

Local Government Pensions Committee
Secretary, Jeff Houston

LGPC Bulletin 172 – May 2018

Please contact [Jayne Wiberg](#) with any comments on the contents of this bulletin or with suggestions for other items that might be included in future bulletins. [LGPC contacts](#) can be found at the end of this bulletin.

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LGPS England & Wales

The LGPS (Amendment) Regulations 2018 [SI 2018/493]

In [bulletin 170](#), we reported that the above [regulations](#) were laid before parliament on 19 April 2018 and came into force on 14 May 2018, with the exception of the provisions listed in regulation 1(3), which have effect from 1 April 2014.

The regulations amend the LGPS Regulations 2013 [[SI 2013/2356](#)] and the LGPS (Transitional Provisions, Savings and Amendment) Regulations 2014 [[SI 2014/525](#)] adding clarity, and addressing issues that were raised during the 2016 [consultation](#), as good stewardship of the regulatory framework of the Scheme.

Following a review of the regulations, on the 11 May 2018, the Secretariat published [bulletin 171](#) setting out the impact of these regulations.

Election for early payment of deferred benefits at age 55 for leavers before 1 April 1998

On 17 May 2018, the Secretariat met with MHCLG to discuss the transitional issue detailed below. The issue relates to the election for early payment of deferred benefits at age 55 for members who left active membership of the scheme prior to 1 April 1998.

On 22 May 2018, we informed administering authorities that MHCLG have confirmed that, although the transitional issue was unintended, they have taken legal advice and can only amend the regulations by means of a further set of amending regulations i.e. they cannot change the amending regulations by guidance or a correction slip.

This means that until further legislation is made, the regulations as they currently stand should be applied. Therefore, any members who are over age 55 on 14 May 2018 will not be able to elect for early payment of their deferred benefits prior to their NRD.

Transitional issue

As we reported in [bulletin 171](#), the amendments made by SI 2018/493 have inadvertently created a transitional issue for those deferred members that have already attained age 55 on 14 May 2018:

- a member over the age of 55 on 14 May 2018 with an NRD of later than 60 has had the option for early payment taken away from them (as the only option for early payment is now 55 and they have passed their 55th birthday). We think that this will have a limited impact as it will only affect those members who joined the LGPS after 1 April 1993 and who left the scheme prior to 1 April 1998 with an entitlement to a deferred benefit. This is because members who joined prior to that date, will have an NRD of age 60.
- a member who is over age 55 on 14 May 2018 with an NRD of 60 cannot take advantage of the new early payment option from age 55. Whilst this member would not previously have had an option for early payment because their NRD is age 60, they are not being afforded the same early payment options that are now available to younger members e.g. a member who is age 58 on 14 May 2018 may only take payment of their benefits at NRD (age

60). However, a member who reaches age 55 on or after 14 May 2018, can now elect for early payment at age 55 or wait and take payment from their NRD.

Updates to guides and websites

In [bulletin 171](#), we confirmed that we would update the technical guides, member communications and the national LGPS member [website](#) to reflect the changes made by the amendment regulations, in due course.

We have been asked to provide approximate timescales for when these changes are likely to take place and are able to confirm that we aim to update the items below by the end of June:

- Discretions policy guide
- Discretions list guide
- Freedom and choice – AVC technical guide
- Freedom and choice – AVC template letters
- Member guides – short and full guides
- Councillor guides - full guide and introductory leaflet for Wales
- Member website – desktop and mobile versions
- Timeline regulations

In July, we will then start to look at the remaining technical guides including the HR and payroll and underpin guides.

2017 LGPS annual report

At the 2018 PLSA local authority conference, Cllr Roger Phillips, the chair of the scheme advisory board for the LGPS in England and Wales (SABEW), launched the 2017 annual report for the English and Welsh scheme.

The aim of this Annual Report is to provide a single source of information about the status of the LGPS for its members, employers, and other stakeholders. Continually improving key information about the Scheme as a whole is one of the top priorities of the Board. This report aggregates information supplied in the 90 fund annual reports, as at 31 March 2017.

Some of the key highlights of the report are listed below:

- The total membership of the LGPS grew by 394,000 (6.9%) to 5.6m members in 2017 from 5.3m.
- The total assets of the LGPS increased to £263bn (a change of 21.2%). These assets were invested in pooled investment vehicles (52%), public equities (32%), bonds (7%), direct property (3%), as well as other asset classes (6%).
- The Local Authority return on investment over 2016/17 was 19.5%. This was reflective of the better market conditions during the year.
- The scheme maintained a positive cash-flow position overall. Scheme income was lower than total scheme outgoings by £484m. However, this was excluding investment income.

- The funds all received unqualified external financial audit certificates from the scheme's external statutory auditors.
- Over 1.6m pensioners were paid over the year. Fewer than 39 formal complaints about scheme benefit administration were determined and less than 13% were upheld by the Pensions Ombudsman.

The report is available at www.lgpsboard.org under [Scheme Annual Report 2017](#).

Data quality / Section 13 workshops

On 18 May 2018, the scheme advisory board for England and Wales (SABEW) emailed pension managers with the agenda and joining instructions for a series of regional workshops. The workshops are taking place throughout June in London, Cardiff, Durham, Manchester and Wolverhampton.

Each event will cover data quality issues in the morning session and Section 13 reporting in the afternoon. The intention is that the events will be interactive with plenty of time for discussion and questions.

The SABEW would be grateful if pension managers could ensure that the invitation is extended to their pension committee and local pension board members.

To book places please email [Rujwinder Padma](#) at GAD.

If you have any questions about the roadshows please contact [Sheila Owen](#) at MHCLG or [John Bayliss](#) at GAD.

High Court judgement in the case of Elmes v Essex

In [bulletin 166](#) and [bulletin 167](#), we provided updates concerning the case of Nicola Elmes v Essex County Council. On 8 May 2018, we emailed the text below to administering authorities:

It has come to our attention that there is some confusion about the status of regulations 24 and 25 of the LGPS (Benefit, Membership and Contributions) Regulations 2007 following the Elmes V Essex High Court judgement. To confirm, the High Court judgement handed down by Mr Justice Walker on 22 January 2018 strikes out the requirement to nominate a cohabiting partner under the regulations. The judgement states:

“The requirement to nominate a person under regulations 24 and 25 of the LGPS (Benefit, Membership and Contributions) Regulations 2007 is incompatible with Article 1 of the first protocol to, and Art 14 of, the European Convention on Human Rights and must therefore be disapplied.”

As confirmed in bulletin 166, in our view, the judgement now enables administering authorities to pay a cohabiting partner's pension where the member left the LGPS (England and Wales) between 1 April 2008 and 31 March 2014 (and died before 1 April 2014) without a nomination form, provided the cohabiting partner criteria in Schedule 1 of the LGPS 2013 regulations are met. We have amended the [timeline regulations](#) accordingly.

We are aware some administering authorities are still not making payment to affected cohabitants. Whilst each administering authority is responsible for the interpretation and application of regulations and judgements in relation to them, not making payment would, in our view, place the authority at risk of the Pensions Ombudsman ruling against it should a cohabiting partner appeal a decision where payment of a survivor's pension is refused because a nomination form is not in place. We therefore recommend that authorities advertise the judgement on websites and in newsletters, as appropriate”.

LGPS Scotland

The Local Government Pension Scheme (Scotland) Regulations 2018 [SSI 2018/141]

The above [regulations](#) were laid before Scottish parliament on 2 May 2018 and come into force on 1 June 2018, with backdated provisions for some regulations.

The regulations are a consolidation of the following regulations together with additional amendments:

- Local Government Pension Scheme (Scotland) Regulations 2014 [SSI 2014/164], and
- The Local Government Pension Scheme (Scotland) Amendment Regulations [SSI 2015/87], and
- The Local Government Pension Scheme (Scotland) Amendment (No. 2) Regulations 2015 [SSI 2015/448], and
- The Local Government Pension Scheme (Scotland) Amendment Regulations 2016 [SSI 2016/32]

At the time of writing, the government response has not been published. Once published, we will review the regulations and publish a further bulletin setting out the impact of these regulations.

GDPR

Privacy notices updated

On 25 May 2018, we uploaded updated versions (clean and tracked) of the full and short privacy notices to the guides and sample document pages of www.lgpsregs.org and www.scotlgpsregs.org. These documents have been updated to reflect Squire Patton Boggs' (SPB) latest thinking following the privacy notices they have just prepared for the police and fire schemes.

Administering authorities should note that:

- a new paragraph six is included in the covering note to both privacy notices to highlight the changes that have been made and to set out the reasons for the changes.
- the changes are not so significant that they require an immediate re-issue of the privacy notices. The changes could be included in an annual update of the privacy notice instead.
- the changes made include an expansion of the “right to object” wording. SPB are of the view that the inclusion of the right to object wording is necessary to

comply with GDPR. Furthermore, the updated guidance on transparency from the EU Article 29 Working Party indicates the explanation of the right to object should be clear and specific.

Retention periods in the LGPS

We have been asked to clarify if there is any reasoning behind the suggested 15 years in the 'how long do we keep your data' section of the full privacy notice produced by SPB. Currently the privacy notice says:

In practice, this means that your personal data will be retained for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Fund and for a period of [15 years] after those benefits stop being paid.

As the footnote suggests a time-period is specified to satisfy the requirements of Article 13(2)(a) of the GDPR. The Article 29 Working Party guidelines state that meaningful information about the likely period of retention should be provided and a generic statement is not appropriate.

We asked SPB for the reasoning behind the 15-year period and received the response below:

This is one of the areas of tension between how pension schemes usually operate in practice and the requirements of GDPR. As the footnote recognises, in practice we anticipate that currently pension schemes rarely (if ever) delete personal data because there is always the possibility that queries will arise many years after a benefit has been settled. GMP reconciliation is a live example of that – schemes would, for example, have found it even harder (if not impossible) to satisfy HMRC that a member's benefit was transferred to another arrangement if they had deleted that member's record following the transfer.

That said, data protection colleagues are of the view that this is an area where market practice may well have to change in future, because it's unlikely to be permissible under GDPR to keep personal data "forever". The guidance from the EU Article 29 Working Party on retention periods has indicated as such – it states "It is not sufficient for the data controller to generically state that personal data will be kept as long as necessary for the legitimate purposes of the processing."

The suggested period of "last payment of benefits plus 15 years" was based on the current maximum statutory limitation period, as any complaints about the payment of those benefits would need to be brought within that timeframe. It does, however, suggest that at some point data would actually be deleted. If (as flagged in the footnote) in practice funds do not currently operate such a practice and don't propose to do so going forward as a response to GDPR, then the wording will need to be amended – I'd suggest by deleting the words "and for a period of [15 years] after those benefits stop being paid" and by moving the words "and for so long afterwards as we consider may be required to deal with any questions or complaints that we may receive about our administration of the Fund" from the first sentence to the end of the second sentence.

However, funds should be aware that if they do not attempt to give a defined period for which personal data will be held, strictly speaking this is unlikely to comply with GDPR. I am, however, aware that many trustees are opting for this type of generic wording in their privacy notices because it reflects the current reality, albeit that they recognise this position may change at some point in the future.

Sharing data between administering authorities

We have been informed that some administering authorities are not providing scheme membership details to other administering authorities without the member's consent.

LGPS Administering authorities process personal data on the basis that they need to do so in order to satisfy their legal obligation as scheme managers. Details of previous scheme membership is necessary to determine, amongst other things:

- the right to benefits under the scheme where the member leaves with less than two years' membership.
- if automatic aggregation should occur.
- the death grant that should be paid in certain circumstances.
- if a refund is applicable where the member leaves without the right to a deferred benefit.
- to determine the statutory right to a CETV.

Therefore, in our view a member does not need to provide their consent for an administering authority to share details of their scheme membership with another authority. The administering authority's privacy notice should detail which organisations you share data with – we will ask SPB to amend the full template privacy notice accordingly.

Tell Us Once and the LGPS database

DWP have confirmed that they are not planning to issue a revised data sharing agreement in relation to Tell Us Once. They have stated that *'there is no requirement under GDPR to amend existing instruments to state GDPR instead of DPA therefore we have no need to amend existing Data Sharing Agreements, however future ones will point to the GDPR instead. Tell Us Once have a full range in place and will rely on our commercial colleagues to do a blanket letter to any 3rd Party external Provider contracted to DWP/Tell Us Once, as necessary.'*

With regard to the information sharing agreement for the LGPS Database, we are looking to expand the use of the NI Database at the same time as updating it to ensure it is compliant with GDPR. We will update funds on the progress with this in future bulletins.

Your LGPS contacts

In [bulletin 170](#), we reminded all administering authorities that they are responsible for maintaining and updating their own contacts via the 'Your LGPS Contacts' system.

In order to comply with GDPR, all administering authorities should ensure the persons named on the 'Your LGPS contacts' system are content for their details to

remain on this list. In the absence of such confirmation, administering authorities should remove that person's details from the contact system.

Data Protection Act 2018

The Data Protection Bill has received Royal Assent to become the [Data Protection Act 2018](#) on 23 May 2018. The Data Protection Act 2018 (Commencement No 1 and Transitional and Saving Provisions) Regulations 2018 [SI 2018/625] has also been published.

The Data Protection Act 2018 includes the provisions of the GDPR. There are some small differences but UK law on data protection is now largely the same as that of the GDPR.

HMRC

CEP reclaim

[Countdown bulletin 32](#) established a new process to allow scheme administrators to reclaim a CEP where a Post 5 April 2016 transfer to another registered pension scheme takes place. The new process involves obtaining the signed authority of both the paying and receiving schemes. The Secretariat queried with HMRC, the necessity for authorisation to be obtained from both parties (previously a CEP could be reclaimed using the authority of the paying scheme only).

HMRC have confirmed that the new process has been introduced because HMRC no longer tracks contracted-out rights post 5 April 2016. Regulation 14(1)(b) of the Occupational Pension Schemes (Schemes that were Contracted-out) (No 2) Regulations 2015 [SI 2015/1677] prescribe that a CEP can only be reclaimed if a transfer takes place and as such, HMRC require authorisation from both parties to confirm that this has happened. Once received HMRC will check that the authorisation contains all the required information, pay the CEP refund and store the document against the customer's national insurance number.

Countdown bulletin 34

On 30 May 2018, HMRC published [countdown bulletin 34](#) including articles on:

- Automation of scheme cessation files
- New automated solution - change of responsible paying authority/buy out
- Not in scheme Contributions Equivalent Premium
- Automation file submissions
- State Scheme Premium payments

Pension Schemes Newsletter 98

On 3 May 2018, HMRC published [pension schemes newsletter 98](#) including articles on:

- Manage and Register Pension Schemes service
- Pension flexibility statistics
- Registration statistics
- Annual allowance calculator
- Lifetime allowance additional member functionality
- Relief at source for Scottish Income Tax
- Pension flexibility payments and Scottish Income Tax

- Trust Registration Service
- Reporting of non-taxable death benefits

Pension Schemes Newsletter 99

On 30 May 2018, HMRC published [pension schemes newsletter 99](#) including articles on:

- Pension Schemes Online service
- APSS262 form
- Event report – reportable events 22 and 23
- Genuine errors
- Relief at source for Scottish Income Tax
- Look up residency status for relief at source

A point of interest to note is the taxation clarification guidance, concerning genuine errors made by an independent financial advisor (IFA) or other agent in prescribed circumstances. Of particular interest, is the last paragraph that confirms a scheme administrator may not apply the genuine errors guidance where:

- the member has changed their mind.
- the error is more than clerical
- the IFA or agent has given advice they now regret and wish to undo the transaction.

The Pensions Regulator

Governance and administration survey findings published

The Pensions Regulator (TPR) have published their [2018 report](#) on the findings of the governance and administration survey (undertaken in November and December 2017) of public service pension schemes. In total 191 of the 207 public service pension schemes completed the survey. This equates to a 92% response rate, covering 98% of all memberships.

The report sets out how TPR have interpreted the findings including, their expectations of those involved in running the schemes and what they will be doing over the next year to address the issues identified in the report. It accompanies the full [research report](#), which shows the responses to all survey questions.

The commentary in the report highlights a number of points that LGPS administering authorities should be aware:

- The survey supports TPR's existing assessment that the top risks are scheme governance, record-keeping and internal controls.
- The survey shows that 34% of LGPS administering authorities hold fewer than four pension board meetings a year. In TPR's view, this provides inadequate opportunity for pension boards to carry out their role effectively and raises concern about the quality of governance.
- Only 45% of active members in the LGPS received their annual benefit by the statutory deadline.
- The summary report states '*The survey shows signs that process improvements have stalled in some Local Government schemes. This group was also the one that was least likely to respond to the survey and we are*

concerned about the risks of disengagement. Because of the specific challenges faced by Local Government schemes, we expect to focus casework activities on the LGPS in the coming year’ (p3).

- The report concludes by saying, ‘Scheme managers should be aware that we are more likely to use our enforcement powers this year. Where we open cases, we will work the schemes involved to resolve gaps in their risk and breach of law processes. When considering action or setting fines, we will take into account a party’s co-operation with us, and their efforts to put things right. For example, those who fail to report breaches to us quickly could receive a higher penalty for a breach, and an additional penalty for a failure to report (p8).

2018 Scheme Return – scheme-specific data

For the first time, the 2018 scheme return will ask administering authorities to report on their common and scheme-specific data scores. The return will specify the common data fields to measure against, but scheme managers within public service pension schemes will also be asked to select what scheme-specific data they need to pay pensions, run the scheme and to undertake fund valuations, and once selected measure against this data.

Administering authorities may well have already received some guidance on what constitutes scheme-specific data from advisers. However, to ensure consistency across all administering authorities, the SABEW are working closely with MHCLG and GAD to develop a standard set of conditional data for administering authorities to use when completing this year’s scheme return.

The intention is to have this ready by mid-June. The SABEW will ensure that practitioners on the scheme advisory board and Cost Management, Benefit Design and Administration committee are involved in the development of the standard list before it is circulated.

We understand that TPR will be issuing the scheme return in July and the deadline for submission will be in September.

Other News and Updates

TPO and TPR establish information sharing agreement

The Pensions Ombudsman (TPO) and The Pensions Regulator (TPR) have agreed to share information with a view to mutually enhancing their knowledge and understanding of developing pension issues.

This information sharing agreement (The Agreement) aims to protect pension scheme members, endorse and support the achievement of higher standards across the industry and ensure a safe pensions saving environment.

The [Agreement](#) came into effect in March and gives details of the principles both organisations will follow when sharing information about complaints and concerns. It acknowledges that both organisations have shared goals and an overlap in responsibilities. The Agreement between the two bodies means that information concerning pension complaints handled by TPO may be shared with TPR, helping to inform its investigation processes. Similarly, following an investigation of a

pensions scheme, TPR may advise TPO of any concerns it has regarding that scheme's failure to implement policy and procedural changes as recommended by TPR.

Communications Working Group

The Communications Working Group (CWG) met on 16 May 2018. The agreements and actions from the meeting along with the annual work plan are available on the [CWG page](#) of www.lgpsregs.org.

At the meeting, the group agreed to produce a leaflet which administering authorities might find useful when preparing a newsletter or other documentation to communicate the changes to scheme members of the LGPS (Amendment) 2018 Regulations. The group aim to circulate the leaflet in the week commencing 25 June 2018.

Training

LGPC Circular 306

On 17 May 2018, the Secretariat published [circular 306](#). The Circular advertised the forthcoming LGPS Trustees 'training programme "Fundamentals" (October – December 2018), organised by the Local Government Pensions Committee (LGPC) and the Annual LGPS Governance Conference (17 – 18 January 2018) formerly known as the "Trustees" Conference.

We would be grateful if administering authorities would bring the circular to the attention of all pension committee and local pension board members along with those who attend/advise the meetings, sub-committees etc.

Whilst neither event is opening for booking at this stage, if you want to register your interest in attending please send a short-email with either "Fundamentals" or "Annual" in the subject line to [Elaine English](#), who will make sure you receive notification of when either event is open for booking (as places are always on a strictly first-come, first-served basis).

The wider landscape

Financial Guidance and Claims Act 2018

At present, the Government provides free financial guidance and debt advice through three services, Pensions Wise, The Pensions Advisory Service (TPAS), and the Money Advice Service (MAS). In December 2016, the Government published a [consultation](#) for the creation of one new single financial guidance body (SFGB) to replace the existing services.

On 10 May 2018, the Financial Guidance and Claims Act 2018 received royal assent and introduced a new Single Financial Guidance Body (SFGB). In addition, the Act made provision about the funding of debt advice in Scotland, Wales and Northern Ireland, and regulated the claims management services.

The aim of the new SFGB is to ensure that people have access to high quality, impartial financial guidance from a single source. The new body will deliver its

pensions, money guidance, consumer protection and strategic functions UK wide. However, the body's debt function will apply to England only, with the devolved administrations responsible for administering funding for debt advice in Scotland, Wales and Northern Ireland.

Existing legislation and FCA rules will be updated to reference the SFGB. We expect the new SFGB to commence in the autumn of 2018, thereafter; administering authorities will need to amend their communications to reflect these changes.

Legislation

United Kingdom

Act	Title
2018	Data Protection Act 2018

Act	Title
2018	Financial Guidance and Claims Act 2018

SI	Reference Title
2018/625	The Data Protection Act 2018 (Commencement No. 1 and Transitional and Saving Provisions) Regulations 2018

SI	Reference Title
2018/577	The Firefighters' Pension Schemes and Compensation Scheme (Wales) (Amendment) Order 2018

SI	Reference Title
2018/576	The Firefighters' Pension Scheme (Wales) (Amendment) Regulations 2018

SSI	Reference Title
2018/537	The Public Service (Civil Servants and Others) Pensions (Amendment) Regulations 2018

SSI	Reference Title
2018/141	The Local Government Pension Scheme (Scotland) Regulations 2018

Useful Links

[LGA Pensions page](#)

[LGPS member website](#) (England and Wales)

[LGPS 2015 member website](#) (Scotland)

[LGPS Advisory Board website](#) (England and Wales)

[LGPS Regulations and Guidance website](#) (England and Wales)

[LGPS Regulations and Guidance website](#) (Scotland)

[Public Sector Transfer Club](#)

[Recognised Overseas Pension Schemes](#) approved by HMRC and who agreed to have their details published.

LGPS pensions section contact details

If you have a technical query, please email query.lgps@local.gov.uk and one of the team's LGPS pensions advisers will get back to you.

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Distribution sheet

Pension managers (internal) of administering authorities

Pension managers (outsourced) and administering authority client managers

Local Government Pensions Committee

Trade unions

CLG
COSLA
SPPA
Regional Directors
Private clients

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