



Ministry of Housing,
Communities &
Local Government

Local Government Pension Scheme: Proposed merger of the West Midlands Integrated Transport Authority Pension Fund and West Midlands Pension Fund

Policy consultation



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July 2019

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Scope of the consultation

Topic of this consultation:	This consultation seeks views on merging the West Midlands Integrated Transport Authority Pension Fund into the West Midlands Pension Fund and designating Wolverhampton City Council as the administering authority for both Funds.
Scope of this consultation:	Section 21 of the Public Service Pensions Act 2013 requires consultation with parties that may be affected by the scheme regulations. This consultation seeks responses from interested parties on amendments to the Local Government Pension Scheme Regulations 2013.
Geographical scope:	These proposals affect the West Midlands Combined Authority area, particularly the areas of the following councils: Birmingham City Council, Coventry City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, Walsall Metropolitan Borough Council and the City of Wolverhampton Council.
Impact Assessment:	The Ministry's policies, guidance and procedures aim to ensure that any decisions, new policies or policy changes do not discriminate against anyone, and that in formulating them the Ministry has taken due regard to its obligations under the Equality Act 2010 and the Public Sector Equality Duty. No impact assessment has been undertaken as we do not believe there are equality impacts on protected groups from the proposals in this consultation.

Basic Information

To:	This consultation is likely to be of interest to the councils in the area of the West Midlands Combined Authority, members and member representatives of the West Midlands Pension Fund and West Midlands Integrated Transport Authority Pension Fund, as well as other bodies that participate in the Local Government Pension Scheme in the West Midlands area.
Body/bodies responsible for the consultation:	Local Government Finance Reform and Pensions, Ministry of Housing, Communities and Local Government
Duration:	This consultation will last for 6 weeks from 23 July to 7 September 2019
Enquiries:	For any enquiries about the consultation please contact: LGpensions@communities.gov.uk
How to respond:	Please respond by email to: LGpensions@communities.gov.uk

Alternatively, please send postal responses to:
LGF Reform and Pensions Team
Ministry of Housing, Communities and Local Government
2nd Floor, Fry Building
2 Marsham Street
London
SW1P 4DF

When you reply it would be very useful if you could make it clear which questions you are responding to.

Additionally, please confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:

- your name,
- your position (if applicable),
- the name of organisation (if applicable),
- an address (including post-code),
- an email address, and
- a contact telephone number.

Chapter 1 - Introduction

Section 21 of the Public Service Pensions Act requires the responsible authority, in this case, the Secretary of State, to consult such persons as he believes are going to be affected before making any regulations to change the terms of the Local Government Pension Scheme. Section 21 of the Public Service Pensions Act 2013 requires that the Secretary of State must consult such persons (or representatives of such persons) who are likely to be affected by the changes.

This consultation contains a proposal of particular interest to the councils in the area of the West Midlands Combined Authority, as well as other bodies that participate in the Local Government Pension Scheme in the West Midlands Pension Fund (WMPF) and the West Midlands Integrated Transport Authority Pension Fund (WMITAPF).

1.2 Background

The West Midlands Integrated Transport Authority Pension Fund was established on 29 November 1991 under the Local Government Superannuation (Miscellaneous Provisions) Regulations 1991. It was established to manage the pensions of local transport workers following the deregulation of bus services in the West Midlands, enabling employees who transferred to the new bus companies to retain their local government pensions following their transfer. Unlike the other funds in LGPS, no public sector employers have ever participated in the WMITAPF. It comprises only two employers who are now owned by private sector parent companies and participate under separate admission agreements; West Midlands Travel Limited and Preston Bus Limited.

Under the Local Government Pension Scheme Regulations 2013, the West Midlands Combined Authority (WMCA) is required to act as the administering authority of the WMITAPF. The WMCA is itself funded in part by its seven constituent metropolitan borough councils¹. The directly employed staff of the WMCA, and those of its seven constituent councils, all participate in the separate WMPF. The WMCA has delegated its LGPS administering authority functions to Wolverhampton City Council (WCC) to administer the WMITAPF on its behalf. WCC is also the administering authority of the WMPF.

On 1 May 2019, a joint application was made on behalf of WCC as the administering authority of the WMPF, and the WMCA as the administering authority of the WMITAPF, proposing to transfer the assets, liabilities and admission agreements of the WMITAPF to WCC to merge the two funds so that WMCA would then cease to be an administering authority in the LGPS. This application for the merger was supported by the seven local authorities who fund in part the WMCA and participate as scheme employers in the WMPF.

¹ Birmingham City Council, Coventry City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, Walsall Metropolitan Borough Council and the City of Wolverhampton Council

1.2 Section 13 report and recommendations

The Government's Actuary Department (GAD) has been appointed by MHCLG to report under section 13 of the Public Service Pensions Act 2013 in connection with the local actuarial valuations of the 91 funds in the Local Government Pension Scheme in England and Wales. Section 13 requires GAD to report on whether the following aims of the LGPS are achieved:

- compliance,
- consistency,
- solvency and
- long term cost efficiency.

In 2018, GAD issued its Section 13 report² on the 2016 valuation of LGPS funds.. The report identified the solvency risks for the WMITAPF, which is a closed fund. The report noted that the WMITAPF retains the specific risk arising from the majority of the fund liabilities being backed by a single private sector employer (West Midlands Travel Limited) and being closed to new entrants. In particular, the GAD considered two scenarios in which the solvency of the WMITAPF may be at risk:

- a. If both West Midlands Travel Limited and Preston Bus Limited exited the WMITAPF, there would be no fall-back in the event that the funds were ultimately insufficient to meet benefits when due; and
- b. If the last remaining employer in the WMITAPF defaulted and the employer was unable to meet its exit requirements.

As a result of the issues highlighted in their report, GAD recommended that WMCA, as the administering authority, put a plan in place. This merger of the WMITAPF into the WMPF is the proposed plan to manage the risk of the WMITAPF in the long term.

1.3 Key features of the merger proposal

One of the main principles of the merger is that there should be no significant increase in cost or risk to WCC or WMCA or other employers participating in either the WMPF or the WMITAPF.

In order to protect all scheme employers in the WMPF, WCC would like to ring-fence the liabilities of West Midlands Travel Limited and Preston Bus Limited separately as they present different risks and would be managed in different ways. To facilitate this, the assets and liabilities of each employer will be transferred to their own admission body funds established by WCC in accordance with Regulation 54 of the Local Government Pension Scheme Regulations 2013. The Secretary of State will be given a power to make directions as to how these admission body funds shall be

² <https://www.gov.uk/government/publications/local-government-pension-scheme-review-of-the-actuarial-valuations-of-funds-as-at-31-march-2016>

established. The draft Direction which the Secretary of State proposes to issue is at Annex C.

This Direction also requires that WMCA, as a scheme employer in the WMPF, must enter into an arrangement with WCC such that in the event that West Midlands Travel Limited exits the admission agreement fund without there being sufficient assets to meet its liabilities, then WMCA will subsume any outstanding assets and liabilities of West Midlands Travel Limited with its own assets and liabilities in the WMPF. This would then result in the dissolution of the admission agreement fund.

The merger would be given effect to by means of a statutory instrument, amending the Local Government Pension Scheme Regulations 2013. This statutory instrument, a draft of which is at Annex B, will remove the current requirement that WMCA maintains a pension fund. It will also make provision for the assets, liabilities and admission agreements of the WMITAPF to be transferred to the WMPF in such a way that the principles of the merger set out above can be achieved.

1.4 Cost savings

Cost savings resulting from the merger are expected to be moderate, given the operational efficiencies already in place through existing delegations. However, there is potential for greater savings through running a single pension fund. For example, in addition to savings of £22,000 recharged annually to the Fund for WMCA employee-time spent in relation to the annual pension fund accounts, there would be further reporting efficiencies for CWC/WMPF.

1.5 Effect on asset pooling

The reform of investment management in the Local Government Pension Scheme (LGPS) for England and Wales began in 2015 with the publication of criteria and guidance on pooling of LGPS assets, following extensive consultation with the sector. LGPS administering authorities responded by coming together in groups of their own choosing to form eight asset pools.

The WMPF and WMITAPF have both chosen to participate in the LGPS Central investment pool. However, WMCA is not a direct shareholder in the LGPS Central Limited pool company and has not yet invested WMITAPF assets through the LGPS Central investment structures. However, WMCA has signed a cost sharing agreement, with all authorities participating in LGPS Central, whereby it incurs a share of LGPS Central's operator costs in proportion with the WMITAPF's total assets. It is proposed that this arrangement would cease on the merger, with WCC effectively picking up those costs through the cost sharing agreement as its total asset size will then include those assets taken on as a result of the merger.

1.6 Timescale for implementation

The proposed date for the merger to have effect is 31 March 2019. This is to tie in with the LGPS scheme year end, valuation dates and the setting of new employer contribution rates effective from April 2020. Consequently, this means that the

amendments will have retrospective effect. We believe that in the circumstances, this is reasonable and creates no disadvantage to the interested parties. We also note that another recent merger of LGPS funds, that between the Wandsworth and Richmond funds was successfully made with retrospective effect.

Question 1 – Do you agree to the proposed merger of West Midlands Integrated Transport Authority Pension Fund into West Midlands Pension Fund on the basis of these principles?

Chapter 2 – Detailed terms of the merger

Outlined below are the proposed terms of the merger. In this Chapter, ‘the Regulations’ mean the Local Government Pension Scheme Regulations 2013:

- 1.1 on the merger date, WMCA would cease to be an administering authority in the LGPS (notwithstanding WMCA remaining a scheme employer in the WMPF) ;
- 1.2 on the merger date, all assets and liabilities of the WMITAPF maintained by WMCA would transfer and become the assets and liabilities of a pension fund maintained by WCC (including the bulk purchase annuity policy with Prudential Retirement Income Limited) subject to the liability of ring-fencing set out below;
- 1.3 the West Midlands Travel Limited and Preston Bus Limited admission agreements would continue to have effect with WCC substituted as the new administering authority in the place of WMCA;
- 1.4 any current guarantees in place in relation to West Midlands Travel Limited and Preston Bus Limited would be novated from WMCA to WCC where necessary (to be confirmed with the respective guarantors);
- 1.5 no later than 3 months after the date of the statutory instrument that gives effect to the merger, WCC and WMCA would publish a statement setting out the assets and liabilities of their respective pension funds immediately before the merger date;
- 1.6 after the change of administering authority, any payment due to be made by WMCA relating to its function as the administering authority of the WMITAPF which had not been made before the merger date, must be paid into a pension fund maintained by WCC;
- 1.7 any question concerning the rights or liabilities of any person under the Regulations (or earlier regulations) which was due to be decided by WMCA but which was not decided before the change of administering authority, must be decided by WCC;

- 1.8 any arrangements under Regulation 17 of the Local Government Pension Scheme Regulations 2013 (additional voluntary contributions) under a scheme established by WMCA will continue to have effect as if they had been entered into, under a scheme established by WCC; and
- 1.9 in order to protect all scheme employers in the WMPF, the assets and liabilities of West Midlands Travel Limited and Preston Bus Limited will be transferred to their own admission body funds established by WCC in accordance with Regulation 54 of the Local Government Pension Scheme Regulations 2013.

Question 2 - Do you agree with the proposed terms of the merger?

About this consultation

This consultation document and consultation process have been planned to adhere to the Consultation Principles issued by the Cabinet Office.

Representative groups are asked to give a summary of the people and organisations they represent, and where relevant who else they have consulted in reaching their conclusions when they respond.

Information provided in response to this consultation, including personal data, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA), the EU General Data Protection Regulation, and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential, please be aware that, as a public authority, the Department is bound by the Freedom of Information Act and may therefore be obliged to disclose all or some of the information you provide. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Ministry of Housing, Communities and Local Government will process your personal data in accordance with the law and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties. A full privacy notice is included at Annex A.

Individual responses will not be acknowledged unless specifically requested.

Your opinions are valuable to us. Thank you for taking the time to read this document and respond.

Are you satisfied that this consultation has followed the Consultation Principles? If not or you have any other observations about how we can improve the process please contact us via the [complaints procedure](#).

Annex A

Personal data

The following is to explain your rights and give you the information you are entitled to under the Data Protection Act 2018.

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the data controller and contact details of our Data Protection Officer

The Ministry of Housing, Communities and Local Government (MHCLG) is the data controller. The Data Protection Officer can be contacted at dataprotection@communities.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

The Data Protection Act 2018 states that, as a government department, MHCLG may process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

Section 21 of the Public Service Pension Act 2013 requires the responsible authority, in this case the Secretary of State, to consult such persons as he believes are going to be affected before making any regulations for the Local Government Pension Scheme. MHCLG will process personal data only as necessary for the effective performance of that duty

3. With whom we will be sharing your personal data

We do not anticipate sharing personal data with any third party.

4. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for two years from the closure of the consultation.

5. Your rights, e.g. access, rectification, erasure

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

- a. to see what data we have about you
- b. to ask us to stop using your data, but keep it on record
- c. to ask to have all or some of your data deleted or corrected

d. to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

- 6. Your personal data will not be sent overseas**
- 7. Your personal data will not be used for any automated decision making.**
- 8. Your personal data will be stored in a secure government IT system.**

Annex B

STATUTORY INSTRUMENTS

2019 No.

PUBLIC SERVICE PENSIONS, ENGLAND AND WALES

The Local Government Pension Scheme (West Midlands Integrated Transport Authority Pension Fund and West Midlands Pension Fund Merger) Regulations 2019

Made - - - - - ***

Laid before Parliament ***

Coming into force - - - ***

The Secretary of State makes these Regulations in exercise of the powers conferred by sections 1, 2(1) and 3 of, and Schedules 1 to 3 to, the Public Service Pensions Act 2013⁽³⁾.

In accordance with section 21 of that Act, the Secretary of State has consulted such persons, and the representatives of such persons, as appeared to the Secretary of State to be likely to be affected by these Regulations⁽⁴⁾.

In accordance with section 3(5) of that Act, these Regulations are made with the consent of the Treasury.

Citation, commencement and interpretation

1.—(1) These Regulations may be cited as the Local Government Pension Scheme (West Midlands Integrated Transport Authority Pension Fund and West Midlands Pension Fund Merger) Regulations 2019.

(2) These Regulations come into force on [TBC] but have effect from 31st March 2019.

(3) In these Regulations—

“the 2013 Regulations” means the Local Government Pension Scheme Regulations 2013⁽⁵⁾;

⁽³⁾ 2013 c.25. See section 28 of the Act which provides for regulations made under section 7 of the Superannuation Act 1972 (c. 11) to have effect as scheme regulations under section 3 of the Act.

⁽⁴⁾ A statement of the persons whom the Secretary of State would normally expect to consult has been published and can be found at [TBC].

⁽⁵⁾ 2013/2356 as amended by S.I. 2014/44, S.I. 2014/1146, S.I. 2015/57, S.I. 2015/755, S.I. 2016/449, S.I. 2016/646, S.I. 2016/946, S.I. 2017/126, S.I. 2017/251, S.I. 2017/612, S.I. 2018/103, S.I. 2018/269, S.I. 2018/493, S.I. 2018/696, S.I. 2018/891, S.I. 2018/1133, S.I. 2018/1149, S.I. 2018/1366, S.I. 2019/383, and by S.I. 2019/615.

“Combined Authority” means the West Midlands Combined Authority⁽⁶⁾;
“the Earlier Regulations” has the meaning given by regulation 1(6) of the Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014⁽⁷⁾;
“the merger date” means 31st March 2019;
“Wolverhampton” means Wolverhampton City Council; and
other expressions have the same meaning as in the 2013 Regulations.

Modification and amendment of the Local Government Pension Scheme Regulations 2013

2.—(1) From the merger date, the 2013 Regulations apply in relation to the Combined Authority⁽⁸⁾ and to Wolverhampton with the following modifications—

- (a) regulation 103 (changes of administering authority) does not apply in relation to the transfer of assets and liabilities described in regulation 3(1) of these Regulations; and
- (b) the table in Part 2 of Schedule 3 (pension funds) applies as if for any person for whom the appropriate administering authority had been or would be the Combined Authority, the appropriate administering authority is Wolverhampton.

(2) Paragraph 1(z) of Part 1 of Schedule 3 (pension funds) of the 2013 Regulations is omitted.

Transfer of assets, liabilities and responsibilities

3.—(1) On the merger date all assets and liabilities of the West Midlands Integrated Transport Authority Pension Fund become the assets and liabilities of the pension fund maintained by Wolverhampton.

(2) No later than 3 months after the date these Regulations come into force, the Combined Authority and Wolverhampton must publish a statement setting out the assets and liabilities of their respective pension funds immediately before the merger date.

(3) On and after the merger date—

- (a) any payment received by the Combined Authority relating to its function as an administering authority for the West Midlands Integrated Transport Authority Pension Fund before that date, must be paid into the pension fund maintained by Wolverhampton; and
- (b) any payment due to be made by the Combined Authority relating to its function as an administering authority for the West Midlands Integrated Transport Authority Pension Fund which had not been made before that date, must be paid from the pension fund maintained by Wolverhampton.

(4) Any question concerning the rights or liabilities of any person under the 2013 Regulations or the Earlier Regulations which was due to be decided by the Combined Authority but which was not decided before the merger date, must be decided by Wolverhampton.

(5) Any admission agreement or guarantee agreement in respect of which the Combined Authority is the administering authority continues to have effect with Wolverhampton substituted as the administering authority for those agreements.

(6) Any arrangements under regulation 17 of the 2013 Regulations (additional voluntary contributions) under a scheme administered by the Combined Authority in respect of the West Midlands Integrated Transport Authority Pension Fund continue to have effect as if they had been entered into under a scheme established by Wolverhampton.

(7) Wolverhampton is to be substituted for the Combined Authority in any instruments, contracts or legal proceedings which relate to any of the Combined Authority’s functions as an administering authority and are made or commenced before the merger date.

⁽⁶⁾ The West Midlands Combined Authority was established by the West Midlands Combined Authority Order 2016, S.I. 2016/653.

⁽⁷⁾ S.I. 2014/525

⁽⁸⁾ The West Midlands Combined Authority was established by the West Midlands Combined Authority Order 2016 (S.I. 2016/653).

Admission agreement funds

4.—(1) Paragraph (2) applies where on or after the merger date an admission agreement fund for the admission bodies in the West Midlands Integrated Transport Authority Pension Fund is established under regulation 54 of the 2013 Regulations (admission agreement funds).

(2) Where this paragraph applies—

- (a) a separate admission agreement fund must be established in respect of each admission body;
- (b) the administering authority must comply with any directions issued by the Secretary of State in relation to the establishment, administration, or closure of these admission agreement funds.

We consent to the making of these Regulations.

Names

Date Two of the Lords Commissioners of Her Majesty's Treasury

Signed by authority of the Secretary of State for Housing, Communities and Local Government

Name

Minister of State

Date Ministry of Housing, Communities and Local Government

EXPLANATORY NOTE

(This note is not part of the Regulations)

These Regulations provide for the merger of the West Midlands Integrated Transport Authority Pension administered by the West Midlands Combined Authority and the West Midlands Pension Fund administered by Wolverhampton City Council (“Wolverhampton”). From 31st March 2019 the West Midlands Combined Authority is no longer required to maintain the West Midlands Integrated Transport Authority Pension Fund for the purposes of the Local Government Pension Scheme. All assets and liabilities relating to the West Midlands Integrated Transport Authority Pension Fund up to that date are transferred to Wolverhampton which becomes the appropriate administering authority for all members of the West Midlands Integrated Transport Authority Pension Fund. Regulation 4 makes further provision in relation to the establishment of new admission agreement funds for the admission bodies that previously participated in the West Midlands Integrated Transport Authority Pension Fund.

No impact assessment has been produced for these Regulations because no impact on the private or voluntary sectors is foreseen.

Annex C



Ministry of Housing, Communities & Local Government

Director of Pensions
West Midlands Pension Fund

Date: [XX XXXX XXXX]

Dear [X]

Secretary of State's Direction on the Establishment of Admission Body Funds by the City of Wolverhampton Council

1. I am writing with regard to your application of 1 May 2019 submitted jointly made jointly on behalf of Wolverhampton City Council ("**Wolverhampton**") and the West Midlands Combined Authority ("**the Combined Authority**"), together the "**Applicants**".

2. This Direction from the Secretary of State is made under the provisions of regulation 4 of the Local Government Pension Scheme (West Midlands Integrated Transport Authority Pension Fund and West Midlands Pension Fund Merger) Regulations 2019 ("**the Regulations**").

The Consultation

3. The Secretary of State has consulted bodies appearing to be affected by a proposed Direction under the Regulations. A public consultation was launched on 23 July and closed on [XX September]. [summary of consultation responses].

Admission Agreement Funds

3. Wolverhampton has on the merger date established two new admission agreement funds under regulation 54 of the 2013 Regulations (admission agreement funds) for each of West Midlands Travel Limited and Preston Bus Limited being the only admission bodies and scheme employers that previously participated in the West Midlands Integrated Transport Authority Pension Fund ("**the WMITAPF**").

The Secretary of State’s Direction

4. On behalf of the Secretary of State, I am authorised to issue Directions under the powers in regulation 4(2)(b) of the Regulations. The Secretary of State directs that:

1. The assets of the WMITAPF shall be allocated to the new admission agreement funds according to the respective allocation of the assets to West Midlands Travel Limited and Preston Bus Limited within the WMITAPF immediately before the merger date;
2. Wolverhampton shall maintain separate funding strategy statements and investment strategy statements for each admission agreement fund to reflect their different funding and investment strategies;
- 3.
4. In the event West Midlands Travel Limited were to exit the LGPS without fully discharging its liabilities (either directly or through the guarantee agreement with National Express Group plc), the Combined Authority as a scheme employer in the West Midlands Pension Fund shall make arrangements with Wolverhampton as the appropriate administering authority to subsume the assets and liabilities of the admission agreement fund relating to West Midlands Travel Limited with its own assets and liabilities in the West Midlands Pension Fund.

Yours sincerely,

Local Government Finance Reform and Pensions Division

A copy of this letter has been sent to the following:
