies with climate objectives. 4.Portfolio alignment with climate transition goals is monitored using Science Based Targets Initiative (SBTI) metrics. 5.The ACT Spectrum framework is used to assess how financial assets align with the low-carbon transition. 6.Decarbonisation targets have been set for listed equity, corporate bonds, and the combined listed equity/bond portfolios, benchmarked to a June 2021 baseline.	1.Implemented 2.Implemented 3.Implemented 4.Implemented 5.Implemented 6.Implemented	All actions are implemented.		Investments and Accounting Manager	01/06/2025		
31									
4c	Custody arrangements may not be sufficient to safeguard Pension Fund assets.	1.The Custodian is selected from experienced providers on the LGPS National Framework who have met the quality criteria for the framework. 2.Complete and authorised agreements are in place with external custodian. 3.External custodian's compliance with International Standard on Assurance Engagements (ISAE) No. 3402, Assurance Reports on Controls at a Service Organisation. 4.Officers of the Fund engage in quarterly monitoring of custodian performance.	1.Implemented 2.Implemented 3.Implemented 4.Implemented	All actions are implemented.		Investments and Accounting Manager	01/06/2025		
32									
5c	Pension Fund investments may not be accurately valued	1.The Fund employs a custodian to independently review the fund asset values applied by Fund Managers and these valuations are applied in the year-end financial statements. 2.The year-end financial statements record the Funds asset position and is subject to robust review by external audit. 3.Officers work closely with the Fund's Custodian to ensure accuracy of asset valuations. 4.Officers perform a quarterly reasonableness check on the Custodian valuations by comparison with investment manager reports.	1.Implemented 2.Implemented 3.Implemented 4.Implemented	All actions are implemented.		Investments and Accounting Manager	01/06/2025		
33									
6c	Investment decisions and portfolio management may not achieve the return required or be performed in accordance with instructions provided.	1.The Fund is compliant with investment regulations and best practice guidance. 2.The Fund appoints professional investment advisers to support the Pension Committee's investment decisions. 3.The Fund's asset allocation is considered by the Actuary when undertaking the triennial valuation. 4.Investment performance is closely monitored, the Investment Sub Committee receives quarterly performance reports provided by recognised industry professionals highlighting key issues. 5.The Fund has an Investment Strategy Statement in place which includes the Fund's Responsible Investment Policy. 6.An action plan has been developed to help reduce the carbon risk within the Fund's investments and transition to a more sustainable portfolio. 7. A Climate Action Plan is in place, outlining key milestones and actions to manage carbon risk and support the decarbonisation of the Fund's listed equity, corporate bond, and combined portfolios.	1.Implemented 2.Implemented 3.Implemented 4.Implemented 5.Implemented 6.Implemented 7.Implemented	All actions are implemented.		Investments and Accounting Manager	01/06/2025		
34									
7c	Geopolitical risks may adversely affect global markets in which the Pension Fund invests.	1.Diversification across asset classes, sectors and geographies. 2. The Fund has currency hedging arrangements in place. 3. Investment consultants and independent advisors are appointed to gain insights and advice on potential risks and mitigation strategies. 4. Regular fund reviews.	1.Implemented 2.Implemented 3.Implemented 4.Implemented	All actions are implemented.		Investments and Accounting Manager	01/06/2025		
35									
8c	Government may wish the Fund/ACCESS pool to merge with another pool, which appears contrary to the Fund's best interests and may lead to legal recourse.	1. On-going engagement with the Government including participation to consultations, where appropriate.	1.In progress	Timely analysis of merge/build options by ACCESS (Ben Barlow) Local analysis of merge/build options (Ben Barlow)		Investments and Accounting Manager	01/06/2025		
36									

B	C	D	E	F	G	H	I	J	K	L	M	
Risk Number	Description of Risk	Cause of risk	Impact if this risk occurs	Strategic objective(s) linked to	Current Impact	Current Likelihood	Current Risk rating (Red, Amber, Green)	Target Impact	Target Likelihood	Target Date	Treatment of risk	
2	Administration and Communications											
38	1d	Incorrect/poor quality data held on the Pension Administration and Payroll platforms or delays with receiving information leading to incorrect information/delayed provision of information to members and stakeholders	Data inaccuracies. Delayed data updates. Technological limitations. Operational inefficiencies.	Moderate	To maintain accurate records and ensure data is protected and used for authorised purposes only. To deliver clear, inclusive, accessible communications to stakeholders, including up-to-date information in order that informed decisions can be made.	3	3	Amber	3	2		reduction
39	2d	Unable to deliver pension services due to an inadequate business continuity plan.	Human error. Inadequate training. Inadequate policies and procedures. Resource constraints. Inadequate testing. Outdated plans. Dependency on key personnel.	Minor	To administer the Fund in a professional, effective, and cost-efficient manner, utilising technological solutions and collaboration.	2	2	Green	2	1		reduction
40	3d	Unable to deliver pension services due to inadequate recruitment/retention processes and inadequate skills and knowledge to undertake the role effectively.	Skill shortages. Increased workload. Training gaps. Low morale and engagement.	Moderate	To ensure individuals responsible for managing the Fund and delivering its services have the appropriate knowledge and expertise.	3	3	Amber	2	2		reduction
41	4d	Unable to deliver pension services due to high levels of workplace sickness absence.	Frequent occurrences of illness Work-related stress Inefficient sickness management processed	Moderate	To administer the Fund in a professional, effective, and cost-efficient manner, utilising technological solutions and collaboration.	3	3	Amber	3	2		reduction
42	5d	Failure to process all casework in line with service standards and statutory deadlines.	Skill shortages. Increased workload. Training gaps. Incorrect prioritisation of workflow. Sickness. Resources not managed effectively.	Moderate	To put in place performance standards for the Fund and its employers and ensure these are monitored and developed as necessary. To administer the Fund in a professional, effective, and cost-efficient manner, utilising technological solutions and collaboration.	3	2	Green	3	2		retention/tolerance
43	6d	Failure to operate strict financial controls.	Incorrect assessment of risk. Ineffective oversight. Ineffective segregation of duties. Inadequate policies. Collusion. Poor planning. Failure to monitor and adjust.	Moderate	To ensure robust processes, controls, and risk management are in place. To administer the Fund in a professional, effective, and cost-efficient manner, utilising technological solutions and collaboration.	3	2	Green	3	2		retention/tolerance
44												

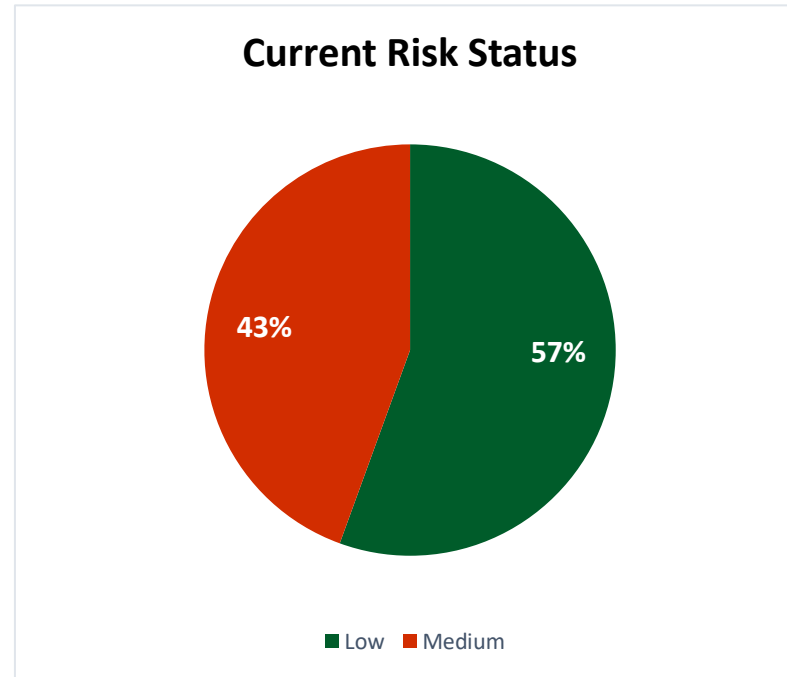
B	C	N	O	P	Q	R	S	T	U
Risk Number	Description of Risk	Internal controls/mitigations for risk	Status of Internal controls/mitigations for risk	Further Action and who has responsibility	Date for completion of action	Risk Manager	Next review date	Exempt	Further comments
2	Administration and Communications		Administration and Communications						
38	1d	Incorrect/poor quality data held on the Pension Administration and Payroll platforms or delays with receiving information leading to incorrect information/delayed provision of information to members and stakeholders	1.Data Improvement Policy and Plan in place and reviewed annually 2.The Local Pension Board has oversight of policy reviews in line with Pension Committee approvals 3.The Pension Committee and Local Pension Board receive updates against the plan quarterly. 4.Dedicated Employer Services Team to query/chase data as required. 5.Administration Strategy in place which sets out expectations of employers and potential sanctions. 6.Escalation process in place for repeated incorrect or delayed data being received by the Fund.	1.Implemented 2.Implemented 3.Implemented 4.Implemented 5.Implemented 6.Implemented	All actions are implemented.	N/A	Governance and Regulations Manager	01/06/2025	
39	2d	Unable to deliver pension services due to an inadequate business continuity plan.	1.Business Continuity plan in place and is reviewed at least annually. 2.Business continuity arrangements includes the ability for staff to work remotely to meet the demands of the service. 3.Multi skilling across the service for flexibility and resilience. 4.The BCP was tested as part of the war game exercise. 5.Emergency contact details updated as required and held securely. 6. Business Impact assessment completed.	1.Implemented 2.Implemented 3.Implemented 4.Implemented 5.Implemented 6.Implemented 7.Implemented 8.Implemented	All actions are implemented.		All managers	01/06/2025	
40	3d	Unable to deliver pension services due to inadequate recruitment/retention processes and inadequate skills and knowledge to undertake the role effectively.	1.Establishment reporting undertaken monthly to identify any recruitment/retention issues. 2.Recruitment undertaken utilising all available avenues including agency staff. 3.Staff leaving interviewed to understand reason for cessation. 4.Regular performance reporting across all business processes serves as early warning system. 5.Consultancy contracts in place as a backstop. 6.Establishment increased to allow for a higher vacancy factor in key teams. 7.Utilising additional recruitment avenues. 8.Induction session for new members of the Service 9.Succession planning for key officers by: -Ensuring knowledge of all tasks is shared by at least 2 members of staff. -Ensuring that procedure notes are created for key processes. -Encouraging development opportunities where appropriate. -Internal succession plan being developed to cover key roles. 10.Training programme delivered by more experienced members of the team. 11.Task management workflow system to guide Officers through processes and key prompts where required. 12.Shadowing/supportive network for queries. 13.Training Officer role created to alleviate training pressures across the service.	1.Implemented 2.Implemented 3.Implemented 4.Implemented 5.Implemented 6.Implemented 7.Implemented 8.Implemented 9.Implemented 10.Implemented 11.Implemented 12.Implemented 13.Implemented	All actions are implemented.		All managers	01/06/2025	Current risk remains at 9 due to sickness management and losing a key Manager in the service.
41	4d	Unable to deliver pension services due to high levels of workplace sickness absence.	1. Operational structure addressed to add extra resilience. 2. Multi skilling across the service. 3. Absence management processes in place. 4. Training Officer role created to alleviate training pressures across the service.	1. Implemented 2. Implemented 3. Implemented 4. Implemented	All actions are implemented.		All managers	01/06/2025	
42	5d	Failure to process all casework in line with service standards and statutory deadlines.	1. Service KPIs and Customer journey KPIs in place for monitoring performance. 2. Workflow monitoring including priority status. 3. Pension Committee and Pension Board oversight of performance. 4. Training Officer role in place to support training requirements. 5. Management review of performance. 6. Breaches log in place to report statutory failures.	implemented	All actions are implemented.			01/06/2025	
43	6d	Failure to operate strict financial controls.	1. Segregation of duties within all service areas. 2. Adequate resource and training to ensure roles and responsibilities are defined. 3. Internal and external audits undertaken. 4. Anti Fraud and Corruption Policy in place. 5. System controls in place. 6. Active management of the payment of benefits through workflow.	implemented	All actions are implemented.			01/06/2025	
44									

Risk Management Dashboard

Score	Current No of Risks
Low	20
Medium	15
High	-

Risk score	Current No. of Risks
2 (Low)	1
3 (Low)	2
4 (Low)	9
6 (Low)	8
8 (Medium)	3
9 (Medium)	4
12 (Medium)	8

Current Risk Index	248
Previous Risk Index	229
Total risks	35
Previous number of risks	32



New Admissions

- **ABM Catering Limited (Fulbourn Primary School)**

ABM Catering Limited entered a contract with Cambridgeshire County Council to provide catering services at Fulbourn Primary School. As a result, three employees transferred to the admission body and a pass-through admission agreement has been put in place. The agreement was backdated to 1 August 2024 and the backdated contributions have been collected. The assets and liabilities have been retained by the Cambridgeshire County Council.

- **Compass Group UK & Ireland Limited (Four Cs MAT)**

Compass Group UK & Ireland Limited entered a contract with Four Cs Multi Academy Trust to provide cleaning services at Discovery Primary Academy. As a result, three employees transferred to the admission body and a pass-through admission agreement has been put in place. The agreement was backdated to 1 November 2024 and the backdated contributions have been collected. The assets and liabilities have been retained by the Four Cs Multi Academy Trust.

- **Innovate Services Limited (Astrea Academy Trust)**

Innovate Services Limited entered a contract with Astrea Academy Trust to provide catering services at St Ivo Academy. As a result, six employees transferred to the admission body and a pass-through admission agreement has been put in place. The agreement was backdated to 1 August 2024 and the backdated contributions have been collected. The assets and liabilities have been retained by Astrea Academy Trust.

- **KGB Cleaning South West Limited (The Active Learning Trust)**

KGB Cleaning South West Limited entered a contract with The Active Learning Trust to provide catering services at Kingsfield Primary Academy. As a result, two employees transferred to the admission body and a pass-through admission agreement has been put in place. The agreement was backdated to 1 September 2024 and the backdated contributions have been collected. The assets and liabilities have been retained by The Active Learning Trust.

- **ServiceMaster Limited (Heltwate School)**

ServiceMaster Limited entered a contract with Peterborough City Council to provide cleaning services at Heltwate School. As a result, one employee transferred to the admission body and a pass-through admission agreement has been put in place. The agreement was backdated to 1 January 2024 and the backdated contributions have been collected. The assets and liabilities have been retained by Peterborough City Council.

- **Littleport Town Council**

Littleport Town Council were admitted to the Fund as a Designation body on 1 April 2025 when they passed a resolution designating their Clerk as eligible for membership of the LGPS.

New cessations

- **Caterlink Limited (The Active Learning Trust)**

Caterlink Limited were admitted to the Fund under a pass-through agreement on 1 August 2018 after entering a contract to provide catering services to The Active Learning Trust.

On 31 August 2024, the admission agreement ceased when the contract ended. Caterlink Limited are no longer an admission body in respect of this agreement. Their participation in the Fund has continued in respect of other ongoing admission agreements.

No exit payment or credit is required as the pension liabilities were retained by The Active Learning Trust.

- **Edwards & Blake Limited (Bassingbourn Primary School)**

Edwards & Blake Limited were admitted to the Fund under a pass-through agreement on 1 September 2018 after entering a contract to provide catering services to Bassingbourn Primary School.

On 18 October 2024, the admission agreement ceased when the last active member left. Edwards & Blake Limited are no longer an admission body in respect of this agreement. Their participation in the Fund has continued in respect of other ongoing admission agreements.

No exit payment or credit is required as the pension liabilities were retained by Cambridgeshire County Council.

- **Hertfordshire Catering Limited (Hauxton Primary School)**

Hertfordshire Catering Limited were admitted to the Fund under a pass-through agreement on 1 September 2020 after entering a contract to provide catering services to Hauxton Primary School.

On 9 November 2024, the admission agreement ceased when the last active member left. Hertfordshire Catering Limited are no longer an admission body in respect of this agreement. Their participation in the Fund has continued in respect of other ongoing admission agreements.

No exit payment or credit is required as the pension liabilities were retained by Cambridgeshire County Council.

- **ServiceMaster Limited (The Active Learning Trust)**

ServiceMaster Limited were admitted to the Fund under a pass-through agreement on 1 September 2021 after entering a contract to provide catering services to Kingsfield Primary Academy.

On 31 August 2024, the admission agreement ceased when the contract ended. ServiceMaster Limited are no longer an admission body in respect of this agreement.

Their participation in the Fund has continued in respect of other ongoing admission agreements.

No exit payment or credit is required as the pension liabilities were retained by The Active Learning Trust.

Update on previously reported cessations

- **Aspens Services Limited (St John the Baptist Catholic Academy Trust - Sacred Heart Catholic Primary School)**

The cessation of Aspens Services Limited was originally reported at the October 2024 meeting of the Pension Fund Committee.

Following an exit credit determination, as required by, and considering the factors listed under section 64 (2ZC) of the Regulations, the Administering Authority has determined that the amount of exit credit payable to Aspens Services Limited is £4,500. The exiting employer has been informed of the decision and its right to appeal the decision. Payment of the surplus was made on the 14 March 2025.

- **Burwell Parish Council**

The cessation of Burwell Parish Council was originally reported at the March 2025 meeting of the Pension Fund Committee.

Following an exit credit determination, as required by, and considering the factors listed under section 64 (2ZC) of the Regulations, the Administering Authority has determined that the amount of exit credit payable to Burwell Parish Council is £26,000. The exiting employer has been informed of the decision and its right to appeal the decision. Payment of the surplus was made on the 25 April 2025.

Cambridgeshire Pension Fund Board Agenda Plan

Meeting date	Agenda item	Lead officer
July 2025	Election of the Chair and Vice-Chair	Democratic Services
	Governance and Compliance Report [standing item]	M Oakensen
	Administering Authority Discretions Policy [post-scrutiny]	M Oakensen
	EDI Policy [post-scrutiny]	M Oakensen
	External Audit Plan Results Report [to note].	B Barlow
	Administration Report (including Risk Monitoring, Business Plan Update and Admissions and Cessations) [standing item]	M Whitby
	Valuation Update (incl. Funding Strategy Statement draft) [to note] exempt	C Blose
	ACCESS Update [to note] exempt	M Whitby
October 2025	Governance and Compliance Report [standing item]	M Oakensen
	Dashboard update [to note]	M Whitby
	Final Annual Report and Statement of Accounts	B Barlow
	Cambridgeshire Gender Pay Gap Analysis [to note]	M Oakensen
	Data Improvement Policy [pre scrutiny]	M Whitby
	Investment Strategy Statement [to note]	B Barlow
	Cessations Policy [post scrutiny]	C Blose
	Funding Strategy Statement	C Blose
	Administration Report (including Risk Monitoring, Business Plan Update and Admissions and Cessations) [standing item]	M Whitby
	Valuation Update [to note] exempt	C Blose
	ACCESS Update [to note] exempt	M Whitby
January 2026	Governance and Compliance Report [standing item]	M Oakensen
	Pension Dashboard update [approval]	M Whitby
	Effectiveness Reviews & conclusion of 2024 actions [to note]	M Bratec
	Communications strategy and Plan [pre scrutiny] Page 155 of 156	C Blose
	Conflicts of Interest Policy [post scrutiny]	M Oakensen

Meeting date	Agenda item	Lead officer
	Administration Report (including Risk Monitoring, Business Plan Update and Admissions and Cessations) [standing item]	M Whitby
	Valuation Update [to note] exempt	C Blose
	ACCESS Update [to note] exempt	M Whitby
April 2026	Annual Business Plan and Medium-Term Strategy [to note]	M Whitby
	Governance and Compliance Report [standing item]	M Oakensen
	Internal Audit Report [to note]	M Oakensen
	General Code of Practice review and conclusion of 2024 actions [to note]	M Bratec
	Pension Dashboard update [to note]	M Whitby
	Administration Report (including Risk Monitoring and Admissions and Cessations) [standing item]	M Whitby
	Valuation Update [to note] exempt	C Blose
	ACCESS Update [to note] exempt	M Whitby