

Investment Committee

DATE: 10 November 2025

VENUE: Hybrid Meeting (MS Teams and 18 Smith Square)

TIME: 11:00 – 13:00

AGENDA

Item		Paper	Timings
1	Welcome, introductions, apologies and declaration of interests		11:00
2	Meeting protocol		11:05
3	Actions and Agreements from 7 July 2025	Paper A	11:10
4	Ministry of Housing, Communities and Local Government (MHCLG) Update	Verbal	11:15
5	Code of Transparency Compliance Update	Paper B	11:30
6	Code of Transparency Framework Project	Paper C Annex A Annex B Annex C (CONFIDENTIAL) Annex D (CONFIDENTIAL)	11:40
7	New Pooling Steering Group	Paper D Annex A (CONFIDENTIAL)	11:55
8	Pension Schemes Bill – local investment	Paper E	12:05
9	Responsible Investment Advisory Group (RIAG) Report	Paper F	12:15
10	Board response to Palestine Solidarity Campaign letter	Verbal	12:25
11	Committee Workplan	Paper G	12:35
12	AOB and date of next meeting		12:45

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Item 3 – Paper A

Actions and Agreements from 7 July 2025

Present

Councillor Andrew Thornton
Sandra Stewart

Peter Wallach

Euan Miller

Jeffrey Dong
Marco Gonzalez
David Walker
Tony English
Pete Smith

Fiona Miller
Chris Rule

Tommy Bowler
John Wiffen

Andrew Dobbie
Christophor Ward

Oliver Watson

Clair Alcock

Jeremy Hughes
Becky Clough
Sophia Chivandire

Ona Ehimuan
Sarah Tingey

Chair – West Yorkshire Pension Fund
Greater Manchester Pension Fund
(Chair of Responsible Investment
Advisory Group (RIAG))
Practitioner – Merseyside Pension
Fund
Practitioner – West Yorkshire Pension
Fund
Practitioner – Swansea Pension Fund
Investment Consultant (Aon)
Investment Consultant (Hymans)
Investment Consultant (Mercer)
Investment Consultant (Barnett
Waddingham)
Asset Pool (Border to Coast)
Asset Pool (Local Pensions
Partnership Investments – LPPI)
Member representative – UNITE
Academies representative – The
Green School Trust (observer in
place of Richard Lane)
UNISON
Government Actuary's Department
(GAD)
Ministry for Housing, Communities
and Local Government (MHCLG)
Head of Pensions and Board
Secretary, Local Government
Association (LGA)
Senior Pensions Secretary, LGA
Board Support & Policy Officer, LGA
Pensions Policy and Support Officer,
LGA
Pensions Secretary, LGA
Research and Data Analyst, LGA

Scheme Advisory Board Secretariat

Local Government Association, 18 Smith Square, Westminster, London SW1P 3HZ
E SABSecretariat@local.gov.uk W www.lgpsboard.org

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Item 1 – Welcome, introductions and declarations of interests

1. The Chair welcomed all in attendance including Clair Alcock who was attending her first meeting after joining the LGA as Head of Pensions in May 2025 and John Wiffen who was attending as an observer after being nominated as the new Academies Representative following Richard Lane stepping down.
2. Apologies had been received from Nick Buckland (Kent Pension Fund), Cllr Robert Chapman, Andrew Dobbie (UNISON) and George Georgiou (GMB). There were also apologies from Colin Cartwright (Aon); Marco Gonzalez attended in his place.
3. There were no declarations of interest Fiona Miller (FM) declared an interest in Item 5 as Deputy Chief Executive Officer of the Border to Coast pool.

Item 2 – Meeting protocol

4. The Chair advised members of the virtual meeting protocol.

Item 3 – Actions and agreements from the meeting of 3 March 2025

5. The actions and agreements from the previous meeting were agreed.

Item 4 – MHCLG update

6. Oliver Watson (OW) confirmed that the Pensions Schemes Bill had been introduced to Parliament and would have its second reading on 8 July 2025. Following from the Government's response to the Fit for the Future consultation, there would be changes to the LGPS 2013 Scheme regulations and the LGPS Investment Regulations 2016. There would be guidance produced by MHCLG to assist funds and pools. There will be a consultation on the new regulations in Autumn 2025 and implementation is expected to take place in Spring 2026.
7. The Committee noted the Board's concerns over the pace of change that Government was looking for in moving to the new pooled arrangements sent out in the Fit for the Future response. OW said that from MHCLG's perspective the process was going well and the check-in conversations had all been constructive.

Item 5 – Fit for the Future – pooling governance guidance

8. Jeremy Hughes (JH) introduced Paper B to the Committee. The paper summarised some of the areas that the new pooling governance

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guidance might helpfully provide clarity on and at Annex A (circulated confidentially) included the draft version of the legal advice that the Board had sought from Burges Salmon on conflicts-of-interest under the new pooling arrangements. The legal advice also covered the different pooling governance models in relation to conflicts of interest. OW confirmed that it had not been finally decided whether the guidance would ultimately be directed at funds, pools or both.

9. The Committee shared some technical comments on the confidential draft for the Secretariat to share with Burges Salmon and discussed how it would be used for giving practical advice to funds and pools to develop their own process of transparency, compliance and develop best practice governance models. It was agreed that the Secretariat would discuss the draft with Burges Salmon before putting the final draft to the Board for approval and draft communications to accompany the advice.
10. It was also agreed that a working group be established to input into pooling guidance and for this to be a priority workstream. Both Chris Rule (CR) and FM expressed interest in contributing to the pooling governance guidance and agreed to contact the Secretariat to confirm the appropriate representative from their respective pooling companies. The Committee agreed that the guidance should ideally look not just at what is expected by the Financial Conduct Authority (FCA) as a regulatory requirement but also what is emerging best practice.

ACTION – that the Secretariat discusses the Committee’s comments of the drafted legal advice on conflicts-of-interest with Burges Salmon before putting the final draft to the Board for approval and draft communication to accompany the advice.

ACTION - that the Board establishes a pooling governance guidance working group.

Item 6 – Code of Transparency (CoT) compliance update

11. Ona Ehimuan (OE) introduced Paper C to the Committee, summarised the compliance figures in the paper and gave an update on asset managers that had a significant number of late templates. A question was raised on whether subsidiaries of companies with a high number of late templates should be allowed to sign up to the Code. OE explained that the Board would still accept subsidiaries signing up to the Code given the overall benefits to the LGPS and the funds. The focus

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remained on working collaboratively with any asset manager having issues to support and resolve these issues.

Item 7 – Code of Transparency Framework Project

12. OE introduced Paper D to the Committee. Since the last meeting, a founder's group for the new proposed framework had been put together and had met twice. The third meeting would take place on 8 July 2025.
13. The Secretariat had also started discussions with the pools to determine whether there would be interest in using the new framework to assist with their increased reporting requirements under the new pooling arrangements. Discussions with MHCLG had also been helpful testing whether the department wanted to be involved in or support the Code of Transparency by endorsing it via guidance and regulations.
14. At Annex C was a draft revised Code of Transparency that funds and Code signatories would be consulted on from 14 July to 15 August 2025. The Committee commented on the draft, specifically on the reductions in template submission deadlines. There was some concern that this could create unintended consequences, but it was agreed to approve the draft for consultation and consider all comments before putting a final version for Board approval. The Committee also noted the project plans included at Annexes A and B.

ACTION – That the Secretariat submits an update to the Board on the CoT data system project and consults on the draft revisions to the LGPS Code of Transparency.

Item 8 – RIAG Report

15. Sandra Stewart (SS) introduced Paper E to the Committee. The Group last met on 9 June 2025. There was no update on climate risk reporting from MHCLG. The Group discussed the impact of the new pooling model on responsible investment policies. It is possible that there will be difficulties where funds within a pool have different approaches or where a fund's approach differs from that of its pool. It was said that also it was more complicated to develop a common stance on human rights or war/conflict issues, as compared to climate change.
16. The Group supported the Government's plans for local investment but expressed that in some areas it would undoubtedly take more time to develop the necessary mature regional relationships to carry out the plans as detailed in the Fit for Future response.

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17. There was also support for the SAB producing practical guidance on how to consider scheme members' and employers' views when setting a RI policy, but the Secretariat would not have resource to do this as a priority. It was also noted that there seemed to be increasing turnover on pension committees which necessitated increased training especially around topics like RI.
18. The changes to the Financial Reporting Council's (FRC) Stewardship Code were discussed. The Group said that although it was disappointing that specific references to ESG had been removed, the Code still made reference to sustainability which cover these factors. Finally, the Group discussed a perceived resistance to ESG considerations from private markets investment managers in the US.

Item 11 – AOB and date of next meeting

19. There were no AOB items raised.
20. The date of the next meeting was confirmed as 10 November 2025 at 11:00am.

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Item 5 – Paper B

Code of Transparency Compliance Update

(standing agenda item)

Background

1. The Local Government Pension Scheme (LGPS) Code of Transparency (the Code) requires signatories to provide certain cost information to their LGPS clients. To enable the Scheme Advisory Board (SAB) to have direct oversight of Code compliance, as well as see scheme-wide cost data, the SAB make available an online system, specifically for the LGPS, which is provided by Byhiras. This was launched at the end of March 2020.

Compliance

2. The table in **Annex A** sets out how uptake and use of the system has developed since the system was launched.
3. The below table shows the rate of compliance per year between 2019/20 to 2024/25 compared to the last meeting

	Completion rate	Predominate asset class in missing templates
2019/2020	98% (same at the last meeting)	Infrastructure and Unlisted equity (more commonly known as private equity)
2020/2021	99% (same at the last meeting)	Unlisted equity and Property
2021/2022	98% (same at the last meeting)	Unlisted equity, Property, Active listed equity and 'Other'
2022/2023	99% (same at the last meeting)	Property and Active listed equities
2023/2024	98% (same as the last meeting)	Property, Active listed equity, Active listed fixed income, Multi asset funds/diversified and 'other'
2024/2025	98% (increased from 51%)	Property, Active listed equity, Unlisted equity, Active listed fixed income, Private debt and 'other'

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Ongoing engagement

4. While compliance is increasing, the Secretariat has ongoing engagement with fund managers that still have a significant number of late templates as at the date of this report. These are:

- a) JP Morgan Asset Management have 18 late templates out of 225 required templates (4 for 2024/25, 3 for 2023/24, 1 for 2022/23, 1 for 2021/22, 1 for 2021, 2 for 2020 and 6 for 2019), an increase from 14 at the last meeting.

The Secretariat contacted JP Morgan in September and October 2025 to request an update on the remaining outstanding templates and are awaiting a response.

- b) Aviva Investors Global Services Limited have 36 late templates out of 38 required templates (4 for 2024/25, 4 for 2023/24, 4 for 2022/23, 4 for 2021/22, 4 for 2020/21, 2 for 2019/20, 3, for 2024, 3 for 2023, 3 for 2022, 3 for 2021 and 2 for 2020) which is an increase from 32 at the last meeting.

Aviva previously informed the Secretariat that they send template directly to their clients and have had issues uploading real estate templates due to reporting deadlines, as well as issues with logging on to the system due to no longer having mobile phones to complete two factor authentication. The Secretariat has liaised Aviva and Byhiras to arrange an alternative method of authentication, however they have also expressed issues with the schedules on the system not reflecting the reporting deadlines needed. The Secretariat have communicated with Aviva for a progress update in October 2025 on this issue but have not received a response to date.

- c) Veritas Asset Management had 13 late templates out of 20 required templates (1 for 2024/25, 1 for 2023/24, 1 for 2022/23, 2 for 2021/22, 2 for 2024, 2 for 2023, 2 for 2022, 2 for 2021) which was an increase from 12 at the last meeting.

The company have been contacted in September and October 2025 regarding the outstanding templates, and were informed that this is being reviewed. 3 of the late templates have now been uploaded with 10 late templates left on the system.

- d) Madison Capital Funding have 12 late templates out of 12 required templates (3 for 2024, 3 for 2023, 3 for 2022 and 3 for 2021).

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The company was contacted in September and October 2025 regarding the outstanding templates, and the Secretariat have been informed by one of their LGPS clients that Madison Capital Funding was acquired by Apogem Capital in April 2022. The new company have been encouraged to sign up to the Code.

- e) Neuberger Berman had 36 late templates out of 838 required templates, 24 of which are Q1 2025/26 templates which is not yet under overall tracking by the Committee (tracking usually commences after the financial year end). The Secretariat have nonetheless asked for an update on the upload of these templates as they are overdue along with the remaining late templates (9 for 2024/25, 2 for 23/24 and 1 for 2019/20) and 26 of the templates have been uploaded with 10 remaining on the system.

New signatories for the code

5. Since the last meeting, we have had 1 new manager sign up to the Code:

- Jennison Associates on 30 July 2025

Recommendation: That the Committee notes this summary report.

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Annex A

Headline statistics on cost transparency compliance system users and uses

Cumulative totals to the date shown

Date	No. of managers on system	Total no. of schedules established	No. of templates complete	No. of templates due	No. of templates late
June 2020	46	1,023	922	96	5
January 2021	69	1,358	1,265	0	93
April 2021	86	2,984	1,394	1,448	142
September 2021	95	4,252	3,639	163	450
November 2021	103	4,551	3,732	208	611
February 2022	107	4,995	3,863	439	693
May 2022	114	7,326	4,089	2,215	1,022
September 2022	113	7,102	6,360	53	744
November 2022	115	6,884	6,411	15	458
February 2023	114	7,147	6,508	264	363
May 2023	114	9,584	6,869	2,344	371
July 2023	113	9,706	7,751	1,603	352
November 2023	115	9,792	9,418	15	359
February 2024	116	10,357	9,630	262	465
July 2024	118	13,154	11,344	1,571	239
November 2024	120	13,319	12,952	54	313
February 2025	120	13,633	13,011	319	303
July 2025	120	16,320	14,649	1,451	210
November 2025	122	16,457	16,209	55	193

Scheme Advisory Board Secretariat

Local Government Association, 18 Smith Square, Westminster, London SW1P 3HZ
 E SABSecretariat@local.gov.uk W www.lgpsboard.org

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Totals (non-cumulative) for each financial year

Date	No. of managers with schedules	Total no. of schedules established	No. of templates complete	No. of templates due	No. of templates late
2019/20 Change from July 2025	77 Down 1	1,438 No change	1,419 Up 1	0 No change	19 Down 1
2020/21 Change from July 2025	103 No change	2,671 No change	2,652 Up 1	0 No change	19 Down 1
2021/22 Change from July 2025	109 Down 1	2,917 Up 1	2,875 Up 1	0 No change	42 No change
2022/23 Change from July 2025	109 No change	3,067 No change	3,042 Up 2	0 No change	26 Down 2
2023/24 Change from July 2025	105 Down 4	3,097 No change	3,064 Up 12	0 No change	33 Down 12
2024/25 Change from July 2025	107 Down 3	3,152 Up 32	3,106 Up 1,492	0 Down 1,451	46 Down 9

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Local Government Association, 18 Smith Square, Westminster, London SW1P 3HZ
E SABSecretariat@local.gov.uk **W** www.lgpsboard.org

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Item 6 – Paper C

Code of Transparency (CoT) Project Update

Background

1. The Board is currently working with the [National LGPS Frameworks team](#) to replace the current centrally procured CoT data system with a framework approach. It is expected that the new framework will offer basic data collection and validation, with an option to add on benchmarking services for an additional fee. Since the last Committee meeting, the Founders' group has had four further project meetings, and a market engagement session was held at the LGA offices on 13 August 2025.
2. As part of wider plans to continue moving forward with the Code of Transparency, the Code itself has been reviewed, and a final draft of the Code plus updated FAQs has been circulated confidentially. Annex C highlights the key changes and includes the proposed revised Code while Annex D contains the revised FAQs, for the Committee's final comments before Board approval is sought at its next meeting.

Considerations

3. The Founder's group met on 8 July 2025, 9 September 2025, 2 October 2025 and 13 October 2025 and has extensively discussed the structure of the new framework and the planned procurement. Additionally, a market engagement session was held on 13 August 2025 which was attended by 8 potential suppliers, some of whom have provided feedback on the draft specification for the framework. The specification and the quality questions for the framework remain under development, however it is expected that the procurement process will open in December 2025/January 2026 with an aim for the framework to go live in April 2026. The contract for the existing system ends in August 2026.
4. The Secretariat have also held discussions with pools to determine potential interest in the use of the framework, which have been positive. Discussions have also been held with officials from the Ministry of Housing, Communities and Local Government (MHCLG) to discuss aligning efforts to continue driving best practice in relation to the management of investment costs. These discussions will continue as statutory guidance for the Investment Regulations is revised as part of the Fit for the Future proposals.

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5. The timetable for the Framework project can be found at Annex A.
6. The LGPS Code of Transparency has also been reviewed as stated at the last meeting, following on from the conclusion of the Board's consultation in the Summer (14 July – 15 August 2025). We consulted administering authorities and Code signatories (including the LGPS investment pools); 36 responses were received and 100% of the Code signatories that responded indicated that they would remain committed to the Code. The responses have been reviewed and the final draft of the Code, along with a summary of the changes and a draft revised copy of the FAQs accompanying the Code, have been circulated to the Committee confidentially at Annex C ahead of the meeting. The project plan for revision of the Code has been revised to reflect current progress and updated timelines and can be found at Annex B.
7. The Committee is asked to review the final draft of the Code (Annex C – CONFIDENTIAL) and updated FAQs (Annex D – CONFIDENTIAL) with a recommendation to flag any areas for further consideration and subsequently submit a final draft to the Board for approval at its November meeting.

Recommendation: That this Committee reviews the final draft of the revised Code of Transparency at Annex C and updated FAQs at Annex D recommends its approval for publication to the Board at the November 2025 meeting highlighting any final areas for review.

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ANNEX A – CODE OF TRANSPARENCY FRAMEWORK PROJECT TIMETABLE

The timetable below sets out the updated key decision points and proposed timescales. The timetable for the project will remain agile to respond to developments as they emerge.

Project stage	Current timeline and proposed future timescales	Required input	Progress
Byhiras contract extension and novation	December 2023 - April 2024	Secretariat to write formal notification of contract extension to Byhiras	COMPLETE
CoT system working group	January - February 2024	Members to be selected, Secretariat to arrange meetings and collate findings	COMPLETE
Market engagement prep	February – April 2024	LGA Procurement team to assist with shaping of early market engagement questions	COMPLETE
Early market engagement	24 June – 6 August 2024	Secretariat to schedule meetings with providers and collate feedback to present case to Board	COMPLETE
Survey of funds based on early market engagement findings	9 September – 27 September 2024	Secretariat to devise and issue survey using Survey Monkey	COMPLETE
CoT system working group final meeting	w/c 7 October 2024	Feedback on survey results	COMPLETE
Board executive panel recommendation	w/c 21 October 2024	Send updates/information pack pre meeting	COMPLETE
Update Investment Committee	11 November 2024	Secretariat to update the Investment Committee on the	COMPLETE

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Project stage	Current timeline and proposed future timescales	Required input	Progress
		project and the recommendation being made by the panel	
Board final decision	25 November 2024	Secretariat present paper to Board and invite final decision on future of the system. The final decision will be made by the Board on recommendation from an executive panel comprised of members from the Board.	COMPLETE
Ministerial Budget submission for 2025/26	November 2024	Start-up costs for framework development approved by Minister	COMPLETE
Framework development scoping conversations	December 2024 – April 2025	Various – Secretariat, National LGPS Team, fund officers (volunteers as Framework Founders)	COMPLETE
Framework development	April 2025 – April 2026	Various – Secretariat, National LGPS Team, fund officers (volunteers as Framework Founders)	IN PROGRESS
Framework launch and transition from Byhiras system	April 2026 – August 2026	Various – Secretariat, National LGPS Team, fund officers (volunteers as Framework Founders), fund officers (system users to retrieve	

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Project stage	Current timeline and proposed future timescales	Required input	Progress
		data from Byhiras), Byhiras (to support transitional arrangements and comms)	
Byhiras contract end	30 August 2026		

*Rows in grey indicate stages that have been completed.

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ANNEX B – LGPS CODE OF TRANSPARENCY REVIEW PROJECT TIMETABLE

Project timetable

The timetable below sets out the updated key decision points and proposed timescales. The timetable for the project will remain agile to respond to developments as they emerge.

Project stage	Proposed timescale	Required input	PROGRESS
Initial review of Code	May – June 2025	Secretariat to make initial comments and tracked changes on current Code document	COMPLETE
Present at Founder Meeting 2	13 June 2025	NLGPS Founders asked for feedback on draft.	COMPLETE
Update Investment Committee	7 July 2025	Present early draft to Committee, invite feedback	COMPLETE
Consultation with asset owners and Code signatories	14 July – 15 August 2025	Email to stakeholders, collate and review feedback. Update to given to the Board at July meeting (21 st July 2025)	IN PROGRESS
Review responses	w/c 15 – 22 August 2025	Secretariat to review comments and make tracked changes if needed.	COMPLETE
Present at Founders Meeting 4	w/c 8 September 2025	High level overview of consultation responses and any changes that will be made. Present final draft. Feedback limited to areas of significant issue	COMPLETE – the draft was sent via correspondence to the Founder's Group on 7 October 2025. This enabled the group to discuss priority issues more closely related to the framework procurement at its meetings. The Secretariat utilised the additional time to review the

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			responses and further consider the changes needed and alignment with the Framework project.
Send final draft to Investment Committee with recommendation	w/c 22 September 2025	Send final draft to Committee by correspondence with recommendation that it is passed to the Board for approval	COMPLETE – the final draft was circulated via correspondence on 30 October 2025.
Send final draft to Board for approval	w/c 6 October 2025	Send final draft to the Board and request approval	
Publish new Code of Transparency	w/c 13/20 October 2025, comms rollout in following weeks	Publish on Board website, follow comms programme to raise awareness of new Code i.e. emails to stakeholders, LinkedIn, monthly bulletin, DG magazine, LGPS Live SAB update.	

*Rows in grey indicate stages that have been completed.

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Item 7 – Paper D

New Pooling Steering Group

Background

1. [The Government's response to the Fit for the Future consultation](#) and incoming [Pension Schemes Bill](#) have confirmed the changes to be made in the way assets are pooled and managed in the LGPS. These changes represent a major change in the Scheme's operating model, and the Board agreed at its last meeting that we need to consider its own arrangements to reflect the changing role(s) in order that the Board can continue to fulfil its statutory duties.
2. In particular, the Secretariat were asked to consider the ways that the relationship between the Board, its sub-committees and groups and the pools could develop a closer formalised link to facilitate discussions and collaborative thinking on key topics and issues as they arise.

Considerations

3. To enable the Board and its Committees to engage in a more comprehensive and systematic way with the pools, the Secretariat is proposing to establish a new Pooling Steering Group. This group would report directly to the Investment Committee and through them to the Board, in a similar fashion to the Responsible Investment Advisory Group. However, the group will differ in that it will not operate as an advisory group and will instead provide a forum for collaborative discussions, including provision for input from the Board as well as from scheme member and employer representatives.
4. It is envisioned that the membership of this Group will include the Board Chair, company representatives from each asset pool, representatives from the relevant Board sub-committees, scheme member representatives and an official from the Ministry for Housing, Communities and Local Government. Also included in the proposed membership group is a special interest representative, which the Secretariat envision being a governance consultant, and a wider industry representative which remains open for discussion. The Secretariat also proposes the inclusion of a representative from this group on the Responsible Investment Advisory Group (RIAG). This is to reflect that while each fund will continue to set its own responsible investment policy, the implementation of it will fall to pools.

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5. A draft Terms of Reference (Annex A) has been circulated to the Committee confidentially pending approval by the Board at its next meeting on 24 November 2025.

Recommendation: That the Committee consider this report and submit the draft Terms of Reference to the Board for approval at its next meeting on 24 November 2025.

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Item 8 – Paper E

Pension Schemes Bill – local investment

Background:

1. The [Government response to the Fit for the Future consultation](#) confirmed that all LGPS administering authorities (AAs) need to set a strategy and investment target in relation to local investment.
2. The Government is also in the process of establishing strategic authorities across England under the Devolution agenda. Clause 2 of the [Pension Schemes Bill](#) (PSB) would in addition require LGPS administering authorities to “co-operate with the strategic authorities to identify and develop appropriate investment opportunities”.
3. The Government’s response to the consultation used an alternative formulation for local investment obligations, saying that LGPS AAs should “have regard to” the strategic authority’s growth plan in setting out their policy on local growth in their investment strategies.
4. The PSB defines local investments as “investments in, or for the benefit of persons living or working in the scheme manager’s area, or the areas of the other scheme managers participating in the same asset pool company as the scheme manager”. However, the Minister [said at Committee stage](#) that this definition is not to be interpreted too narrowly and should not “prevent investments that straddle boundaries—for example, investments in transport and infrastructure that would benefit people living in both Wales and neighbouring English counties”.
5. In the Fit for the Future consultation response, a link was drawn between local and impact investing, with the definition being “broadly local or regional to the AA or pool. It should have some quantifiable external benefits to the area in question, including economic growth, environmental benefits or positive social impacts”.
6. AAs will also need to report on levels of investment and the associated impact, although we understand from the consultation response that the Ministry of Housing, Communities and Local Government (MHCLG) will not be too prescriptive as to how impact should be reported. However, changes are planned to the Board’s annual report guidance to help AAs with this. Because of this, the Committee is asked to consider whether any best practice guidance from the Board would be helpful.
7. The Good Economy have recently published a report entitled “[Scaling-Up Local Investing for Place-Based Impact: A Strategic Framework and Guidance for LGPS](#)”. In that report, which had input from all of the pools (except Access) and several funds, they recommend the establishment of a common impact reporting standard for local

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investments. This would be intended “to ensure consistency, comparability and transparency of impact reporting – and stakeholder accountability for the local economic, social and environmental impact of local investing”.

Issues for the Committee

8. The views of the Committee are invited on the most appropriate ask of AAs in relation to the new strategic authorities - specifically whether we need to seek clarification of what “co-operation” with strategic authorities means in this context.
9. The Secretariat are cautious about a statutory requirement for AAs to “develop” local growth proposals with strategic authorities. This might be clearer once we see draft guidance, but potentially it creates a risk of a conflict of interest when decisions need to be taken on whether it to invest in those proposals. This is only partially mitigated by the pool company doing the due diligence in respect of the proposal, given the close connection between them.
10. There is also a question of how AAs or pools will in practice engage with the new strategic bodies or mayors. This could be particularly challenging when partner funds in a pool straddle a large number of different strategic authorities, possibly with different levels of sophistication or capacity in developing projects, and there is competition for the AA/pool’s attention and engagement with proposals.
11. Guidance will also be key around the degree to which pools have discretion to apply less or more strenuous financial criteria in some areas than in others. It could be because different AAs may legitimately take different approaches on investment criteria which are more subjective, like member support or risk appetite. The Board has also been clear that there needs to be some recognition that AAs will have to apply their political antennae in relation to proposals which evince strong local opinions (positive or negative).
12. The Secretariat believes that there is merit in adopting a common reporting standard for local investments (or at least in having a stated aspiration to do so over time). If the Committee agrees, we can advance this position with MHCLG and also start work on how we could devise and agree such a standard.
13. We invite any other comments or observations that Committee members have on the local investment proposals or would like the Board to include in its briefings on the Pension Schemes Bill on this point.

Recommendation

That the Committee discusses the points raised above.

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Item 9 – Paper F

Responsible Investment Advisory Group (RIAG) report

Report from last meeting on 6 October 2025

1. Oliver Watson (OW) from Ministry for Housing, Communities and Local Government (MHCLG) explained that the Government will in due course be consulting on revised Investment Strategy Statement and Pooling Governance Guidance, in line with the Fit for the Future consultation response. Draft investment regulations are also expected to be consulted on later in the calendar year. The group asked about the [Climate Related Transition Plans Requirements consultation](#) issued by the Department for Energy Security and Net Zero which closed on 18 September 2025. OW explained that the consultation made high level references to the Local Government Pension Scheme (LGPS) but confirmed that there were no timelines yet for a Government response or for a further consultation on climate reporting to be issued. However, it is still expected that climate related requirements in the LGPS will be developed separately to the private sector.
2. The group agreed that engagement with stakeholders on responsible investment policy was difficult to navigate, and the Board's offer of guidance would be useful. Any guidance should focus on how to evidence that decisions were properly informed, and case studies would be useful. It was largely thought that large-scale engagement with scheme members was not common, but more funds are now actively considering how best to undertake this type of engagement, including the use of surveys. How best to engage with scheme members had been discussed within many of the funds represented in the group but there was a concern about how representative the results truly were. Guidance on methodology and the framing of questions would be useful to ensure they are not leading towards getting a certain response. Given the clear statements in the [recent legal advice from Nigel Giffin KC](#), it seems likely that most funds will want to engage with scheme members and other stakeholders about their use of non-financial factors in the future.
3. It was agreed that the Secretariat reflect on this feedback to consider what type of practical guidance is needed and come back with some proposals to review at a future meeting.
4. An overview of the letter and position paper that was received by numerous funds from the Palestine Solidarity Campaign (PSC), as well as the subsequent statements made by the Board, was discussed. It was not

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expected that the Minister would make statement on whether the Government has a view on these matters.

5. The Pension Schemes Bill's progress through Parliament was discussed. It had just completed the Committee stage in the House of Commons. The Bill includes statutory requirements for local investment in the LGPS and requires LGPS AAs to "co-operate with the strategic authorities to identify and develop appropriate investment opportunities". The group were asked for their thoughts on the local investment proposals and any points they would like the Board to include in its briefings on the Pension Schemes Bill.
6. The group generally agreed that common reporting guidelines on local investment would be useful however this shouldn't be overly prescriptive, as this could hinder innovation. It was noted that there are parallels with the Cost Transparency Initiative and it would be useful to develop a similar mechanism. [The Good Economy's White Paper, Scaling-Up Local Investing for Place-Based Impact was flagged as a good resource](#) and the measurement of outputs and impact would be useful but there was a need to be realistic about what could be achieved. The group discussed that standardised reporting should include funds and pools however it should be noted that not all local investment will be impact based, and any reporting standards needed to take account of this. It was agreed that the Secretariat would bring a paper with areas to consider when developing practical guidance to a future RIAG meeting.
7. The expectations on funds and pools to co-operate with strategic authorities and to identify and develop opportunities was discussed. The group had questions about how this could work in practice, and it was acknowledged that relationships would take significant time and effort to develop.
8. The International Court of Justice (ICJ) Advisory Opinion on Climate Change which was published on 23 July 2025 and group agreed to readdress the topic at the next meeting on 1 December 2025.
9. The Board's establishment of a new Pooling Steering Group was discussed under Any Other Business. The group's aim is to enable the Board to have a more formal link with the pools. A draft Terms of Reference (ToR) had been drawn up and further consideration would be given to a representative from RIAG.
10. The date of the next RIAG meeting was confirmed as 1 December 2025.

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Hybrid Meeting – 10 November 2025

Item 11 Paper G

Committee Workplan

Background

1. The Terms of Reference for this Committee state that a workplan must be developed and submitted for approval to the Board on an annual basis. The workplan is required to be flexible as the Committee will need to respond to matters as they arise, but this paper gives an overview of the key workstreams associated with the Committee in 2026.

Investment Committee Draft Workplan

Workstream	Details	Action for next Committee	Timescales
Code of Transparency	<p>The Committee previously agreed to:</p> <ul style="list-style-type: none">• Work with the National LGPS Framework team to develop a framework for funds to procure investment cost data monitoring and benchmarking services• Revise Code to launch alongside the framework <p>This work remains ongoing and will continue into 2026</p>	See Item 7	<p>New framework projected to launch in April 2026.</p> <p>Revised Code to be taken to the Board for approval on 24 November 2025.</p>

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Workstream	Details	Action for next Committee	Timescales
Fit for the Future consultation	<p>Work with the Ministry of Housing Communities and Local Government (MHCLG) to ensure the draft Bill is implementable by funds and pools, minimising the risk of unintended consequences.</p> <p>Establish a closer, formalised link between the pools and the Board</p> <p>Support the development of guidance needed for the implementation of reforms.</p>	See Items 4, 7, 8 and 9	<p>Bill currently going through Parliament, Royal Assent being sought for March 2026.</p> <p>Consultation on draft guidance expected in the new year.</p> <p>New pooling arrangements in place from 1 April 2026.</p> <p>Proposal for new Pooling Steering Group put to Board in November 2025. First meeting in (early 2026 pending Board approval).</p>
Fiduciary duty advice	<p>The Committee agreed to:</p> <ul style="list-style-type: none"> Seek legal opinion with follow up questions on fiduciary duty and conflicts of interest. These opinions have been published and can be found on the Board website. 	See Item 10	Proposals to be sent to the Board for approval on 24 November 2025

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Workstream	Details	Action for next Committee	Timescales
Responsible investment (RI)	<p>Committee agenda informed by RIAG.</p> <p>The Group have discussed how Fit for the Future proposals interact with RI policies and fund requirements.</p> <p>Group have agreed to develop practical guidance for setting RI policy and explore whether a common standard for local investing reporting can be identified for the Scheme.</p> <p>At some point we expect climate risk reporting regulations and requirement for transition plans to be implemented for LGPS</p>	<p>Continue discussions at RIAG meetings.</p> <p>Proposal on reporting guidance to be taken to future meeting and provide update to the Committee in the next RIAG Report</p>	<p>Bill currently going through Parliament Royal Assent being sought for March 2026.</p> <p>Consultation on draft guidance expected in the new year.</p>

Recommendation

For the Committee to submit the workplan to the Board for approval.
