



Department
of Health &
Social Care

NHS Pension Board annual report

Covering the period April 2021 to March 2022

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Introduction

This is the seventh annual report of the NHS Pensions Board (the 'Board'). It explains the work the Board has done in relation to its responsibilities relating to the NHS Pension Scheme for England and Wales (the 'Scheme').

The Board was established under the Public Service Pensions Act 2013 and has operated since 1 April 2015.

The Board is responsible for assisting the Secretary of State for Health and Social Care, as the scheme manager, in:

- securing compliance with laws, regulations and directions which apply to the Scheme
- complying with relevant requirements of the Pensions Regulator, particularly Code of Practice no.14 on Governance and Administration of Public Service Pension Schemes'

Board activities – the 2021 to 2022 objectives and work plan

The Board operates according to a work plan. The work plan for 2021 to 2022 has been completed and a copy is attached at Annex C.

The work plan contains a series of standing items, plus a number of specific matters. The specific matters include regular 'deep dives' on particular subjects, but items are added where the Board wants to consider additional issues.

The Board also had a series of objectives in 2021 to 2022, and its performance against those is explained below.

Ensure that all responsibilities under the Board's terms of reference are met, including legislative and regulatory compliance, efficient and effective service delivery and the provision of the necessary assurance to the scheme manager. The Board carries out this function in its regular meetings, primarily, with some specific issue-focused activities at other times.

Ensure that key risks are effectively identified and managed. The Board reviews risk management at all regular meetings and continues to identify risks, responses and outcomes.

Oversee the Engagement and Communication Steering Group to ensure that it operates to improve member understanding and appreciation of Scheme benefits, encourage employer use of the Scheme as a recruitment and retention tool and drive digital development and capabilities. This group is progressing actions and reports regularly to the Board.

Consolidate and continue board member training and development, to ensure all members can perform their responsibilities effectively. Training (including via deep dive sessions and webinars shared with the Scheme Advisory Board) and 1-2-1 discussions between board members and the chair have taken place throughout the year.

Ensure suitable succession planning is in place as board member terms expire. The Board considers any delay in board member replacement or term extension to be a matter of process completion only and continues to operate, with any decision ratified as necessary.

Continue to focus on the role of employers in delivering effective outcomes for their staff who are scheme members and ensuring areas for improvement in employer performance are identified and implemented. The Board considers progress on this at each regular meeting

Consider and respond to any findings made by the Pensions Regulator in its annual survey of public service pension schemes. However, survey results from the February 2021 have not yet been made available.

Ensure continued focus on developing and implementing a programme of activities driving service improvement in respect of scheme administration, utilising the output from benchmarking, member feedback activities and employers' priorities. The Board receives and feeds back on regular reports on these issues, in its regular meetings.

Continue the development of effective working relations with all key stakeholders.

Ensure future legislative and regulatory developments which may impact on NHS Pension provision are identified and responded, as appropriate, to in a timely and effective manner. Regular reporting is provided to the Board by DHSC. The Board has adopted and implemented a process for responding to government consultations on matters affecting the NHSPS, where it considers that would be an appropriate exercise in accordance with its functions.

Reviewing the development of legislation and operation concerning the McCloud discrimination remedy.

Conclusion

This report covers the third year in which I have held the position of Pension Board Chair and I am delighted to have been appointed for a further 3-year term, starting in April 2022.

The Pensions Board held its meetings remotely during the year 2021 to 2022, to ensure work continued throughout periods of restrictions on gathering and reflecting the need for workplace flexibility at a time of continuing pressure across the NHS. I would like to pay tribute to the efforts of board members and those who support us from NHSBSA, the Department for Health and Social Care and further afield. We look forward to meeting in person again during mid-2022.

During the year, Elaine Sparkes has joined the Pension Board following the retirement of Paul Moloney and Nicola Lee resigned in November 2021 (following a change of role). I would like to welcome Elaine, and to thank Paul and Nicola for their excellent attendance, engagement, energy and endeavours in the work of the Pension Board.

In 2022, we have taken the opportunity to look at more strategic areas of our operation including how the Pensions Board can support more quality services for the Scheme's employers and members. We monitor closely the progress on the major projects of McCloud remedy and pensions dashboard preparations. As well as supporting good administration and service delivery, the Pensions Board wants to see the NHS Pension Scheme continue to be recognised for the valuable benefits it delivers to a large and highly diverse workforce across England and Wales.

Helen Miles
Chair

Section A

Business Improvement Team (BIT) 2021 to 2022

- The development of a number of online pensions calculators (OPC) replacing existing Excel versions
- Service improvement – the OPC tools can be updated annually, and more efficiently with less resource required to complete the updates. Automated outputs reduce processing time
- Nine Excel calculators have now been fully transitioned into OPC and the Excel versions have been retired. A further 11 Excel calculators are at test or development and will be released into the live environment between April and July 2022
- Development of the work manager tool to incorporate the complaints team
- Service improvement – improved reporting of work on hand and automated reports on complaints trends, to identify improvements. Improved process for referring cases internally and tighter control around SLAs
- System improvements to Compendia for bereavement casework including the creation of new process guides and training material to accurately detail the new processes
- Service improvement – more cases are automated through the system reducing processing times and delivering outcomes to members' families more speedily
- Compendia functionality for DG lump sum calculations has been implemented including scheme transition members. Previously all these calculations were manual and now around 60% can go through the system
- Conducted analysis on customer call referrals for Pensioner Admin, Transfers, Pension on Divorce, Awards and Bereavement Teams. Made recommendations on how to improve the service and implemented the agreed recommendations working with subject matter experts and operations managers
- Service improvement – improvement to the service provided to our customers through improved outputs, website guidance and knowledge within the customer contact centre
- Improvements have been made to a number of forms on the website including AW8 and dependents claim form to improve the customer experience
- A new 24-hour turnaround on all call referrals has been successfully implemented in April 2022 and reduced the number of chase up referrals significantly
- Review and improvement of the 'Not in good order' process within the Awards Team. Focusing on how information can be requested in the most effective manner and most convenient way for our customers via email or telephone. Guidance and process maps have been created to support our administrators in following the new process

- Service improvement – lower postage costs for returning documents, less risk of data breaches and fewer delays to our customers. All of these enable more timely payments

Section B

Risk management

The figures below show the risks identified by the Board, on a grid where the X axis shows the likelihood of each risk, from 1 to 5, and the Y axis shows its impact, from 1 to 5. The grid is coloured in red, amber and green to show the level of each risk as per the following key.

Key

Red - extreme risks:

Always unacceptable and require mitigation to reduce probability and/or impact to reduce the residual risk.

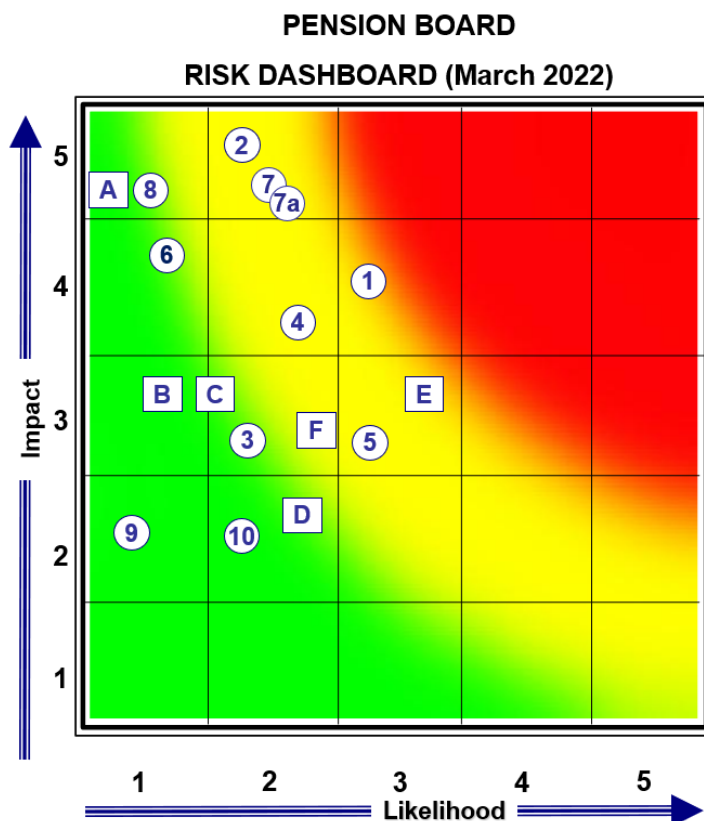
Amber – moderate to high risk:

Normally call for mitigation to reduce the risk but should be measured against potential costs that may occur should the risk materialise and the level of risk tolerance should be identified. In some cases, an informed decision to tolerate the risk is possible where mitigation is not cost effective.

Green – low risks:

Normally requires no further action. Care should be taken not to put unnecessary controls in place costing money and/or time. Risk can be closed when confident.

Figure 1: Pension Board risk dashboard



Pension Board risks

- A: Pension Board failure to identify and report regulation breaches (impact 5, likelihood 1, low risk)
- B: failure to declare conflicts of interest (impact 3, likelihood 1, low risk)
- C: Pension Board expertise to identify appropriate MI and scrutinise/challenge administrators (impact 3, likelihood 1 or 2, low risk)
- D: that the Pension Board is unable to fulfil regulatory requirements due to membership turnover issues or absence of chair (impact 2, likelihood 2, low risk)
- E: reputational risk relating to NHSBSA strategic decisions/lack of control (impact 3, likelihood 3, moderate risk)
- F: Pension Board inability to monitor effectiveness of communications (impact 3, likelihood 2, moderate risk)

Administrator risks

- 1: inaccurate or untimely employer or admin comms (impact 4, likelihood 3, moderate risk)
- 2: member lack of understanding of benefits (impact 2, likelihood 2, moderate risk)
- 3: major data loss or confidentiality or GDPR breach (impact 3, likelihood 2, low risk)
- 4: systematic data quality issues (impact 4, likelihood 2, moderate risk)
- 5: systematic errors in calculating member benefits (impact 3, likelihood 3, moderate risk)
- 6: increase in late or non-payment of contributions (impact 4, likelihood 1, low risk)
- 7: increase in complaints leading to sanctions, potential reputational damages (impact 5, likelihood 2, moderate risk)
- 7a: impact of contingent decisions on complaint handling and funding (impact 5, likelihood 2, moderate risk)
- 8: major service failure (impact 5, likelihood 1, low risk)
- 9: fraud risk issues (impact 2, likelihood 1, low risk)
- 10: fraud (impact 2, likelihood 2, low risk)

NHS PENSION BOARD

EXTERNAL RISKS DASHBOARD (March 2022)

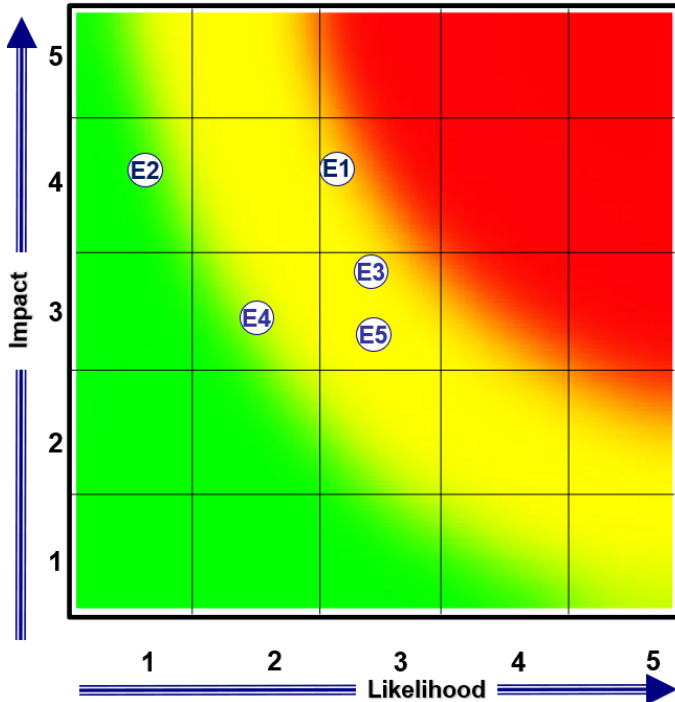


Figure 2 – external risks dashboard

External risks

E1: external legislative impacts, such as, tax (AA, LTA), saving (LISA), state pension arrangements or the NHSPS contribution review lead to an increase in scheme opt outs (impact 4, likelihood 3, moderate risk)

E2: there are significant scheme opt outs resulting from the introduction of local flexible benefits packages or avoidance of scheme administration charge/introduction of new models of care (impact 4, likelihood 1, low risk)

E3: valuation outcomes will result in changes to the Scheme (impact 3, likelihood 3, moderate risk)

E4: complex remedial action to respond to McCloud remedy (impact 3, likelihood 2, low to moderate risk)

E5: increase in employer expectations due to employer levy (impact 3, likelihood 3, moderate risk)

Section C

Communications and engagement

The Board has a subgroup focussing on communication and engagement of both scheme members and employers. The terms of reference for the group are shown below. An action plan for activity during April 2021 to March 2022 was developed which included:

- a review of language used in guidance explaining the provisions of the Scheme
- focus group research with new members and new starters
- creation of asset packs for employers' use
- creation of new, accessible and easy to understand scheme guides
- changes to the opt-out process to ensure members understand the long-term implications of opting out of the Scheme

Communications and member or employer engagement activity to support the remedial activity in response to the McCloud judgement is included in the overall McCloud programme, managed jointly by NHSBSA, DHSC and NHS Employers and overseen by both the Board and the ESG.

This work has progressed and will continue into 2022 to 2023 complementing the McCloud activity in relevant areas.

NHS Pensions Board Engagement Subgroup – terms of reference

Purpose and objectives

Purpose

The purpose of the sub-group is to assess, monitor and ensure the effectiveness of communication and engagement regarding the NHS Pension Scheme (NHSPS).

It is a sub-group of and will report to NHS Pensions Board (NHSPB). It may also engage with the Scheme Advisory Board (SAB) as it sees fit.

It will work in collaboration with representatives of NHS employers authorised to offer the NHSPS, to improve employer and member understanding of NHSPS benefits, to enhance member experience and protect membership.

The forum will be strategic and proactive in its approach towards the communication of the NHSPS to NHS employers, employees and scheme members.

Objectives

The objectives of the forum are as follows:

- to focus on key strategic areas, as agreed with NHSPB and NHS Business Services Authority (NHSBSA), to maximise the take up and membership of the NHSPS, reduce opt out levels and support the on-going marketing of the Scheme and its benefits which in turn aims to improve understanding and member experience

- strategic, proactive engagement with employers authorised to offer the NHSPS, employees who may be eligible for NHSPS membership and NHSPS members
- to lead on other related issues as agreed with the Chair of the sub-group, the NHSPB and NHSBSA

Membership

Group membership will include (not exhaustive):

- employer and member representatives from NHSPB
- NHSBSA
- and NHS Employers

Not all NHSPB members will have representation, but sub-group members will be expected to be mindful of the range of different employer types and occupational groups covered by the NHSPS and ensure comprehensive communications for a mix of audiences.

Ways of working

This is a sub-group of the NHSPB and will be chaired by a nominated representative from the NHSPB.

The sub-group is expected to meet at least quarterly ahead of each NHSPB meeting.

Updates from the sub-group will be provided to each NHSPB meeting by NHSBSA and/or sub-group chair.

Notes and actions from the sub-group will be circulated to sub-group members by NHSBSA and used as an audit trail.

NHSBSA will make final decisions about engagement on NHSPS issues to ensure consistency, and the NHSBSA is responsible for pensions materials.

Escalation of any issues will be to the sub-group chair and NHSBSA representatives for resolution and, if not resolved, further escalation will be to NHSBSA pensions senior management team and/or to the Board if required.

The sub-group will utilise other existing networks, such as, the Service Improvement and Development (SID) Board and, Stakeholder Engagement Team for testing and feedback.

Expectations of forum members

To commit to regular attendance at sub-group meetings and/or workshops as necessary. The location of meetings or workshops will be as central as possible for attendees.

To contribute to the development of tools/information to engage effectively with employers and scheme members.

To be collaborative and respectful of other sub-group members; enthusiastic; innovative; owners of actions; providers and conduits of timely feedback and updates; pragmatic about

solutions; sensitive about discussions which can be confidential; mindful of data protection and publication arrangements.

Outputs and recommendations from the forum

The sub-group will report to each NHSPB meeting on the effectiveness and impact of NHSPS strategic communications and engagement.

It will make recommendations on the key strategic areas and/or any other strategic activities as appropriate to the NHSPB for due consideration, endorsement or validation as appropriate.

Annex A - NHS Pension Board – membership

Chair:

Helen Miles

Member representatives:

- Dr David Bailey, British Medical Association –BMA Pensions Committee Member
- Geoff Lester, Federation of Clinical Scientists – NHS Pension Board Representative
- Nicola Lee, Royal College of Nursing – National Officer – Resigned November 2021
- Paul Moloney, Pharmacists Defence Association – National Officer – resigned August 2021
- Alan Fox, Unison - National Pensions Officer
- Colenzo Jarrett-Thorpe, Unite – National Officer
- Elaine Sparkes, Chartered Society of Physiotherapy - Assistant Director, Employment Relations and Union Services – appointed October 2021

Employer representatives:

- Andrea Hester, NHS Employers – Deputy Director of Employment Relations and Reward
- Paul Thomas, NHS Wales Shared Services Partnership – Director of Employment Services
- Bryan Logan, Torbay and South Devon NHS Foundation Trust – Payroll Manager
- Amanda Bromley, Tameside and Glossop Integrated Care NHS Foundation Trust - Director of Human Resources
- Nina Singh, West London NHS Trust - Director of Workforce and Organisational Development
- Stuart Murdoch, Capita PLC – Assistant Pensions Manager

NHS Pension Board meetings – members’ attendance 2021 to 2022

- May 2021: 84%
- August 2021: 84%
- November 2021: 77%
- February 2022: 69%

Annex B - NHS Pension Board – terms of reference

Introduction

The Public Service Pensions Act 2013 (the act) required the establishment of a Pension Board with responsibility for ‘assisting the scheme manager’ in securing compliance with all relevant pensions law, regulations and directions – as well as the Pension Regulator’s relevant codes of practice. This role is one of providing assurance over and governance of the pension scheme’s administration.

The act also specified that pension boards should have equal numbers of member and employer representatives – currently 6 each on the NHS Pension Board (NHSPB).

The NHSPB covers England and Wales.

Regulation 4 of the National Health Service Pension Scheme Regulations 2015 (UK Statutory Instrument 94 of 2015), effective from 1 April 2015, established the NHSPB in law. Schedule 1 of those Regulations adds further detailed regulatory provisions relating to the NHSPB.

In addition to the member and employer representatives, government representatives attend NHSPB meetings, including DHSC, and Wales. Government representatives are non-voting board members. Professional advisors, for example, accountants, Government Actuary’s Department and lawyers can be instructed from the DHSC’s resource allocation providing the requirement for that advice is in line with the NHSPB’s legislative responsibilities.

The scheme administrator (NHSBSA) will provide the necessary input to support the NHSPB in delivering its assurance responsibilities.

The NHSBSA will provide the secretariat with DHSC seeking nominations and making appointments to the NHSPB based on the regulatory provisions. The NHSPB meets quarterly.

Accountability

The NHSPB collectively and members individually are accountable to the scheme manager, the Secretary of State, the responsible authority for the NHSPS.

DHSC continues to be responsible for contractual arrangements, including delivery against agreed KPIs, for NHSBSA.

Responsibilities of the NHSPB

The NHSPB is responsible for assisting the scheme manager in:

- overall assurance and governance of the NHSPS administration
- assuring effective and efficient administration of the NHSPS
- assuring that decisions made by NHSBSA are fully legally compliant, including consideration of cases that have been referred to TPR and/or the Pension Ombudsman recommending changes to processes, training and/or guidance where necessary
- supporting continuous improvement in the administration of the NHSPS
- assuring NHSBSA supports employers to communicate the benefits of the NHSPS and fully utilise it as part of the NHS total reward offer through effective communication to members

- assuring NHSBSA supports members with a range of tools to improve their understanding of their pension benefits as part of the total reward offer, and to inform their personal financial and career planning
- supporting effective implementation of the employer charter
- enabling data quality improvements to deliver career average revalued earnings (CARE) pension outcomes
- complying with TPR's codes of practice
- fostering good working relationships with TPR
- consideration of TPR reports including responses to recommendations
- producing an annual report outlining the work of the NHSPB throughout the NHSPS year

Membership

The membership of the NHSPB includes:

- member representatives nominated by the staff side of the NHS staff council to ensure a broad representation of NHSPS membership; for example, to include deferred and pensioner representation. Member representatives will be voting members
- employer representatives nominated by NHS Employers to ensure a broad representation of employers with NHSPS members including for example, NHS employing organisations, general medical practice and independent providers of clinical services as defined within a standard NHS contract. Employer representatives will be voting members
- an independent chairperson appointed via the public appointments process. The chair holds the deciding vote if any vote taken by the member and employer representatives on the Board results in an equal vote
- representatives from DHSC, who are non-voting members
- representative from the Welsh Government, who is a non-voting member

Attendance is expected of NHSPB members at all meetings. Where a member of the Board is unable to attend board meetings or participate in activities of the Board, other than temporarily, the remaining members of the Board may agree that a substitute or another person may attend from that representative during that period. The appointed employer and member representatives will remain equal in number at all times.

Decision-making process

The NHSPB operates on a consensus basis; however, each member (except government representatives) has individual voting rights. In the event that consensus cannot be reached, a vote is taken. The chair does not vote at this stage; only if the vote is equal will the chair have the deciding vote. The scheme manager is made aware when a decision is reached in this manner.

Quorum

Half of the voting members of the NHSPB represent a quorum for board meetings to go ahead, with at least 3 member representatives and 3 employer representatives being present. The chair must also be present for the meeting to be quorate. Non-quorate meetings may proceed in exceptional circumstances, but no binding decisions are made, nor votes taken.

Conflicts of interest

The act requires that members of the NHSPB do not have conflicts of interests. All members of the NHSPB are required to declare any interests and any potential conflicts of interest in line with legal requirements in the Act and TPR's code of practice. These declarations are required as part of the appointment process, as well as at regular intervals throughout a member's tenure.

Training requirements

Members of the NHSPB will be expected to have a good, sound knowledge and understanding of the NHSPS rules, the NHSPS's administration policies and pension law. This will require on-going updates and training as legal requirements change and develop including relevant regulations and directions from Her Majesty's Treasury and the Department for Work and Pensions. This is set out in TPR's Code of Practice number 14, 'governance and administration of public service pension schemes'.

Meeting arrangements

The NHSPB meets quarterly. Frequency of meetings is kept under review to ensure NHSPB responsibilities are discharged. There is the possibility for ad-hoc meetings if required at the chair's discretion.

The NHSBSA undertakes the NHSPB's secretariat function ensuring:

- facilities are available to hold meetings
- an annual schedule of meetings is organised
- suitable arrangements are in place to hold additional meetings if required – ensuring adequate notice
- papers are distributed 7 days before each meeting except in exceptional circumstances
- minutes of each meeting are circulated within 14 working days following each meeting

Expertise

It may be necessary to draw on particular experts or expert groups to support the responsibilities of the NHSPB, such as actuaries and lawyers. This is done on an 'as required' basis; any expert advisor attending the meeting is not a NHSPB member and does not have a vote. If required, sub-groups may be established to assist the NHSPB.

Relationship to the NHS Pension Scheme Advisory Board

Whilst the function of the NHS Pension Scheme Advisory Board (SAB) is to provide advice to the Responsible Authority (such as, Secretary of State) about the desirability of NHSPS changes – there are occasional needs for some sharing of information and discussion between the Boards. The NHSPB chair holds regular meetings with SAB co-chairs; and the SAB minutes are a standing agenda item for NHSPB meetings. The NHSPB provides a summary of its meetings to the SAB.

Remuneration

Remuneration for NHSPB members is limited to a refund of actual expenses incurred in attending NHSPB meetings, in accordance with DHSC's expenses policy. The chair's remuneration is agreed on appointment.

Tenure

Tenure period for NHSPB members is 3 years on a rolling appointment basis – with a maximum of 9 years in any continuous period of 12 years.

Tenure is decided by the scheme manager during the appointment process but should usually be a term of 3 years. NHSPB members may have different tenures, if necessary, to ensure continuation of membership in equal numbers for the employer and staff-side members. The chair's tenure is agreed on appointment, again expected to be 3 years.

Resignation of NHSPB members is documented in writing to the NHSPB Chair and DHSC. A minimum one month's notice period must be given to enable a replacement member to be found in time for the next NHSPB meeting.

The performance of NHSPB members is assessed on a periodic basis to ensure all members are adequately meeting their duties. Poor performance will result in corrective action being taken, and in exceptional circumstances the removal of the NHSPB member.

Review

These terms of reference are reviewed periodically.

Annex C - work plan 2021 to 2022

This table shows at which meeting each task on the work plan was considered. The tasks on the work plan are grouped into 5 areas: risk management, administration and BSA, board operation, strategy and planning, and interaction with SAB/TPR/others.

Risk management

May 2021	August 2021	November 2021	February 2022
Review key risks	Not applicable	Review key risks	Review key risks
Review risk management approach	Not applicable	Review risk management approach	Review risk management approach
Not applicable	Full review of key risks	Not applicable	Not applicable

Administration and BSA

May 2021	August 2021	November 2021	February 2022
MI and compliance pack review	MI and compliance pack review	MI and compliance pack review	MI and compliance pack review
Formal review of MI pack	Not applicable	Not applicable	Not applicable
Continuous improvement initiatives	Continuous improvement initiatives	Continuous improvement initiatives	Continuous improvement initiatives
Measuring customer experience deep dive	Not applicable	Not applicable	Not applicable
Not applicable	Finance deep dive	Not applicable	Not applicable
Not applicable	Not applicable	Not applicable	Benchmarking output

Not applicable	Not applicable	Update from Stakeholder Engagement Team	Not applicable
Not applicable	Not applicable	Data quality deep dive	Not applicable
Not applicable	Not applicable	NHSBSA workforce directorate update	Not applicable
Not applicable	Not applicable	Not applicable	Consider changes to MI pack for future year
Not applicable	Not applicable	Not applicable	Pension fraud risks deep dive
Cyber security update	Not applicable	Not applicable	Not applicable

Board operation

May 2021	August 2021	November 2021	February 2022
Sign off work plan for year to come	Not applicable	Not applicable	Not applicable
Pension Board effectiveness review	Not applicable	Not applicable	Not applicable
One to one training needs review	One to one training needs review	One to one training needs review	One to one training needs review
Not applicable	Review terms of reference	Not applicable	Not applicable
Agree next 3/4 meeting dates – rolling basis	Agree next 3/4 meeting dates – rolling basis	Agree next 3/4 meeting dates – rolling basis	Agree next 3/4 meeting dates – rolling basis

Not applicable	Review Pension Board member appointments	Not applicable	Not applicable
Not applicable	Review Pension Board Annual Report	Not applicable	Not applicable
Not applicable	Pension Board effectiveness review - results	Not applicable	Not applicable
Not applicable	Not applicable	Not applicable	Agree outline of next Pension Board annual report
Not applicable	Not applicable	Not applicable	Training plan review
Not applicable	Not applicable	Not applicable	Training policy and process

Strategy and planning

May 2021	August 2021	November 2021	February 2022
Horizon scanning – future developments	Not applicable	Horizon scanning – future developments	Not applicable
Engagement and comms update	Engagement and comms update	Engagement and comms update	Engagement and comms update
Not applicable	Not applicable	Engagement outcomes annual review	Not applicable
Not applicable	Not applicable	Not applicable	Strategy planning

Interaction with SAB/TPR/others

May 2021	August 2021	November 2021	February 2022
Not applicable	Scheme Advisory Board annual update	Not applicable	Not applicable
Not applicable	Not applicable	TPR survey results (annual)	Not applicable

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