

**Scheme Advisory Board (SAB) meeting**  
**23 March 2026, 1.30pm to 3.30pm**  
**Beecham Room, 18 Smith Square, London**  
**and Microsoft Teams**



## **Paper H: Compliance and Reporting Committee (CRC) update**

### **Key points to note**

This paper summarises the work undertaken by the CRC, its working groups and the next steps for the CRC workplan when the Government's Fit for the Future regulations and guidance are introduced. It also includes an update on the fund annual report guidance. The Board Secretariat wants to thank all volunteers within each CRC workstream for their continued input into each project.

### **Recommendation**

That the Board notes this update and agrees the following:

- the project governance proposal for the peer support pilot
- the CRC's workplan and secretariat's proposal for post Fit for the Future workplan.

### **Working groups summary**

#### **Audit**

The main aim of this working group is to feed into the policy work for the proposed changes to the decoupling of the pension fund accounts, to discuss general audit issues and set the agenda for the Audit Roundtable meeting. The working group last met in September 2025 and received an update from Ministry for Housing, Communities and Local Government (MHCLG) officials on the emerging proposal to decouple pension fund accounts from local authority accounts, but no further engagement has taken place. The Audit Roundtable group met on 7 November 2025. No further meetings have been organised until more information is available, the secretariat is following the [English Devolution and Community Empowerment Bill](#) timetable which is the legislative vehicle for the decoupling of accounts.

#### **Knowledge and understanding**

In December 2025, the group were provided with an advance draft of the draft governance regulations and knowledge and understand guidance associated with Fit

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for the Future. The group were asked to provide comments on the contents of the drafts.

## **Good Governance**

The group met on 16 February 2026 and officials from MHCLG provided an update on the progress to date reviewing the consultation responses on both the draft regulations and draft guidance in relation to the governance proposals within Fit for the Future.

## **Peer support project**

The CRC noted the update on this project when it met in March 2026. Since receiving Board approval in November 2025, the peer support pilot has moved into the development phase and the secretariat has drafted a framework, prepared various guidance documents for peers and funds and identified the suite of documentation and administration procedures needed for a peer support event. In January 2026, the peer support working group met and endorsed progress to date, recommending improved navigation within the draft framework, and agreed that final drafting timetable should align with forthcoming new Fit for the Future regulations and guidance (when available).

The secretariat has increased communication activity around peer support including setting up a [dedicated website page](#), a presentation at the LGPS Governance Conference and is receiving growing interest from funds.

The secretariat team have been working with Camden Pension Fund who have expressed interest in the pilot. A timetable for the pilot event is currently being arranged, with the pilot expected to take place in Summer 2026. Training for a cohort of volunteer peers is expected to take place in May 2026.

## **Peer support pilot delivery model**

The secretariat met with the LGA colleagues in February 2026 to determine what support can be provided to the pilot, such as training for the peers and allocating a peer manager for the event.

Various alternative delivery models are being considered by the secretariat for facilitating the peer support pilots. The original plan was to deliver the pilots using LGA's experienced improvement team managers; however, the internal team

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responsible for coordinating this work cannot confirm their availability due to the ongoing LGA restructure consultation, which is expected to run until 19 March 2026 (covered under item 5).

As a result, alternative delivery options such as appointing an external associate to support facilitation are being explored. While this is likely to increase costs, this is considered necessary to maintain momentum and provide certainty for the pilot timetable. However, it is expected that the budget the secretariat allocated for the pilot (and then subsequently agreed by the Board) is still appropriate and does not need to change.

### **Project governance**

Work is expected to continue at pace to deliver the peer support pilot with the intention to keep the Board updated at each meeting, rather than seek formal approval at each individual stage. This reflects the need for a more flexible decision-making process that is not dependent on the full CRC and Board meeting timetable. The aim is to ensure the pilots can progress at pace, with appropriate oversight and clear escalation routes.

The secretariat asks the Board to agree the proposal below for project governance during the pilot phase as much of the preparation for the first pilot event will need to take place before the Board next meets, establishing governance parameters at this stage will support timely delivery. This governance model is proposed:

- The secretariat will act as the operational lead for the pilot, taking day-to-day decisions, managing logistics, coordinating with participating funds and peers and agreeing documentation
- The working group supports delivery providing subject-matter expertise and supports progress by shaping materials, offering technical insight, and ensuring well-developed recommendations are brought forward for formal consideration
- The Board Chair (or vice-chair) will provide strategic oversight and will take significant decisions that fall outside the secretariat's remit but do not require full Board approval. This will allow timely resolution of issues that may arise between meetings
- The CRC will retain oversight of the project's strategic direction and any policy documents and material changes to scope and documentation. Updates will be provided at each scheduled meeting.

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**Annex A** outlines the key milestones which have occurred and are planned for the delivery of pilot 1. These are based on our understanding of the project to date and learning from LGA colleagues on similar projects.

### **CRC workplan following Fit for the Future**

The CRC workplan for 2026 was submitted to the Board and approved on 24 November 2025. It was previously envisaged that all working groups were expected to conclude by March 2026, apart from peer support. However, it is expected that further work is required beyond this point, to not only discuss the delivery and implementation of the Fit for the Future regulations and guidance but also determine whether administering authorities (AAs) require additional support.

Whilst implementation remains targeted for 1 April 2026, (at the time of drafting this report) there is still no firm date on Royal Assent for the Pensions Bill, this could mean a delay in secondary legislation and relevant guidance being available for AAs. The secretariat has been working closely with MHCLG officials to understand priorities and some of the contingencies around the passage of the Bill and drafting of the necessary regulatory amendments. The secretariat proposes that the working groups in the CRC should continue as currently set-up to help support a smooth implementation of Fit for the Future proposals, monitor new arrangements and produce additional guidance, as required.

Looking ahead, the Board intends to work with MHCLG to develop a detailed and deliverable LGPS roadmap, including drafting supplementary guidance for areas either not covered in the final publications or areas which AAs require more detail.

The CRC's workplan is at **annex B** and the Board are asked to agree that the working groups continue and monitor the implementation of the new arrangements and determine whether AAs require additional support. The secretariat believes the following areas may need further support for AAs:

- Guidance on creating the Governance Strategy, Training Strategy and Conflicts of Interest policy (similar to the Board's previously issued Funding Strategy Statement (FSS) guidance)
- How funds deal with reporting of breaches specific to the scheme to the Pensions Regulator (TPR), including specifically breach recording, materiality assessing and reporting
- How the Independent Governance Review fits with the Board's peer support offer
- Monitor the implementation of the independent person role, including

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understanding challenges and best practice examples of introducing this role to be shared across LGPS.

- Monitor the implementation of Senior LGPS officer role and the changing role of the pools, including understanding challenges and best practice. And whether existing communication channels support communication between the board, Senior LGPS Officer and the pools (including the Board's new pooling steering group) or whether any new communication channels are needed.

### **Annual report guidance**

The Board issued updated annual report guidance in March 2024 jointly approved by the Board, the Chartered Institute of Public Finance and Accountancy (CIPFA) and MHCLG. The guidance applied from the 2023/24 reporting year and was intended to be kept under review, with further revisions anticipated once MHCLG confirmed the additional reporting requirements arising from the Fit for the Future proposals.

Due to the final overriding legislation and guidance not being available yet, updating the guidance and sharing with the CRC when it met in March 2026 was not possible.

The additional reporting requirements are being identified by MHCLG and the Board is asked to note that updated guidance will be brought to the next meeting to apply to 2026/27 fund Annual Reports.

### **Scheme Annual Report 2024-2025**

As of 11 March 2026, 84 out of 87 annual reports have been published online, the remaining three funds have been contacted by the Secretariat to request a copy of their report. 75 fund annual reports were published by the 1 December 2025 statutory deadline. A breakdown of the status of the 84 annual reports can be found below:

Final	Draft
52	32

## Annex A- Key milestones of the delivery of pilot 1

This milestone plan provides a high-level overview of the key stages involved in delivering the peer support pilot, including planning and coordination as the project moves from development into implementation.

**Stage 1: Initiation and Scoping Discovery:** (November 2024 – March 2025)

**Stage 2: Design and development:** (April 2025 – September 2025)

**Stage 3: Approval and mobilisation:** (July 2025 – November 2025)

**Stage 4: Pilot preparation:** (December 2025 – March 2026)

**Stage 5: Delivery and testing:** (May 2026 – August 2026)

**Stage 6: Evaluation and learning:** (September 2026 – November 2026)

Project stage	Focus	Tasks	Milestone/Approval
1 <b>Initiation and Scoping Discovery</b> November 2024 – March 2025	<p>Meet and set up project plan</p> <p>Meet with LGA peer review team for advice/support</p> <p>Prep for CRC Meeting</p> <p>Meet with MHCLG to discuss proposal</p>	<p>Pensions Policy and Support Officer and Board Support and Policy Officer to meet and set up project plan for the peer support officer.</p> <p>Secretariat to meet with LGA to discuss LGA peer review process.</p> <p>Pensions Policy Support Officer to make any amendments to project proposal following meet.</p> <p>Draft the working group Terms of Reference (ToR)</p> <p>Draft CRC report, draft project ToR and high-level project plan for CRC meeting.</p>	<p><b>Approval:</b></p> <p>Working group ToR, peer support ToR, high level project plan completed and approved by CRC.</p> <p><b>Milestone:</b></p> <p>LGA peer support process outlined by LGA.</p> <p>Peer support process defined from IGR.</p> <p>Volunteers for working group recruited.</p>

			<p>Secretariat to send comms in January bulletin inviting funds interested to register interest in joining a working group</p> <p>Secretariat to meet with MHCLG to discuss the project proposal.</p>	
2	<p><b>Design and development</b> April 2025 – September 2025</p>	<p>Decision at Board meeting with SAB managers</p> <p>Organise working group meetings dates</p> <p>LGA peer challenge shadowing</p>	<p>Papers taken to the Board similar to CRC,</p> <p>Secretariat to shadow LGA peer challenge for better understanding of the process</p> <p>Discussion with managers around costs Pensions Policy and Support officer to arrange meetings with volunteered funds and other stakeholders</p> <p>Pensions policy and support officer to schedule regular meetings with all and separate meetings with stakeholders for updates</p> <p>Secretariat to meet regularly for updates on project.</p>	<p><b>Milestone:</b> Peer support project update provided.</p> <p>Working group met 3x over 5 months.</p> <p>Board Policy Officer and Pension Policy and Support shadowed two different LGA peer challenges.</p>
3	<p><b>Drafting of pilot proposal and approval</b> (July 2025 – November 2025)</p>	<p>Draft LGPS peer support framework and available in time for CRC and Board</p>	<p>Draft framework and project proposal presented to working group, CRC and Board for approval.</p>	<p><b>Approval:</b> Framework models approved at CRC.</p> <p>Pilot proposal and budget</p>

		Project proposal which includes consideration of budget and other constraints to be delivered to the Board for decision		approved by the Board.
4	<b>Pilot preparation</b> (December 2025 – March 2026)	Commence pilot scoping	<p>Initial meeting with pilot fund</p> <p>Draft framework shared with working group, LGA colleagues and host fund</p> <p>Drafting and developing key project documents, such as peer and fund guidance note, peer induction pack, timetable, peer charter, peer database, email templates of information</p> <p>Identifying and considering additional pensions specific documentation that may be required pilot such as Insurance policy, whistle blowing policy, expenses policy, expression of Interest, form for peers, terms and conditions for peers and funds,</p> <p>Draft project governance structures and updated key milestones</p> <p>Identify LGA support</p> <p>Secure training for</p>	<p><b>Milestone:</b></p> <p>Meeting with pilot fund completed</p> <p>Framework draft completed and feedback received from LGA colleagues, working group and pilot fund</p> <p>Training organised</p> <p>Pilot dates finalised</p> <p>Project update to Board and CRC</p>

			peers, Confirm pilot peer team Final scoping meeting with fund Meeting with LGA facilitator Finalise pilot dates with fund Create budget and expenses tracker Identify secretariat support Project update to CRC & Board	
5	<b>Delivery and testing: (May 2026 – August 2026)</b>	Pilot delivery, evaluation and next steps	Training for peers, Finalising final steps with pilot fund Pilot exercise Feedback to Board Reflecting on pilot findings	To be confirmed
6	<b>Evaluation and learning: (September 2026 – November 2026)</b>		Update to working group Project update to CRC Project update to Board	To be confirmed

## Annex B – Compliance and reporting committee workplan 2026

Workstream	Details	Timescale
Audit issues	<p>To share views of administering authorities and scheme employers and input expertise to government to assist in shaping the proposal and implementation for decoupling the pension fund accounts from the main administering authority accounts</p> <p>To recommend agenda items for the Audit Roundtable meetings.</p>	Target completion date to be confirmed
Knowledge and understanding	To feed views and expertise into updated knowledge and understanding statutory guidance and assist the Board when developing guidance for creating a Training Strategy	<p>Draft statutory guidance consulted on in December 2026</p> <p>Guidance on the creation of supplemental knowledge and understanding guidance and Training Strategy guidance, to be confirmed once governance guidance completed.</p>
Good Governance	To input into the updates required to governance statutory guidance	New guidance to be ready for April 2026 implementation date
Peer Support	To scope out the feasibility of creating a LGPS peer support offer and delivery peer support pilot events.	Ongoing.
Local pension board support and guidance	To strength the support, networking and learning opportunities for local pension board (LPB) members	To be confirmed