

Investment Committee

Hybrid Meeting – 10 November 2025

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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