

LGPC Bulletin 270 – November 2025

This bulletin contains updates for all LGPS stakeholders. It includes important articles on:

- [Fit for the Future – technical consultation](#) (England and Wales only)
- [LGA and LGPC response to consultation on changes to LGPS Scotland](#)
- [TPR publish revised data quality guidance](#)
- [Deputy Pensions Ombudsman clarifies ‘transfer credits condition’](#)
- [AVCs template MoU and guidance notes](#).

If you have any comments or articles for future bulletins, please contact query.lgps@local.gov.uk.

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LGPS England & Wales

Fit for Future – technical consultation

MHCLG launched the ‘Fit for the Future – technical consultation’ on 20 November 2025. The consultation runs for six weeks and closes on 2 January 2026.

It seeks views on two draft statutory instruments:

- LGPS (Pooling, Management and Investment of Funds) Regulations 2026
- LGPS (Amendment) Regulations 2026.

The aim is to confirm whether these instruments deliver the policy proposals set out in the earlier ‘Fit for the Future’ consultation. We covered this in bulletins [257](#), [259](#), [264](#) and [265](#).

The LGPS (Pooling, Management and Investment of Funds) Regulations 2026 will replace the LGPS (Management and Investment of Funds) Regulations 2016 and give legal effect to proposals in the pooling and local investment chapters of the consultation.

The LGPS (Amendment) Regulations 2026 will amend the LGPS Regulations 2013 and implement the governance proposals from the consultation.

Both sets of regulations will be supported by guidance.

MHCLG intends the final regulations to come into force on 1 April 2026, subject to the timing of the Pension Schemes Bill through Parliament.

We will respond to the technical consultation before the closing date.

You can read the consultation documents on the [Scheme consultations](#) page of www.lgpsregs.org.

LGPS Scotland

LGA and LGPC response to consultation

We have published the joint response from the LGA and LGPC to the consultation on proposed changes to the LGPS Scotland. The response was published on 18 November 2025 and is available alongside the consultation documents on the [Scheme consultations](#) page of www.scotlgpsregs.org.

The consultation ran from 2 September to 25 November 2025 and sought views on the draft LGPS (Scotland) (Amendment) Regulations 2026.

The response broadly supports the proposed changes but raises several technical issues. It calls for clarity on timings and transitional arrangements and, in some areas, recommends delayed implementation and additional guidance.

Scottish LGPS Advisory Board

Summary of investments responses published

On 6 November 2025, the Board published a [summary of responses](#) from all 11 Scottish administering authorities. The summary sets out current and planned investments in Scottish infrastructure projects and Scottish equities.

The publication followed a request from Scottish Ministers. In response, the Board asked authorities to provide information on:

- the amount and proportion of assets invested in Scottish equities
- the amount and proportion of assets invested in Scottish infrastructure.

TPR

Enforcement strategy consultation – LGA / LGPC response

On 11 November 2025, we published a response on behalf of the LGA and LGPC to TPR's consultation on its proposed enforcement strategy.

The response broadly supports TPR's approach, welcoming its agile, risk-based and preventative framework. However, it calls for greater transparency in enforcement decision-making and clearer success metrics to measure effectiveness.

TPR ran the consultation from 16 September to 11 November 2025. We previously covered this in [bulletin 268](#).

You can find all consultation documents, including the LGA and LGPC response, on the:

- [non-scheme consultations](#) page of www.lgpsregs.org
- [non-scheme consultations](#) page of www.scotlgpsregs.org.

TPR publishes revised data quality guidance

The Pensions Regulator (TPR) has released [revised member data guidance](#), bringing all its data-related resources together in one place.

The revised guidance sets out clearer expectations for schemes and includes best practice examples to help improve data management capability. The guidance explains how:

- scheme managers are ultimately accountable for data quality, even if tasks are delegated to administrators
- scheme managers must ensure regular data assessments, review reports, and submit accurate data scores in their scheme return
- scheme managers should have a clear data management strategy, allocate resources for improvements, and challenge service providers where standards are not met.

The revised guidance follows TPR's [recent report on its regulatory initiative](#), which targeted schemes at risk of falling short on data quality standards. Through this initiative, TPR asked schemes to demonstrate compliance, encouraged improvements, and gathered insights to refine its communications and guidance. The key findings include:

- while most schemes have made progress on cleansing personal data for dashboards, value data, used to calculate benefits, is often overlooked
- improvement plans are frequently informal or fragmented, and trustee engagement ranges from proactive oversight to near-complete reliance on administrators
- controls and trustee focus vary widely. In many cases, administrators lead data assessments with limited trustee scrutiny.

TPR is now scrutinising the data preparations of the UK's largest schemes and will expand its engagement in 2026. Trustees and scheme managers need to be ready to demonstrate how they are maintaining their member data in line with legal requirements and TPR expectations. Schemes unable to demonstrate compliance may face formal intervention, including improvement notices.

Action for administering authorities

Review the revised data quality guidance.

TPR blog on pension scams

On 27 November 2025, TPR published [a blog about pension scams](#). The blog marks an important milestone: the fifth anniversary of TPR's 'Pledge to Combat Pension Scams'.

The blog also accompanies recent updates to the pledge and the launch of a new campaign. In the blog, TPR reviews the significant progress industry has made, what still needs to be done and the way ahead.

Other news and updates

Budget 2025

On 26 November 2025, Rachel Reeves, Chancellor of the Exchequer, delivered the [Budget 2025](#).

Points of interest for LGPS administering authorities include:

- **Salary sacrifice changes:** From 6 April 2029, the Government will limit the value of pension contributions made through salary sacrifice that can receive employee and employer national insurance contributions relief to £2,000 per year. The change will be implemented through primary and secondary legislation, which will be introduced in due course. [Guidance on this proposal](#) has been published by the Government.
- **Stamp duty land tax (SDLT) relief:** The Government will amend Stamp Duty Land Tax rules to provide for a time-limited SDLT exemption for transfers of real estate assets from LGPS member funds into qualifying pools. The aim is to facilitate compliance with the Government's pooling requirements. This will be legislated for in the Finance Bill 2026-27. We understand the relief will be available for 5 years from the date of implementation.
- **Inheritance tax:** The Budget document reaffirms the Government's intention to proceed with previously announced proposals to include certain unused pension funds and death benefits within the estate for inheritance tax (IHT) purposes for deaths after 5 April 2027. On the same day as the Budget, the Government also published a [policy paper on the proposals](#). This sets out that the Government will introduce a mechanism for personal representatives (PRs) to direct pension scheme administrators to withhold 50 per cent of taxable benefits for up to 15 months from the date of death, where the PRs expect IHT to be due.

Other pension-related announcements include:

- confirmation of next year's increase to the basic and new State Pension
- a commitment to maintain the triple lock for the duration of the current Parliament
- amendments to the rights of overseas residents to top up their State Pension by paying class 2 voluntary national insurance contributions
- measures to ease the administrative burden for pensioners whose sole income is the basic or new State Pension without increments, so they will not need to pay small amounts of tax via simple assessment from 2027–28, even if the State Pension exceeds the personal allowance.

PASA publishes new data quality guidance and a data improvement plan template

Following the publication of TPR's revised data quality guidance (see [earlier article](#)), the Pensions Administration Standards Association (PASA) published new data quality guidance and a data improvement plan template through its Data Working Group. These resources help pension schemes respond to TPR's revised member data guidance.

TPR's revised guidance asks schemes to check member data against six key dimensions: accuracy, completeness, consistency, timeliness, uniqueness and validity. PASA's guidance explores each dimension and provides practical detail on how schemes can assess and improve the quality of member data across these areas.

The accompanying data improvement plan template provides schemes with a structured framework to plan, document and deliver data improvement activity. It can be adapted to suit each scheme and helps trustees, administrators and advisers set up clear, auditable data improvement processes.

For more details, and links to the guidance, read [PASA's press release](#).

PASA Issues guidance on digital transformation

On 23 November 2025, PASA released the first part of a new three-part guidance series from its Digital Administration Working Group.

The publication 'Delivering Effective Digital Transformation' offers practical guidance for pension schemes embarking on, or progressing through, digital transformation. It outlines how schemes can establish the right frameworks, technologies and cultural mindset to ensure successful and sustainable digital change.

The next part of the series will be published in January 2026. It will provide actionable strategies and planning frameworks for delivering digital transformation, regardless of scheme size or digital maturity.

For more details and to access the full guidance, see [PASA's press release](#).

Deputy Ombudsman clarifies 'transfer credits condition'

On 30 September 2025, the Deputy Pensions Ombudsman ruled on [case CAS-78486-R8D8](#). The decision clarifies how the 'transfer credits condition' under the Pension Schemes Act 1993 should be interpreted.

The member transferred their defined benefit pension to a Small Self-Administered Scheme in 2015. The member argued that the transfer should not have occurred because they did not have a statutory right to transfer as they had no earnings from any source at the time, and therefore the 'transfer credits condition' was not met.

To be a statutory transfer, the receiving occupational pension scheme must use the cash equivalent transfer value to secure 'transfer credits', which are defined in the legislation as rights allowed to a member as an 'earner' under the rules of the receiving scheme.

The Deputy Ombudsman dismissed this argument, ruling that the condition was met. Her full reasoning is set out in paragraphs 59 to 76 of the decision. It is based on her interpretation that references to an 'earner' in this context refer to the benefits on transfer being limited to the type of rights an earner could acquire as a member of the scheme. It is not dependent on the individual's earning status.

The complainant's representatives referenced the 2016 case of [Hughes v Royal London](#). In this case the Court also considered the 'transfer credits condition', in particular, whether the member needed to be an earner from a sponsoring employer of the receiving scheme, or whether earnings from any source would suffice. The Court ruled that earnings from any source would meet the condition.

The Deputy Ombudsman's decision confirms that she is not bound to follow the assumed interpretation of the word 'earner' in the definition of 'transfer credits' in the Hughes case. She notes that the judge in that case also raised the possibility of interpreting the 'transfer credits condition' differently. In paragraph 26, the Judge suggested that the condition might refer to 'rights which have the character of rights which were allowed to persons who were earners but without requiring the individual applicant for a transfer of the cash equivalent to be himself or herself an earner.' However, as neither party supported this interpretation, the Judge did not rule on it.

Summary

This decision confirms that members transferring to an occupational pension scheme do not need to have earnings from any source to meet the 'transfer credits condition'. However, it is important to note that since 2021, transfers to occupational pension schemes must now establish an employment link to a sponsoring employer of the receiving scheme under the Occupational and Personal Pension Schemes (Conditions for Transfers) Regulations 2021.

We will update our technical guidance on transfers out to reflect this case.

CIPFA training – feedback needed

After a year's break, the Chartered Institute of Public Finance and Accountancy (CIPFA), working with Mercer, will resume its training programme in 2026.

The programme will extend to officers, committees, boards and pools. Sessions will focus on current issues and aim to complement our Fundamentals training. They will be delivered through a mix of online and face-to-face formats.

Given current changes to the landscape, CIPFA has launched [a survey to seek views from administering authorities and members](#) on the style and content of the training to ensure needs are met.

The survey closes on 9 January 2026. If you have any questions, email nicholas.harvey@cipfa.org.

HMRC

Newsletter 175

HMRC has published [newsletter 175](#), which includes the following updates:

- **Budget 2025:** A summary of the main pension-related announcements from the Budget.
- **Speculation about Budget changes:** HMRC asks schemes to remind members about the risks of early access to pensions. If schemes identify new schemes entering the market that offer access to pension savings in ways that raise concern, they should report them to pensions.compliance@hmrc.gov.uk.
- **'Check your pension protections' service:** The service has been renamed 'Check your pension protections and enhancements'. Individuals can now view all protections and enhancements online and submit amendments to some protections online.

- **Reporting QROPS transfers:** Later this year, the Managing Pension Schemes service will include a new feature allowing schemes to report transfers to a qualifying recognised overseas pension scheme (QROPS) to HMRC.
 - **Managing Pension Scheme service:** HMRC has published a [YouTube video on enrolling and migrating to the service](#).
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Pensions dashboards

AVCs template MOU and guidance notes

In November 2025, Jayne Wiberg emailed administering authorities confirming we have published a new Pensions Dashboards AVCs Template Memorandum of Understanding (MOU) along with explanatory notes. These documents were developed by Osborne Clarke, with support from the LGA and the AVCs METS group. Many thanks to everyone involved for their valuable contributions.

Administering Authorities must meet various legal obligations related to pensions dashboards. To do so, they will need to agree on key matters with their AVC providers. The template MOU is designed to support these discussions and help ensure compliance.

While the MOU is not legally binding, it serves as a practical framework for both parties to clarify how they will meet dashboard and data protection requirements, whether using a single or multiple-source approach. Authorities may later decide to formalise these arrangements through legally binding contracts, for which they should seek their own legal advice.

This template MOU and accompanying notes were developed with reference to the law in England and Wales. While the Pensions Dashboards Regulations 2022 and Data Protection laws apply across the UK, Scottish Administering Authorities may wish to seek their own legal advice to confirm applicability and make any necessary adjustments to references within the documents.

You can find the template MOU and explanatory notes on the following web pages, use the subject filter to view all Pensions Dashboards resources:

- [Administrator guides and documents](#) page at www.lgpsregs.org
- [Administrator guides and documents](#) page at www.scotlgpsregs.org.

Action for administering authorities

Consider using the template MOU when engaging with your AVC providers.

PDP marks one year to go until dashboard connection deadline

On 31 October 2025, the Pensions Dashboards Programme (PDP) marked one year until the legal deadline for all pension schemes to connect to the dashboard. To highlight this milestone, PDP released a [short video](#) showing the progress made so far and stressing the need to keep up momentum as the deadline approaches.

Schemes that are due to connect and have questions or need support should contact PDP as soon as possible.

To reinforce this message, PDP issued a [press release](#) on 3 November 2025.

PDP dashboards webinar – 10 December 2025

PDP is hosting a webinar on Wednesday 10 December from 11am to 11.45am. This is an opportunity to hear about the latest updates on pensions dashboards.

The webinar will be hosted by a panel of experts including Chris Curry from PDP, Adam Gifford from MoneyHelper and Lucy Stone from TPR. Participants will also be able to ask questions at the end of the session.

For more information and to secure your place, please visit the [webinar registration page](#).

PDP blog on data quality

On 21 November 2025, the PDP published a [blog called 'Getting data-ready for dashboards: benefits for savers and schemes'](#).

The blog highlights the importance of having high-quality, accurate, and complete member data for dashboards. It explains how high-quality data enables better matching of records, reduces administrative burdens and enhances the overall user experience.

The blog also features comments from TPR, which expand on how improving data readiness can unlock significant opportunities for members, pension providers, schemes and the wider pensions industry. In addition, TPR reiterates the potential consequences for schemes that fail to invest in data quality.

Training

2026 training programme

We are pleased to announce that we have set our [2026 training programme](#).

We will be running a busy schedule of online and in-person courses for both practitioners and employers.

The courses will open for bookings on the [LGA events website](#) from mid-December 2025. We will send an email to administering authorities when bookings open.

We have two new courses available in 2026:

- Additional contributions – a half day online course covering additional pension contributions (APCs) and additional voluntary contributions (AVCs).
- Understanding tax allowances in the LGPS – a full day course available online and in person covering annual allowance, lump sum allowances and inheritance tax. We will also be running a Scotland specific version of this course.

More information on all of our courses and their content is available on the Training and Development pages of www.lgpsregs.org.

Administrator and employer training

We still have some availability on the courses covered by the 2025 programme:

Aggregation training

- [Aggregation training – Online 11 December 2025](#) (one place remaining)

Understanding transfers out training

- [Understanding LGPS Transfers Out – Online 4 February 2026](#)
- [Understanding LGPS Transfers Out – Online 18 March 2026](#)

Understanding transfers in training

- [Understanding LGPS Transfers In – Online 19 February 2026](#)
- [Understanding LGPS Transfers In – Online 25 March 2026](#)

These events are available to book via the [LGA events website](#). Each course page provides information on the programme, pricing and the booking link.

For more information on all available training courses, please visit [LGPS Training and Development](#).

For any further enquiries, please email training.lgps@local.gov.uk.

LGPS Governance Conference 2026

Our 2026 Governance Conference is being held in Cardiff on Thursday 29 January and Friday 30 January 2026. In person places are now sold out, but it is still possible to join us virtually. [Book now to attend the LGPS Governance Conference 2026 virtually.](#)

If you would like to be placed on our waitlist for an in-person place, please email training.lgps@local.gov.uk.

The conference is aimed at officers, pension committee and local pension board members. It brings together LGPS professionals for two days of insightful discussions, expert analysis and valuable networking.

The programmes include sessions on:

- **LGPS: fit for the future:** a strategic discussion on the future of the LGPS.
- **Balancing the LGPS equation: legislation, administration and leadership:** explore the interplay between regulation and real-world delivery.
- **Pensions dashboards:** get up to speed on dashboards.
- **Pooling: LGPS relationships in transition:** with some pools welcoming new funds, this session examines how investment governance is evolving.
- **MHCLG update:** receive a direct update from MHCLG – covering regulatory changes, consultations and national strategy.
- **Implications of Local Government Reorganisation:** understand the impact of structural changes in local government on pension governance and administration.
- **Peer support: sharing LGPS good governance experience:** learn from real-world examples of strong governance, including tools, frameworks and shared experiences.
- **Being an effective pension committee or board member:** this session explores the role of a committee or board member – what good looks like, how to add value and how to navigate responsibilities with confidence.
- **Investment outlook:** an expert view on economic and market trends.

LGPS England & Wales Scheme Advisory Board (SAB)

Response to Access and Protections consultation

At its November 2025 meeting, the Board discussed the key points to include in its response to the [Access and Protections consultation](#), which closes on 22 December

2025. The Board's Secretariat is drafting the response and will publish it on [their website](#) ahead of the consultation deadline.

Response to Fit for the Future technical consultation

The Board's Secretariat is preparing its response to the Fit for the Future technical consultation. The consultation closes on 2 January 2026 (see [earlier article](#) for more details about the consultation). The Board's Secretariat will publish its response on the [Board's website](#) before the consultation deadline.

At the same time, the Board's Secretariat is working closely with MHCLG on developing statutory guidance. This guidance will clarify and expand on what is set out in the draft regulations. Drafts have been shared with fund representatives on the Good Governance working group.

Pooling guidance roundtables

In November 2025, the Board's Secretariat held two roundtable events to discuss the incoming pooling guidance with pool representatives and fund officers.

Officials from MHCLG attended both events. They gave updates on the drafting and content of the guidance. Attendees were invited to comment on these.

Audit roundtable

The latest meeting of the audit roundtable took place on 7 November 2025. The group includes practitioners, representatives from local government sector audit firms, regulators and professional bodies.

The roundtable reviewed progress on the audit of the 2024/25 fund accounts and considered the challenges and opportunities presented by the proposed decoupling of pension fund accounts from those of the host authority. The discussion covered:

- timing and publication of audited pension fund accounts
- feasibility of the implementation timetable, possibly to take effect from 2026/27
- changes to publication and scrutiny of accounts rule
- relation to annual governance statements
- relevance of value for money assessments
- sign-off process and key audit partner requirements.

It is understood that the [English Devolution and Community Empowerment Bill](#) will provide the legislative route for decoupling through primary legislation. However, secondary legislation still needs to be drafted.

Board's response to TPR's enforcement strategy consultation

The Board has submitted [its response to The Pension Regulator's \(TPR\) enforcement strategy consultation](#), which closed on 11 November 2025.

In its response, the Board expressed support for TPR's aim to improve governance standards across all pension schemes. However, the Board made clear that this approach must take account of the unique characteristics of the LGPS. The response also highlighted the need for clarity on practical enforcement mechanisms across the scheme.

Board and committee membership

At the last Board meeting on 24 November 2025, the Board [received a paper](#) and considered changes to the membership of the Board and its committees. These changes were approved.

One of the changes was the appointment of Neil Mason, Director of Surrey Pension Fund, as a non-voting member. Neil replaces George Graham, outgoing Director of South Yorkshire Pension Authority (SYPA), who stepped down from the Board at the last meeting.

The Board thanks George Graham for his significant contribution to the Board during his tenure and welcomes Neil Mason.

Voting members also agreed that George Georgiou will become the new Vice-Chair of the Board following Jon Richards stepping down in March 2025. George is the officer scheme member representative for GMB on the Board and Chair of the Cost Management, Benefit Design and Administration (CMBDA) committee.

Board vacancy for legal advisor

The Board is inviting expressions of interest for the position of legal advisor. This role was previously held by Gary Delderfield, who stepped down at the Board meeting on 24 November 2025 following his move from Eversheds Sutherland to Burges Salmon.

The Board is seeking expressions of interest from experienced legal practitioners with substantial knowledge of the LGPS. The successful candidate will attend Board meetings and provide valuable insight and perspective to discussions.

For more information and to submit an expression of interest, please email sabsecretariat@local.gov.uk.

Also, if you are aware of potential suitable candidates, please share this article with them.

Reminder – submit your fund annual report for 2024/25

The Board asks all administering authorities to please send their fund annual report for 2024/25 to sabsecretariat@local.gov.uk as soon as it is published. Reports can be either draft or final versions. The deadline for submission is 1 December 2025.

The Board publishes fund annual reports on its website and uses the data from these reports to produce the Scheme Annual Report. This provides a single source of information on the status of the LGPS for members, employers and other stakeholders.

Thus far, the Board's Secretariat has received 12 reports in total.

SAB website

[The Board's website](#) provides information about its work. Use the links below to find out more about:

- [latest news](#)
- [committee meetings including agenda papers](#)
- [Responsible Investment Advisory Group \(RIAG\) agenda and reports.](#)

Useful links

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

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

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

[LGPS Advisory Board website \(Scotland\)](#)

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

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

[Current LGPS job vacancies](#)

[Public Sector Transfer Club](#)

[Recognised Overseas Pension Schemes](#) that have told HMRC that they meet the conditions to be a ROPS and have asked to be included on the list.

LGPS pensions section

Raising a query

If you have a technical query, please email query.lgps@local.gov.uk and one of the team's LGPS pension advisers will get back to you. To avoid delays in receiving a response, please do not email advisers directly.

Team contacts

Clair Alcock (Head of Pensions)

Telephone: 07464 532613

Email: clair.alcock@local.gov.uk

Lorraine Bennett (Principal Pensions Adviser – LGPC Secretariat)

Telephone: 07766 252847

Email: lorraine.bennett@local.gov.uk

Jayne Wiberg (Lead Pensions Adviser – LGPC Secretariat)

Telephone: 07979 715825

Email: jayne.wiberg@local.gov.uk

Rachel Abbey (Lead Pensions Adviser – LGPC Secretariat)

Telephone: 07827 307003

Email: rachel.abbey@local.gov.uk

Steven Moseley (Lead Pensions Adviser – LGPC Secretariat)

Telephone: 07780 227059

Email: steven.moseley@local.gov.uk

William Girvan (Lead Pensions Adviser – LGPC Secretariat)

Telephone: 07860 686146

Email: william.girvan@local.gov.uk

Lisa Clarkson (Senior Training and Development Adviser – LGPC Secretariat)

Telephone: 07464 532596

Email: lisa.clarkson@local.gov.uk

Toni Durrant (Training and Development Adviser – LGPC Secretariat)

Telephone: 07385 224553

Email: toni.durrant@local.gov.uk

Jennifer Rice (Training and Development Adviser – LGPC Secretariat)

Telephone: 07884 312232

Email: jennifer.rice@local.gov.uk

Gareth Wookey (Training and Development Adviser – LGPC Secretariat)

Telephone: 07751 715218

Email: gareth.wookey@local.gov.uk

Holly De-Buriette (Programme Support Officer – LGPC Secretariat)

Telephone: 0207 664 3056

Email: holly.de-buriette@local.gov.uk

Jeremy Hughes (Senior Pensions Secretary – LGPS Scheme Advisory Board England & Wales)

Telephone: 07960 513946

Email: jeremy.hughes@local.gov.uk

Ona Ehimuan (Pensions Secretary (Governance and Digital) – LGPS Scheme Advisory Board England & Wales)

Telephone: 07501 088144

Email: ona.ehimuan@local.gov.uk

Becky Clough (Board Support and Policy Officer – LGPS Scheme Advisory Board England & Wales)

Telephone: 07795 410793

Email: becky.clough@local.gov.uk

Sarah Tingey (Research and Data Analyst – LGPS Scheme Advisory Board England & Wales)

Telephone: 07548 952802

Email: sarah.tingey@local.gov.uk

Sophia Chivandire (Pensions Policy and Support Officer – LGPS Scheme Advisory Board England & Wales)

Telephone: 0207 664 3085

Email: Sophia.chivandire@local.gov.uk

Further information

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