



Local Pension Board Annual Report

22 May 2024

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Chairman's introduction

Welcome to the Annual Report of the Local Pension Board (LPB) of Wiltshire Pension Fund (WPF). This report covers the period from 1st April 2023 to 31st March 2024 during which the LPB held four meetings. Where appropriate pictorial links are made in the report to the WPF's Vision, Goals and Values.

The focus of the LPB has been on ensuring that WPF governance complies with the Public Service Pensions Act, all of the relevant LGPS regulations, LGPS best practice guidance issued by the national LGPS Advisory Board or CIPFA, and the requirements of the Pensions Regulator (TPR).

I am pleased to say that, with the support of the officers of Wiltshire Pension Fund, the Board continued to make good progress in fulfilling its terms of reference during the 2023/24 financial year, and the LPB is again able to provide assurance that the WPF is complying with its statutory duties.

During 2023/24 the LPB undertook a wide range of work, as set out in the "Outcomes and LPB recommendations made to the Administering Authority (Pension Committee)" section of the full Pension Board Annual Report on pages 6 to 9, which provides details of the work undertaken and the recommendations made to the Pension Committee, the vast majority of which were accepted by the Committee.

During the year a number of key areas were examined in detail by the Board given their importance to the Fund and its members. These included:

- **Governance and administration.** The Board continued to highlight administration performance issues and backlogs which, unless effectively addressed, would have had a significant negative impact on the quality of the services provided to the members of the WPF. The Board recommended that a Key Performance Indicators Improvement Plan should be produced, setting out, in detail, the actions to be implemented to improve administration performance within acceptable timescales. This plan was produced during the year and was agreed by the Wiltshire Pension Committee on 14th December 2023. The Board and Committee will closely monitor the effective implementation of the actions set out in this improvement plan at their meetings during 2024/25.

During the year it was intended to undertake a review of the Funds compliance with the Pensions Regulators new general code of practice, which it was anticipated would be released in 2023. Unfortunately, this was delayed, with the new general code not being published until 27th March 2024, and hence the review of compliance against this code could not be undertaken during 2023/24.

However, whilst no formal assessment against the new general code, or the outgoing code of practice 14 was undertaken, during the year the Board has been reassured by officers that the requirements of the Public Service Pension Act 2013 have continued to be monitored, so that the Fund has remained compliant with the Pension Regulator's guidance relating to governance and administration. In providing this assurance officers have provided to the Board with regular reports demonstrating the funds adherence to the essential elements of the guidance. The Board also continued to monitor the Risk Register of the Fund at each of its meetings during the year, specifically considering proposed changes to risk ratings and/or proposed new risks or deleted risks, prior to their submission to the Wiltshire Pension Committee for approval.

- **Key financial controls operating within the Fund.** As set out in pages 11 to 12, during 2023/24 the Board regularly monitored the implementation of the agreed actions to address the recommendations made in a “limited assurance” internal audit report on key financial controls. Although a number of actions still require completion in 2024/25, the Board was satisfied that officers had made significant progress against the recommendations made by the auditors.

In order to effectively carry out the roles of the Board, and to meet the knowledge and understanding requirements of Board Members, as set out in the Public Services Pensions Act 2013, the Board has a training plan which is updated and approved annually. Details of the training plan are set out on pages 4 to 6 of this Annual Report, from which it can be seen that a wide range of different training opportunities were taken up by Board members during 2023/24.

Finally, the Pension Board can only function effectively with input from all Board members, and I would like to thank my fellow Board members for their support and commitment to their roles on the LPB during the last financial year, and I commend this report to you.

Mark Spilsbury - Independent Chair of the Wiltshire Local Pension Board.

LPB members register and declarations of interest

Role	Member	Date of Appointment	Date left Office	Number of meetings attended in 2023/24 (maximum 4)
Independent Chairman	Mark Spilsbury	01/04/2020	-	4
Employer Member Representatives	Paul Smith	25/02/2020	06/10/2023	2
	Laura Fisher	03/09/2021	-	2
	Juliet Weimar	27/10/2022	12/04/2023	0
	George Simmonds*	18/07/2023	-	4
	Karl Read	20/02/2024	-	0
Scheme Member Representative	Mike Pankiewicz	14/07/2015	-	4
	Marlene Corbey	20/10/2020	-	2
	James Nicholson*	17/10/2023	-	2

*Attendance includes being present as an observer



Biographies of the Local Pension Board Members

Independent Chairman:

Mark Spilsbury, former Head of the Gloucestershire Local Government Pension Fund & Chair of the Local Pension Board for the Cornwall Pension Fund.

Employer Member Representatives:

Karl Read, Finance Manager - Swindon Borough Council
 Laura Fisher, HR Consultant, Wiltshire Council
 George Simmonds, Councillor – Chippenham Town Council

Scheme Member Representative:

Mike Pankiewicz, Unison representative, retired member
 Marlene Corbey, Unison representative, retired member

James Nicholson, Deputy CEO, The Park Academy Trust, active member

Full biographies for all Board Members can be found here

<http://www.wiltshirepensionfund.org.uk/wiltshire-pension-fund/about-us/local-pension-board/>

The register of interests for members of the Local Pension Board can be found here

<http://cms.wiltshire.gov.uk/ieListMeetings.aspx?CId=1280&Year=0>

LPB approved training plan and members training logs

The Public Service Pensions Act 2013¹ requires that members of Local Pension Boards have an appropriate level of knowledge and understanding to carry out their role. Members must be conversant with:

- The regulations of the Local Government Pension Scheme, including historical regulations and transitional provisions, to the extent that they still affect members; and
- any document recording policy about the administration of the scheme.

Local Pension Board members must also have knowledge and understanding of:

- the law relating to pensions, and
- such other matters as may be prescribed in other legislation.

The degree of knowledge and understanding must be appropriate for the purposes of enabling the individual to properly exercise their role. The Wiltshire Pension Fund is committed to supporting members to achieve the level of knowledge and understanding they require by providing the appropriate training and assistance.

Degree of Knowledge and Understanding

Members must “be conversant with” the rules of the LGPS and the policies of the Fund i.e., a working knowledge of what is relevant to the subject under discussion. A Board member be able to identify and challenge a failure to comply with:

- the LGPS Regulations;
- other legislation relating to the governance and administration of the scheme;
- requirements imposed by the Pensions Regulator; and
- any failure to meet the requirements is set out in the new general tPR code of practice.



Areas of Knowledge and Understanding

The areas in which Local Pension Board Members would be expected to be conversant include, but are not limited to:

- Scheme approved policies.
- Risk assessment and management
- Scheme booklets and other members’ communications
- The role of Local Pension Board Members and the scheme manager (Wiltshire Pension Fund)
- Policies in relation to the exercise of discretions
- Communications with scheme members and employers
- Key policy documents on administration, funding, and investment

¹ The Public Service Pensions Act 2013 made amendments to the Pensions Act 2004 (see s248A)

Achieving the required level of knowledge and skills

The Board members approved training programme covering the period 2021 to 2025 has been fully implemented and is designed to develop the necessary level of knowledge and skills for members. The strategy integrates with the Pension Fund Committee members training programme & aims to offer the widest opportunity for development. In line with the CIPFA 2021 training guidance the Fund approved and published its own member training policy, which can be found on the website here: https://www.wiltshirepensionfund.org.uk/media/8972/Committee-and-Board-Training-Policy/pdf/Committee__Board_Training_Policy_2021_.pdf?m=637841427951930000

The Local Pension Board's training plan can be viewed here: [link](#)

This year the Local Pension Board received the following training sessions:

Date of meeting	Topics Covered	Duration (Minutes)	MS	PS	LF	JW	GS	KR	MP	MC	JN
24/05/2023	The annual administration life cycle from the Fund	20	✓	✓			✓		✓	✓	
10/08/2023	Annual Accounts & Audit Strategy	20	✓	✓	✓		✓		✓		
01/11/2023	McCloud - Background, approach and remedy	20	✓				✓		✓	✓	✓
13/02/2024	i-Connect project 2024	20	✓		✓		✓		✓		✓
13/02/2024	Administration Improvements	20	✓		✓		✓		✓		✓
13/02/2024	Responsible Investment Survey Results	20	✓		✓		✓		✓		✓
13/02/2024	KPI Improvement Plan	20	✓		✓		✓		✓		✓
13/02/2024	Staff Engagement survey	20	✓		✓		✓		✓		✓
13/02/2024	Fund Procurement	20	✓		✓		✓		✓		✓

The following were joint training sessions with the Pension Committee:

Date of meeting	Topics Covered	Duration (Minutes)	MS	PS	LF	JW	GS	KR	MP	MC	JN
14/09/2023	Global Secured Credit Fund	30							✓		
14/11/2023	Equality, Diversity & Inclusiveness	60	✓		✓					✓	
23/11/2023	Employer Covenants and the process of managing new and ceasing scheme employers	20							✓		
23/11/2023	Climate Opportunities (Claps)	20							✓		
14/12/2023	National Fraud Initiative and Pension Payroll	20							✓		
20/03/2024	TPR General Code of Practice 2024	120	✓					✓	✓	✓	

The following was additional training opportunities undertaken by Board Members:

Date of meeting	Topics Covered	Duration (Minutes)	MS	PS	LF	JW	GS	KR	MP	MC	JN
20/09/2023	Brunel Investors Day	150			✓				✓		
16/11/2023	Employer Forum	300							✓	✓	
14/02/2024	Investment strategy - Community Housing Portfolio	20							✓		

Key:

HP – Mark Spilsbury, Independent Chair

PS – Paul Smith, Employer Representative, resigned

LF – Laura Fisher, Employer Representative

JW – Juliet Weimar, Employer Representative, resigned

GS – George Simmonds, Employer Representative, replaced Juliet Weimar

KR – Karl Read, Employer Representative, replaced Paul Smith

MP – Mike Pankiewicz, Member Representative

MC – Marlene Corbey, Member Representative

JN – James Nicholson, Member Representative

LPB workplan and outcomes

In pursuit of the Local Pension Board’s aim to assist the Administering Authority as set out in the Legal Basis section, it has set up a work plan intended to operate in conjunction with the workplan of the Fund whilst being committed to its own primary function.



To achieve this Local Pension Board’s terms of reference requires that it develops and reports to the Wiltshire Pension Fund Committee, at least annually, on its work plan for the year. Examples of the areas work it considers it will include (but are not limited to) can be found in paragraphs 80 and 81 of its terms of reference. <http://www.wiltshirepensionfund.org.uk/media/3560/terms-of-reference-local-pension-board.pdf>

Outcomes and LPB recommendations made to the Administering Authority (Pension Committee)

Decisions about the running of the Pension Fund are made by the Wiltshire Pension Fund Committee which is delegated to carry out that function by Wiltshire Council in its capacity as the Administering Authority for the Wiltshire Pension Fund.

The creation of the Local Pension Board does not change the core role of the Administering Authority nor the way it delegates its pension functions to the Pensions Committee. The role of the Local Pension Board is to oversee decisions made by the Administering Authority and to make recommendations to improve the efficient and effective administration and governance of its pension function, including funding and investments.



This year the Local Pension Board has fulfilled its role in the following ways;

Date - Ref	Area	Minute	Outcome
All meetings	Pension Committee decision making	The Local Pension Board actively scrutinises all Pension Committee papers and minutes.	Minuted in LPB minutes
24 May 2023 (Min 189)	Membership	Resolved: The Board recommended that George Simmonds be appointed to the Board as an Employer Member representative	The Board recommendation was accepted
24 May 2023 (Min 189)	Membership	Resolved: The Board recommended that Protocol 2b be updated to enable the Vice Chair’s appointment to no longer need to alternate annually between member & employer representatives	The request was accepted, but its execution will fall after March 2024

Date - Ref	Area	Minute	Outcome
24 May 2023 (Min 197)	Risk Register	Resolved: To recommend the Committee accept the proposed changes set out in the Report	The Board recommendation was accepted
24 May 2023 (Min 197)	SWAP KFC Audit Update	Resolved: To note the progress of the audit recommendations and recommend to the Committee changes to target dates to be in line with the Business Plan 2023/24 activities approved in March 2023.	The Board recommendations were accepted
24 May 2023 (Min 197)	MiFID II	Resolved: To recommend to the Committee that members better support officers concerning the Fund's MiFID II compliance obligations	The Board recommendation was accepted
24 May 2023 (Min 197)	KPI Improvement Plan	Resolved: To recommend that a KPI Improvement Plan be prepared by officers and approved by the Committee	The Board recommendation was accepted
24 May 2023 (Min 199)	Corporate SLA	Resolved: To recommend to the Committee that the drafting of a Corporate SLA be finalised, qualifying the recharge which can be approved by the Committee	The request was accepted, but publication will fall after March 2024
24 May 2023 (Min 201)	Training	Resolved: The Board noted that Committee members had requested a revised training strategy, to that recommended. This was prepared and subsequently approved by the Committee.	The Board recommendation was actioned
24 May 2023 (Min 207)	TPR Reporting	Resolved: The Board requested that a more detailed report be provided to the Committee relating to the potential reporting of a scheme employer to TPR.	The Board recommendation was accepted
10 August 2023 (Min 208)	Membership	Resolved: The Board recommended that James Nicholson be appointed to the Board and that Mike Pankiewicz be reappointed, both as Scheme Member representatives.	The Board recommendation was accepted
10 August 2023 (Min 216)	Risk Register	Resolved: To recommend the Committee accept the proposed changes set out in the Report	The Board recommendation was accepted
10 August 2023 (Min 216)	SWAP KFC Audit Update	Resolved: To note the progress of the audit recommendations and recommend that actions 1 & 10 on the actions log be paused due to material changes to the recommendations as a result of the new Business Plan 2023/24 objectives.	The Board recommendation was accepted
10 August 2023 (Min 216)	SWAP KFC Audit Update	Resolved: To recommend that a schedule of SWAP audit priorities be prepared for consideration by the Committee.	The Board recommendation was accepted
10 August 2023 (Min 216)	Staff Engagement	Resolved: To recommend to the Committee that a dedicated space be supported in County Hall to assist with staff engagement and a return to the office	The Board recommendation was accepted

Date - Ref	Area	Minute	Outcome
10 August 2023 (Min 217)	Training	Resolved: To recommend to the Committee that EDI training be completed by all members	The Board recommendation was accepted
10 August 2023 (Min 217)	EDI	Resolved: To recommend to the Committee that specific EDI wording is included in the Fund's Responsible Investment policy	The Board recommendation was accepted
10 August 2023 (Min 220)	Annual Report & Accounts	Resolved: To recommend to the Committee that if audited accounts weren't available by the statutory deadline, then unaudited accounts should be published on the Fund's website.	The Board recommendation was accepted
10 August 2023 (Min 220)	Annual Report & Accounts	Resolved: To recommend that a written response should be provided to the Committee in respect of the reasons for the reduction in long term investments by BPP.	The Board recommendation was accepted
10 August 2023 (Min 221)	Employer Policies	Resolved: To recommend to the Committee the updated Employer Cessation and New Employer policies.	The Board recommendation was accepted
10 August 2023 (Min 227)	Fraud incident	Resolved: To recommend that the Committee receive a full update concerning the incident of fraud and that a review of the internal controls mitigating incidents of fraud is completed.	The Board recommendation was accepted
10 August 2023 (Min 228)	Bond renewal	Resolved: To recommend to the Committee that a scheme employer bond should be renewed.	The Board recommendation was accepted
1 November 2023 (Min 239)	Risk Register	Resolved: To recommend the Committee accept the proposed changes set out in the Report	The Board recommendation was accepted
1 November 2023 (Min 239)	SWAP KFC Audit Update	Resolved: To note the progress of the audit recommendations and recommend to the Committee a change to the target date of action 6 of action log.	The Board recommendation was accepted
1 November 2023 (Min 239)	i-Connect onboarding	Resolved: To recommend that a report be prepared identifying the tangible results of the i-Connect onboarding exercise of scheme employers	The Board recommendation was accepted
1 November 2023 (Min 239)	Staff engagement survey	Resolved: To recommend that a report be prepared identifying the results of the staff engagement survey	The Board recommendation was accepted
1 November 2023 (Min 241)	KPI Improvement Plan	Resolved: To recommend that the KPI Improvement Plan be submitted to the Committee for their approval	The Board recommendation was accepted
1 November 2023 (Min 244)	Audit Plan 2024/25	Resolved: To recommend to the Committee the proposed audit plan 2025/25 prepared by officers. This plan also should clarify the strategic scope of the anti-fraud audit.	The Board recommendation was accepted

Date - Ref	Area	Minute	Outcome
1 November 2023 (Min 249)	Integrated Payroll System	Resolved: To provide updates to members at meetings in relation to the progress of the Council's Evolve programme and the Fund's integrated payroll system.	The Board recommendation was accepted
13 February 2024 (Min 10)	Risk Register	Resolved: To recommend the Committee accept the proposed changes set out in the Report, with the exception of the Compliance & Regulation risk, which was not seen as significantly materially.	The Board recommendation was accepted.
13 February 2024 (Min 10)	SWAP KPI Audit	Resolved: To endorse the Committee's approval of the KPI audit report recommendations	The Board recommendation was accepted
13 February 2024 (Min 10)	SWAP KFC Audit review	Resolved: To recommend that the Committee approves the KFC audit report review as a true reflection of the progress made.	The Board recommendation was accepted
13 February 2024 (Min 11)	LPB Budget	Resolved: To recommend LPB Budget 24/25 for inclusion and approval in the Fund's budget for 24/25.	The Board recommendation was accepted
13 February 2024 (Min 13)	Immediate payments update	Resolved: To recommend to the Committee they request that the Corporate Director (or Director) for the Evolve Team prepare a report for presentation to the Committee at their March meeting (Ref: Immediate Payments & Payroll migration)	The Board recommendation was not accepted. With reference to Committee minute 18 at their meeting dated 29 February the Committee noted that it would be late and after the testing period for any report to be presented.
13 February 2024 (Min 14)	Administering Authority Discretions Policy	Resolved: To recommend that the Committee approve the changes to the Administering Authority Discretions Policy	The Board recommendation was accepted

LPB Actions log

The Local Pension Board use an Actions Log to track the progress of its actions. The Actions Log forms part of the Board's minutes and is considered at every meeting.

Review of LPB compliance with the Pension Regulator's Code of Practice



One of the key responsibilities of the Local Pension Board is to assist the Administering Authority, Wiltshire Council, to ensure compliance with any requirements imposed by the Pensions Regulator in relation to the Scheme. This guidance can be viewed on the following link;

[Governance and administration of public service pension schemes | The Pensions Regulator](#)

In last year's report the Board commented that in view of the Pension Regulator's anticipated new general code of practice in 2023, it had agreed with officers to stand down the Fund's annual review against the Code of Practice 14, in expectation of the Fund assessing itself against the new Own Risk Assessment (ORA) proposed under the draft guidance. However, the introduction of the new general code of practice has taken longer than expected and was only published on 10 January 2024, with an advertised enforcement date with effect from 27 March 2024.

In light of this delay the Board understands from officers that a review of the Fund's current internal controls and other factors impacted by the new code will now take place during 2024 and after an anticipated 6 months, officers will present an action plan to the Board on the next steps needed to ensure the Fund's compliance.

In endorsing this review the Board recognises that due to the definitions set out in the Pension Act 2004, the ORA, and the Effective System of Governance (ESOG) requirements will not be mandatory for LGPS arrangements like the Wiltshire Pension Fund. However, whilst the legislation may only require the Fund to demonstrate that it has "adequate" systems and controls in place, it will encourage officers to continue with a strategy of annual ORAs to demonstrate the Fund's compliance and foster an approach of "best practice". In taking this approach the Board will seek to reinstate annual self-assessments against the new general code with the first assessment anticipated in March 2025, well within the Regulator's full compliance of the new code by all funds outlined as 2026.

Whilst no formal self-assessment against the outgoing code of practice 14, introduced on 1 April 2015, was undertaken in 2023/24, the Board has been reassured by officers that the requirements introduced by the Public Service Pension Act 2013 have continued to be monitored so that the Fund has remained compliant with the Pension Regulator's guidance relating to governance and administration. In providing this assurance officers have provided to the Board with regular reporting throughout 2023/24 on the essential elements of the guidance. These include the:

- Maintenance of the Scheme's registration:
- Board member compliance and access to information:
- Management of conflicts of interest:
- Publication of Board information and business:
- Evaluation of risk and internal controls:
- Recording keeping of the Fund at both a strategic and operational level:
- Payment of benefits, receipt of contributions and their monitoring and management:
- Statutory communication to all stakeholders:
- Maintenance of an appropriate complaints management function: &
- Maintenance of breach reporting records.

With the introduction of annual ORA reviews, a similar model of completion is proposed to that which has been established in the past. In particular, after officers have undertaken an ORA, the self-assessment will be independently reviewed on a periodic basis and the results of any findings submitted to the Board for their consideration. Additionally, until the new assessment arrangements are well established the Board anticipates taking a prudent approach and requesting independent reviews are undertaken each year.

Internal Audit Update

During 2023/24 the Fund’s internal auditor, South-West Audit Partnership (SWAP), has continued to provide its oversight function. In January 2023 the auditor’s annual review provided a “limited assurance” rating in respect of the Fund’s Key Controls (KC), following which a programme of work was enacted to address the areas of improvement required. A review against that programme of work was again completed by SWAP in January 2024 and a record of the progress made is included in the table below.

The Board notes that as the internal auditors only undertook a review against their January 2023 audit findings and did not conduct a new full audit, no change to the to the original KC audit rating can be stated. However, the Board was satisfied that officers had made significant progress against the recommendations stated by the auditor, a determination which was also reported on by the SWAP themselves.

In addition to the to the KC audit review, SWAP was also commissioned to undertake three other audits during 2023/24. These were a Key Performance Indicator (KPI) audit and a Phase I & Phase II Payroll Migration audits. With regard to the KPI audit, SWAP was able to provide an assurance rating of “reasonable assurance” in relation to the provision of consistent statistical reporting by officers to the members of the Committee and the Board. Noting that any findings would be addressed by officers.

With regard to the Payroll Migration Phases I & II audits, the first audit was a full audit, which considered the project planning, governance, controls, and testing arrangements of the Fund’s payroll migration from Wiltshire Council’s current payroll database to their new Oracle system, as part of the Council’s Evolve programme. This audit was given a “reasonable assurance” rating by SWAP. The Phase II audit was a review and considered the process of actual migration of the payroll to the new Oracle database. Consequently, re-rating did not form part of the scope of the audit.

Where commissioned audits were solely granted by the Pensions Committee the Board notes that progress plans against any audit recommendations were implemented by officers and were able to be regularly submitted to the Board for monitoring.

Key Controls review		
Area of KC action	Key requirements	Percentage Progress Made
New Enrolments	<ul style="list-style-type: none"> • I-Connect onboarding. • Employer scorecard issuance. • Charging employers for additional administrative costs 	50%
Overpayments	<ul style="list-style-type: none"> • Resolving outstanding overpaid pensions • Monitoring aged debt • Writing off arrangements 	80%
Lumpsum payments	<ul style="list-style-type: none"> • Adhering to authority payment levels • Final letter issuance for death cases 	70%
Transfers into the Fund	<ul style="list-style-type: none"> • Allocating tv-in payments to records • Reporting on this completed casework 	95%
Amendments	<ul style="list-style-type: none"> • Recording of data to support changes. • Checking that practices are embedded 	100%
Aggregation processing and backlogs	<ul style="list-style-type: none"> • Accurate identification of the backlog • Management plan to reduce the backlog. • Regular reporting on this casework 	70%

Status 2 Members (Undecided leavers)	<ul style="list-style-type: none"> • Accurate identification of undecided leavers • Timely processing of casework • Regular reporting on this casework 	70%
Retired Members (over 75)	<ul style="list-style-type: none"> • Contacting of members over 75 • Active processing of the casework 	100%
Workflow Management	<ul style="list-style-type: none"> • To actively manage casework by priority • To implement an equivalent workflow management practice in the EST Team 	85%
KPI reporting and monitoring of Staff productivity	<ul style="list-style-type: none"> • Establish accurate KPI report and performance reporting. • Regular data quality reporting • Instigate staff productivity reporting 	70%
Quality Assurance	<ul style="list-style-type: none"> • Establishing consistent QA reviews 	90%
Pension Payroll reconciliation	<ul style="list-style-type: none"> • Resolving non-Fund payments being paid through the pension payroll 	100%
Fund Risks and controls	<ul style="list-style-type: none"> • Engaging manages in updating the risk register 	100%

In conclusion, whilst the Board has been able to monitor the majority of audit activity during the scheme year and would like to thank both the internal audit team and Fund officers for their work in progressing internal controls against the recommendations, it does feel the need to report two key considerations that have emerged in relation to internal auditing:

- Firstly, that as a result of the Fund increasing in its size and complexity, the service offering provided by the internal auditors may require the Fund to look for assurance elsewhere to cover the range of technical aspects of pension fund auditing: &
- Secondly, that where internal audit does not report to the Pensions Committee in respect of commissioned audits, an unaddressed conflict of interest may be present which will require further consideration during the 2024/25 scheme year.

External Audit Update

The pension fund accounts form a part of the full Administering Authority, Wiltshire Council accounts. Unfortunately, Wiltshire Council's final sign off of accounts has continued to be delayed for the accounting years 2019/20, 2020/21 and 2021/22, due to an issue within Wiltshire Council figures. However, the Board has noted that officers have responded to all requests by the external auditors for information for all years of accounts. Additionally, the Board has noted that the auditor was satisfied with the Fund's accounts being in good order and consequently it was felt that the Board need take no further action.

In 2022/23 the Board made several enquiries to Wiltshire Council concerning the nature of the delayed sign offs and in turn Wiltshire Council continued to report that the nature of the auditor's delay lay with the Council's accounts and not the Fund's. Due to their being no change in circumstance in 2023/24 the Board have determined that further enquiries have not been warranted.

In respect of the pension fund's annual report and accounts 2022/23 officers have again had to publish unaudited accounts on its website. The external auditor's Deloitte completed their audit work during October/November and were again satisfied with the Fund's accounts were in good order. However, in recognition of the lack of audit sign off by December the accounts have been recorded on the Fund's TPR breach log.

The Board notes that with effect from 1 April 2024 Wiltshire Council will appoint a new external auditor, Grant Thornton. At the time of writing this report the nature of that handover, relating to the lack of

signed off accounts for several years’ remains unclear, however the Board will be making enquiries in 2024/25 concerning the handover arrangements and resolution of the outstanding sign offs.

Summary of LPB communications outlining links to the website

The Communications Strategy sets out how the Fund will engage, educate and fulfil the needs of both its >85,000 members and c.180 employers. This year we will be reviewing the strategy, ensuring it reflects the approach of the Fund for the next three years. As a Fund we need to ensure we are embracing technology to deliver clear, concise, and relevant communications in the most effective way not only to our members, but also to our employers.

“Our mission is to deliver an effective service, providing our members with the tools they need to plan for their financial future.”

We are committed to supporting our members and employers in their pension journey, last year focusing activities within the below areas:

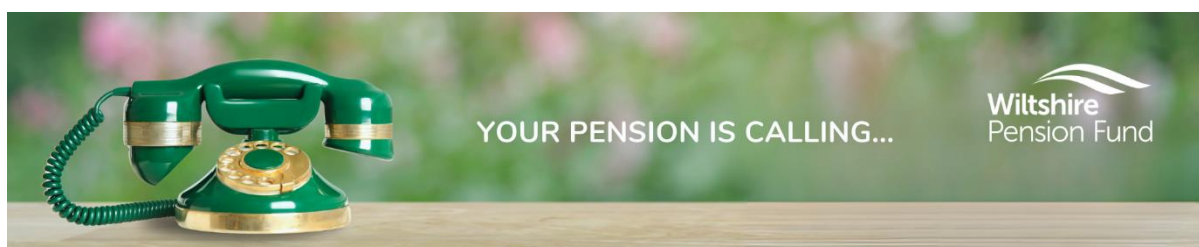


Each quarter we analyse campaign data, to monitor **engagement** within our different demographics, along with a year-on-year comparison for annual campaigns. During [Pension Awareness Week \(PAW\) 2023](#) we created five factsheets for our members, which were circulated across a week long campaign across different digital platforms. The campaign’s aim was to highlight the benefits of the LGPS to members, signpost them to tools and resources to support them in their pension journey and shine a spotlight on the positive impact their pensions are making through responsible investing.

The campaign saw an increase of 5.9% in email open rates with around **65,000 opened** out of the circa 119,000 which were sent out. Data from Google Analytics shows activity more than double across the week, on My Wiltshire Pension and wiltshirepensionfund.org.uk. Also to note is that most visits are via mobile phones, rather than other devices such as desktop or tablets. These stats show that our communications are **targeted, clear and concise** for our members, with work ongoing to ensure that through embracing technology this continues.



Throughout the year we have worked on **resource development**, increasing resources available for not only to our members, but also to our employers. A full review was done on our [Employers website](#), mapping easier navigation, helping employers find what they need more easily. A host of resources have also been created, as can be seen in the [i-Connect](#) section, in the form of videos, presentations, and guides. This helps employers self-serve as much as possible through these additional resources. We also continue to send out our employers [Quarterly Newsletter](#), filled with reminders, updates and important information to help support them as much as possible in being advocates for the scheme.



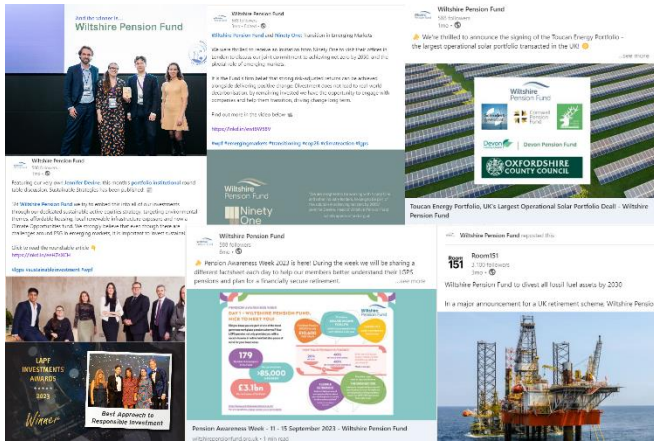
Our [member webinars](#) are also proving to be extremely successful, after a drop in interest, we changed the messaging to “Your pension is calling, pick up the phone “ we had a fantastic 160 registrations. This was an increase of 135 registrations from the previous one.

Feedback from attendees has been extremely positive:

“Clearly explained, thank you.”

“Great presentation.”

These webinars are a fantastic opportunity for our members to understand more about the fantastic pension scheme they are part of, and find out about what **self- service solutions** are available to help them plan for financial security in retirement.



As a Fund we have also been working on our vision goal of transparency and information sharing, specifically through our digital platforms such as our [news articles](#) and [linkedin page](#). By sharing our investment activities, fund news, and campaigns throughout the year, we have not only received [industry awards](#) but also gained recognition from partners and stakeholders as industry leaders for our investment and communication strategies.

This can be shown through the numerous invitations received to feature in [podcasts](#), [industry round tables](#), industry [memberships](#), and other invitation only activities such as the recruitment video being commissioned by [Boarder to Coast](#). We have also most recently received excellent commercial terms on investment fees based on our strong reputation within the industry, with investment managers viewing Wiltshire Pension Fund as a valued partner.

These digital activities have been instrumental in strengthening our reputation within the industry.

Moving forward, over the next three years as detailed in the Business Plan we have identified specific and measurable aims, improvements and continued activities to ensure we maintain and build upon Stakeholder engagement.

LPB operational costs for 2023-24 & budget for 2024-25

The cost of the Wiltshire Pension Fund Local Pension Board is part of the overall running costs of the Fund and should be seen in the context of its role in assisting with the good governance and administration of the Fund.

The budget for the Local Pension Board is approved by the Pension Fund Committee as part of the process of setting the Fund’s budget for the year. Any additional expenditure must be approved by the Wiltshire Council’s Director of Finance, s151 officer.

The budget for 2023-24 and 2024-25 can be seen below.

	2023-24 Budget £	2023-24 Actual £	2024-25 Budget £
Independent Chair Remuneration	£11,750	£0	£12,796
Consultancy Fees	£2,000	£0	£2,000
Training	£2,000	£0	£2,000
Committee Services	£3,947	£0	£4,298
Travel & Subsistence & costs	£500	£0	£500
Catering	£400	£0	£0
Insurance	£3,539	£0	£3,854
Total	£24,136	£0	£25,448

Assurance of the LPB Annual Report

It is the role of the Local Pension Board to assist Wiltshire Council as the Administering Authority for the Wiltshire Pension Fund to secure compliance with:

- The LGPS Regulations and related legislation
- The requirements of the Pensions Regulator; and
- to ensure the effective and efficient governance and administration of the Scheme

The Local Pension Board is not intended to replace existing bodies such as the Wiltshire Pension Fund Committee, nor be responsible for the auditing of the Wiltshire Pension Fund. In carrying out its role, the Local Pension Board has:

- Considered the minutes of the Pension Fund Committee
- Considered the main policies and documents of the Wiltshire Pension Fund
- Considered the Funds Business Plan, Audit Report and Risk Management Strategy
- Received assurance of the Fund's compliance with the Pension Regulator's Code of Practice, through regular officer reporting
- Received legal and regulatory updates on LGPS matters.
- Received training from external advisers and Fund officers.

The funds external auditors have reviewed the LPB annual report as part of their annual audit of the Wiltshire Pension Fund, but they do not provide any assurance over its contents.

This report is intended for the information of Wiltshire Council, the Scheme members and employers who participate in the Wiltshire Pension Fund. This report has been formally noted by the Wiltshire Pension Fund Committee at their meeting of 11th July 2024.

LPB Annual timetable 2024-25 and proposed work plans

https://www.wiltshirepensionfund.org.uk/media/6859/Local-Pension-Board-Work-Plan-2023-24/excel/Local_Pension_Board_Work_Plan_2023-24.xlsx?m=638252880507670000

Appendix 1

Legal basis of LPB and annual reporting

The Local Government Pension Scheme Regulations 2013 (“the Regulations”) established Wiltshire Council as the administering authority for the Wiltshire Pension Fund. The Regulations further require that Wiltshire Council establish a Local Pension Board for the purposes of assisting it:

- to secure compliance with the LGPS Regulations, other legislation relating to the governance and administration of the LGPS, and the requirements imposed by the Pension Regulator in relation to the LGPS; and
- to ensure the effective and efficient governance and administration of the LGPS

The functions of the Local Pension Board do not sit neatly within to local authority committees, including the Pension Fund’s Pension Committee. Importantly, it cannot be delegated to carry out the functions and responsibilities that legally pertain to the administering authority and has no decision-making authority.

The creation of a Local Pension Board does not change the way the administering authority delegates its pension functions, it serves an advisory and compliance role for the Fund. The role of the Local Pension Board is sometimes likened to that of a “critical friend”.

The Regulations require that the Local Pension Board must be constituted of at least 4 members, two of whom act for the membership and two who will act for the fund’s employers. While it is permissible for the Local Pension Board to contain “independent” members, such members are not permitted to vote. Details of how the Chair and members of the Local Pensions Board are appointed can be found in the terms of reference. <http://www.wiltshirepensionfund.org.uk/media/3560/terms-of-reference-local-pension-board.pdf>

The Wiltshire Pension Fund Local Pension Board is comprised of:

- 3 scheme member representatives, and
- 3 employer representatives, and
- 1 non-voting Independent Chair

The Regulations do permit an administering authority to combine its Local Pension Board with the pension committee to which it has delegated some or all of its decision-making responsibilities in respect of the maintenance of the fund, however the express permission of the Secretary of State for the Dept. of Levelling Up, Housing & Communities is required. Wiltshire Council has chosen not to operate a combined Local Pension Board and Pension Committee.

The Public Service Pensions Act 2013 also brought about a new role with the LGPS for The Pensions Regulator. The Regulator now oversees the good governance within all Public Service Schemes, adopting the same powers of enforcement as it does over other Schemes.

While there is no statutory obligation for the Local Pension Board to publish a report, it is recognised as best practice for the Board to report on its activities for the year and its future plans. In addition, the administering authority is required to publish a governance compliance statement which, in addition to information on the governance of the Fund, should include details of the terms, structure and operational procedures relating to its Local Pension Board.

The Board is accountable solely to the administering authority for the effective operation, reporting only to the Pension Committee on the work that it has done, typically in the form of recommendations. The scope of the Board's reports shall include:

- a) a summary of the work undertaken since the last report:
- b) the work plan for last year and the programme for the next 12 months:
- c) areas to be investigated since the last report and how they were dealt with:
- d) any risks or other areas of potential concern it wishes to raise:
- e) details of training received since the last report and planned:
- f) details of all expenses over the past 12 months and projected for next year; and
- g) details of any conflicts of interest identified and how they were dealt with.

The Governance Compliance Statement of the Wiltshire Pension Fund can be found here https://www.wiltshirepensionfund.org.uk/media/6145/Governance-compliance-statement/pdf/Governance_compliance_statement.pdf?m=637506307796670000