

Investment Committee

Hybrid Meeting – 10 November 2025

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.