To: Members of the Local Pension Board

Notice of a Meeting of the Local Pension Board

Friday, 17 October 2025 at 10.30 am

Virtual

If you wish to view proceedings online, please click on this Live Stream Link.
However, that will not allow you to participate in the meeting.

Martin Reeves
Chief Executive

October 2025

Committee Officer: ***Committee Services***
Tel: committeesdemocraticservices@oxfordshire.gov.uk

Membership

Chair – Matthew Trebilcock

Scheme Members:

Alistair Bastin	Stephen Davis	Liz Hayden

Employer Members:

Vacancy	Susan Blunsden	Janet Wheeler

Notes:

- ***Date of next meeting: 23 January 2026***

If you have any special requirements (such as a large print version of these papers or special access facilities) please contact the officer named on the front page, but please give as much notice as possible before the meeting.

AGENDA

1. Welcome by Chairman

2. Apologies for Absence

3. Declarations of Interest - see guidance note below

4. Minutes (Pages 1 - 8)

To approve the minutes of the meeting held on 4 July 2025 and to receive information arising from them.

5. Board Member Terms of Office

Verbal update by Mark Smith, Head of Pensions and Mukhtar Master, Governance and Communications Manager.

This is an update to confirm the reappointment of Board Members and Independent Chair.

6. Unconfirmed Minutes of the Pension Fund Committee Meeting held on 5 September 2025 (Pages 9 - 18)

7. Annual Report and Accounts including Taskforce for Climate-related Financial Disclosures (TCFD) Report (Pages 19 - 136)

Report by: Greg Ley, Financial Manager – Pension Fund Investment

This report presents the draft Annual Report and Accounts for the Pension Fund, including the latest TCFD report, and progress against the targets set in the Fund's Climate Change Policy.

8. Review of the Annual Business Plan (Pages 137 - 148)

Report by: Mark Smith, Head of Pensions

The Board are invited to review the position against the Annual Business Plan for 2025/26 as considered by the Pension Fund Committee at their meeting on 5 September 2025 and to offer any comments to the Committee.

9. Risk Register (Pages 149 - 158)

Report by: Mukhtar Master, Governance and Communications Manager

This is the latest risk register as considered by the Pension Fund Committee on 5 September 2025. The Board are invited to review the report and offer any further views back to the Committee.

10. Governance and Communications Report (Pages 159 - 178)

Report by: Mukhtar Master, Governance and Communications Manager

The Board are invited to review the Governance and Communications Report as presented to the Committee at their meeting on 5 September 2025. The report includes a log of all regulatory and data breaches.

11. Administration Report (Pages 179 - 216)

Report of: Vicki Green, Pension Services Manager

The Board are invited to review the latest Administration Report as presented to the Pension Fund Committee on 5 September 2025, including the latest performance statistics for the service.

12. Items to Include in Report to the Pension Fund Committee

The Board are invited to confirm the issues they wish to include in their latest report to the Committee.

13. Items to be Included in the Agenda for the next Board Meeting

Members are invited to identify any issues they wish to add to the agenda of the next meeting of this Board.

14. EXEMPT ITEMS

The Committee is RECOMMENDED that the public be excluded for the duration of items 15 and 16 in the Agenda since it is likely that if they were present during those items there would be disclosure of exempt information as defined in Part I of Schedule 12A to the Local Government Act 1972 (as amended) and specified in relation to the respective items in the Agenda and since it is considered that, in all the circumstances of each case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

THE REPORTS RELATING TO THE EXEMPT ITEMS HAVE NOT BEEN MADE PUBLIC AND SHOULD BE REGARDED AS STRICTLY PRIVATE TO MEMBERS AND OFFICERS ENTITLED TO RECEIVE THEM.

15. 2025 Valuation Results - Update including draft Funding Strategy Statement - EXEMPT (Pages 217 - 322)

Report by: Mark Smith, Head of Pensions

This report provides Committee with the 2025 valuation results and updated draft Funding Strategy Statement prior to consultation with employers in the autumn.

16. LGPS Pooling Reform - EXEMPT (Pages 323 - 402)

Report by: Mark Smith, Head of Pensions

The Board are invited to note this report as presented to the Pension Fund Committee on 5 September 2025.

LOCAL PENSION BOARD

MINUTES of the meeting held on Friday, 4 July 2025 commencing at 10.30 am and finishing at 1.30 pm

Present:

Board Members:	Matthew Trebilcock – in the Chair Susan Blunsden Alistair Bastin Stephen Davis Liz Hayden Angela Priestley-Gibbins Janet Wheeler
Other Members in Attendance	Councillor Peter Stevens
Officers:	Mark Smith (Head of Pension Services), Vicki Green (Pension Services Manager), Mukhtar Master (Governance and Communications Manager), Anna Lloyd (Governance and Communications Officer), Josh Brew (Responsible Investment Manager) and Lucy Brown (Senior Democratic Services Officer)

29/25 WELCOME BY CHAIRMAN

(Agenda No. 1)

The Chairman welcomed all to the meeting.

30/25 APOLOGIES FOR ABSENCE

(Agenda No. 2)

There were no apologies received.

31/25 DECLARATIONS OF INTEREST - SEE GUIDANCE NOTE BELOW

(Agenda No. 3)

There were no declaration of interests received.

32/25 MINUTES OF THE MEETING OF 25 APRIL 2025

(Agenda No. 4)

Resolved: that the minutes of the meeting held on 25 April 2025 were a true and accurate record.

33/25 UNCONFIRMED MINUTES OF THE PENSION FUND COMMITTEE ON 6 JUNE 2025
(Agenda No. 5)

It was noted that Janet Wheeler attended the meeting as a Local Pension Board Member, and the minutes amended.

The unconfirmed minutes of the Pension Fund Committee held on 6 June 2025 were noted.

34/25 ANNUAL REPORT OF THE PENSION BOARD
(Agenda No. 6)

Mark Smith, Head of Pensions presented the Annual Report of the Pension Board which set out the Board's activities over the past year and included information on the attendance and training records of Board Members. The report outlined the background to the implementation of the Pension Board with effect from 2015/16 as required under the Public Service Pensions Act 2013.

He highlighted that the Board had started the year with a vacancy for one scheme employer representative, and that they had welcomed Janet Wheeler, Town Clerk at Didcot Town Council. There had recently been a resignation from one other scheme employer who was leaving employment and thanked her for their contribution to both the Board and the Committee over her term.

He also highlighted the Board's attendance over the year, including those as observers to the Pension Fund Committee, and also to the Business Planning Workshop held on 16 January 2025 which discussed the 2025/26 Business Plan.

The report also highlighted the reports that had been considered by the Board over the year, which included the Board's own Annual Report for the 2023/24 financial year and the Strategic Asset Allocation report which was considered at the April 2024 meeting. The report concluded with the future work programme, and it was noted that the Board would maintain its focus on the standard administration report, review of the annual business plan, governance and communications report, and the risk register to ensure that the Committee was able to meet its statutory duties and that performance was delivered to the appropriate standards.

The Chair thanked the Head of Pensions for his comprehensive report and noted that this report would form part of the Fund's Annual Report and also reported to Full Council.

The Board were **RESOLVED** to note the details as set out in the Annual Report of the Local Pension Board.

35/25 REVIEW OF THE ANNUAL BUSINESS PLAN
(Agenda No. 7)

Mark Smith, Head of Pensions presented the report which reviewed the position against the Annual Business Plan for 2025/26 as considered by the Pension Fund Committee at their meeting on 6 June 2025 and invited comments from the Board.

He outlined the key objectives for the Oxfordshire Pension Fund which remained consistent with those agreed for previous years, with one slight update to reflect the Fund's improved funding position. He also provided further context to the latest position on each area of delivery and any outstanding actions required.

Following a question from the Board regarding the terminology of 'Plain English' for the outstanding action on 'Implement McCloud (data and IT requirements) and issuing all Annual Business Statements containing McCloud information with Plain English explanation by 31 August 2025, explanations were provided by both Anna Lloyd, Governance and Communications Officer and Vicki Green, Pension Fund Administration Manager, and Janet Wheeler volunteered to check any documents prior to submission to ensure that they would be easily understood by users.

The Board noted the report.

36/25 RISK REGISTER

(Agenda No. 8)

Mukhtar Master, Governance and Communications Manager presented the Risk Register report as considered by the Pension Fund Committee at their meeting on 6 June 2025 and invited comments from the Board. He advised that the report set out any progress on the mitigation actions agreed for those risks not yet at target, and identified any changes to the risks which had arisen since the register was last reviewed.

Following the previous Board meeting where the Board had requested that Risk 18: Failure to Meet Government Requirements on Pooling' be raised to a red rating, he advised that the risk had been assessed through consultation with fund officers and the Independent Investment Adviser and it was agreed that this should be increased to an amber rating at this time. He advised that following the Fit for Future Consultation, and the instruction received from central government that Funds part of the Brunel pooling find another pool to move into, this would naturally increase the risk rating and had scored an amber score of 10.

It was noted that none of the other risks on the risk register were deemed as decreasing in their respective risk rating and none were removed from the register, and it was noted that all risks were monitored on a quarterly basis.

In response to a query raised regarding the use of substitute members on the Pension Fund Committee and the level of training required to undertake that role, Mukhtar Master advised that substitutes are allowed if they have completed the Induction training which is offered to all Members of the Council.

It was brought to the attention of the Board that the Brunel Oversight Representative recently appointed from the Committee had not attended the most recent Brunel

Oversight Board meeting, and that perhaps a substitute should be considered in the event of non-attendance in the future.

Cllr Peter Stevens, Chair of the Committee advised that he would be happy to be a substitute member on the Brunel Oversight Board and questioned if any other members of the Committee were also able to attend. The Chair advised that it was usual that only one member per Committee sit as a representative, however due to the training requirements required for this post, this could be any member of the Committee.

It was also brought to the attention of the Board that there was an obligation for the Committee to consult on its Investment Strategy Statement every three years. It was noted that the current version on the Council website was dated June 2020, and the Board were mindful of its legal duty to carry out this consultation. Mark Smith, Head of Pensions advised that this Statement would have been reviewed as part of the 2022 Valuation, however, and would be reviewed for the 2025 Valuation and presented to the Committee at its next meeting.

The Board noted the report.

37/25 GOVERNANCE AND COMMUNICATIONS REPORT

(Agenda No. 9)

Mukhtar Master, Governance and Communications Manager presented the Governance and Communications Report which had been presented to the Committee on 6 June 2025. He outlined the largest piece of work which was the General Code of Practice and provided an update on the Fund's compliance against the 51 modules that consisted of the new Code over the previous year and also planned for 2025/26. He noted that of the 51 modules, the Fund were only expected to ensure compliance against those relevant to the LGPS and that there were 20 for 2024/25 and 17 for 2025/26.

He also provided an overview of reportable breaches, and advised that there was a slight increase in the number of breaches received for that quarter, mainly due to one employer with multiple contracts failing to submit data or pay contributions on time due to a changeover of inhouse administration. None of the Q4 breaches were materially significant and as such were not notified to either The Pensions Regulator or the Information Commissioner.

The Board noted the report.

38/25 GOVERNANCE AND COMMUNICATIONS POLICY REVIEWS

(Agenda No. 10)

Mukhtar Master, Governance and Communications Manager presented the Governance and Communications Policy Reviews which had been presented to the Committee on 6 June 2025. The following reviewed policies had been agreed by the Committee:

- Communications Policy
- Governance Policy

- Governance Compliance Statement
- Regulation Breaches Policy

He advised that any changes to the above policies was highlighted in the report for the Board's information.

It was noted that there was no mention of consultation regarding the Investment Strategy Statement in the Communications Policy, and Mukhtar Master advised that following the previous discussions, this would be reviewed again as part of the policy renewal cycle.

Following previous discussions regarding whether substitutes should be allowed to sit on the Pension Fund Committee, it was noted that this should be followed up as an action for the Committee to discuss and consider further, as it was agreed by the Board that the level of training required to be an effective member of the Committee required more than a basic level of training.

The Board noted the report.

39/25 ADMINISTRATION REPORT
(Agenda No. 11)

Vicki Green, Pension Services Manager presented the Administration Report, presented to the Pension Fund Committee on 6 June 2025 which included the latest performance statistics for the service. She advised of the following:

- A breakdown of benefit administration work was provided and confirmed that there had been a decrease of 16% of those completed within the Service Level Agreement deadline from the previous quarter.
- The reduction in performance was attributed to a loss of staffing, increase in annual leave and issues with the pension system requiring manual intervention.
- The service was addressing these issues with development of software to enable greater automation of tasks to improve service and performance overall.
- There had been an increase in telephone calls received from the previous quarter, and the team had maintained performance answering 94% of those.
- No pension scams had been reported in the quarter, and due diligence checks were carried out correctly.
- A new member self-service system called Engage will replace the existing version in January 2026, following calls from members identifying issues with logging into their accounts. A further push to encourage sign up would be aligned with the project.

She further highlighted there was a high number of complex cases that would not be completed before the 31 August 2025 deadline for the McCloud project and had provided the Board with updated information prior to the meeting. The Board was asked to comment as to whether the Fund should report a breach or request an extension of time to complete the work. Mark Smith, Head of Pensions advised that it was important to note that the team had made very good progress, and the completion of records had increased from 57% to over 90%, mainly contributable to external factors. He advised the Board that further work would be undertaken to determine whether any of the breaches were material.

Following a question from the Board, Vicki Green advised that since October 2023 all calculations include a McCloud calculation, and therefore these checks were undertaken as part of final retirement calculations.

Mukhar Master, Governance and Communications Manager advised that The Pension Regulator had stated that any decision would need to be agreed through the Board, however the requirement for whether a discretion was applied was more technical and this would be communicated separately.

Following further discussion from the Board, it was agreed that any breaches would need to be notified to The Pension Regulator as information they need to receive. Mark Smith, Head of Pensions advised that any further information, in regard to whether the Fund would apply the discretion could be communicated via email.

The Board noted the report.

40/25 ADMINISTRATION POLICY REVIEW
(Agenda No. 12)

Vicki Green, Pensions Service Manager presented the Administration Policy Review which had been presented to the Committee on 6 June 2025. The following reviewed policies had been agreed by the Committee:

- Data Retention Policy
- Privacy Notice

She advised that changes to the above policies had been linked to changes to the pension dashboard and the ISP.

The Board noted the report.

41/25 ITEMS TO INCLUDE IN REPORT TO THE PENSION FUND COMMITTEE
(Agenda No. 13)

The Board agreed to include the following items in the report to the Pension Fund Committee:

- Ask the Committee to look at the potential to review the use of substitute members attending the Pension Fund Committee.
- Confirm the substitute for the Brunel Oversight Board.

42/25 ITEMS TO BE INCLUDED IN THE AGENDA FOR THE NEXT BOARD MEETING
(Agenda No. 14)

The Board agreed to include the following as an agenda item for the next meeting:

- Consultation on the Investment Strategy Statement.

43/25 EXEMPT ITEMS
(Agenda No. 15)

The Board was RESOLVED that the public be excluded for the duration of items 16 and 17 in the Agenda since it was likely that if they were present during

those items there would be disclosure of exempt information as defined in Part I of Schedule 12A to the Local Government Act 1972 (as amended) and specified in relation to the respective items in the Agenda and since it was considered that, in all the circumstances of each case, the public interest in maintaining the exemption outweighed the public interest in disclosing the information.

44/25 LGPS POOLING REFORM

(Agenda No. 16)

The Board received a report from the Executive Director of Resources and Section 151 Officer which covered the recently proposed reforms to pooling proposed by central government as presented to the Pension Fund Committee on 6 June 2025.

The Board discussed the various options presented by the Fund Officers to explore options that would seek to achieve the best outcome for both scheme members and employers in private session.

The Board noted the report.

45/25 AFFORDABLE HOUSING

(Agenda No. 17)

The Board received a report from the Executive Director of Resources and Section 151 Officer which provided an update on the Affordable Housing project as presented to the Pension Fund Committee at its meeting on 6 June 2025.

The Board discussed the item in private session.

The Board noted the report.

.... in the Chair

Date of signing ....

This page is intentionally left blank

PENSION FUND COMMITTEE

MINUTES of the meeting held on Friday, 5 September 2025 commencing at 10.00 am and finishing at 12.45 pm

Present:

Voting Members:	Councillor Peter Stevens – in the Chair Councillor Andrew Crichton Councillor Nick Field-Johnson Councillor Dan Levy Councillor Leigh Rawlins
Non-Voting Members:	Steve Moran, Pension Scheme Member (non-voting)
By Invitation:	John Arthur, Independent Financial Advisor
Local Pension Board Members:	Janet Wheeler Stephen Davis
Officers:	Lorna Baxter (Executive Director for Resources and Section 151 Officer), Mark Smith (Pension Service Manager), Vicki Green (Pension Services Administration Manager), Greg Ley (Pension Fund Investment Manager), Josh Brewer (Responsible Investment Manager), Mukhtar Master (Governance & Communications Manager), Anna Lloyd (Governance & Communications Officer), Lucy Brown (Senior Democratic Services Officer)

The Committee considered the matters, reports and recommendations contained or referred to in the agenda for the meeting, together with [a schedule of addenda tabled at the meeting] and decided as set out below. Except as insofar as otherwise specified, the reasons for the decisions are contained in the agenda and reports [agenda, reports and schedule/additional documents], copies of which are attached to the signed Minutes.

37/25 APOLOGIES FOR ABSENCE AND TEMPORARY APPOINTMENTS
(Agenda No. 1)

Apologies were received from Councillors Cotter and Henwood, and Alistair Bastin and Liz Hayden from the Local Pension Board.

38/25 DECLARATIONS OF INTEREST - SEE GUIDANCE NOTE
(Agenda No. 2)

There were no declaration of interests received.

39/25 PETITIONS AND PUBLIC ADDRESS
(Agenda No. 3)

Jessica Hollows addressed the Committee on Item 17: LGPS Pooling Reform. She thanked the Committee for allowing her to address the Committee again and wished to entreat the Committee to strengthen and operationalise the Fund's Responsible Investment Policy which identified human rights as a key priority in the process of selecting and transferring to a new Fund Pool in the coming months. She advised the Committee that she had created a list of the Fund's most recent holdings, categorised by companies whose violations were documented, and who had not responded to any engagement, and this information was made available to the Committee.

The Chair of the Committee thanked the speaker and advised that he had asked Officers to provide further information in regard to the comments raised further on in the agenda.

Following questions raised by members of the Committee regarding the Fund investing in contentious areas, and Mark Smith, Head of Pensions confirmed that following previously sought legal opinion on the rules of international law published by the Scheme Advisory Board, there has been a request for a recent review and are awaiting comment.

40/25 MINUTES
(Agenda No. 4)

On consideration of the minutes of the meeting held on 6 June 2025, the Committee requested the inclusion of additional text under Item 14: Report of the Independent Financial Advisor as there were some actionable points that were not included. It was agreed that these minutes would be amended and brought to the next Committee meeting.

41/25 MINUTES OF THE LOCAL PENSION BOARD
(Agenda No. 5)

The Committee **RESOLVED** to note the unconfirmed minutes of the Local Pension Board which had met on 4 July 2025.

42/25 REPORT OF THE LOCAL PENSION BOARD
(Agenda No. 6)

Janet Wheeler, Local Pension Board Member introduced the report, in place of Alistair Bastin, which set out the items the Local Pension Board wished to draw to the attention of the Committee following their last meeting.

She highlighted that the Local Pension Board resolved to recommend that the Committee review the level of knowledge of any substitute members attending any Committee meeting to ensure that the necessary knowledge and understanding was covered by all those attending Committee meetings. The Board also requested that the Committee confirm the substitute member for the Brunel Oversight Board.

In response to a query raised by the Committee regarding what training would be required to enable a substitute to sit on a committee meeting, Mark Smith, Head of Pensions advised that it would be for the Committee to determine if the appropriate knowledge and training had been completed before allowing any such substitute.

The Committee **RESOLVED** to note the report.

43/25 REVIEW OF THE ANNUAL BUSINESS PLAN 2025/26
(Agenda No. 7)

Mark Smith, Head of Pensions presented the report of the Executive Director of Resources and Section 151 Officer which reviewed progress against key priorities set out in the Annual Business Plan for the Pension Fund for 2025/26. He advised of one key section under Governance of the Fund, the Workforce Strategy and following feedback from the Committee, have engaged a company to perform salary benchmarking, as well as taking part in the Hymans salary survey. He outlined the two pieces of work involved, firstly in the organisational redevelopment of roles with the Council, and also the overlay of how the team was maintained going forward. The action was marked as an 'Amber' in the key service priorities, as it was recognised that they are key pieces of work to be completed.

He also highlighted the challenges experienced in resourcing that had delayed the launch of the new website, further meetings had taken place with IT, and a plan of action determined.

In response to a query raised by the Committee regarding the level of RAG rating allocated against 'Local Government Reform', he advised that this would remain at Green but would be monitored as the programme developed. He also advised that more detail would be provided in the private session regarding how the workforce strategy would be impacted by Local Government Reforms, and considerations that the team are taking into account when developing ongoing discussions.

In response to comments raised regarding the use of venture capital and start up investments utilised in other authorities, Mark Smith advised that these would be considered when determining the Committee's training development programme.

In response to an earlier query raised under agenda item 6, Mark Smith advised that consideration would be given to raising the rag rating of the 'Strategic Asset Allocation' from Green to Amber, however highlighted that this would be a longer ongoing piece of work that once set spanned over the next three years and this should be noted by the Committee.

In agreeing the recommendations, the Committee noted the further actions which included the delay in launching the pensions website and concerns regarding recruitment.

The Committee RESOLVED to:

i) **Review the progress against each of the key service priorities as set out in the report; and**
ii) **Agree any further actions to be taken to address those areas not currently on target to deliver the required objectives.**

44/25 RISK REGISTER REPORT
(Agenda No. 8)

Mukhtar Master, Governance and Communications Manager presented the report of the Executive Director of Resources and Section 151 Officer which presented the latest position on the Fund's risk register, including any new risks identified since the report to the last meeting.

He advised that there were no new emerging risks, however noted that the LGPS Fit for the Future Consultation, Local Government Devolution and Reorganisation and the new Fair Deal were being monitored for any potential risk that could affect the Fund. The only risk to have increased this quarter was Risk 19: Failure of the Pool Vehicle to meet local objectives, which had moved from Green to Red, due to current pooling reforms, it would not be possible to meet this requirement.

It was noted that Risk 4: Under performance of asset managers or asset classes; currently assessed as Green and on target, however with the new central government position to Brunel, it is becoming clear that recruitment and retention of staff was becoming difficult for Brunel and was being monitored.

In response to a query raised by the Committee regarding Risk 19: Failure of Pooled Vehicle to meet local objectives; Mark Smith, Head of Pensions advised that due to the intervention around Pooling, the Fund was mindful of not incurring additional costs brought about by reinvesting in different funds, and this had been investigated and quantified by the Fund Managers in taking this decision.

The Committee RESOLVED to note the latest risk register and accept that the risk register covered all key risks to the achievement of their statutory responsibilities, and that the mitigation plans, where required, were appropriate.

45/25 GOVERNANCE AND COMMUNICATIONS REPORT
(Agenda No. 9)

Mukhtar Master, Governance and Communications Manager presented the report of the Executive Director of Resources and Section 151 Officer which covered the key governance and communication issues for the Fund, including a report on any breaches of regulation in the last quarter.

He provided a further update on the Pension Regulator's General Code of Practice, which reported that there was a requirement to complete all of the 51 modules by March 2025 to be compliant, however not all modules applied to the LGPS, and 20 modules were reviewed. He advised that Hymans had conducted an independent review of the results for 2024/25 and had stated that 'it is our opinion that OPF appears to be in a good position against the requirements of the General Code of Practice'. The Fund achieved a 100% for 18 modules, and 67% and 50% respectively for the remaining two modules.

He also provided an update on the mandatory training required by the Committee and advised that four of the five new Councillors had confirmed their mandatory training route. The mandatory training should be completed by 31 December 2025.

In response to a query raised by the Committee, it was agreed that the Chair would prompt any outstanding training requirements to those Councillors.

The Committee RESOLVED to:

- **i) Note Hymans Oversight & Challenge Report regarding the fund's General Code of Practice compliance work 2024/25.**
- **ii) Note the Fund's update on General Code of Practice Compliance 2025/26.**
- **iii) Note the Committee and Board training update.**
- **iv) Note the latest quarter's breaches for the fund.**
- **v) Note the communications update.**

46/25 ADMINISTRATION REPORT

(Agenda No. 10)

Vicki Green, Pension Services Manager presented the report of the Executive Director of Resources and Section 151 Officer which updated the Committee on the key administrative issues including service performance measurement, the debt recovery process and any write offs agreed in the last quarter.

She highlighted that a breach would be reported to the Pension Regulator in connection with the Fire Service Active and Deferred benefit statements, which were not issued by 31 March 2025 due to outstanding regulation queries and complexities with the cases. It was also noted that the Pension Dashboard Project would be completed ahead of schedule following meetings with IT and would be connected by the end of September.

An update was provided on the McCloud Project, and it was confirmed that 96% of status 1 and 4 cases would include the McCloud protection in their 2025 Annual Benefit statements and that all affected members were notified of their position in their statements, as per the disclosure regulations. Vicki Green highlighted that it was a very complex project, which was due to be completed by August 2026, and full details were available in Appendix 10.

In response to a comment by the Committee, Vicki Green was informed of AI checking software that can be sourced that would enable the team to check the use of AI software in producing CVs etc, and Vicki Green thanked the Committee for this information.

In response to a query raised by the Committee, Vicki Green confirmed that all members had been contacted regarding the McCloud Project and outlined the different letters that had been sent to members of the scheme.

The Committee RESOLVED to note the position of the McCloud project and the decision to exercise the discretion provided by the LGPS (Information) Regulations 2024 not to reflect McCloud in some of the 2025 annual benefit statements.

47/25 REPORT OF THE INDEPENDENT ADVISOR

(Agenda No. 11)

John Arthur, Independent Financial Advisor presented the report which provided an overview of the financial markets, the overall performance of the Fund's investments against the Investment Strategy Statement and commentary on any issues related to the specific investment portfolios. The report included the quarterly investment performance monitoring report from Brunel.

He commented on the current performance of the Fund which stood at an 'all time' high at £3.75bn, however remained beneath its benchmark due to the poor performance from the Global and Private equity portfolios managed by Brunel. He also highlighted the effect of the US Dollar which continued to weaken against all major currencies and had lowered the return of US assets to a Sterling based investor. However, it was noted that in performance terms, whilst the Fund was lagging its benchmark, over the longer term it was surpassing the actuarial' investment return.

He advised the Committee that the Fund had requested Apex to carry out a Strategic Asset Allocation review, and as part of that the current benchmarks would be reviewed to ensure they were appropriate. (ACTION)

Gregory Ley, Pension Fund Investment Manager advised the Committee that the Fund would be moving money out of equities into cash, which would reduce the exposure to the US Dollar. John Arthur advised the Committee on his concerns regarding the US President and the ongoing effect of increased tariffs, and that by reducing the equities to the strategic benchmark, reviewing the strategic benchmark which would be carried out over the second quarter of this year, would provide assurance that the Fund was not overweight within the US equity market.

The Committee expressed their frustration that the report did not show how Brunel's performance compared against other asset classes and that this had been requested at the meeting of 13 December 2024. John Arthur responded that he had expected this information to be shared with the Committee in Brunel's own reports, however, could include this in future reports if it did not cause unnecessary duplication. It was agreed, on the Committee's wishes, that this information be provided by the Independent Financial Advisor, in his report. (ACTION)

The Committee repeated their concerns with the level of current risk and highlighted the need for a strategic allocation review in terms of those risks that could apply and John Arthur, whilst highlighting the level of stagnation, cautioned against responding to short term fluctuations in inflation to determine level of risk and rather position the Fund for long term growth.

Stephen Davis, Local Pension Board Member arrived at the meeting.

In response to queries raised by the Committee, Mark Smith, Head of Pensions advised that any suggested changes to the benchmark would be agreed with themselves and their Pooling partner prior to implementation.

In response to query regarding the level of risk of moving investments to cash, John Arthur advised that this would be a transitory move and could be reallocated when moving to the new Pool, however, would advise this to be a short-term allocation only.

In response to a request from the Committee, John Arthur agreed to feedback to Apex, a request for an in-depth review of the level of asset allocation in either private equity or sustainable investments, to determine any future investment opportunities as part of the Strategic Asset Allocation review. He also agreed to include further detail on the underlying private equity holdings with a view to either moving investment into private equity holdings or transferring to those that are performing better. (ACTION)

The Committee thanked the Independent Financial Advisor for his comprehensive report.

48/25 CORPORATE GOVERNANCE AND SOCIALLY RESPONSIBLE INVESTMENT
(Agenda No. 12)

Josh Brewer, Responsible Investment Officer presented the report which provided the Committee with an opportunity to raise any concerns concerning Corporate Governance and Responsible Investment which needed to be brought to the attention of the Committee. He provided a high-level overview of Brunel's activity in relation to conflict areas for human rights as referenced by the speaker at Item 3 and subject to correspondence that had been received by the Fund. He advised the Committee of the complexity of the area that had taken place over previous decades and that the Fund should take the lead from Government but should manage the risk of exposure to those risks and outlined the procedures in place to do that.

He further advised that Brunel would continue to apply the levers listed in the report and Fund Officers would keep these under active review. He proposed that the Responsible Investment and Climate Change Committee scheduled for 25 September should include Brunel, who should be requested to present in more detail on this overview, which could be held as a closed session to enable the Committee and Board members to complete a more comprehensive review.

Josh Brewer updated the Committee on the recommendation at the previous meeting to invest in affordable housing and advised that they had met with two companies and were currently reviewing referencing in order to make a final decision on which company to invest with. He advised that as Officers, and in consultation with John Arthur, Independent Financial Advisor for the Fund, they were confident that either company could deliver on the returns and risk management required and would bring the final recommendation to the December Committee meeting.

The Committee were RESOLVED to note the report.

The Committee adjourned for a break for 5 minutes at the end of this item.

49/25 ANNUAL REPORT AND ACCOUNTS INCLUDING TASKFORCE FOR CLIMATE-RELATED FINANCIAL DISCLOSURES (TCFD) REPORT

(Agenda No. 13)

Gregory Ley, Pension Fund Investment Manager presented the report of the Executive Director of Resources and Section 151 Officer which presented the draft Annual Report and Accounts for the Pension Fund, including the latest TCFD report, and progress against the targets set in the Fund's Climate Change Policy.

He highlighted the Asset Allocation table within the report which detailed the increased investment in UK Investments, and the changes to the annual report guidance which set a requirement to list the Fund's UK exposure in terms of investments. He noted that the list did not include UK property and corporate debt which equated to £300m, approximately a third of the total investment.

In response to a query raised by the Committee, it was advised that the differing contribution rates relate to different employers and therefore varying rates applied.

Josh Brewer, Responsible Investment Officer presented the TCFD report which was in its fifth year and presented how the Fund was performing under delivery of the commitments made to the 2020 Climate Change Policy. He highlighted the challenges as the policy that was developed predicated the government and regulatory action in order to address climate change, which had not materialised to the extent originally envisaged, however there remained a pathway to net zero.

The Committee noted the report.

50/25 EXEMPT ITEMS

(Agenda No. 14)

The Committee RESOLVED that the public be excluded for the duration of Items 15, 16 and 17 on the Agenda since it was likely that if they were present during those items there would be disclosure of exempt information as defined in Part 1 of Schedule 12A of Page 10 the Local Government Act 1972 (as amended) and specified in relation to the respective items in the Agenda and since it was considered that, in all circumstances of each case, the public interest in maintaining the exemption outweighed the public interest in disclosing that information

51/25 2025 VALUATION UPDATE AND FUNDING STRATEGY STATEMENT REVIEW

(Agenda No. 15)

The Committee received a report with the 2025 valuation results and updated draft Funding Strategy Statement prior to consultation with employers in the autumn.

The Committee discussed the item in private session.

The Committee RESOLVED to:

i) **Note the progress on the 2025 valuation; and**
ii) **Approved the draft Funding Strategy Statement (FSS) which would go out to consultation with employers and other stakeholders in the autumn.**

52/25 SUPPORTED/TRANSITIONAL HOUSING FUND INVESTMENT UPDATE

(Agenda No. 16)

The Committee received a verbal update on the Supported/Transitional Housing Fund project.

The Committee discussed the item in private session.

The Committee noted the update.

53/25 LGPS POOLING REFORM

(Agenda No. 17)

The Committee received a report which covered the recently proposed reforms to pooling proposed by central government. The Committee discussed the item in private session and received a verbal update from the Head of Pensions on the latest update on the selected partner which had been received that morning.

The Committee RESOLVED to agree the recommendations that were contained within the confidential report.

.... in the Chair

Date of signing ....

This page is intentionally left blank

OXFORDSHIRE PENSION FUND
REPORT AND ACCOUNTS 2024/25

Registered Number: PS049/20

CONTENTS

	Page
Foreword by the Executive Director Resources and Section 151 Officer	2
Oxfordshire Pension Fund Local Pension Board	6
Statement of Responsibilities for the Pension Fund	10
Auditor's Report	11
Members, Managers and Advisers	12
How the Scheme Operates	13
Participating Employers and their Contribution Rates	15
Governance & Communication	19
Risk Management	21
Scheme Administration & Administration Performance	25
Financial Performance	27
Investment Review	31
Taskforce on Climate-related Financial Disclosures Report	42
Other Material	69
Pension Fund Accounts 2024-25	70
Actuarial Statement	105
Summary of Benefits	108
Investment Strategy Statement	111
Governance Policy Statement	112
Funding Strategy Statement	113
Communications Policy Statement	114
Communication	115
Useful Contacts and Addresses	117

FOREWORD TO THE 2024/25 PENSION FUND REPORT AND ACCOUNTS BY THE DEPUTY CHIEF EXECUTIVE AND EXECUTIVE DIRECTOR FOR RESOURCES (SECTION 151 OFFICER)

Introduction

I am pleased to present the Pension Fund Report and Accounts for the Oxfordshire County Council Pension Fund for the year 2024/25.

2024/25 started much like previous years waiting for the publication of a number of expected Government proposals. As the year progressed we saw significant activity from the new Government around pensions with some of that focus on the LGPS. The long-expected consultations arrived en masse, in May 2024 the Minister for Local Government wrote to all administering authorities of the Local Government Pension Scheme, asking each authority to set out its approach to achieving efficiencies in the management, governance and administration of their Fund and their asset pool. In September 2024, we saw a Call for Evidence to inform the first phase of the Pensions Investment Review. On 14 November 2024 during the Mansion House speech the Government released a number of pension related consultations, the key consultation of importance to the LGPS was the Local Government Pensions Scheme (England and Wales): Fit for the future consultation. This covered reforming asset pools, boosting investment in Local and UK investments and strengthening the governance at both Fund and pool level. We also saw LGPS investment pools would be required to report by March 2025 on how they intended to deliver the new model of pooling. In April 2025, we received confirmation that our investment pool; the Brunel Pensions Partnership did not meet the Government's vision for the future of the LGPS, as such we were invited to consider and identify which pool the Fund wished to partner with going forward. It is difficult to see this pace slowing with further consultations already in progress with more due for release.

Progress was made on a number of fronts during the last year. We continued to strengthen the governance arrangements of the Fund as the Governance and Communications Team, worked to ensure compliance with the General Code of Practice issued by the Pension Fund Regulator. Independent oversight of this commenced to give an appropriate level of scrutiny over the Fund's progress.

At the start of the year we welcomed a new Committee Chair and Deputy Chair. Then due to the local elections welcomed a nearly new Pension Fund Committee in May 2025, changing Chair and Deputy Chair once again. As such a key area of focus throughout the year has been on induction, training and support to Committee Members ensuring their Knowledge and Understanding was sufficient to take on what has been a busy period for the Fund.

The Investment Team continued to develop our work on responsible investment, with a key achievement being our successful application to the Financial Reporting Council to be recognised as a signatory under the UK Stewardship Code. To be recognised as a signatory to the Code confirms that we have evidenced our commitment to engaging with our investee companies and using our voice and votes to encourage companies to act in a way that delivers long-term sustainable solutions, across the full range of environmental, social and governance issues.

Within the Administration Service, the key challenge was continuing to work through the additional work associated with implementing the McCloud remedy. Significant effort was required both within the Administration Team but also across all scheme employers. Being a valuation year significant preparation was undertaken with our scheme employers, in advance of the valuation date, setting out the focus on data quality.

Key Outcomes during 2024/25

A number of key milestones were achieved during the year. Including the development of our workforce strategy, we have focussed on growing, supporting and developing our team throughout the year and will continue to build on this to enable us to create a truly inclusive working environment.

The completion of the work against the General Code of Practice modules. Significant progress was made on the McCloud remedy, we also saw improved reporting on administration processes with the development of new reporting functionality. We saw positive feedback from Scheme Members via the regular surveys, but also overwhelmingly good feedback from the in-person sessions run by the team.

We appointed our affordable housing provider, enabling us access to additional investment that provides an inflation linked return alongside delivering local impact.

2025 is also a valuation year as such we saw significant amounts of advance work completed, in preparation for a very different economic environment at this valuation from previous cycles.

We saw continued focus on our responsible investment policy and significant voting activity through our investment pool.

The Fund

The Fund again saw turnover amongst the scheme employers, largely confined to the admitted bodies. This largely reflects movements of schools, either new academies or switches between Trusts, and the results of outsourcing arrangements. There were 150 scheme employers as at 31 March 2025. The Fund had a total of 75,049 members as at 31 March 2025, an increase of 2.4% since last year.

In terms of cash-flow, the Fund saw a small fall in net positive cashflow from dealings with scheme members from £26.3m last year to £19.7m. This will be reviewed as part of the work on the 2025 Valuation and strategic asset allocation review, with the option to switch to income classes in a number of the existing investment portfolios (so investment income is paid back to the Fund rather than being re-investing as is the current practice).

Investment Performance

The Fund value increased over the course of the 2024/25 financial year ending the year at £3.650bn (£3.541bn as at 31 March 2024). Total investment return over the year was 2.52%. According to the initial results from the 2025 actuarial valuation, the Fund is 129% funded in respect of the pension benefits earned to date, although it should be noted that two thirds of the benefits to be paid out over the next 50 years have not yet been earned or funded.

The Future

The Government has already made it clear during the first 12 months of office that they intend to encourage Pension Funds to invest in the UK economy. The extent to which the Government will encourage/require LGPS Funds to invest in the UK and the definition of Local and UK investments remains to be clarified, also how this will interact with the Fund's fiduciary duty remains to be seen.

We now have the answer to how many pools there will be for the foreseeable future, there will be six pools, it will likely take a number of years to work through the operational and governance matters and potentially wind up/transfer the Brunel Pensions Partnership.

For the Oxfordshire Pension Fund, the future challenges will be taken on by a relatively new Pension Fund Committee, with the support of an experienced Local Pension Board and Fund officers.

The Fund has four key priority areas for the coming year, the first being to deliver further improvements to the governance arrangements of the Fund, with key areas of focus on succession planning and supporting internal development of the team. Continue work on the General Code of Practice and implement the remaining outcomes of the Good Governance Review.

The second priority area for 2024/25 is to improve the operational effectiveness of the Administration function, as measured by a reduction in complaints and regulatory breaches, and improvements in customer satisfaction and data quality. Delivery against the requirements of the McCloud remedy is another key aspect of this priority. Part of the delivery of this priority will be to enhance our employer engagement through our new Employer Services Team.

The third priority area is to develop further the Fund's Investment and Funding service. Part of this will be achieved through delivery of the 2025 valuation and associated work such as out Strategic Asset Allocation review and cashflow modelling. An important part of this priority is continuation of our responsible investment policy, some of which will be dependent upon the not so small item of finding a new investment pool and working collectively with our new partner funds.

The fourth and final priority area covers the delivery of service enhancements and cost reductions through use of technology. A key area of this priority will be the development and launch of our new dedicated Fund website to improve accessibility and enhance the user experience. In addition, to support our service delivery the final key area of focus is the development of our administration system, ranging from the implementation of Pension Dashboard to the development of the system to increase our own internal efficiency, alongside supporting Scheme Members to have an enhanced and improved experience when accessing information about their pension. A key focus will be increasing automation, enhanced cyber security and exploring the use of AI tools within our existing system.

I would like to thank our Pension Fund Committee, Local Pension Board, Fund officers, our employers and our other partners for their hard work, support and dedication to ensuring we deliver an excellent service to our Scheme Members.

As we look ahead, we recognise that significant work remains to meet the growing demands placed upon the Fund. At the same time, we are committed to embracing and leading the transformation of our service—ensuring it is equipped to meet future opportunities. Our focus remains, to deliver secure and long-term sustainable pensions for our Scheme Members, provide affordable pension provision for our employers, and continue generating meaningful impact and value across our region and society.

Lorna Baxter
Executive Director of Resources & Section 151 Officer
August 2025

The Oxfordshire Local Government Pension Scheme (LGPS) Pension Board

All Public Sector Pension schemes were required under the Public Service Pensions Act 2013 to set up a Pension Board with effect from 2015/16 to assist the administering authorities of their Pension Scheme in ensuring compliance with LGPS and other pension regulations.

The Oxfordshire Pension Fund Committee, acting as administering authority of the Oxfordshire LGPS, agreed the terms of reference of the Pension Board in March 2015.
These terms of reference are available on the Board's website at
https://www.oxfordshire.gov.uk/cms/content/lgps-local-pension-board

Under the constitution of the Board, an annual report on the work of the Board should be produced by the Board for inclusion in the Fund's own annual report; and it should be presented to the Pension Fund Committee within 6 months following the end of the municipal year. This report meets that requirement for the 2024/25 financial year, covering the work from the July 2024 Board meeting to their meeting on 25 April 2025.

Board Membership

The Board started the year with a vacancy for one scheme employer representative following the resignation of Marcia Slater who had retired from her employment.
The employer representative vacancy was advertised via the employer's newsletter and on the Fund Website. This attracted two responses. After a review of responses Janet Wheeler, Town Clerk at Didcot Town Council was appointed to serve on the Board.
We have recently received notification of the resignation of one scheme employer representative, Angela Priestley-Gibbins, who is leaving employment and is therefore no longer eligible to serve on the Board as an Oxfordshire Scheme Employer representative. The Board thanks Angela for her contributions.

Attendance at Board meetings was as follows:

	15 July 2024	18 October 2024	24 January 2025	25 April 2025
Scheme Employer Representatives				
Angela Priestley-Gibbins (The Thera Trust)	Yes	Yes	Yes	Yes
Susan Blunsden (Cherwell District Council)	No	Yes	Yes	Yes
Janet Wheeler (Didcot Town Council)	N/a	Yes	Yes	Yes
Scheme Member Representatives				
Stephen Davis (Oxford Direct Services & Unite)	Yes	No	Yes	Yes
Alistair Bastin (Oxfordshire County Council & Unison)	Yes	Yes	Yes	Yes
Liz Hayden (Retired Member)	Yes	Yes	No	Yes

All meetings were attended and chaired by the Independent Chair Matthew Trebilcock, the Head of Pensions for the Gloucestershire Pension Fund under the reciprocal agreement. Cllr Donna Ford attended all meetings of the Board in her capacity as Chair of the Pension Fund Committee as part of the arrangements agreed within the Governance Review to improve communications between the Committee and Board.

Sean Collins, the Head of Pensions for the Oxfordshire Fund retired on 31 July 2024 and stepped down as Independent Chair of Gloucestershire Local Pension Board under the reciprocal arrangement. Mark Smith, the new Head of Pensions for the Oxfordshire Fund commenced as Independent Chair of the Gloucestershire Local Pension Board from 1 August 2025

A number of the Board Members regularly attended the Pension Fund Committee as observers, with Alistair Bastin presenting the report of the Board to the Committee. Board Members were also regular attenders at the training events run through the year, to which all Committee and Board members were invited.

With the agreement of the Independent Chairman and members of the Board, all meetings of the Board during 2024/25 were held virtually. As the Board was set up under separate legal provision from the other County Council Committees, there is no legal requirement for meetings to be held in person

Members of the Board also attended the Business Planning Workshop held on 16 January 2025 which discussed the 2025/26 Business Plan.

The Board have also been represented throughout the year on the Climate Change Working Group. Alistair Bastin has also served as a member of the Brunel Oversight Board as one of two representatives of all scheme members on that Board following an election process across the ten Funds within the Brunel Pension Partnership.

Alistair Bastin also sat as a member of the technical interview panel as part of the selection process for the new Head of Pensions position. The Panel provided advice to the Executive Director of Resources & Section 151 Officer on the LGPS knowledge, skills and experience evidenced by the candidates, who was responsible for making the final decision on the appointment.

Work Programme

The work programme for the Board continued as a mix of a regular review of a set of standard reports as presented to the previous meeting of the Pension Fund Committee, ad-hoc review of reports to the Pension Fund Committee and new items brought direct by the Fund's officers or made at the request of Board members such as the paper on the Strategic Asset Allocation including active verses passive investment management.

The standard reports reviewed at each of the Board meetings in that last year were:

- Review of the Annual Business Plan and Budget
- Governance and Communications Report
- Risk Register
- Administration Report

The main issues identified by the Board in respect of these reports were in respect of the skills, knowledge and experience of those charged with the governance of the Fund. During the year, the Board expressed concern with the local elections and possible change in Committee membership and loss of experience. An additional risk was added to the risk register and monitored by the Board. The Board also raised specific concerns around the resources available to manage the McCloud project and kept a regular review of the status of the project throughout the year.

A major element of the work of the Board during the year 2024/25 focussed on the new General Code of Practice, published by the Pension Regulator.

During the year, the Board reviewed the following Committee reports:

a. July 2024 – the Fund Cashflow and 2025 Triennial Valuation.
b. October 2024 - the Annual Report and Accounts for the Pension Fund and the Responsible Investment Policy – Monitoring and Reporting.
c. January 2025 – Pension Investment Review – A Call for Evidence and the Workforce Strategy.

The new items considered by the Board which had not previously been presented to the Pension Fund Committee were:

a. The Boards own Annual Report for the 2023/24 financial year considered at the July 2024 meeting.
b. The report on the Strategic Asset Allocation considered at the April 2024 meeting.

Future Work Programme

A key work area for the Board during 2025/26 will be monitoring the progress against and independent review of the General Code of Practice issued by the Pension Regulator. This is consistent with one of the primary objectives of the Board to ensure that the Pension Fund Committee is meeting its regulatory duties and ensuring all material breaches are reported to the Pension Regulator.

The Board will also maintain its focus on the standard administration report, review of the annual business plan, governance and communications report and the risk register to ensure that the Committee is able to meet its statutory duties, and performance is delivered to the appropriate standards.

The Board will also maintain its focus on the future governance arrangements for the Fund and in particular the impact of the changes to the leadership of the Fund both on the Committee and at Officer level. Key to this will be reviewing the current training arrangements and the effectiveness of these in ensuring appropriate levels of skills and knowledge on the Committee and the Board itself. Reviewing progress on the implementation of the Workforce Strategy will also form a key part of the Board’s work in this area, including the development of self-service tools for scheme members and employers, the automation of certain processes, development of a new Fund website.

Other areas of work for the Board in 2025/26 will be to oversee the work undertaken by the Committee for the 2025 Valuation, implementation of pensions dashboard and delivery of the McCloud solution for the 2025 Annual Benefit Statements. The oversight of Board will also be critical on the matter of pooling reform, as the Administering Authority seeks to find a new investment pool.

Board Members Training 2024/25

Local Pension Board Member Training 2024/25	
Alistair Bastin	PLSA Local Authority Forum
	National Knowledge Assessment 2024
	Pre-Committee Training 07/06/2024 Triennial Valuation (Hymans) 2
	Pre-Committee Training 06/09/2024 Affordable Housing (M&G)
	Pre-Committee Training 13/12/2024 Brunel Governance
	Pre-Committee Training 07/03/2025 Triennial Valuation (Hymans)
Angela Priestley-Gibbins	LGA Fundamentals
	LGA LGPS Governance Conference
	National Knowledge Assessment 2024
	Pre-Committee Training 07/06/2024 Triennial Valuation (Hymans) 2
	Pre-Committee Training 06/09/2024 Affordable Housing (M&G)
	Pre-Committee Training 13/12/2024 Brunel Governance
	Pre-Committee Training 07/03/2025 Triennial Valuation (Hymans)
Liz Hayden	TPR Toolkit
	National Knowledge Assessment 2024
Susan Blunsden	National Knowledge Assessment 2024
Stephen Davis	Pre-Committee Training 13/12/2024 Brunel Governance
	Pre-Committee Training 07/03/2025 Triennial Valuation (Hymans)
Janet Wheeler	Induction
	National Knowledge Assessment 2024
	Pre-Committee Training 07/03/2025 Triennial Valuation (Hymans)

Statement of Responsibilities for the Pension Fund

The County Council's Responsibilities

The County Council is required to:

- make arrangements for the proper administration of the financial affairs of the Pension Fund and to ensure that one of its officers has the responsibility for the administration of those affairs. For the County Council, that officer is the Executive Director for Resources and Section 151 Officer;

- manage its affairs to secure economic, efficient and effective use of resources and safeguard its assets.

The Pension Fund Committee has examined the Pension Fund accounts and authorised the Chairman to approve them on its behalf.

The Responsibilities of the Executive Director for Resources and Section 151 Officer

The Chief Finance Officer is responsible for the preparation of the Pension Fund's accounts in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2024/25 ('the Code of Practice').

In preparing this Statement of Accounts, the Executive Director for Resources and Section 151 Officer has:

- selected suitable accounting policies and then applied them consistently;
- made judgements and estimates that were reasonable and prudent;
- complied with the Code of Practice.

The Executive Director for Resources and Section 151 Officer has also:

- kept proper accounting records which were up to date;
- taken reasonable steps for the prevention and detection of fraud and other irregularities.

LORNA BAXTER
Executive Director for Resources and Section 151 Officer

INDEPENDENT AUDITOR'S STATEMENT TO THE MEMBERS OF OXFORDSHIRE PENSION FUND ON THE PENSION FUND FINANCIAL STATEMENTS

SCHEME MANAGEMENT & ADVISORS

Administering Authority	Oxfordshire County Council County Hall Oxford OX1 1ND
Administrator	Executive Director Resources & Section 151 Officer
Pension Fund Committee County Council Members 2024/25 Membership	Cllr Donna Ford (Chair) Cllr Michael O'Connor (Deputy Chair) Cllr Bob Johnston (to June 24) Cllr Nick Field-Johnson Cllr Imade Edosomwan Cllr Ian Middleton Cllr John Howson Cllr Peter Stevens (from September 24)
Representatives of District Councils	Cllr Jo Robb (SODC)
Representatives of Scheme Employers	Alistair Fitt (Oxford Brookes University)
Scheme Member Representative	Steve Moran
Independent Investment Adviser	John Arthur Apex Investment Advisers
Fund Managers	Adams Street Partners Brunel Pension Partnership Legal & General Investment Management Partners Group Insight Investment Management
Internally Managed Funds	Listed Private Equity
Actuary	Hymans Robertson
Auditor	Ernst & Young LLP
AVC Provider	Legal and General
Custodian	State Street Bank and Trust Company
Legal Advisers	Oxfordshire County Council Legal Services
Bankers	Lloyds Bank Plc

HOW THE SCHEME OPERATES

♦ Legal Framework

The Local Government Pension Scheme is a statutory, funded defined benefit pension scheme. The operation of the Oxfordshire County Council Pension Fund is principally governed by the Local Government Pension Scheme Regulations 2013 [as amended] (effective from April 2014).[1] The scheme covers eligible employees and employees of other bodies eligible to be employers in the Scheme. A list of all those bodies with employees currently participating in the Scheme is shown on pages 15 to 18.

This career average revalued earnings (CARE), defined benefit scheme provides benefits related to actual salary for its members and the benefits are unaffected by the investment return achieved on the Scheme's assets. 'CARE' benefits build up each year with annual revaluation while pensions paid to retired employees, their dependents, and deferred benefits are subject to mandatory increases in accordance with annual pension increase legislation. Since 2011 the amount is based the Consumer Price Index (CPI).

All active LGPS members at 31 March 2014 were transferred to the new LGPS for 1 April 2014. Their final salary benefits linked to the final pay definitions of the previous regulations continue while accrual of membership stopped at 31 March 2014.
Pension Investment and Administration is governed by Her Majesty's Customs and Revenue Office (HMRC) setting out personal maximum values of benefit and reporting structures for schemes.

♦ Contributions

The Oxfordshire County Council Pension Fund is financed by contributions from employees and employers, together with income earned from investments. The surplus of contributions and investment income over benefits being paid is invested.

The contribution from employees is prescribed by statute at rates between 5.5% and 12.5% of pay.

Employers' contribution rates are set following the actuarial valuation, which takes place every three years. The contribution rate reflects an employer experience, the fund deficit or surplus and is the rate at which employers need to contribute to achieve a 100% funding level projected over 22 years.

Contribution rates for 2024 - 2025 were based on the completed valuation of the Scheme's financial position as at 31 March 2022 and are shown on pages 15 to 18.

♦ Benefits

The benefits payable under the Scheme are laid down by the 2013 Regulations. Pension payments are guaranteed and any shortfall is met through the Pension Fund linked to employer contribution rates set by the fund valuation. The Scheme is a 'defined benefit scheme and provides a pension based on 1/49th of pensionable pay each year of membership with annual revaluation, adjusted in line with CPI. A Summary of Benefits is shown on pages 108 to 110.

<u>Overriding legislation</u>

The LGPS exists within rules laid down by HMRC. These provide time limits for benefit payments and also on the member limits to the amount of pension built up within a year and within a lifetime. At retirement a member has to declare any other benefits, not just from the LGPS but all pension provision, to ensure all benefits are within this limit. A tax charge is imposed if this limit is exceeded or if the member fails to make the declaration.

[1] From 01 April 2014 new LGPS have introduced a new scheme. This is still a defined benefit scheme which is now based on Career Average Revalued Earnings (CARE)

Members can convert a portion of their annual pension to provide a larger tax free lump sum at retirement.

The limits an individual can build up in a year and a lifetime are set by HMRC with additional reporting timetables for fund administration.

♦ Adjudication of Disagreements Procedure

The first stage of a dispute is, generally, looked at by the claimants' employer. The second stage referral is to the County Council and the Appointed Person. For information please contact the Pension Services Manager.

PARTICIPATING EMPLOYERS

Scheduled Bodies	Contribution Rate Payroll % 2024/25	Additional Monetary Amount 2024/25	Scheduled Bodies (cont)	Contribution Rate Payroll % 2024/25	Additional Monetary Amount 2024/25
Abingdon & Witney College	20.0%	-	Chinnor Parish Council	21.7%	-
Abingdon Learning Trust	21.2%	-	Chipping Norton Town Council	21.7%	-
Abingdon Town Council	21.7%	-	Cholsey Primary School (OPEN)	19.3%	-
AcerTrust MAT	20.3%	-	Cumnor Parish Council	21.7%	-
Activate Learning Education Trust	20.3%	-	Didcot Town Council	21.7%	-
Activate Learning	19.8%	-	Drayton Parish Council	21.7%	-
Adderbury Parish Council	21.7%	-	Europa School	19.3%	-
Anthem School Trust	19.1%	-	Eynsham Parish Council	21.7%	-
Aspirations Academy Trust	21.8%	-	Eynsham Partnership	20.0%	-
Badgemore Primary – The Circle Trust	19.9%	-	Faringdon Town Council	21.7%	-
Banbury Town Council	21.7%	-	GEMS Didcot Primary Academy	19.3%	-
Benson Parish Council	21.7%	-	GLF- William Morris	18.1%	-
Berinsfield Parish Council	21.7%	-	Goring Parish Council	21.7%	-
Bicester Town Council	21.7%	-	Gosford & Water Eaton Parish Council	21.7%	-
Blackbird Leys Parish Council	21.7%	-	Henley College	20.0%	-
Bladon Parish Council	21.7%	-	Henley on Thames Town Council	21.7%	-
Bloxham Parish Council	21.7%	-	Heyford Park Parish Council	21.7%	-
Burford School	22.4%	-	Kennington Parish Council	21.7%	-
Cambrian Learning Trust	21.1%	-	Kidlington Parish Council	21.7%	-
Carterton Town Council	21.7%	-	Kingston Bagpuize with Southmoor	0.0%	-
Chadlington Parish Council	21.7%	-	Parish Council	21.7%	-
Chalgrove Parish Council	21.7%	-	Ladygrove Park Primary School	19.7%	-
Cherwell District Council	15.9%	-	Langtree Academy	19.3%	-

List of Participating Employers continues on next page…

PARTICIPATING EMPLOYERS

Scheduled Bodies (cont)	Contribution Rate Payroll % 2024/25	Contribution Rate Additional Monetary Amount 2024/25	Scheduled Bodies (cont)	Contribution Rate Payroll % 2024/25	Contribution Rate Additional Monetary Amount 2024/25
Leafield Parish Council	21.7%	-	South Oxfordshire District Council	17.8%	411,000
Lewknor Parish Council	21.7%	-	Spelsbury Parish Council	21.7%	-
Littlemore Parish Council	21.7%	-	Stanton St John PC	21.7%	-
Long Hanborough Parish Council	21.7%	-	St Johns Academy Trust	22.1%	-
MacIntyre Academy Trust	16.0%	-	Sutton Courtenay Parish Council	21.7%	-
Maiden Erlegh Trust	19.3%	-	Thame Partnership Academy Trust	19.8%	-
Marcham Parish Council	21.7%	-	Thame Town Council	21.7%	-
Milton Parish Council	21.7%	-	The Gallery Trust	19.4%	-
Nettlebed Parish Council	21.7%	-	The Merchant Taylors Oxfordshire Academy	0.0%	-
North Hinksey Parish Council	21.7%	-	School Trust	19.3%	-
Old Marston Parish Council	21.7%	-	The Mill Academy Trust	21.2%	-
Oxford Brookes University	19.2%	-	The Pope Francis MAC	20.5%	-
Oxford City Council	13.4%	-	United Learning Trust	16.7%	-
Oxford Diocesan Trust	20.2%	-	Vale of the White Horse District Council	17.8%	767,000
Oxford Direct Services	20.6%	-	Wallingford Town Council	21.7%	-
Oxfordshire County Council	19.9%	-	Warriner MAT	21.6%	-
Propeller Academy Trust	19.4%	-	Watlington Parish Council	21.7%	-
Radley Parish Council	21.7%	-	West Oxfordshire District Council	17.6%	766,000
Ramsden Parish Council	21.7%	-	Wheatley Parish Council	0.0%	1,200
Ridgeway Education Trust	24.8%	-	Willowcroft Academy Trust	17.5%	-
Risinghurst & Sandhills Parish Council	21.7%	-	Witney Town Council	21.7%	-
River Learning Trust	19.2%	-	Woodstock Town Council	21.7%	-
Sandford St Martin Parish Council	21.7%	-	Wootton Parish Council	21.7%	-

List of Participating Employers continues on next page...

PARTICIPATING EMPLOYERS

Admitted Bodies	Contribution Rate Payroll % 2024/25	Contribution Rate Additional Monetary Amount 2024/25
A2 Dominion	17.2%	-
Affinity Trust	19.9%	-
Alliance in Partnership Limited – The Cooper School (Bicester Learning Academy) catering	21.2%	-
Aspens Services Limited – Pope Francis Multi Academy Company (St Gregory the Great Secondary School and St Joseph's Primary School ,Thame, (catering contract)	20.5%	-
Atlas Cleaning Limited - EPAT	20.0%	-
Banbury Museum Trust	17.2%	-
Caber Facilities Management Limited – Caldecott Primary School, Abingdon (cleaning contract)	19.9%	-
Capita	17.8%	-
Caterlink Limited – Acer Trust (Botley School, Oxford) (catering contract)	20.3%	-
Caterlink – Faringdon Learning Trust	9.6%	-
Caterlink Ltd – Oxford Diocesan Schools Trust (St Frideswide CofE Primary School) (catering contract)	20.2%	-
Clarendon Limited – Clanfield Church of England Primary School (cleaning contract)	19.9%	-
Cleantec Services Ltd – Pope Francis MAC (Blessed George Napier School) (cleaning contract)	20.5%	-

Admitted Bodies (cont)	Contribution Rate Payroll % 2024/25	Contribution Rate Additional Monetary Amount 2024/25
Cleantec Services Limited – River Learning Trust (cleaning contract)	19.2%	-
Community Integrated Care (OCC care contract)	19.9%	-
Culinera Ltd – River Learning Trust (The Swan School) (catering contract)	19.2%	-
Dolce Limited at Eynsham Partnership Academy (Eynsham Primary School) (catering contract)	20.0%	-
Dolce Limited – River Learning Trust (Bayards Hill School, Oxford) (catering contract)	19.2%	-
Dolce Limited – River Learning Trust (Lots 6 and 7) (catering contract)	19.2%	-
Dolce Limited – River Learning Trust (The Marlborough School, Woodstock) (catering contract)	19.2%	-
Dolce Limited –Windmill Primary School	19.9%	-
Edwards & Ward – River Learning Trust Lot 1 (The Oxford Academy and Wheatley Park School) (catering contract)	19.2%	-
Edwards & Ward – River Learning Trust Lot 2 (Chipping Norton School) (catering contract)	19.2%	-
Edwards and Ward (St Andrews C.E. Primary School)	19.9%	-
Edwards & Ward - Vale Academy Trust	20.4%	-

List of Participating Employers continues on next page…

PARTICIPATING EMPLOYERS

Admitted Bodies (cont)	Contribution Rate Payroll % 2024/25	Contribution Rate Additional Monetary Amount 2024/25
Edwards and Ward – Vale Academy Trust (Larkmead School) (catering contract)	20.4%	-
Fresh Start – Bishop Loveday	21.6%	-
Fresh Start Ltd (Bloxham School contract)	19.9%	-
Greenwich Leisure Limited	23.1%	-
Groundwork South	19.9%	-
Hill End Outdoor Education Centre	13.5%	-
HPS Services FM Ltd	21.8%	-
KGB Cleaning South West Ltd - Activate Learning Education Trust (Bicester Tech & School)	20.3%	-
Kidz Zone Club Limited – Langford Village Community Primary School (OCC) (before and after school clubs contract)	19.9%	-
Maid Marions Ltd– Faringdon Academy of Schools	18.8%	-
M Group Services	19.9%	-
Order of St John's Care Trust (Oxford)	39.8%	-
Oxford Archaelogical Unit	17.2%	-
Oxford Community Work Agency	17.2%	-
Oxfordshire LEP	19.9%	-
Parker Contract Cleaning	19.9%	-
Publica	17.6%	-
Purgo Supply Services Ltd	21.6%	-
Rapid Clean - Stockham Primary School	19.9%	-
Rapid Commercial Cleaning Ltd	19.9%	-

Admitted Bodies (cont)	Contribution Rate Payroll % 2024/25	Contribution Rate Additional Monetary Amount 2024/25
Saba Park Services	26.5%	-
School Lunch Company (North Hinksey CE Primary School)	20.2%	-
School Lunch Company (Orchard Fields)	19.9%	-
School Lunch Company – The Blake CofE Primary School, Cogges	20.2%	-
Serco Leisure	20.6%	-
Stir Food Limited – Mill Academy Trust (Queen Emma's Primary School) (catering contract)	21.2%	-
Swalcliffe Park School Trust	17.2%	-
Taylor Shaw Limited – United Learning Trust (Orchard Meadow and Windale Schools) (catering contract)	16.7%	-
Thames Valley Partnership	17.2%	-
The Camden Society - Lot 1	19.9%	-
The Camden Society - Lot 2	19.9%	-
UBICO Limited	17.6%	-
Vale Capita	17.8%	-
Yorkshires Cleaning Service Ltd – ODST (St Christopher's CofE Primary School, Cowley, Oxford) (cleaning contract)	20.2%	-
Yorkshires Cleaning Services - St Francis CE Primary School, Cowley, Oxford	19.9%	-

Governance

Conflicts of Interest

All councillors and co-opted members are required to register any disclosable pecuniary interests. In preparing the year-end statement of accounts checks are made for any potential related party transactions using the interests declared by Councillors on the Pension Fund Committee.

The Governance Compliance Statement which details the degree of compliance with best practice is available on the Council's public website.

Pension Fund Committee

Committee Membership and Attendance 2024/25

Councillor	07-Jun-24	06-Sep-24	13-Dec-24	07-Mar-25
County Councillors;				
Councillor D Ford (on committee since June 2024)	✓	✓	✓	✓
Councillor B Johnston (on committee since June 2021)	✓	n/a	n/a	n/a
Councillor M O'Connor (on committee since March 2024)	✓	✗	✓	✓
Councillor N Field-Johnson (on committee since May 2017)	✓	✓	✓	✗
Councillor I U Edosomwan (on committee since May June 2021)	✓	✓	✓	✓
Councillor J Howson (on committee since October 2022)	✓	✓	✓	✓
Councillor I Middleton (on committee since March 2024)	✓	✗	✓	✗
Councillor P Stevens (on committee since Sept 2024)	n/a	✓	✓	✓
District Councillors;				
Councillor J Robb (on committee since September 2019)	✗	✓	✓	✗
Scheme Employers;				
Alistair Fitt (Oxford Brookes University) (on committeee since June 2021)	✓	✓	✓	✓

Committee Members Training Received 2024/25

Donna Ford	Induction
	TPR Toolkit
	National Knowledge Assessment 2024
	Pre-Committee Training 07/06/2024 Triennial Valuation (Hymans) 2
	Pre-Committee Training 06/09/2024 Affordable Housing (M&G)
	Pre-Committee Training 13/12/2024 Brunel Governance
	Pre-Committee Training 07/03/2025 Triennial Valuation (Hymans)
	LGA Governance Conference
Michael O'Connor	Induction
	TPR Toolkit
	National Knowledge Assessment 2024
Imade Edosomwan	Induction
	National Knowledge Assessment 2024
	Pre-Committee Training 07/06/2024 Triennial Valuation (Hymans) 2
	Pre-Committee Training 06/09/2024 Affordable Housing (M&G)
	Pre-Committee Training 13/12/2024 Brunel Governance
	Pre-Committee Training 07/03/2025 Triennial Valuation (Hymans)
Nick Field-Johnson	Induction
	Pre-Committee Training 07/06/2024 Triennial Valuation (Hymans) 2
	Pre-Committee Training 06/09/2024 Affordable Housing (M&G)
	National Knowledge Assessment 2024
	PLSA LA Conference Private and Public Pension Summit
John Howson	National Knowledge Assessment 2024
	Pre-Committee Training 07/06/2024 Triennial Valuation (Hymans) 2
	Pre-Committee Training 06/09/2024 Affordable Housing (M&G)
	Pre-Committee Training 13/12/2024 Brunel Governance
	Pre-Committee Training 07/03/2025 Triennial Valuation (Hymans)
Ian Middleton	Induction
	TPR Toolkit
	National Knowledge Assessment 2024
	Pre-Committee Training 07/06/2024 Triennial Valuation (Hymans) 2
	Pre-Committee Training 13/12/2024 Brunel Governance
Peter Stevens	National Knowledge Assessment 2024
	Induction
	LGA Fundamentals
	Pre-Committee Training 06/09/2024 Affordable Housing (M&G)

	Pre-Committee Training 07/03/2025 Triennial Valuation (Hymans)
	LGA Governance Conference
Alistair Fitt	National Knowledge Assessment 2024
	Pre-Committee Training 07/06/2024 Triennial Valuation (Hymans) 2
	Pre-Committee Training 06/09/2024 Affordable Housing (M&G)
	Pre-Committee Training 13/12/2024 Brunel Governance
	Pre-Committee Training 07/03/2025 Triennial Valuation (Hymans)
Jo Robb	National Knowledge Assessment 2024
	LGA Fundamentals Day 2
	LGA Fundamentals Day 3
	Pre-Committee Training 06/09/2024 Affordable Housing (M&G)
Steve Moran	National Knowledge Assessment 2024
	Pre-Committee Training 06/09/2024 Affordable Housing (M&G)
	Pre-Committee Training 13/12/2024 Brunel Governance
	Pre-Committee Training 07/03/2025 Triennial Valuation (Hymans)

Members that have been on the Pension Fund Committee in previous financial years will have attended training events in those years in addition to the training undertaken in the current financial year.

Risk Management

Internal Risk Management

Officers operate within the financial procedures and control environment of the Administering Authority. These are regularly audited by internal and external audit.

The Council's Internal Audit function undertook a review of the Pension Administration operations in 2023/24 with an overall conclusion of 'G' (There is a strong system of internal control in place and risks are being effectively managed. Some minor action may be required to improve controls.). Internal Audit also undertook a review of Pensions Administration – IT Applications in 2023/24 with an overall conclusion of 'A' (There is generally a good system of internal control in place and the majority of risks are being effectively managed. However, some action is required to improve controls). All actions resulting from the audits have been addressed by management.

The Pension Fund Committee is responsible for the prudent and effective stewardship of the Oxfordshire County Council Pension Fund. As part of this duty the Committee oversees the monitoring and management of risk. This role includes:

- Determining the risk management policy and reconciling this with wider organisational risk policy
- Setting the risk management strategy in line with the risk policy
- Overseeing the risk management process

The risk management process involves: Risk identification, risk analysis, risk control and monitoring.

A key tool for the management of risk is the risk register. The register incorporates an assessment of the impact and likelihood of identified risks to give a risk score, assigns a target risk score, as well as the actions required to achieve the target score. The risk register is kept under review by the Executive Director for Resources and Section 151 Officer and is presented to the Committee on a quarterly basis. The risk register is also regularly reviewed by the Oxfordshire Local Pension Board.

Risks are identified and assessed using a scoring matrix. The scoring matrix assesses two elements of a risk:

- the chance of it happening
- the impact if it did happen

Risks are analysed between:

- Funding
- Investment
- Governance
- Operational
- Regulatory

Each element is independently assessed on a scale of 1-5 (5 being the highest risk). These scores are then multiplied to give an overall score. The risk register lists the risks identified, the consequence of each risk occurring, the score assigned to each risk, the target score for each risk and the measures in place to address the risk. This process identifies the risks with the highest scores, and those furthest away from their targets, which are then closely monitored.

The table below details the highest scoring risks from the most recent version of the risk register for the Fund (a copy of the full risk register is available in the Pension Fund Committee papers for June 2025 which is on the Council's public website).

Officers are mindful of risk in carrying out their duties on a day to day basis and any significant risks identified are reviewed and managed through processes and controls accordingly. The Pensions teams have regular team meetings through which any operational risks can be discussed and dealt with appropriately.

Summary of Key Risks identified on the Pension Fund Risk Register

Risk	Cause	Impact	Likeli-hood	Risk Score	Actions Required
Operational					
Insufficient resources from Committee to deliver responsibilities	Budget reductions	4	2	8	Annual budget review as part of business plan.
Insufficient Skills and Knowledge amongst Board Members	Turnover of Board membership	4	2	8	Implement new training plan 2025/26 based on the outcomes of the National Knowledge Assessment from Hymans.
Insufficient Resource and/or Data to Comply with Consequences of McCloud Judgement & Sergeant.	Significant requirement to retrospectively re-calculate member benefits	4	2	8	Re-organising this work between the whole team based on existing skill sets.
Governance					
Failure to meet government requirements on pooling	Inability to agree proposals with other administering authorities	5	2	10	Full engagement within Brunel Partnership.

Page 41

Third Party Risk Management

The Pension Fund Committee receive quarterly investment performance reports and receive regular updates from Fund Managers which provide an opportunity to ensure their strategies are in line with expectations and to discuss any risks the Committee is concerned about. Officers also have regular meetings with the Independent Financial Advisor and Fund Managers through which performance is reviewed and key issues are discussed.

The Fund's investment managers and its custodian issue annual internal control reports prepared by their auditors. For fund managers, auditors typically issue a report based on the Statement on Standards for Attestation Engagements (SSAE 16) in North America, or Audit & Assurance Faculty (AAF 01/06) in the UK. The International Auditing & Assurance Standards Board (IAASB) has also developed the International Standard on Assurance Engagements (ISAE 3402) as a global standard of reporting, for use from 2012. These documents identify internal processes and procedures, and details of the audit testing performed on them during the year. The reports are reviewed annually by the pension investments team and are used to gain assurance that the third parties' internal controls are sufficient and are operating effectively. Any concerns are discussed with the third parties to ensure corrective action is being taken where weaknesses are identified.

The following reports were received and reviewed:

Company	Report Type	Reporting Period End	Auditor
Adams Street Partners	SOC 1	30 September 2024	KPMG
Partners Group	ISAE 3402	31 December 2024	PricewaterhouseCoopers
State Street Bank & Trust Company (Custodian)	SOC 1	31 March 2025	Ernst & Young
Legal & General Investment Management	AAF 01/20 / ISAE 3402	31 December 2024	KPMG

The pension investment team analyse and reconcile valuation information provided by the custodian to that of the investment manager and follow up any significant variations. The custodian also undertakes a monthly reconciliation between its records and those of funds managers and is required to investigate and report the reasons for any significant variances.

The fund's Independent Investment Advisor monitors the market and the activities of investment managers and informs officers if there are any concerns, such as changes in key staff.

Scheme Administration and Administration Performance

The Pension Services team is responsible for all scheme member benefit administration. This involves liaising with all scheme employers to receive monthly and end of year data returns, checking this information prior to loading this on to the pension system.

Once data is loaded the team can then calculate and process queries and benefit payments to scheme members.

Data assurance comes from internal checks; process review; and internal and external audit reviews.

Scheme Communications are detailed in the Communication Strategy which details types and methods of communication used to reach all fund's stakeholders. This is underpinned by the Pension Fund pages located on the County Council's website, which contains links for following fund documents:

- Communication Policy Statement
- Annual Report and Accounts
- Triennial Valuation Report
- Investment Strategy Statement
- Funding Strategy Statement
- Governance Policy Statement
- Statements of Policy about Exercise of Discretionary Functions
- Administration Strategy

Complaints are dealt with in line with the Adjudication of Disagreements Procedure which is set out in Regulation. This is a three stage process:

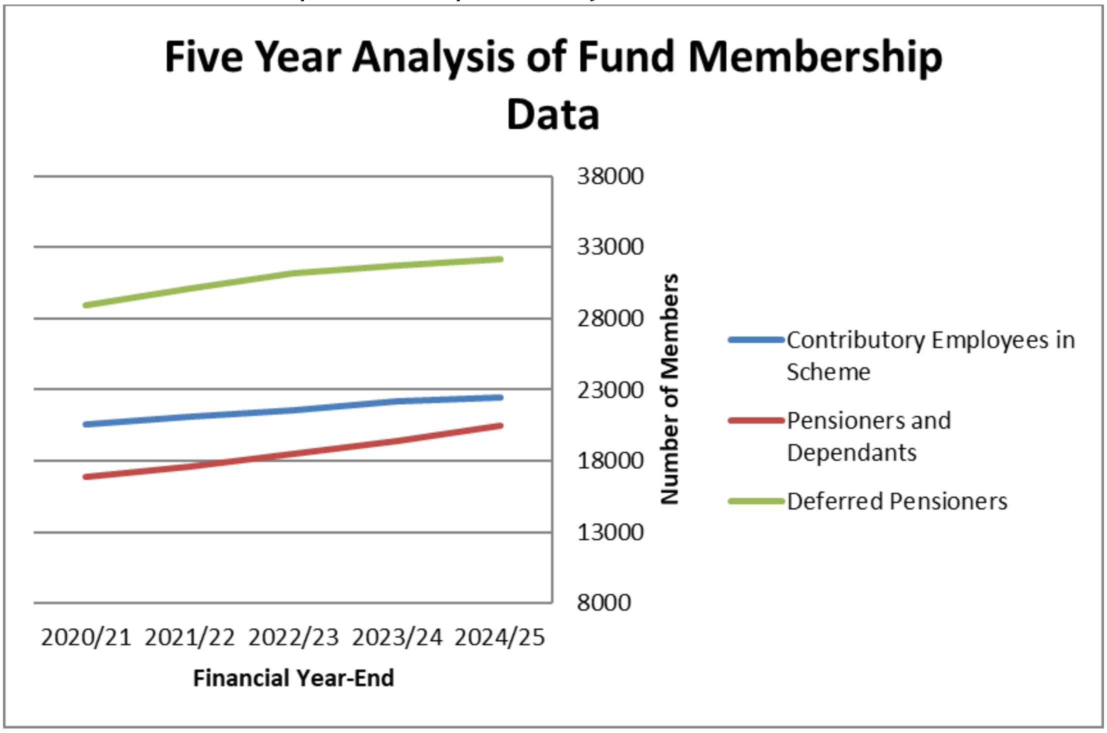
- Stage 1 – depending upon nature of complaint the Appointed Person from either the fund or scheme employer will review and provide a written determination to the points raised.
- Stage 2 – should the member be unhappy with the decision made at age 1 they have the right to ask for the Appointed Person at stage 2 to review their case.
- If, after this second independent review the member remains unhappy with the outcome they can then refer their case to the Pension Ombudsman.

The Regulations – Under the framework of overarching pension regulations The Local Government Pension Scheme is governed by statutory regulations which are the responsibility of the Ministry of Housing, Communities and Local Government.

The LGPS is applicable to staff working in the public sector, although this excludes Fire Officers, Teachers and Police Officers who have their own separate schemes. However, it will include any staff working in those areas but ineligible to join those other public sector schemes.

Members of the scheme will be employed by Oxfordshire County Council; District Councils; Town and Parish Councils; Academies, as well as private sector companies providing services on their behalf.

The fund membership over the past five years is shown below:



Promotion of Scheme Membership

The fund supplies template letters for employers to incorporate within their starter / new joiner process. This information will point to the centrally provided on-line guides (www.lgps2014.org) concerning costs and benefits of the LGPS for members, and also to the scheme guides. Both the brief guide and the full detailed guide are hosted on the fund website pages (www.oxfordshire.gov.uk/lgpsmembersguide). When requested the fund will comment on employer prepared automatic enrolment notices to members, which would be sent to eligible jobholders where the LGPS is the qualifying pension saving scheme.

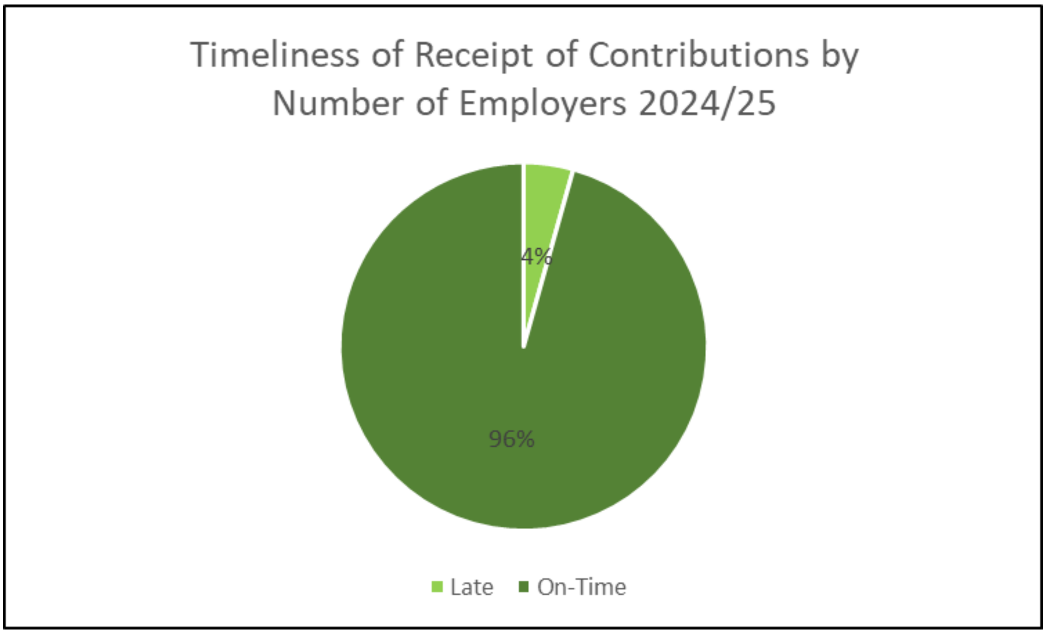
Memberships

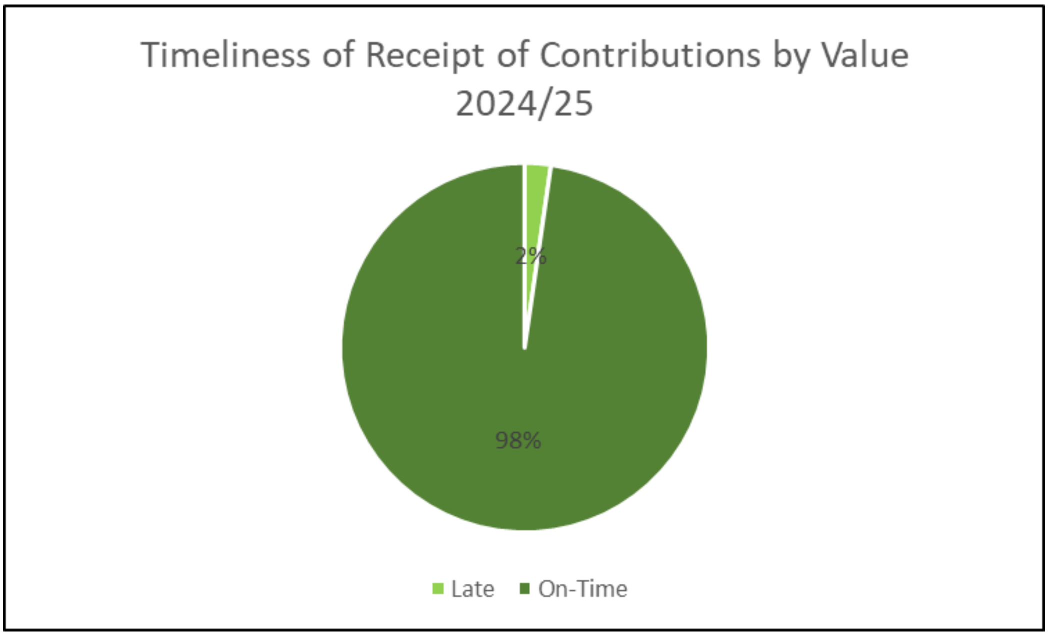
The Fund is a member of the National Association of Pension Funds, Local Authority Pension Fund Forum, Institutional Investors Group on Climate Change, Climate Action 100+, Pensions for Purpose and subscribes to the CIPFA Pensions Network.

Financial Performance

Contributions

Payment of contributions from employers is monitored on a monthly basis as they fall due. Reconciliations are undertaken between contributions received and those expected with any discrepancies followed up with the employer. Late payments are immediately followed up with employers to request payment. If contribution payments are repeatedly late the issue is escalated and a letter is sent to employers. Fines are also issued in accordance with the Administration Strategy. The graphs below illustrate the timeliness of the receipt of contributions from employers during 2024/25





Budget

The below table shows the budget for 2024/25:

	Budget £'000
Administrative Expenses	
Administrative Employee Costs	1,861
Support Services Including ICT	1,338
Printing & Stationary	82
Advisory & Consultancy Fees	165
Other	60
Total Administrative Expenses	**3,506**
Investment Management Expenses	
Management Fees	14,800
Custody Fees	30
Brunel Contract Costs	1,453
Total Investment Management Expenses	**16,283**
Oversight & Governance	
Investment & Governance Employee Costs	444
Support Services Including ICT	13
Actuarial Fees	292
External Audit Fees	50
Internal Audit Fees	9
Advisory & Consultancy Fees	101
Committee and Board Costs	24
Subscriptions and Memberships	20
Total Oversight & Governance Expenses	**952**
Total Pension Fund Budget	**20,741**

Investment Pooling – Brunel Pension Partnership

In 2015 the Department of Communities and Local Government (as it then was) issued LGPS:
Investment Reform Criteria and Guidance which set out how the government expected funds to establish asset pooling arrangements. The objective was to deliver:

- Benefits of scale.
- Strong governance and decision making.
- Reduced costs and excellent value for money, and
- An improved capacity and capability to invest in infrastructure.

This has led to the creation of eight asset pools which have significantly changed the previous approach to investing, although it should be stressed that the responsibility for determining asset allocations and the investment strategy remain with individual pension funds.

As a result of the investment pooling agenda, the Oxfordshire Pension Fund joined with nine other LGPS administering authorities to set up the Brunel Pension Partnership. Oxfordshire County Council approved the business case for Brunel, based on estimated potential fee savings of £550 million over a 20 year period across the ten funds, of which Oxfordshire's share was £18 million with a breakeven year of 2025. The expected costs and savings for the Oxfordshire Pension Fund, as per the original business case approved, and then submitted to Government, are set out in the following table:

	2016/ 2017	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026	2026 to 2036	Total
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Set up costs	117	1,041										**1,158**
Ongoing Brunel Costs			430	558	577	595	614	634	655	676	8,093	**12,833**
Clients Savings			(114)	(117)	(120)	(124)	(128)	(132)	(136)	(140)	(1,648)	**(2,658)**
Transition costs			1,231	2,315	12							**3,558**
Fee savings			(191)	(504)	(920)	(1,070)	(1,235)	(1,413)	(1,513)	(1,620)	(24,618)	**(33,084)**
Net costs / (realised savings)	**117**	**1,041**	**1,357**	**2,252**	**(452)**	**(599)**	**(748)**	**(910)**	**(994)**	**(1,084)**	**(18,173)**	**(18,194)**

Following approval of the business case, the Brunel Pension Partnership Ltd was established in July 2017, as a company wholly owned by the Administering Authorities (in equal shares) that participate in the pool. The company is authorised by the Financial Conduct Authority (FCA). It is responsible for implementing the detailed Strategic Asset Allocations of the participating funds by investing Funds' assets within defined investment portfolios. In particular, Brunel researches and selects the external managers or pooled funds needed to meet the investment objective of each portfolio.

Now that Brunel is operational, the financial performance of the pool will be monitored to ensure that Brunel is delivering on the key objectives of investment pooling. This includes reporting of the costs associated with the appointment and management of the pool company including set up costs, investment management expenses and the oversight and monitoring of Brunel by the client funds. The set up and transition costs incurred to date are set out in the following table.

	Cumulative £000s
Set up costs:	
Recruitment	18
Legal	133
Consulting, Advisory & Procurement	82
Other support Costs e.g.IT, accommodation	0
Share Purchase / Subscription Costs	840
Other Working Capital Provided e.g. loans	-
Staff Costs	-
TOTAL SET UP COSTS	**1,072**
Transition Costs:	
Transition Fee	240
Tax	833
Other Transition Costs	6,553
TOTAL TRANSITION COSTS	**7,626**

A summary of the costs and savings to date compared to the original business case is provided in the following table.

	2023/24				2024/25			
	Budget		Actual		Budget		Actual	
	In Year £000	Cumulative to date £000	In Year £000	Cumulative to date £000	In Year £000	Cumulative to date £000	In Year £000	Cumulative to date £000
Set up costs	0	1,158	0	1,072	0	1,158	0	1,072
Ongoing Brunel Costs	634	3,409	1,301	6,377	655	4,064	1,487	7,863
Clients Savings	(132)	(734)	0	0	(136)	(870)	0	0
Transition costs	0	3,558	0	7,626	0	3,558	0	7,626
Fee savings	(1,413)	(5,333)	(4,467)	(14,684)	(1,513)	(6,846)	(5,422)	(20,105)
Net costs / (realised savings)	**(911)**	**2,058**	**(3,166)**	**(391)**	**(994)**	**1,064**	**(3,935)**	**(3,544)**

Investment Review

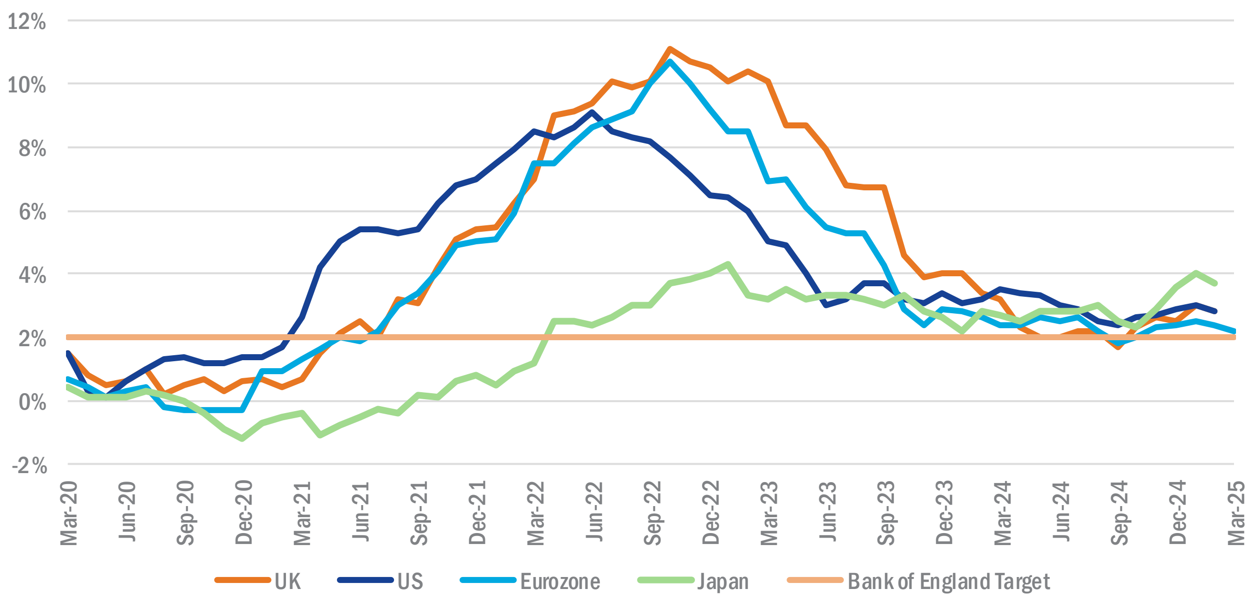
Independent Investment Adviser's Report

Economic Background

The US economy continued to outperform expectations through the financial year 2024/5 with US Gross Domestic Product (GDP) growth of 2.4% per annum over the calendar year 2024. The expectation of rapid interest rate cuts failed to materialise in this environment and whilst the US Central Bank (the Federal Reserve) did cut interest rates for the first time since 2020 in September 2024, they did not move at the speed that markets had been expecting leading to some disappointment and for bond yields to rise (prices fall) slightly over the financial year. This created a less beneficial backdrop to equity markets globally and share price rises were muted over the period. Part of the cause of this delay in interest rate cuts was stubborn inflation which remained above central bank targets of 2% at around 2.5% in both the US, and UK. Inflation eased in the EU as economic growth disappointed allowing for a slightly faster pace of interest rate cuts there.

The chart below shows inflation as measured by the Consumer Price Index (CPI) for the major economic areas. It shows how rapidly inflation picked up in 2021/2, following a prolonged period of very low inflation and therefore low interest rates. Because inflation is measured as the change in prices over the preceding twelve months, the rate will naturally peak as past price rises drop out of the equation, this occurred in 2023, but, as can be seen from the far right of the chart, inflation has not reached central banks@ targets of 2% per annum and this is restraining any fall in bond yields and thereby a rise in bond prices.

Chart 1: CPI – Annual rate of Inflation - Five Years to March 2025



Source:Bloomberg

Of course, much changed in November 2024 with the re-election of Donald Trump as US President. Whether one believes in his politics or not, his approach to economic policy and trade does carry risks and has increased the level of uncertainty around the economic outlook.

1) His clampdown on immigration and removal of both documented and undocumented immigrants does lower the pool of labour (most migrants are of working age and do work). This will push up labour costs, particularly at a time when the working population is falling as a percentage of the total population as baby boomers move into retirement and birth rates across the developed world remain low. This will put some upward pressure on wage inflation at a time when the unemployment rate is already low.

2) The recent 'Big Beautiful Budget Bill' has lowered taxes for the well-off whilst cutting benefits in terms of access to the health system and food support for the impoverished. This looks to leave the US still running a hefty budget deficit (spending more than it raises in taxes) which will add to the long-term debt pile in the US at a time when this has already hit over 100% of GDP and has the potential to spook investors in US Government Debt (Treasuries). Longer duration bond yields are remaining high due to this. Long duration bond yields are important for corporates looking to raise borrowing to invest and hence can be detrimental to economic growth.

3) Trade policy and the introduction of trade tariffs may raise revenue for the Government to help square this circle but, again, are inflationary in that the trade tariffs will be passed on to some extent to US consumers. Production was moved offshore to lower costs, bringing production back to the US may increase security but it will raise prices. The trade tariffs happen immediately whilst the hoped for increased investment by companies moving production back to the US will take some years to plan and build factories. This requires a stable business environment for companies to make long-term investment decisions.

President Trump could have played this really well and US economic growth could continue whilst inflation stays low but the policy decisions he is making are creating greater risks of an error - be that lower economic growth and a possible recession - making the Government budget deficit unfinanceable or inflation picking up on the back of US trade tariffs and retaliation from other trading partners.

My conclusion to all of this is that the economic and market outlook for the future remains highly uncertain with inflation likely to remain volatile and prone to rise over the medium term.

Actuarial revaluation

2025 is an actuarial revaluation year when the Fund's actuary recalculates the value of the pensions already earnt by existing employees and the current value, in today's money, of all future pension benefits which will be earnt by existing and future employees. From this they calculate the funding level of the Scheme and the investment return required to maintain full funding into the future. You will be pleased to hear that the Fund is currently well funded and with interest rates and bond yields now higher than the last revaluation in 2022, the current valuation future pension payments (the liabilities) will fall whilst the required investment return will rise. This will make the Fund look very healthy, but this is a one-off valuation which takes a snapshot of investment markets and pension liabilities as at the 31st March 2025. Given the uncertain economic and political environment we are now in I am relieved that the Fund has significant headroom in terms of the size of the Fund's assets when set against the current calculation of the Fund's liabilities.

Fund Returns

The 2024/5 fiscal year was tough in investment terms, your Fund returned 2.6% over the period, roughly in line with the actuary's expectations for future investment returns. This return increased the size of your Fund to £3.63bn.

Global Equities rose just over 7% in local currency terms over the financial year. This rise was slightly lower in Sterling terms as the UK currency strengthened against both the US Dollar and the Euro over the financial year. UK Government bonds (Gilts) fell as inflation stabilised above the Bank of England's target of 2% per annum limiting the prospect of interest rate cuts which tend to be positive for bonds.

However, the Fund return for the financial year 2024/5 was below the return of the Fund's benchmark at 4.9% over the period. Over the last 5 years the Fund has also underperformed its benchmark returning 8.5% per annum against 9.8% per annum for the benchmark. Over the last 10 years the Fund has returned 6.7% against the benchmark return of 7.1% per annum. The poor performance against the Fund benchmark is driven by the disappointing performance of the underlying asset managers appointed by Brunel (see below) across most of the quoted asset markets especially within Equities. This has been driven by the concentration of investment performance within equity markets in a small number of mainly US, mega sized technology stocks in the belief that they will be major beneficiaries of the growth in the applications for Artificial Intelligence (AI). It has been a difficult investment environment for active equity managers to outperform their benchmark when all the investment return comes from the largest 7 US technology stocks. Investment managers are required to run a more diversified portfolio than that by their own risk controls.

Nonetheless, this return of 6.7% per annum over the last 10 years is above the rate assumed by the actuary which means the Fund's assets have increased by more than the actuary's calculation of the Fund's liabilities (the accrued pension obligations) leaving the Fund in a strong position to meet these obligations into the future. The Fund does still need to earn an investment return over the long-term to cover the cost of future pension accruals but remains well funded at the current time.

Brunel Pension Partnership – Pooling

Currently 90% of the Fund is managed by the Brunel Pension Partnership (Brunel). These assets remain segregated within Brunel and managed purely in the interest of the members
of the Oxfordshire County Council Pension Fund. Brunel now manage over £35bn of assets for 10 Local Government Pension Schemes across the South-West of England.

Frustratingly, in April 2025, the Government rejected Brunel's plans for its future development and informed Brunel's member Funds, including Oxfordshire, that they needed to join one of the 6 remaining, approved pools and that this work needed to be completed by March 2026. This is a very short timeline and costs will be incurred by the Fund to select and then move to a new pool. I will comment on this in next year's report.

The remaining assets held outside of Brunel are long-term investments into Private Equity and Infrastructure assets, these are illiquid investments such that it is not cost effective to realise these just to reinvest via Brunel.

Post year-end your Fund committed to invest £65m into Social and Affordable housing with a significant proportion of this investment targeted for the county of Oxfordshire.

At the time of writing a manager has been appointed and is undergoing due diligence before contracts are signed. Again, I will comment on this initiative further next year.

Outlook

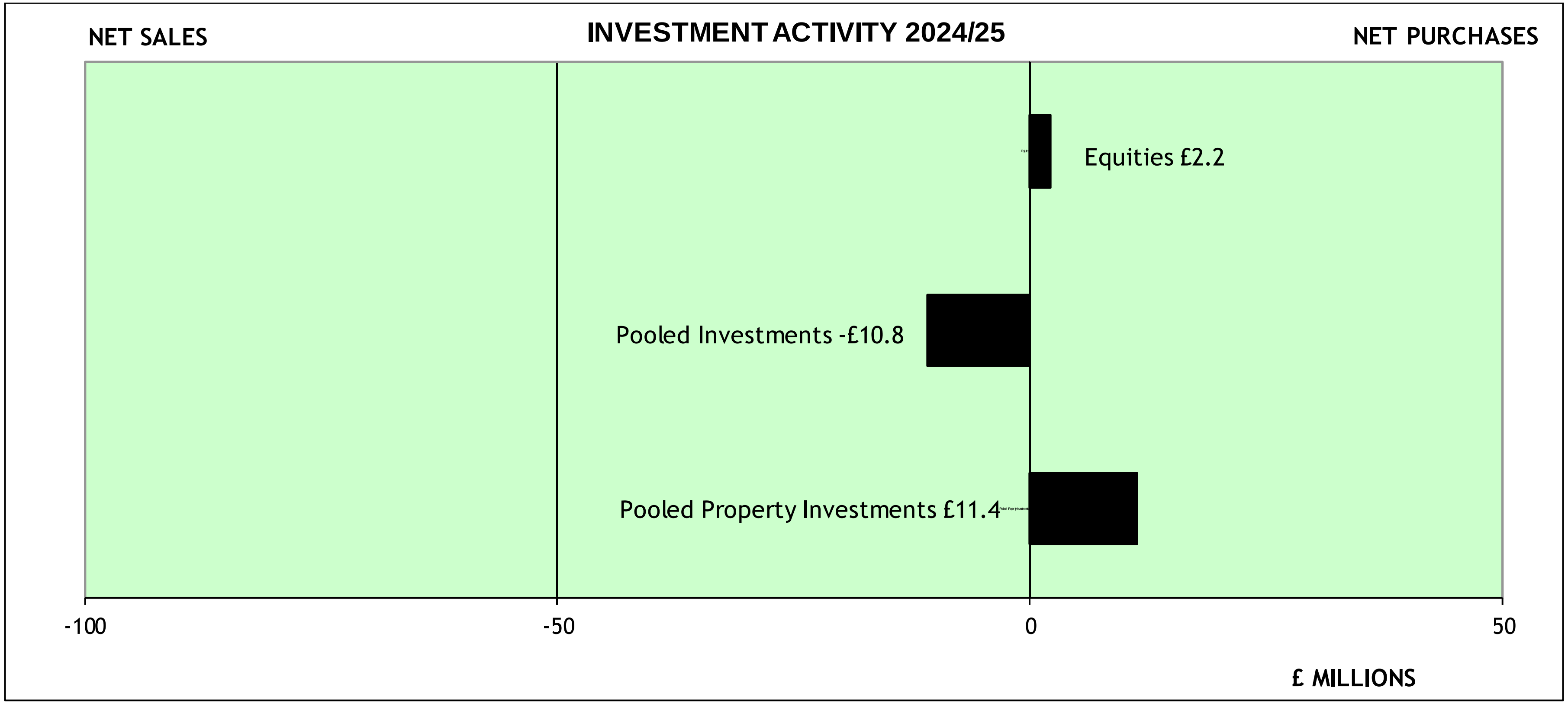
Investment markets are likely to remain difficult for the next few years and my expectation is that inflation is not yet beaten and because of this interest rates will remain higher over the medium-term but also more volatile as central banks look to tread a tightrope between containing inflation and securing economic prosperity and full employment. Your Fund is well diversified, across different asset classes as well as by industry and geography which will make it better able to weather this period of potentially lower returns.

As an open, Defined Benefit Pension Fund, your Fund has the benefit of having a very long-term investment horizon, this allows the Fund to invest for the long-term, to weather periods of market volatility and invest in the best interests of not just the Fund's membership but also the global environment. Through Brunel, the Fund looks to work with investment managers whose aim is to invest responsibly, considering the Environmental, Social and Governance (ESG) background to their investments as well as targeting investment returns. The Pensions Committee aim is to ensure that the new pool the Fund moves to maintains the same, high focus on ESG issues as Brunel did and will continue to invest in this manner as we move forward on a journey to a safer, less carbon intensive future.

John Arthur
Independent Investment Advisor
July 2025

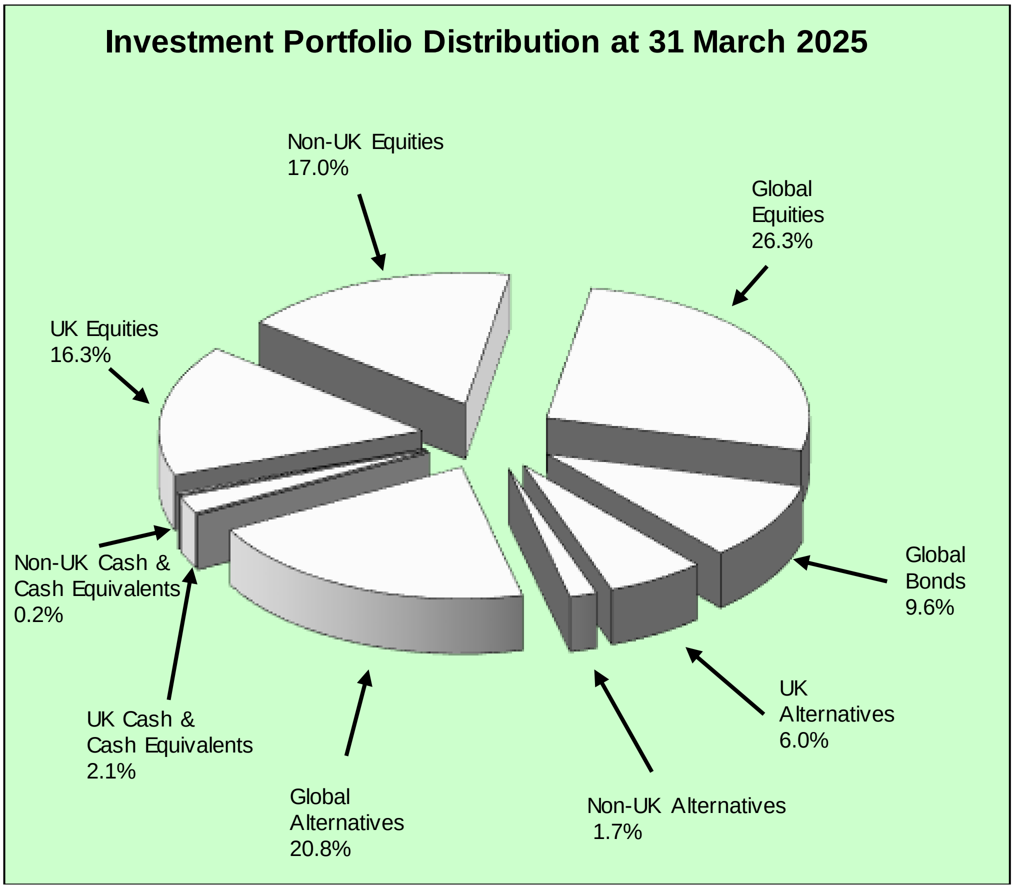
- **Investment Activity**

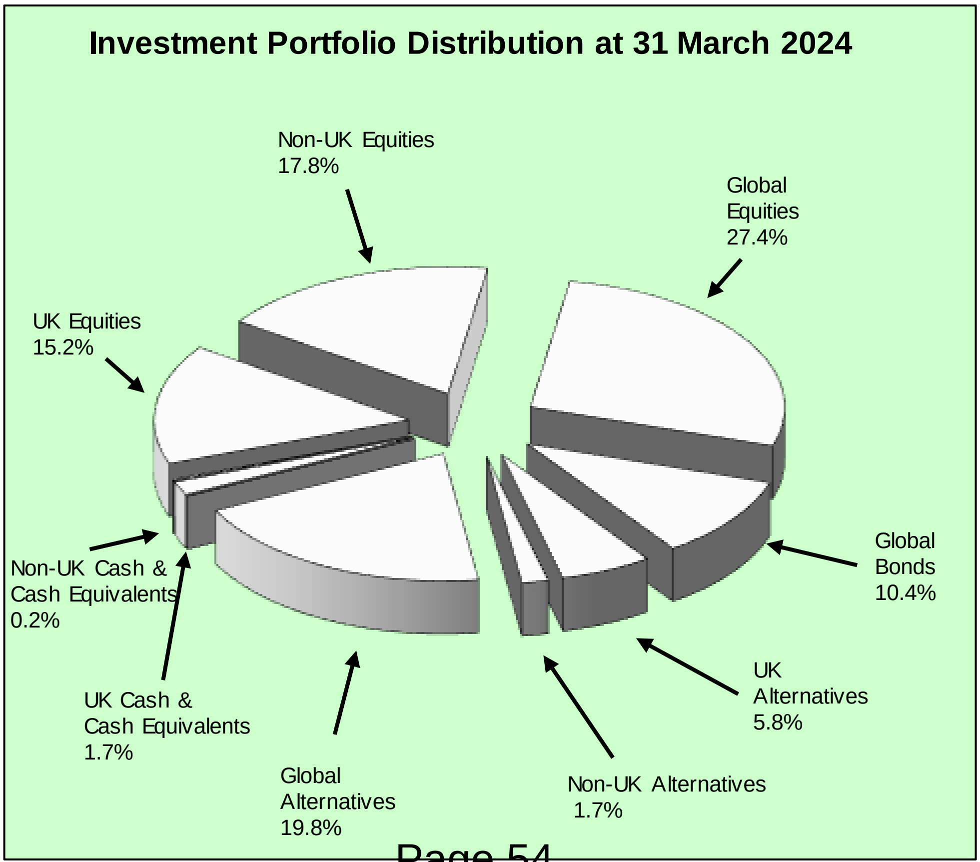
The Pension Fund invested a net £2.8 million during the year ended 31 March 2025. The amounts invested or disinvested in each principal category of asset are shown in the chart below. Derivatives are not included in the chart.



Portfolio Distribution

The distribution of the Pension Fund amongst the principal categories of assets as at 31 March 2025 is shown in the chart below. A comparative chart of the position at 31 March 2024 is also shown. Changes in the asset weightings, from one year to another, are due to investment activity and market movements.





Asset Allocation

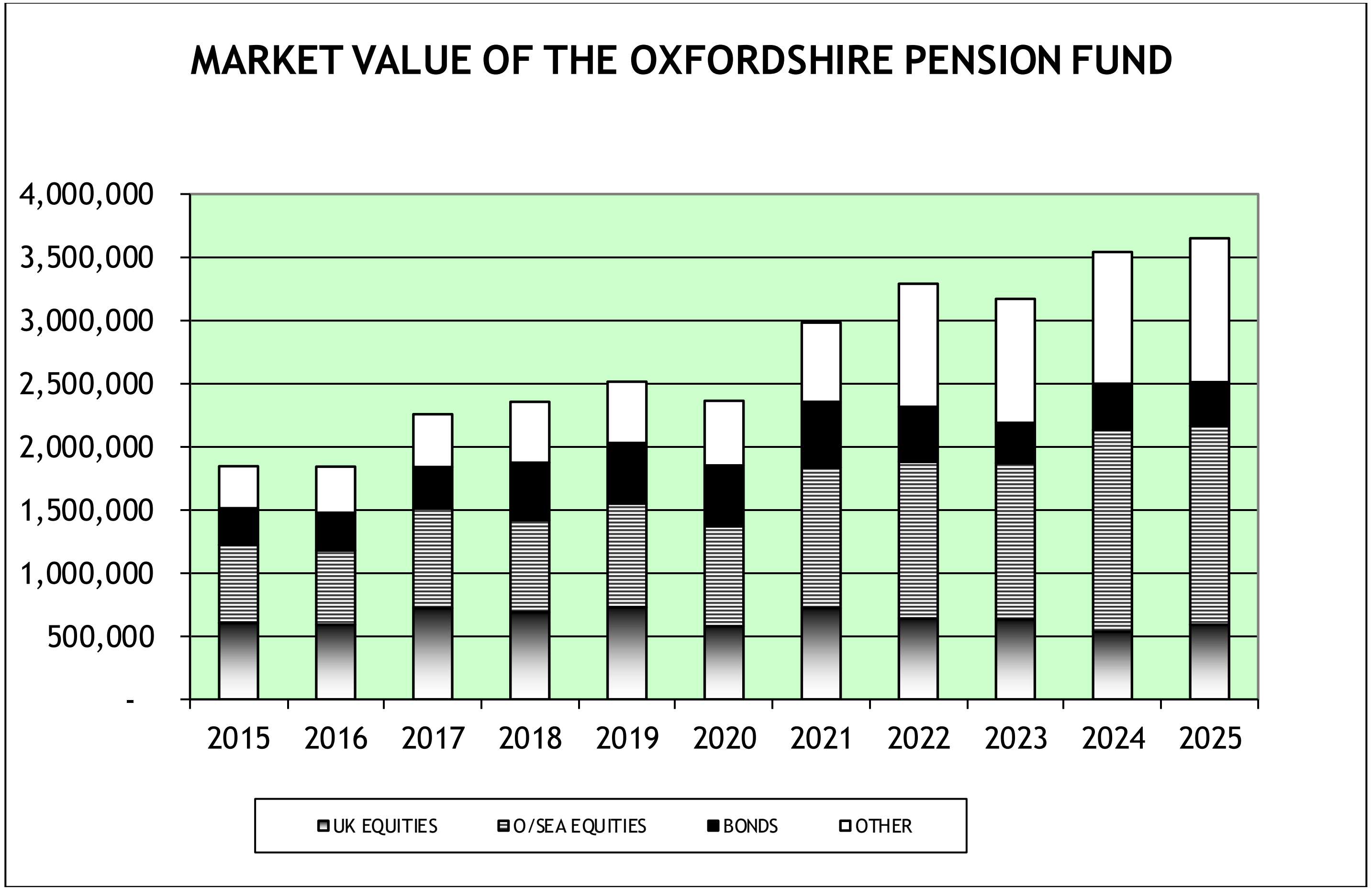
The Pension Fund's asset allocation as at 31 March 2025 is shown in the table below:

£m Asset Values as at 31 March 2025	Pooled	Under Pool Management	Not Pooled	Total
Equities	1,967	-	-	1,967
Bonds	510	-	-	510
Property	310	-	16	326
Private Equity	160	-	294	454
Private Debt	89	-	-	89
Infrastructure	165	-	37	202
Cash	13	-	72	85
Total	**3,214**	**-**	**419**	**3,633**

The below table shows the Pension Fund's investments in the UK using the guidance from the Preparing the Pension Fund Annual Report Guidance for Local Government Pension Scheme Funds April 2024.

£m Asset Values as at 31 March 2025	Pooled	Under Pool Management	Not Pooled	Total
UK Listed Equities	445	-	-	445
UK Government Bonds	206	-	-	206
UK Infrastructure	75	-	23	98
UK Private Equity	23	-	250	273
Total	**749**	**-**	**273**	**1,022**

Portfolio Asset Allocation over the Ten Years to March 2025
The total assets (including accruals) of the Pension Fund have grown from £1,845 million at end of March 2015 to £3,650 million at end of March 2025 (see chart below).
Over the period the percentage in UK equities decreased from 32.8% to 16.2% and bonds decreased from 15.7% to 9.5%.



♦ Investment Benchmark and Performance

The performance of the individual Fund Managers against their benchmark is shown in the following table. Each Fund Manager is given a different target to outperform their benchmark over a rolling three-year period. The table shows that performance in 2024/25 at the total fund level was 2.4% below benchmark with an overall return of 2.5%.

Fund Manager	Target %	One Year Ended 31 March 2025		Three Years Ended 31 March 2025		Five Years Ended 31 March 2025	
		Benchmark Return %	Oxfordshire Return %	Benchmark Return %	Oxfordshire Return %	Benchmark Return %	Oxfordshire Return %
Brunel UK Equities	2.0	11.0	9.7	7.7	7.4	12.3	11.4
Passive Dev Eq Paris Aligned	n/a	3.4	3.3	8.1	8.0	-	-
Brunel Global Sustainable Equities	n/a	5.3	-2.7	8.1	2.8	-	-
Brunel Global High Alpha Equity	2-3	5.2	0.8	8.8	6.9	15.7	14.8
Brunel Sterling Corporate Bonds		2.4	4.2	-0.8	0.4	-	-
Brunel Multi-Asset Credit		9.2	8.4	8.2	5.4	-	-
Passive Index Linked Gilts Over 5 Years		-10.4	-10.4	-16.6	-16.5	-	-
Brunel UK Property		6.3	5.2	-3.4	-2.6	-	-
Brunel International Property		-0.4	-4.5	-1.7	-4.6	-	-
In-House Property	Excess	6.4	-13.3	-3.3	-6.7	2.7	-2.0
In-House Private Equity	1.0	5.3	6.4	8.1	6.0	18.9	17.1
Brunel Private Equity - Cycle 1	3.0	5.3	5.4	8.1	8.4	14.8	12.9
Brunel Private Equity - Cycle 2		5.3	8.2	8.1	4.9	-	-
In-House Infrastructure	4.0	6.8	7.7	9.5	5.6	8.2	8.3
Greencoat Wessex Gardens		6.8	-0.6	-	-	-	-
Brunel Infrastructure - Cycle 1	4.0	2.6	10.2	5.2	9.7	4.7	7.7
Brunel Infrastructure - Cycle 2		2.6	2.0	5.2	6.5	-	-
Brunel Infrastructure - Cycle 3		2.6	5.8	-	-	-	-
Brunel Secured Income - Cycle 1	2.0	2.6	5.5	5.2	-3.5	4.7	0.9
Brunel Secured Income - Cycle 2		2.6	0.6	5.2	-3.4	-	-

Brunel Secured Income – Cycle 3		2.5	2.6	-	-	-	-
Brunel Private Debt - Cycle 2		9.2	7.0	8.2	9.8	-	-
Brunel Private Debt - Cycle 3		9.2	9.9	-	-	-	-
Cash	n/a	4.9	6.1	4.0	9.9	2.5	6.6
Total Fund		**4.9**	**2.5**	**5.3**	**3.1**	**9.8**	**8.3**

Cash held by Fund Managers is included within total Fund Manager performance.

Further investment performance details comparing the Oxfordshire Pension Fund with other local authority funds and indices are shown in the table below.

% Returns per annum for the financial year ended 31 March 2025				
Actual Returns	1 year	3 years	5 years	10 years
Oxfordshire Total Fund Return	2.5	3.1	8.3	6.6
Average Returns				
PIRC LGPS Universe Median Return	3.5	3.6	8.2	6.5
Oxfordshire Benchmark	4.9	5.3	9.8	7.1

Responsible Investment

Fund managers produce reports outlining their engagement and ESG related activity. All of the Fund's investment managers are signatories to the United Nations Principles for Responsible Investment Initiative. Fund managers and officers monitor ESG related developments and reports are produced for the Committee on topical ESG issues relevant to the Fund. In 2019/20 the Pension Fund adopted a Climate Change Policy recognising this as the single most important factor that could materially impact its long-term investment performance given its systemic nature and the effects it could have on global financial markets. A copy of the Policy is available on the Council's website: OCCPF Climate Change Policy (oxfordshire.gov.uk).

The Fund has produced a report based on the Taskforce on Climate-related Financial Disclosures (TCFD) recommendations which is included below on pages 42-68:

Voting

Introduction

The UK Stewardship Code was introduced by the Financial Reporting Council in 2010, and revised in September 2012. The Code, directed at institutional investors in UK companies, aims to protect and enhance the value that accrues to ultimate beneficiaries through the adoption of its seven principles. The code applies to fund managers and also encourages asset owners such as pension funds, to disclose their level of compliance with the code.

Principle 6 of the Code states that Institutional investors should have a clear policy on voting and disclosure of voting activity. They should seek to vote all shares held and should not automatically support the board. If they have been unable to reach a satisfactory outcome through active dialogue then they should register an abstention or vote against the resolution, informing the company in advance of their intention to do so and why.

The Oxfordshire County Council Pension Fund's voting policy is set out in its Investment Strategy Statement which states that in practice the Fund's Investment Managers are delegated authority to exercise voting rights in respect of the Council's holdings. Voting decisions are fully delegated to fund managers, while recognising that the Fund maintains ultimate responsibility for ensuring that voting is undertaken in the best interests of the Fund.

Oxfordshire County Council Pension Fund TCFD Report
Year Ending 31/12/24

August 2025

Oxfordshire County Council Pension Fund Taskforce on Climate-related Financial Disclosures Report for year ending 31/12/2024

Introduction

This is the Oxfordshire Pension Fund's (the Fund) fifth report under the Taskforce on Climate-related Financial Disclosures (TCFD) framework. As well as reporting against the TCFD recommendations the report is intended to review the progress made against the Fund's Climate Change Policy and Implementation Plan which were agreed in June 2020.

When the current Climate Change policy was adopted by the Oxfordshire Pension Fund in 2020 one of the key principles it was based upon was that there would be robust government action, including regulation, to tackle temperature rises caused by the burning of fossil fuels.

Unfortunately, the government action required has not materialised to the extent needed. Although there has been some good progress in the UK, particularly around the switch to renewable energy generation there has not been enough done to reduce Greenhouse Gas (GHG) emissions globally. This situation has been exacerbated by the actions of the current US administration, which has rolled back initiatives to tackle climate change and sought to accelerate the extraction of US fossil fuels. Within this context it is looking increasingly challenging to limit GHG emissions so that global temperature rises are kept below 1.5-2°C.

In March 2023 the Intergovernmental Panel on Climate Change (IPCC) published the synthesis report from its Sixth Assessment Cycle. The report made for sombre reading covering the inadequacy of emissions cuts, more severe climate impacts than expected from current warming, and the future risks from every fraction of a degree of warming. The report also highlights the need for a dramatic increase in capital that is directed towards climate mitigation and adaptation.

The United Nations Environment Programme's 2024 Emissions Gap Report continues to show how far off-target the world currently is from meeting a commitment of keeping global temperature rise to below 1.5°C.

Cuts in GHG emissions of 42% are needed by 2030 and 57% by 2035 to get back on track for 1.5°C. According to the report, national policies currently in place point to a 2.6-3.1°C temperature rise over the course of this century, well above the 1.5°C target identified in the Paris Agreement..

Although a 2.6-3.1°C temperature rise would almost certainly have a very negative impact on long-term investment returns, as well as on society and the environment more generally, it is also true to say that we are seeing a 'bending' of emissions and implied temperature curves. The temperature trajectory would be 4.1-4.8°C without any climate policies, and 3.6-4.8°C with 2007-2013 climate policies.[2] At

[2] https://climateactiontracker.org/global/emissions-pathways/

the current rates of change we are moving in the right direction, but that change is not happening quickly enough to ensure that temperature rises are kept below 1.5°C.

There is still a feasible pathway to net zero by 2050. However, the window for necessary action is rapidly closing and further delay risks irreversible changes to the climate system and its associated impacts on wider human society and the environment. At the same time, the increased risk of temperature changes being above 2°C means that the Pension Fund needs to develop its plans for adapting to a hotter world with a less stable climate. We are now working with Brunel to understand better how the companies we invest in are preparing to adapt to climate change, for example through the physical risk engagement programme with companies in the food and drink sector, which is covered in more detail in a case study later in this report.

TCFD and the ISSB standards

.

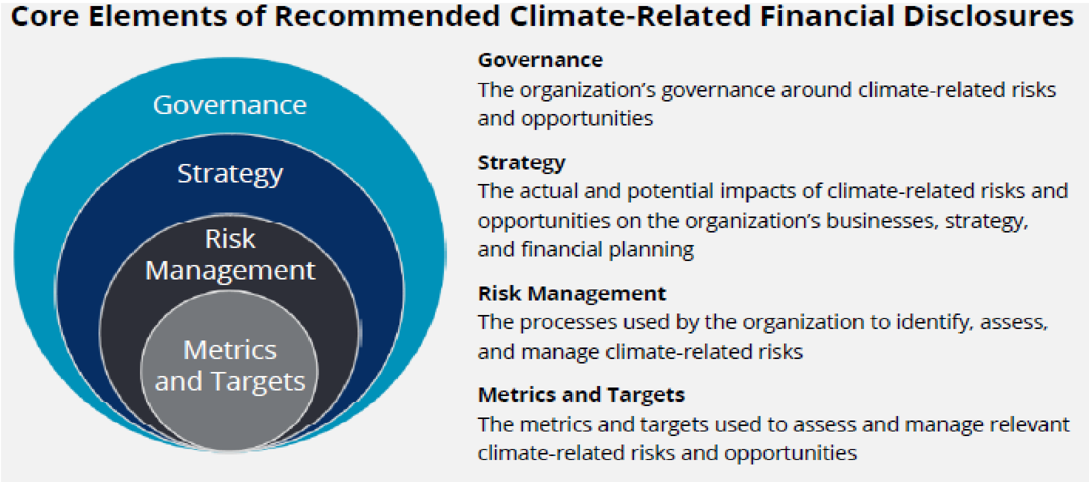
The TCFD was established in 2017 to develop recommendations for more effective climate-related disclosures by companies, banks, asset managers, asset owners and insurance companies. This could then promote more informed investment, credit, and insurance underwriting decisions and, in turn, enable stakeholders to understand better the concentrations of carbon-related assets in the financial sector and the financial system's exposures to climate-related risks.

In July 2023 the Financial Stability Board (FSB) announced that the work of the Task Force on Climate-related Financial Disclosures (TCFD) has been completed, with the ISSB Standards marking the 'culmination of the work of the TCFD'. Having fulfilled its remit, TCFD disbanded in October 2023.

Organisations can continue to use the TCFD recommendations should they choose to do so, and this report is based on those recommendations. For future reports the Fund may decide to move to the ISSB's IFRS S2 *Climate-related Disclosures* framework.

Recommended Disclosures:

The four core elements of the recommended disclosures are detailed in the diagram below.



(Recommendations of the Task Force on Climate-related Financial Disclosures, 2017)

The TCFD recommendations on climate-related financial disclosures are intended to be widely adoptable and applicable to organisations across sectors and jurisdictions.

In November 2020, the UK Government announced its 'TCFD road-map' with a commitment to roll out statutory TCFD compliant disclosure across the finance sector by 2025. This is underway with regulators having made, or being in the process of making, TCFD based reporting mandatory.

Whilst this implementation plan is on-going following the phased introduction of legislation to UK Listed companies and Occupational Pension Schemes in 2021, there is currently no statutory requirement for Funds within the Local Government Pension Scheme (LGPS) to report under this framework. Although it is not a legal requirement for LGPS funds to produce an annual TCFD report it is seen as good governance and best practice for organisations to demonstrate how they are managing climate-related financial risks.

Governance

TCFD Recommended Disclosure – a. Describe the board's oversight of climate-related risks and opportunities.

The Fund's governance arrangements are set out in its Governance Policy Statement. All functions relating to the management of the Pension Fund have been delegated by Oxfordshire County Council to the Pension Fund Committee. As such, the Committee are responsible for the Fund's long-term strategy.

The Pension Fund Committee are responsible for signing off on the Fund's Responsible Investment Policy which, alongside the Climate Change policy, outlines the Fund's approach to managing climate change related risks and opportunities. The Fund has an Independent Investment Adviser who provides investment advice including on investment strategy, this includes the integration of climate change related risk assessment into the investment approach of the Fund.

Climate change is considered in the budget setting process for training requirements, any climate related consultancy deemed beneficial, and climate related reporting requirements.

In June 2020 the Pension Fund Committee agreed a Climate Change Policy and Climate Change Policy Implementation Plan. Progress against the Policy and Implementation Plan is to be reported to Committee quarterly with a more detailed annual review.

Following agreement of the Policy a Climate Change and Responsible Investment Working Group was formed, which currently comprises of Committee members, a Local Pension Board member, Fund officers, the Fund's Independent Investment Adviser, a scheme member representative, and a member of the Fossil Free Oxfordshire campaign group. The Working Group aims to meet quarterly to review and discuss the Fund's approach to climate change mitigation and adaptation.

As required by LGPS regulations, the Pension Fund operates a Local Pension Board which meets on a quarterly basis. The Board's role is to ensure the efficient and effective governance and administration of the Fund, including compliance with relevant regulations and legislation that apply to the Fund.

The Fund, along with nine other LGPS funds, is currently a part of the Brunel Pension Partnership which develops investment portfolios that are made available to client funds to invest in. Under pooling requirements set by the government the Fund is required to make all investments through Brunel while maintaining responsibility for asset allocation decisions. The key bodies where the Fund interacts with Brunel are the Client Group, Brunel Oversight Board, and Shareholder Forum where Fund representatives and Brunel meet. There is also a Responsible Investment sub-Group where discussions take place between Brunel and the various client funds about the approach to assessing and managing climate-related risks, amongst other issues.

Climate-related risks and opportunities form a key part of the reporting received from Brunel on their portfolios and activities and Brunel has a dedicated responsible investment team.

As the asset manager responsible for appointing sub-asset managers, Brunel has a key role ensuring that climate-related risks and opportunities are integrated into the investment process. In fact, Brunel go beyond this, with a stated aim to "*systematically change the investment industry to ensure that it is fit for purpose for a world where the temperature rise needs to be kept to 1.5°C compared to pre-industrial levels.*"

In practical terms this translates into a focus on five principal areas, as shown in the chart below: Policy Advocacy; Product Governance; Portfolio Management; Persuasion; and Positive Impact.

Brunel regularly publishes its own plans and performance in this area – going beyond regulatory requirements. Brunel's annual [RI & Stewardship Outcomes Report] considers performance in meeting Brunel's responsible investment goals – including on climate change; their annual [Carbon Metrics Report] shows the exposure of all its active holdings; and the [TCFD Climate Action Plan] reports on Brunel's progress around climate metrics and targets.

Brunel published its first Climate Change Policy in 2020. In 2022, a Climate Stocktake was undertaken to review this Policy. At the time of publication Brunel are part-way through its 2025 Climate Stocktake. Brunel are following a similar approach for this second Stocktake, engaging with partner funds and reviewing practices via key questions.

- Did we deliver what we said we would do?
- Does it still meet the expectations and needs of our partner funds?
- Is it best practice?
- What are other stakeholder views?
- Are asset managers aligned?
- Are there companies of concern?

Following the analysis, Brunel will look to revise and enhance its [Climate Change Policy], to ensure that it is driving the right behavioural change.

TCFD Recommended Disclosure – b. Describe management's role in assessing and managing climate-related risks and opportunities.

Day-to-day management of the Fund's Climate Change Policy implementation is delegated to management through the Executive Director for Resources and Section 151 Officer and they are required to report progress to the Pension Fund Committee quarterly. Management receives an annual carbon metrics report from Brunel, which informs its reporting to Committee.

Officers engage with Brunel and other Fund Managers on climate issues and receive and consider responsible investment reporting, including climate related, that is included in Fund Managers' quarterly reports. The Fund has an officer representative on the Brunel Responsible Investment Sub-Group, who currently chairs this group, and Cross-Pool Responsible Investment Group where developments around climate issues are regularly discussed (e.g. metrics developments, engagement activities and results).

The Fund has a Responsible Investment Officer post. A key area of responsibility for this role is around monitoring and reporting on the Fund's climate-related risks and how these are being managed.

Management is responsible for developing and operating a training plan for Committee members and Officers to ensure appropriate skills and knowledge.

Strategy

TCFD Recommended Disclosure – a. Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.

The Pension Fund has liabilities that stretch decades into the future and so primarily takes a long-term view to investment decisions. Given the diversity and global nature of the Fund's investments almost all climate-related risks and opportunities are relevant to the Fund. While some of the climate-related risks/opportunities apply to the Fund across its investments as a whole, others are specific to certain sectors or geographies and fund managers are required to consider the materiality of these.

The most significant long-term risk is the systemic risk across financial markets, including social and other factors, associated with climate change that could arise if actions are not taken to adhere to the Paris Agreement. Examples of this type of systemic risk include unmanaged mass migration or the collapse of food production systems, both of which would have a hugely negative impact upon financial markets. Setting a target of Net Zero Paris alignment by 2050 is a commitment by the Fund to help to manage and mitigate that systemic risk, with a view to being able to meet the Fund's liabilities into the future.

In terms of more specific and short/medium-term risks - stranded assets, physical risks (e.g. property), sovereign debt where countries are dependent on fossil fuel linked revenue, policy risk (e.g. carbon pricing), technology risk (obsolescence), social and economic disruption as the result of a transition away from a fossil fuel-based economy and changes in consumer behavior are all factors that can affect the Fund's investments. There is also a risk that the Fund develops its investment strategy around achievement of the Paris goals but the goals are not achieved, meaning the Fund's investment strategy is misaligned with the reality of the actual climate path.

The Fund has identified climate-related opportunities including the ability to reduce portfolio risk by identifying and taking action on assets at risk under Paris aligned scenarios and the potential to identify outperformance opportunities by investing in those companies whose business models/strategies are best aligned with meeting Paris Agreement scenarios. Additionally, investment opportunities exist in assets linked to the implementation of the Paris Agreement. For example, the Global Sustainable Equities (GSE) portfolio differs from our other active equity portfolios in its approach to climate opportunities in that the portfolio has a specific objective to pursue such opportunities.

TCFD Recommended Disclosure – b. Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.

Climate change is considered in the development of the Fund's Investment Strategy Statement, which includes the Fund's strategic asset allocation. After each funding valuation undertaken by the actuary the Fund completes a fundamental review of its asset allocation which will consider climate related risks and opportunities. The Fund uses diversification to manage investment risks but given the systemic nature of climate risks this approach has limits to its effectiveness under more extreme scenarios.

The Fund's Climate Change Policy states that where there are two investment options that broadly aim to deliver the same investment objective the Pension Fund will prioritise the option that delivers the best fit to its climate change commitment. For example, consistent with this principle the Fund moved around 15% of the Fund from regular market-cap index trackers to a Paris aligned benchmark (PAB) alternative in 2020.

Climate related risks and opportunities are considered when setting the Pension Fund's Business Plan and these also inform discussions with Brunel around portfolio offerings and construction. In 2025 the Fund tendered for an asset manager to provide an affordable housing fund where one of the key criteria used to assess the various funds was the extent to which the manager had set environmental targets for the portfolio. The asset manager appointed has a target that all new housing developments should be to EPC A standard.

The Pension Fund has made a commitment to achieve net-zero emissions on its own operations by 2030.

TCFD Recommended Disclosure – c. Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.

The Fund is committed through its Climate Change Policy to staying abreast of the latest scientific developments in respect of climate change to ensure that the Policy remains appropriate in its aim to align with the Paris Agreement.

Under a scenario where additional cuts in emissions are required to meet the Paris Agreement, and there was a global commitment to achieve this, the Fund would anticipate amending its target for emissions reductions across its investments accordingly and making any necessary changes to its asset allocation targets and/or investment portfolios.

Under a scenario where the Paris Agreement goals were to be overshot the Fund would consider making changes to its investments that align with this reality, this would likely include mitigating physical risks that would be associated with such a scenario. The Fund would also review whether there are changes the Fund could make, for example in engagement activity or policy advocacy, that could help correct the scenario back towards a Paris aligned one.

The draft government guidance by the Ministry of Housing, Communities and Local Government (MHCLG) on TCFD implementation proposes to place a new duty on LGPS Administering Authorities (AAs) to assess their assets, liabilities, investment strategy and funding strategy against climate risks and opportunities in at least two climate scenarios. This assessment must include at least one scenario based on a global temperature rise of 2°C or lower on pre-industrial levels. This assessment must occur at least once every valuation cycle. In interim years, AAs must consider whether any changes in the fund have been substantial enough to require scenario analysis to be repeated.

There has been controversy over the application of scenario analysis to the potential impacts of climate change, with some approaches criticized for potentially underplaying the impact of climate change on long term investment returns. For this reason the Fund has taken a cautious approach to using scenario analysis in previous reports given the limitations of quantitative scenario planning of this type as a tool for assessing what impact climate change may have on our investment portfolios.

Such analysis is in its infancy, and Brunel, along with other investors, are evolving how they embed the analysis into its processes. The focus is on providing decision-useful information for Brunel's partner funds, and this is only one way in which this goal can be achieved. Scenarios are a useful tool for portfolio managers to engage in dialogue and to ask the right questions about holdings; they are not a tool to use in isolation. Brunel do not use these to make specific investment decisions.

Brunel's scenario analysis utilises market-standard scenarios including:

- NGFS scenarios (Orderly Net-Zero, Disorderly Net-Zero) for Transition Risk analytics for in-scope investments
- IPCC SSP, The Network for Greening the Financial System (NGFS) was established in 2017 by central banks and supervisors with the aim to promote best

practices and enhance the role of the financial system to manage risk and mobilise capital for a low-carbon economy

Brunel's scenario analysis approach is based around using different scenarios to analyse companies' exposure to physical risk from climate change, to analyse portfolio alignment with the Paris Agreement and to understand potential earnings at risk from carbon pricing on a portfolio level.

Physical risk

What is it?
Physical risks stemming from climate change can manifest as persistent due to long-term alterations in climate patterns or acutely through specific events such as floods or storms. Supply chain disruptions, operational interruptions and asset damage are all examples of risk implications from physical risk.

How will we use the information?
To pinpoint the assets most vulnerable to climate hazards, using the point in time assessments of exposure to climate hazards.
The financial implications of these physical risks will be assessed by contrasting changes in climate hazard exposure against a location-specific baseline for each asset. This approach allows Brunel to concentrate on the financial materiality of climate hazard exposures for distinct asset categories.

Paris Alignment (SDA & GEVA)

What is it?
Assessing the decarbonisation rates of individual companies in comparison to the targets set by the Paris Agreement. This enables us to track our listed portfolios and benchmarks against the goal of limiting global warming to less than 2°C above pre-industrial levels.
How will we use the information?
To combine the rates and evaluate the overall Paris alignment of the portfolio.

Transition Risk / Earnings at Risk

What is it?
A direct impact on a company's operations, of rising carbon prices, is likely to be seen, where regulations impose a higher price for greenhouse gas emissions. Companies may be vulnerable to pass-through costs of rising carbon prices as suppliers try and recover their own additional regulatory costs.
How will we use the information?
The S&P Earnings at Risk framework allows us to quantify a company's potential exposure to carbon price increases associated with Scope 1 and 2 emissions for holdings from 2025 to 2050.

Risk Management

TCFD Recommended Disclosure – a. Describe the organization's processes for identifying and assessing climate-related risks.

Climate change is included in the Fund's risk register, which considers impact and likelihood in assigning a score. The risk register is reviewed on a quarterly basis and reported to Committee at each meeting. Officers consider regulatory, scientific and political developments on climate change, in particular those from recognised international bodies such as the IIGCC, International Energy Agency, and the UN Environmental Programme.

The Fund meets regularly with Brunel and discusses climate issues including any identified from the narrative reporting or climate metrics provided by Brunel. Officers also carry out regular checks on the Fund's investment portfolios to identify any holdings that might represent a heightened climate-related risk.

Brunel in turn meet with their appointed fund managers who also have a responsibility to consider climate related risks and opportunities. For example, Brunel have a target for all companies held in their portfolios to achieve a Transition Pathway Initiative score of 4 or higher.

Climate-related risks are often identified through the Brunel Responsible Investment and Investment teams, and information regarding the risks and impacts is then bought to the Investment Risk Committee (BIRC). In this forum the standard climate metrics are considered alongside the additional information provided and the materiality of the risk is determined, along with recommended courses of action. Where this related to a new risk, the emerging risk process is applied. The Responsible Investment Sub-Group at Brunel provides an additional forum to discuss climate related risks with Brunel.

Case Study – Top 10 GHG emitters report

In 2024 across all the Brunel equity and bond portfolios the top 10 GHG emitting companies accounted for 29% of all emissions. The remaining 3000+ companies were responsible for 71% of emissions. Given the significant GHG emission footprint of these top 10 companies they represent some of the largest risks within our investment portfolios. In response to requests from Oxfordshire and other client funds Brunel developed an annual bespoke report for each client fund identifying their top 10 emitters, providing background information on each company and also the latest state of play on engagement with the company by Brunel, Brunel's engagement advisor EOS Hermes and by the individual asset managers.

The Top 10 report enables the fund to identify key risks and also to understand the materiality of those risks based on each company's business model and also the status of the latest engagements with the company around climate-related risks. It is a key tool for identifying risk and understanding how that risk is being managed.

TCFD Recommended Disclosure – b. Describe the organization's processes for managing climate-related risks.

The Fund is responsible for asset allocation decisions and sets its asset allocation targets to be consistent with the Fund's Climate Change Policy. Where the Fund identifies investment needs that are not currently deliverable from Brunel portfolios there is a process for the creation of new portfolios by Brunel that can meet that need.

The key approach by which the Fund's risk is managed is through diversification of investment into a variety of asset classes. Within this strategy there is also embedded an approach of integrating climate change risk management into the investment process.

Case Study – Climate alignment of the biggest emitters

At the end of 2023 a new climate alignment policy for the highest emitting companies was agreed between Brunel and its client funds. This was in response to concerns that the Climate Action 100+ companies were not moving fast enough to be in alignment with the objectives of the Paris Agreement.

Each year Brunel's CA100+ holdings are assessed against the Alignment Maturity indicators used for the CA100+ benchmark. Those that do not meet the threshold of the policy and cannot provide credible evidence of alignment to net zero will be classed as Climate Controversial and given 12 months to improve. If they are found not to have improved sufficiently at the end of the time period then they will face further escalation, up to and including the potential for divestment.

Built into the Climate Alignment policy is a year-on-year tightening of the criteria to ensure that progress on alignment with the Paris Agreement is ongoing as we move towards 2050. The exact detail of the tightening of the criteria is discussed at the Responsible Investment sub-Group (RISG), with a recommendation then going via the Client Group to the Brunel Investment Committee.

When it came to setting the criteria for 2025 in November 2024 the RISG chose to adopt significantly tighter criteria than in the previous year, including holding Oil & Gas companies to a higher standard than other sectors, due to the level of risk for these companies.

Voting and engagement form an important part of the Fund's management of climate-related risks. Engagement on behalf of the Pension Fund primarily takes place through Brunel, their appointed fund managers, and their engagement provider.This is in accordance with the approach set out in Brunel's Climate Change Policy, which the Fund is able to input into. Voting is undertaken on behalf of the Fund by Brunel, utilising the expertise of their voting and engagement provider and appointed managers.

Brunel's approach to voting escalation sees an initial vote against the reappointment of a company Chair escalate to other board members where they have not met their climate disclosure expectations. These expectations will increase over time with the target of all their material holdings being on the Transition Pathway

Initiative (TPI) Level 4 as a minimum, and having made meaningful progress to alignment with a 2°C or below pathway.

Case Study – Shareholder resolution at Shell

Shell has consistently been one of the top contributors to the Oxfordshire Pension Fund's carbon footprint, and as with all companies involved in fossil fuels, can attract criticism. It is the company that the Fund has raised the most concerns about with Brunel, and there is a strong focus by both Committee and officers on ensuring that the company is being held to account to manage the significant risks that its business model entails.

A key role of active ownership is to hold companies to account for the commitments they make and as a long-term shareholder, Brunel has been engaging with Shell for several years on a range of topics. This takes up a lot of resource but given the potentially key role that an integrated oil and gas company such as Shell could have in the required energy transition it has been seen as a worthwhile use of resources.

At the end of 2024, Brunel co-filed a resolution on the congruency of Shell's Liquid Natural Gas (LNG) strategy and its climate commitments, along with ACCR and other LGPS funds. This resolution received over 20% support at the company's 2025 AGM.

Brunel has also had several conversations with the company on their views on the demand drivers of LNG growth, the alignment with their net zero target and the resilience of the LNG portfolio given the scaling of renewables and likely downward pressures on prices. We believe further transparency is critical for investors to appraise the risks and opportunities as it relates to these issues.

Whilst the Oxfordshire Fund has concerns regarding Shell's long-term alignment with the Paris Agreement, Brunel will continue to engage with the company for the time-being.

The Fund, through Brunel and the Fund's membership of the Institutional Investors Group on Climate Change (IIGCC), is involved in the development of Paris Aligned Portfolios under the IIGCC's Net Zero Framework. It is intended that this work will lead to all portfolios offered by Brunel being Paris aligned eventually.

The Fund believes that in some areas, particularly around public policy engagement, it is beneficial for the Fund to act with like-minded investors. As such, the Fund is a member of investor groups whose aims are aligned with those of the Fund in respect of climate change including Climate Action 100+, Institutional Investors Group on Climate Change and the Local Authority Pension Fund Forum.

TCFD Recommended Disclosure – c. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.

Climate change is included on the Fund's risk register, which is a standing item at the quarterly Committee meetings. Climate change is a key topic included as part of the Committee training plan to ensure appropriate skills and knowledge for those making decisions.

In appointing third parties, such as the Fund's Independent Investment Adviser, the Fund will set out requirements around responsible investment issues such as climate change as appropriate.

Climate change is also considered by the Fund's actuaries when undertaking their funding valuation.

In 2024 the Fund published its first [responsible investment policy](), which highlights the key sustainability-related risks to the Fund. These priority areas were identified through an analysis using the World Economic Forum' Global Risks report, alongside an assessment of the key sectoral risks for those sectors the Fund has the greatest exposure to.

Climate change is identified as one of the high priority risks in the policy, but other related-risks were also identified, including deforestation. There is no pathway to net zero that doesn't include addressing deforestation, so this is a key part of our approach to climate risk, as laid out in our responsible investment policy. Brunel are currently working with their engagement and voting provider Hermes EOS to use engagement activities and voting decisions to manage risks related to deforestation.

We work with our asset manager Brunel to identify the areas of greatest risk and agree resource allocations in response to those assessments. This allocation strategy helps the Fund to mitigate and manage those risks. A key tool for this process is the annual Climate Metrics report provided by Brunel for the Fund. This provides a useful snapshot of performance and risk in relation to the Fund's Net Zero targets at both an aggregated overall Fund level and individual portfolio level.

Metrics and Targets

TCFD Recommended Disclosure – a. Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.

Metrics reported in this section are from the Fund's Carbon Metrics Reports. The report includes listed equity and the Sterling Corporate Bond portfolio, covering around 60% of the Fund's overall investment portfolio. The Fund is working to improve reporting across other asset classes, including private markets, so that the level of coverage can be increased.

We seek to manage climate risk in each and every portfolio, as well as our own operations, but we are not in a position to quantitatively measure and report progress in all these areas. We prioritise the disclosure metrics for our listed equities and corporate bonds, as this represents the highest proportion of the Fund's assets under management (AUM).

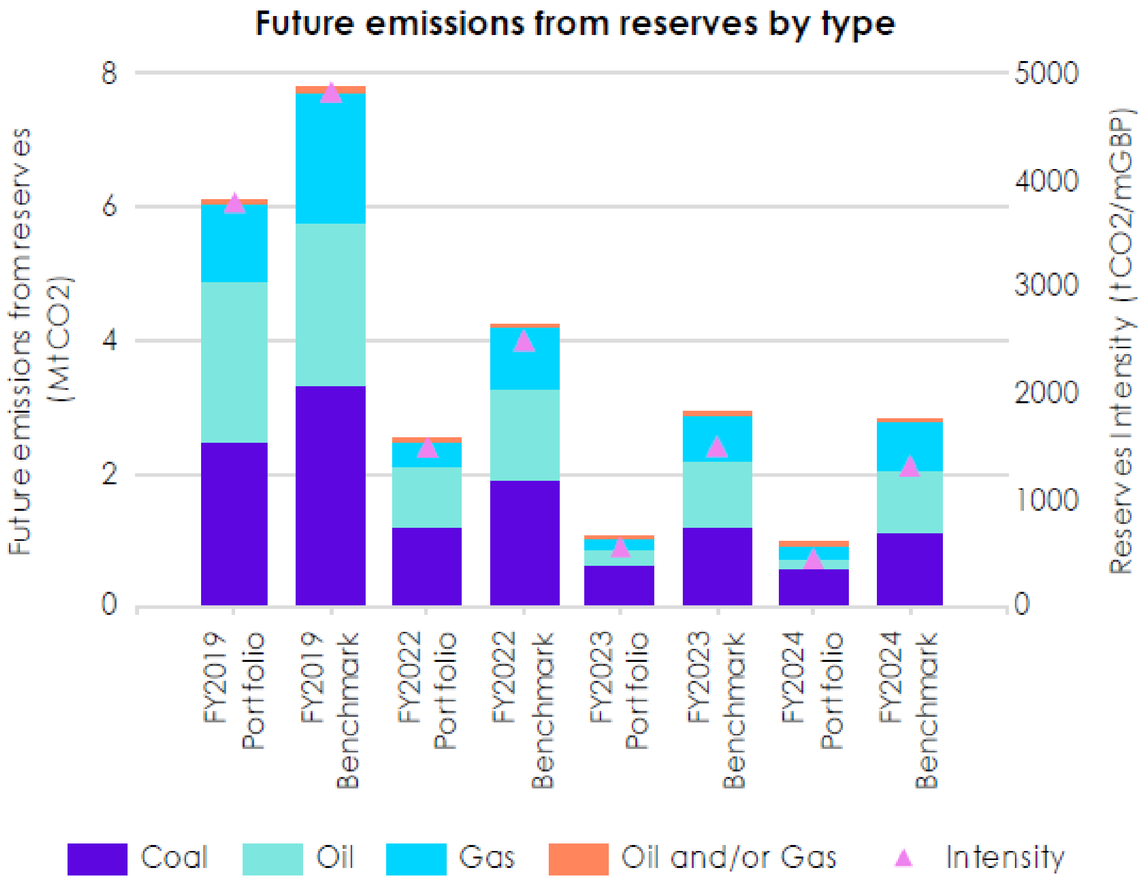
It is recommended that this report is not read in isolation. It should be considered alongside the Oxfordshire Pension Fund Carbon Metrics Report which is designed to provide detailed metrics and information regarding individual Listed Markets portfolios and the Sterling Bond portfolio.

The Fund currently uses the following metrics to assess climate related risks and opportunities at both an aggregate and listed portfolio level:

- Weighted Average Carbon Intensity (WACI)
- Absolute Carbon Footprint by Scope
- Carbon to Value IntensityFossil Fuel Revenue Exposure
- Fossil Fuel Reserves Exposure
- Future Emissions from Reserves
- Disclosure Levels (Scope 1 and 2 Emissions)

Fossil fuel reserves exposure and future emissions from reserves are useful insights into potential downstream scope 3 emissions and can be used as an indicator of potential stranded asset risks.

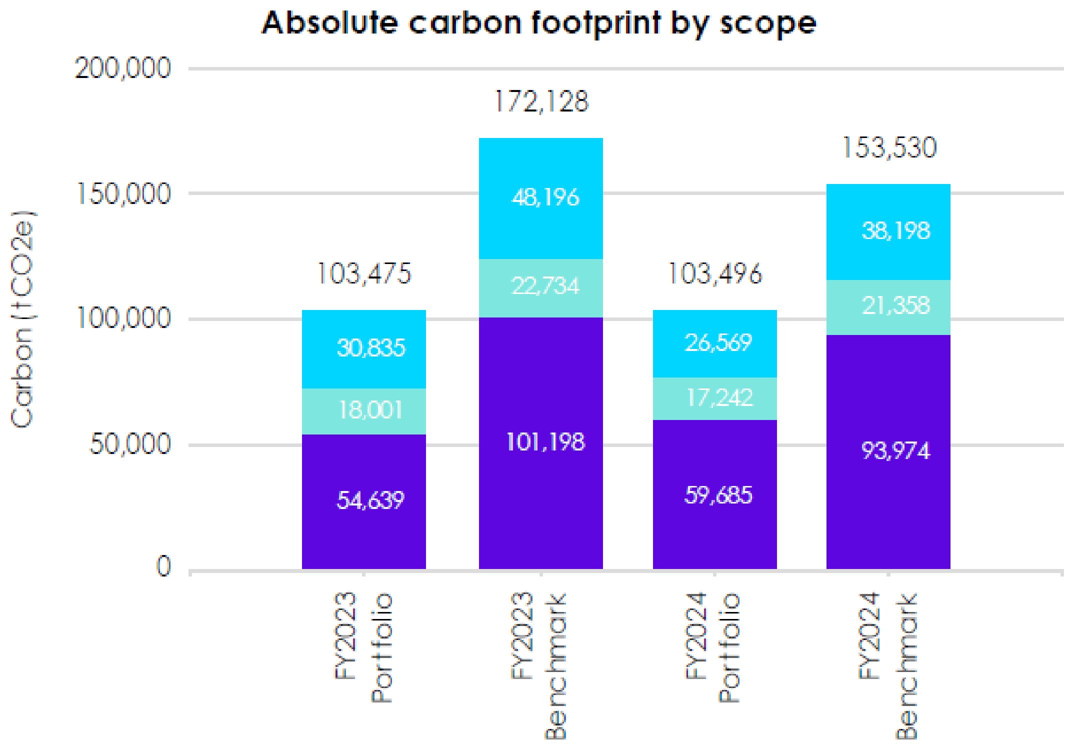
The bar chart below shows fossil fuel reserves exposure for the Fund annually from 2019-2024.



TCFD Recommended Disclosure – b. Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks.

The Pension Fund's Carbon Metrics report discloses scope 1, 2 and upstream first tier scope 3 emissions for all listed equity portfolios and the Fund's Sterling Corporate Bond Portfolio.

The graph below provides a snapshot of the Absolute Carbon Footprint by Scope of the Fund at an aggregated level versus its benchmark as at 31/12/2024.

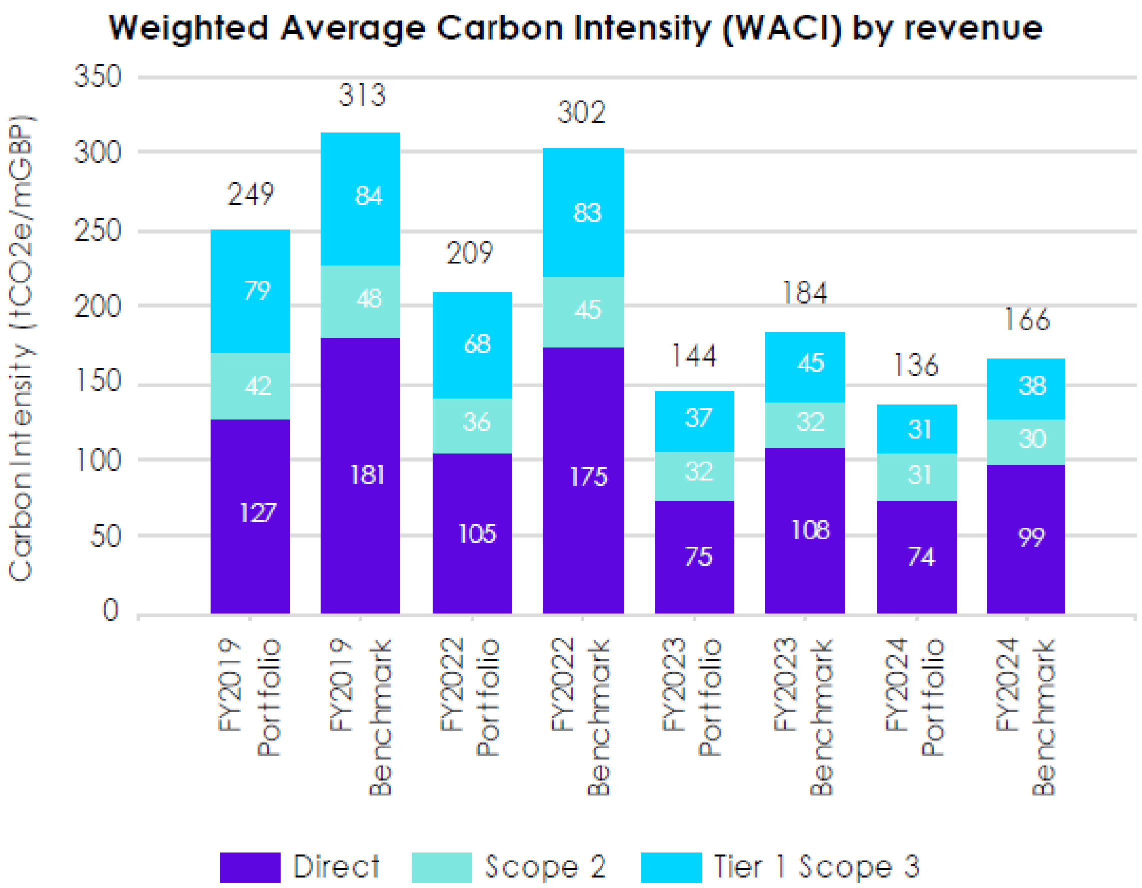


TCFD Recommended Disclosure - c. Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.

The Fund has an annual reduction target for GHG emissions across its investment portfolios of 7.6%.

The metric that has been identified in the Climate Change policy to track progress against this target is the Weighted Average Carbon Intensity (WACI) by revenue figure. This metric takes the carbon intensity (total carbon emissions divided by total revenue) of each investee and multiplies it by its weight in the portfolio.

According to the most recent Climate Metrics report from Brunel the WACI by revenue of the Oxfordshire Aggregate Portfolio is around 18% lower than its Strategic Benchmark



The overall WACI by revenue figure for 2024 saw a decrease of 5.5% compared to the 2023 level. This means the overall level of reduction from 2019 is around 45%, which means we are on target for an annualized rate of reduction of 7.5% since 2019.

For our listed equity portfolios Brunel has set the following targets:

100% of AUM in material (high impact) sectors* In developed listed equities that are i) achieving Net Zero or ii) meeting a criterion considered to be aligned or iii) aligning** by 2030, extending to all markets by 2040.
Brunel's ambition is that by 2040 all listed assets are i) achieving Net Zero or ii) meeting a criterion considered to be aligned or iii) aligning***.

** Currently in scope are listed companies on the Climate Action 100+ focus list; companies in high impact sectors consistent with Transition Pathway Initiative sectors including banks.*
*** Note that, for a product to be on track for meeting its target, at least 80% of assets must fall into in the first and second categories*
**** Note that, for a product to be on track for meeting its target, at least 80% of assets must fall into in the first and second categories*

Whilst the Fund does not have a specific fossil fuel reserves exposure reduction target, it does support seeking to reduce exposure over time, in line with our commitment to be net zero by 2050.

One area that is important to track to understand if the Fund is making progress towards its net zero target is to calculate its investments into companies delivering the green products and services driving the transition to a low carbon economy. Following on from 2023's pilot FTSE Russell have assessed a number of Brunel's portfolios for their exposure to green revenues vs their benchmark, the results are in the table below:

Portfolio	Green revenues	Benchmark green revenues
Active Global High Alpha Equity	9.8%	8.8%
Active UK Equity	3.5%	4.1%
Passive World Developed Equity PAB Index	18.7%	8.8%
Active Global Sustainable Equity	15.6%	9.1%
Sterling Corporate Bonds	4.1%	7.5%

As the table shows, all of the portfolios apart from the Active UK Equity and Sterling Corporate Bonds are ahead of their benchmarks, with the Passive World Developed PAB Index and the Active Global Sustainable Equity portfolios showing significant outperformance.

Climate Change Policy Implementation Plan Progress

The table below gives a high-level status on progress against the various actions identified as required to deliver the Climate Change policy Implementation Plan.

Activity	Status	Notes
Target a 7.6% annual reduction in GHG emissions across its investment portfolios using WACI as a metric	On target	Currently delivering a 7.5%% annual reduction in portfolio carbon intensity since 2019 using WACI as a metric.
Work with Brunel to establish whether alternative portfolios are available that better deliver on the Policy than current options	Under target	Passive funds moved to PAB index; rebalancing of equity towards Global Sustainable and Passive FTSE PAB portfolios. Work to move UK Equity portfolio from focus on large cap to SME cap companies currently paused.
Consider the renewable infrastructure weighting when making future allocations to the Brunel Infrastructure portfolio	On target	Infrastructure funds Cycle 2 and 3 have higher renewables weighting. £30m allocated to Wessex Gardens climate solutions portfolio
Investigate an appropriate metric for measuring the proportion of assets invested in climate mitigation and adaptation	On target	Green revenues data now available for equity, bonds and infrastructure portfolios
Work with Brunel to set appropriate targets and measures of success in relation to engagement activity undertaken on the Fund's behalf	On target	The Fund supports the use of internationally recognised standards and frameworks such as the Transition Pathway Initiative and the Climate Action 100+ benchmark as the basis for engagement
The effectiveness of the engagement approach operated by Brunel will be formally reviewed as part of the 2025 stocktake of their Climate Change Policy and the Pension Fund will contribute to this review.	On target	New engagement plan agreed with Brunel and other clients that will see companies required to meet CA100+ criteria, that will tighten over time. Failing companes could ultimately face exclusion from investment portfolios.
Work with Brunel to identify or develop appropriate metrics, across all investment portfolios, to monitor the successful implementation of the Policy.	On target	Climate metrics report is a useful tool for measuring implementation of the policy. Also working with Brunel to develop metrics on green revenues and widening of coverage to all asset classes.
Consider joining investor groups whose aims align with those of the Pension Fund's Climate Change Policy.	On target	Member of the IIGCC, Climate Action 100+ and the Local Authority Pension Fund Forum
Investigate options for portfolio scenario analysis based on different climate change scenarios so that this	On target	The latest Brunel Climate Metric report includes some scenario analysis metrics. We will continue

can be incorporated in the next fundamental asset allocation review in 2026.		to work with Brunel to develop this further.
Pension Fund to be carbon neutral on its own operations by 2030.	On target	Working with the Oxfordshire County Council Net Zero team to benchmark current operations

Emissions Reduction Target

As noted above the Fund's Climate Change Policy Implementation Plan set a target to reduce greenhouse gas emissions intensity by 7.6% per annum. This was set to be consistent with the Fund's Policy commitment to be aligned to the 1.5°C temperature goal of the Paris Agreement with limited or no overshoot.

As the chart on page 59 shows the Fund has been able to hit the target set in the Climate Change policy to reduce the emissions intensity of our portfolios by 7.6% each year.

While the Fund does not have a target for reductions in exposure to fossil fuel reserves this has reduced by over 80% since 2019.

The Fund recognises that there are a range of different metrics to assess emissions related to investment portfolios, all of which have their own merits and drawbacks. At present the Fund is reporting on WACI (as recommended by TCFD) as this can be used across all listed portfolios, irrespective of allocations and therefore can be decision-useful in assessing the relative carbon emission efficiency (per million pounds) of portfolios when attributing the impacts of strategic asset allocation decisions.

However, WACI has limitations in being used to assess progress against the Fund's emissions reduction target, principally because it is an efficiency measure and so while efficiency may improve this does not mean actual emissions are necessarily reducing. The Fund's investment in the Brunel Sustainable Equities portfolio can also have a short-term negative impact on WACI performance as the managers in the portfolio are actively targeting investments in companies who are at the forefront of the energy and industrial transition to Net Zero. These are leaders in challenging and difficult-to-abate sectors.

These sectors inevitably have a higher carbon intensity today than companies in most other sectors, whose own transition journey is dependent on such companies. For example, one such company in the portfolio is Waste Management Inc. a waste and environmental services company operating in the US. The company is one of the largest contributors to the overall carbon intensity of our portfolio but it is also an energy transition solutions company, with key business activities including renewable energy and recycling.

An additional issue across all metrics is the use of scope 3 emissions where data quality and double counting factors, when using full scope 3 emissions, make its use challenging. At present the Fund's WACI data includes Scope 1, Scope 2, and first tier Scope 3 emissions (upstream emissions).

It is important that the Fund continues to work with Brunel to monitor and develop metrics such as fossil fuel reserves exposure, overall carbon emissions and green revenue exposure to be able to give a more granular and rounded assessment of progress towards its net zero target.

Other Implementation Plan Items

The Fund's Implementation Plan sets out several actions over the near-term that management has determined will enable it to deliver on its Climate Change Policy. Progress against each of these is summarised below.

Work with Brunel to establish whether alternative passive, or similar, equity funds are available that better deliver on the Policy than current options available to the Fund.

Brunel worked closely with leading index provider FTSE Russell to develop two indexes that met the EU criteria to be classified as a Climate Transition Benchmark or a Paris Aligned Benchmark. These indexes were made available for investment in November 2021. The Pension Fund Committee made a decision to move the Fund's full passive holdings of c.£530m to the Paris Aligned Benchmark fund putting it among the first group of investors to invest in the index. Of the two funds developed the Paris Aligned Benchmark has stricter climate criteria and effectively excludes fossil fuel companies from the index. The Fund has also been rebalancing some of its active equity funds away from portfolios with higher fossil fuel reserves exposure towards the Global Sustainable Equity and the Passive FTSE PAB Index portfolio, where exposure to reserves is lower and green revenues higher.

A decision was taken by the Committee to shift our current UK Active Equity portfolio from a focus on large Cap FTSE 100 companies towards a small and medium cap portfolio. This will reduce the Fund's exposure to oil and gas supermajor companies, which are significant contributors to the GHG footprint of the current portfolio. This work is currently paused as a result of the government's Fit for the Future reforms to the LGPS pooling structures.

Consider the renewable infrastructure weighting when making future allocations to the Brunel Infrastructure portfolio.

The Brunel's infrastructure portfolio specification states that a majority of the portfolio will seek to deliver climate solutions and a just energy transition to a lower carbon global economy.

In 2024 the Oxfordshire Fund joined five other Brunel client funds to invest into a climate solutions portfolio which will see more than £300m invested into a wide range of renewable technologies such as solar and wind as well as into battery storage and green hydrogen production.

Oxfordshire joined Avon, Cornwall, Devon, Gloucestershire and Wiltshire to invest through the Wessex Gardens Fund managed by Schroders Greencoat. The first investment involved acquiring a stake in the Toucan energy portfolio, investing £230m in the deal to acquire local solar assets. This is part of the largest operational solar deal ever transacted in the UK.

Investigate an appropriate metric for measuring the proportion of assets invested in climate mitigation and adaptation.

The Fund continues to work with Brunel in developing an appropriate metric or set of metrics and determining the criteria used to identify investments in climate mitigation and adaptation. This links to wider work being undertaken by various governments including the EU who have developed an EU Green Taxonomy and the UK which has established a Green Technical Advisory Group to advise the government on the establishment of a UK taxonomy that sets the criteria for an investment to be defined as environmentally sustainable.

For the Fund to set targets it first needs to be able to establish the current level of investments in climate solutions/green revenues. Once a baseline has been established then the percentage increase over time of investments by the Fund into companies contributing to the low carbon transition of the economy can be tracked and reported on.

FTSE Russell produced a 2022 paper on green revenues exposure of equity portfolios in a 1.5°C scenario. According to this analysis a 1.5°C Paris aligned calculation (low case) calls for:

- 12% green economy exposure of the listed equity market by 2023.
- By 2030 this should be 20%
- By 2050 this should be 25%
- Therefore exposure is heavily front-loaded in order to mitigate temperature rises above 1.5°C.

Brunel have calculated the Weighted Absolute Value (£) of Green Revenues of the Fund's equity and bond portfolios using the FTSE Russell green revenues methodology. On this basis it is estimated that the Fund's exposure to green revenues as at December 2024 was £279,348,910, as a percentage of total investment into sterling bonds and listed equity portfolios this equals 12.72%.

Brunel have also calculated the green revenues from the Stepstone managed private market infrastructure portfolios, which is equivalent to £88,938,422.40out of a total investment into those funds of £104,480,000.00. The Wessex Gardens fund also has a 100% allocation to assets that generate green revenues, the Oxfordshire Pension Fund has allocated £30,000,000 to this fund. If we add these all together that translates into 17.1% green revenue exposure % of our investments into sterling bonds, equity and infrastructure private markets, including Wessex Gardens.

This figure is well above the forecast required green revenues exposure for 2024 to be on track for net zero, estimated to be at around 12%, however, it is important to note that the calculation did not include investments into other asset classes including private equity and property where the percentage may well be higher. We will continue to work with Brunel to develop a metric for green revenues that includes the Fund's investments into all asset classes.

The Pension Fund will work with Brunel to set appropriate targets and measures of success in relation to engagement activity undertaken on the Fund's behalf.

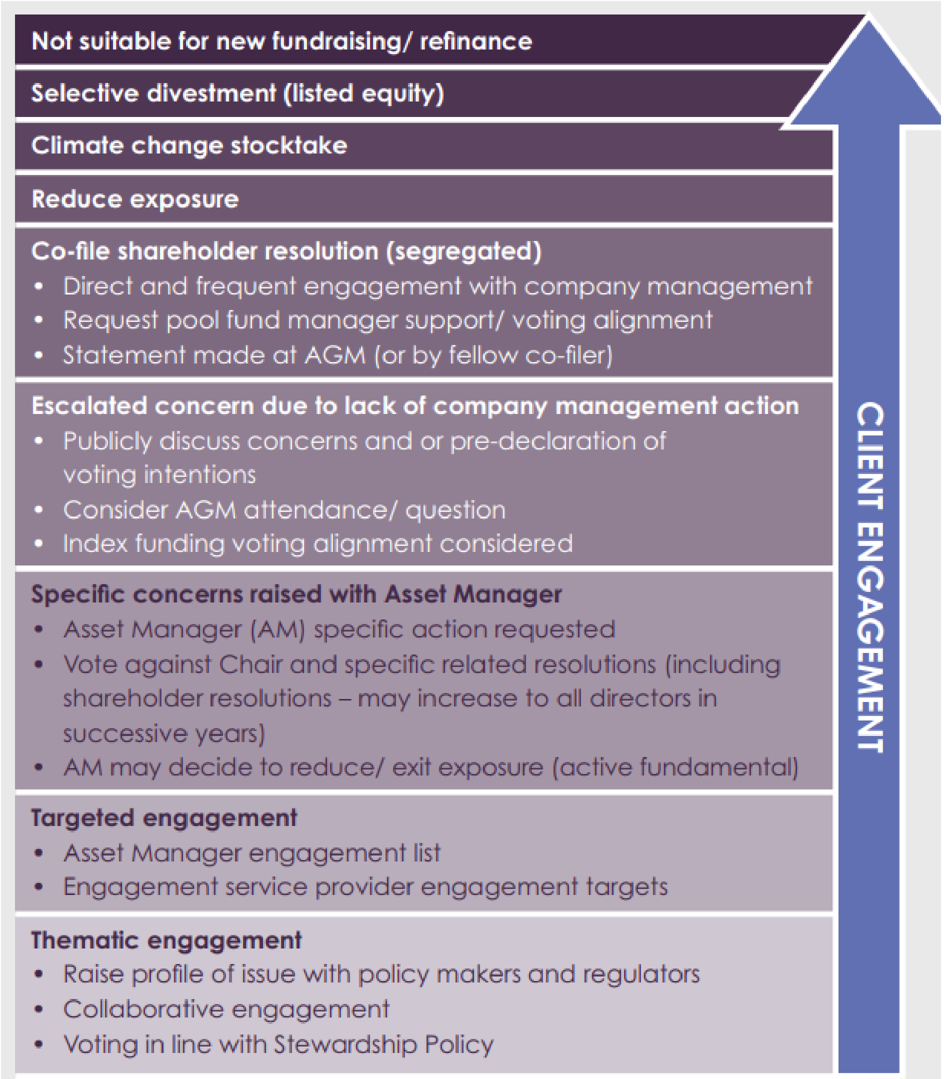
Brunel has three main strategies that it uses to persuade companies and other entities to act on climate change, namely: (a) direct engagement, including voting its shareholdings, (b) collaborative engagement, in particular through Climate Action 100+ (CA100+), and (c) engagement via its investment managers.

In relation to company engagement, Brunel expects companies in high-emitting sectors to publish their climate transition action plan, and to annually disclose emissions and progress against their commitments and targets. These expectations apply across all of the asset classes that Brunel invests in. In listed equities (and fixed income, in cases where investors are granted formal voting rights), Brunel has built these expectations into its voting policy.

Brunel will vote against the re-election of the company Chair where:

- Oil & Gas, Utilities, and all European companies have not at least reached Level 4 of the Transition Pathway Initiative (TPI) framework
- A company has not reached level 3 of the TPI framework for the US and Asia, or where the TPI score has fallen from level 4
- A company's strategy is materially misaligned with the goals of the Paris Agreement
- A company's strategy is misaligned to net zero ambitions

In cases where escalation is necessary Brunel has the following approach:



The effectiveness of the engagement approach operated by Brunel will be formally reviewed as part of the 2025 stocktake of their Climate Change Policy and the Pension Fund will contribute to this review.

A key component of the engagement approach is to encourage companies to set plans and objectives to align with net-zero.

Brunel provides updates on the engagements with companies every quarter and more detailed analysis on an annual basis in the Responsible Investment and Stewardship Outcomes Report.

In 2024 Brunel's engagement advisor Hermes EOS engaged with 759 companies on Brunel's behalf. Of these engagements around half were on environmental issues, including climate change.

As part of the Pension Fund's input into the stocktake it agreed an Engagement Policy for the Climate Action 100+. The policy focuses on companies with the highest emissionsA series of measures are set out in the policy with target dates for achievement, failure to meet the criteria will lead to the potential exclusion of a company.

During 2024 following discussions between client funds and Brunel a more ambitious set of criteria were agreed for Brunel's climate policy that much more closely align with those Oxfordshire adopted. These criteria are now in effect and will be reviewed annually to agree a ratcheting up of the requirements companies need to meet or potentially face exclusion from portfolios.

Work with Brunel to identify, or develop if not available, appropriate metrics, across all investment portfolios, to monitor the successful implementation of the Policy.

Work on metrics is ongoing and is expected to be an evolving process that incorporates developments in available data with the aim of increasing the accuracy and relevance of metrics as well as increasing the level of portfolio coverage. Brunel are now able to provide an annual set of climate metrics for the Fund's equity and bond holdings. We now also have access to green revenues data for some of the private market funds too. Going forwards we will work with Brunel to extend the green revenues data across all investment classes to help better understand the positive impact of the Fund's investments into the transition towards a low carbon economy.

While metrics are available for listed equities and bonds there is currently a lack of data available for the majority of other assets particularly in a format that allows aggregation at portfolio level. There are some industry developments in this area that could be useful to the Fund, for example the Carbon Risk Real Estate Monitor that has been developed for real estate assets.

Brunel are working with their private market managers to produce climate data that can be used to measure alignment with climate goals.

This is also an area being looked at by the IIGCC as part of their Net Zero Investment Framework and the Fund will monitor the outputs from this work and its applicability to the Pension Fund's investments.

Consider the merits of joining investor groups whose aims align with those of the Pension Fund as set out in the Policy.

The Fund continues to be a member of The Institutional Investors Group on Climate Change (IIGCC), Climate Action 100+ and the Local Authority Pension Fund Forum..

In April 2025 the Fund become signatories to the Asset Owner Statement on Climate Stewardship. This statement was issued by the Brunel Pension Partnership, the People's Pension, and Scottish Widows to articulate asset owner expectations on the implementation of climate stewardship by their asset managers.

The statement outlines key principles for asset managers, including engaging in industry and public policy discussions, prioritizing collaborative initiatives, developing a robust theory of change for company engagement, implementing a systematic voting approach, and adequately resourcing the stewardship function.

Investigate options for portfolio scenario analysis based on different climate change scenarios so that this can be incorporated in the next strategic asset allocation review in 2026.

The draft government guidance by MHCLG on TCFD implementation proposes to place a new duty on LGPS Administering Authorities (AAs) to assess their assets, liabilities, investment strategy and funding strategy against climate risks and opportunities in at least two climate scenarios. This assessment must include at least one scenario based on a global temperature rise of 2°C or lower on pre-industrial levels. This assessment must occur at least once every valuation cycle. In interim years, AAs must consider whether any changes in the fund have been substantial enough to require scenario analysis to be repeated.

As noted previously, for the latest reports Brunel have implemented forward looking metrics using various different climate scenarios. These are:

- Physical Risk
- Paris Alignment
- Transition Risk / Earnings at Risk

By their nature, scenarios are uncertain and not a precise science. The scenarios put forward will never come to pass as described, but are also based on assumptions and what are often new and evolving data sets.

Scenarios are a useful tool for Brunel's portfolios managers to engage in dialogue and to ask the right questions about holdings, they are not a tool to use in isolation or to make specific investment decisions.

The Oxfordshire Pension Fund Carbon Metrics Report provides portfolio level scenario assessments using the above criteria for our listed equity portfolios and the sterling bonds portfolio.

As well as addressing the Pension Fund's investments the Policy also sets a target for the Pension Fund to be carbon neutral on its own operations by 2030.

The Fund continues to work within Oxfordshire County Council's wider goal to achieve net zero emissions by 2030 across the whole organization, of which the Pension Fund is part. The Fund intends to report data on this and actions taken in future updates.

Other Material

Employer Discretions

Pension Services can supply employers with related pension costs which would result following an employer's action on a discretionary policy. The employer's written decisions are required before pension services will take action in any circumstance which could incur additional cost, unless it is clear from an employer's current written policy statement that the decision is in accordance with that statement. For example, some employers will allow late transfers without further consideration while others need to make individual decisions.

Fund Account for the Year Ended 31 March 2025			
	Notes	2025 £'000	2024 £'000
Contributions and Benefits			
Contributions Receivable	6	-139,412	-135,929
Transfers from Other Schemes	7	-27,574	-17,260
Other Income		-19	-21
Income Sub Total		**-167,005**	**-153,210**
Benefits Payable	8	129,652	114,793
Payments to and on Account of Leavers	9	17,658	12,131
Expenditure Sub Total		**147,310**	**126,924**
Net (Additions)/Withdrawals From Dealings With Members		**-19,695**	**-26,286**
Management Expenses	10	23,989	22,676
Net (Additions)/Withdrawals From Dealings With Members Including Management Expenses		4,294	-3,610
Returns on Investments			
Investment Income	11	-29,462	-24,257
Profits and Losses on Disposal of Investments and Changes in Market Value of Investments	14a	-83,478	-343,413
Less Taxes on Income	11	8	-2
Net returns on Investments		**-112,932**	**-367,672**
Net (Increase)/Decrease in the Net Assets Available for Benefits During the Year		**-108,638**	**-371,282**
Opening Net Assets of the Scheme		3,541,434	3,170,152
Closing Net Assets of the Scheme		**3,650,072**	**3,541,434**

Net Assets as at 31 March 2024			
	Notes	2025 £'000	2024 £'000
Investment Assets			
Equities	14b	197,361	177,643
Pooled Investments	14b	3,024,041	2,967,703
Pooled Property Investments	14b	326,101	315,717
Derivative Contracts		0	0
Loans	14c	15,000	0
Cash Deposits	14c	7,557	5,753
Other Investment Balances	14c	1,977	2,093
Long-Term Investment Assets	14b	840	840
Investment Liabilities			
Derivative Contracts		0	0
Other Investment Balances	14c	-3	-4
Total Investments		**3,572,874**	**3,469,745**
Assets and Liabilities			
Current Assets	15	80,385	74,514
Current Liabilities	16	-3,596	-3,235
Net Current Assets		**76,789**	**71,279**
Long-Term Assets	17	409	410
Net Assets of the scheme available to fund benefits at year end		**3,650,072**	**3,541,434**

The Fund's financial statements do not take account of liabilities to pay pensions and other benefits after the period end. The actuarial present value of promised retirement benefits is disclosed at Note 26.

Note 1 – Description of the fund

This description of the Fund is a summary only. Further details are available in the Fund's 2024/25 Annual Report and in the underlying statutes.

General

The Oxfordshire County Council Pension Fund is part of the Local Government Pension Scheme which is a statutory, funded, defined benefit pension scheme. Oxfordshire County Council is the administering body for this pension fund. The scheme covers eligible employees and elected members of the County Council, District Councils within the county area and employees of other bodies eligible to join the Scheme.

The scheme is governed by the Public Service Pensions Act 2013 and is administered in accordance with the following secondary legislation:

- The Local Government Pension Scheme Regulations 2013 (as amended)

- The Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014 (as amended)
- The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016.

This defined benefit scheme provides benefits related to salary for its members. Pensions paid to retired employees, their dependants, and deferred benefits are subject to mandatory increases in accordance with annual pension increase legislation. The amount is determined by the Secretary of State.

Membership
The majority of fund employers are required to automatically enrol eligible jobholders into the LGPS under the government's auto-enrolment legislation, employees may then choose to opt-out of the scheme. Some employers will have the option of whether to auto-enrol eligible jobholders into the LGPS or another qualifying scheme.

Members are made up of three main groups. Firstly, the contributors - those who are still working and paying money into the Fund. Secondly, the pensioners - those who are in receipt of a pension and thirdly, by those who have left their employment with an entitlement to a deferred benefit on reaching pensionable age.

Organisations participating in the Oxfordshire County Council Pension Fund include:

- Scheduled Bodies – Local authorities and similar bodies, such as academies, whose staff are automatically entitled to become members of the Fund.
- Admitted Bodies – Organisations that participate in the Fund under an admission agreement between the Fund and the organisation. Admitted bodies include voluntary, charitable and similar bodies or private contractors undertaking a local authority function following outsourcing to the private sector.
- Admitted Bodies can be split in to two groups:
    - Community Admission Bodies – these are typically employers that provide a public service on a not-for-profit basis and often have links to scheduled bodies already in the Fund. Housing Corporations fall under this category.
    - Transferee Admission Bodies – these are bodies that provide a service or asset in connection with the exercise of a function of a scheme employer. Typically this will be when a service is transferred from a scheme employer and is to allow continuing membership for staff still involved in the delivery of the service transferred.

Full definitions are contained in The Local Government Pension Scheme (Administration) Regulations 2008.

The table below details the composition of the Fund's membership:

	As at 31 March 2025	As at 31 March 2024
Number of Contributory Employees in Scheme		
Oxfordshire County Council	8,217	8,375
Other Scheduled Bodies	13,799	13,391
Admitted Bodies	446	442
	22,462	**22,208**
Number of Pensioners and Dependants		
Oxfordshire County Council	11,343	10,858
Other Scheduled Bodies	7,769	7,267
Admitted Bodies	1,336	1,263
	20,448	**19,388**
Deferred Pensioners		
Oxfordshire County Council	16,129	16,303
Other Scheduled Bodies	14,819	14,137
Admitted Bodies	1,191	1,243
	32,139	**31,683**

Unprocessed leavers are included as Deferred Pensioners.

Funding

The Oxfordshire County Council Pension Fund is financed by contributions from employees and employers, together with income earned from investments. The contribution from employees is prescribed by statute, and for the year ending 31 March 2025 rates ranged from 5.5% to 12.5% of pensionable pay.

Employers' contribution rates are set following the actuarial valuation, which takes place every three years. The latest actuarial valuation took place in 2022 and determined the contribution rates to take effect from 01 April 2023. Employer contribution rates currently range from 9.6% to 37.3% of pensionable pay.

Benefits

Prior to 1 April 2014, pension benefits under the LGPS were based on final pensionable pay and length of pensionable service as summarised below.

	Service Pre 1 April 2008	**Service Post 31 March 2008**
Pension	Each full-time year worked is worth 1/80 × final pensionable salary.	Each full-time year worked is worth 1/60 × final pensionable salary.
Lump Sum	Automatic lump sum of 3 × pension. In addition, part of the annual pension can be exchanged for a one-off tax-free cash payment. A lump sum of £12 is paid for each £1 of pension given up.	No automatic lump sum. Part of the annual pension can be exchanged for a one-off tax-free cash payment. A lump sum of £12 is paid for each £1 of pension given up.

From 1 April 2014 the scheme became a career average scheme, where members accrue benefits based on their pensionable pay in any given year at an accrual rate of 1/49th. Accrued pension is indexed annually in line with the Consumer Prices Index. The normal retirement age is linked to each individual member's State Pension Age.

There are a range of other benefits provided under the scheme including early retirement, disability pensions and death benefits. Scheme members are now also able to opt to pay 50% of the standard contributions in return for 50% of the pension benefit.

Note 2 – Basis of Preparation

The accounts have been prepared in accordance with the requirements of the Code of Practice on Local Authority Accounting in the United Kingdom 2024/25.

Regulation 5(2)(c) of the Pension Scheme (Management and Investment of Funds) Regulations 1998 (SI 1998 No 1831) prohibits administering authorities from crediting Additional Voluntary Contributions to the Pension Fund. In consequence Additional Voluntary Contributions are excluded from the Net Assets Statement and are disclosed separately in Note 21.

The accounts summarise the transactions of the Pension Fund and detail the net assets of the Fund. The accounts do not take account of the obligation to pay future benefits which fall due after the year-end. The Code gives administering authorities the option to disclose this information in the net assets statement, in the notes to the accounts or by appending an actuarial report prepared for this purpose. The pension fund has opted to disclose this information in Note 24.

The accounts have been prepared on a going concern basis. The Fund's cashflow monitoring shows that cashflows from dealings with members continue to be positive each month and are currently running at around +£0.5m per month on average. Even if the cashflow position from dealing with members turns negative the Fund generates investment income that can also be used to pay pensions without the need to sell assets at a potentially suboptimal time. The Fund has a level of assets that would be able to cover pension payments for over a decade at current pension payment levels even if no further income was received. The Fund is subject to an actuarial valuation every three years so any deterioration in the funding position leading up to the valuation would be factored in when setting contribution rates for employers to ensure the fund is able to meet all its future obligations. The funding level of the Pension Fund as assessed by the Fund's actuary at the 2022 valuation was 111%. Therefore, management are assured the pension fund remains a going concern for at least 12 months from the date of the signed accounts.

Note 3 – Summary of Significant Accounting Policies

Investments

1. Investments are shown in the accounts at market value, which has been determined as follows:

   (a) The majority of listed investments are stated at the bid price or where the bid price is not available, the last traded price, as at 31 March 2025.

   (b) Unlisted securities are included at fair value, estimated by having regard to the latest dealings, professional valuations, asset values and other appropriate financial information.

   (c) Pooled Investment Vehicles are stated at bid price for funds with bid/offer spreads, or single price where there are no bid/offer spreads, as provided by the investment manager.

   (d) Where appropriate, investments held in foreign currencies have been valued on the relevant basis and translated into sterling at the rate ruling on 31 March 2025.

   (e) Fixed Interest stocks are valued on a 'clean' basis (i.e. the value of interest accruing from the previous interest payment date to the valuation date has been included within the amount receivable for accrued income).

   (f) Derivatives are stated at market value. Exchange traded derivatives are stated at market values determined using market quoted prices. For exchange traded derivative contracts which are assets, market value is based on quoted bid prices. For exchange traded derivative contracts which are liabilities, market value is based on quoted offer prices.

   (g) Forward foreign exchange contracts are valued by determining the gain or loss that would arise from closing out the contract at the reporting date by entering into an equal and opposite contract at that date.

   (h) All gains and losses arising on derivative contracts are reported within 'Changes in Market Value of Investments'.

Foreign Currencies

2. Balances denominated in foreign currencies are translated at the rate ruling at the net assets statement date. Asset and liability balances are translated at the bid and offer rates respectively. Transactions denominated in foreign currencies are translated at the rate ruling at the date of transaction. Differences arising on investment balance translation are accounted for in the change in market value of investments during the year.

Contributions

3. Employee normal contributions are accounted for when deducted from pay. Employer normal contributions that are expressed as a rate of salary are accounted for on the same basis as employees' contributions, otherwise they are accounted for in the period they are due under the Schedule of Contributions.

Employer deficit funding contributions are accounted for on the due dates on which they are payable in accordance with the Schedule of Contributions and recovery plan under which they are being paid or on receipt if earlier than the due date.

Employers' pensions strain contributions are accounted for in the period in which the liability arises. Any amount due in year but unpaid will be classed as a current financial asset. Amounts not due until future years are classed as long-term financial assets.

The Actuary determines the contribution rate for each employer during the tri-ennial valuations of the Fund's assets and liabilities. Employees' contributions have been included at rates required by the Local Government Pension Scheme Regulations.

Benefits, Refunds of Contributions and Transfer Values

4. Benefits payable and refunds of contributions have been brought into the accounts on the basis of all amounts known to be due at the end of the financial year. Any amounts due but unpaid are disclosed in the net assets statement as current liabilities. Transfer values are those sums paid to, or received from, other pension schemes and relate to periods of previous pensionable employment. Transfer values have been included in the accounts on the basis of the date when agreements were concluded.

   In the case of inter-fund adjustments provision has only been made where the amount payable or receivable was known at the year-end. Group transfers are accounted for in accordance with the terms of the transfer agreement.

Investment Income

5. Dividends and interest have been accounted for on an accruals basis. Dividends from quoted securities are accounted for when the security is declared ex-div. Interest is accrued on a daily basis. Investment income is reported net of attributable tax credits but gross of withholding taxes. Irrecoverable withholding taxes are reported separately as a tax charge. In the majority of cases investment income arising from the underlying investments of the Pooled Investment Vehicles is reinvested within the Pooled Investment Vehicles and reflected in the unit price. It is reported within 'Changes in Market Value of Investments'. Foreign income has been translated into sterling at the date of the transaction. Income due at the year-end was translated into sterling at the rate ruling at 31 March 2025.

Investment Management and Scheme Administration

6. A proportion of relevant County Council officers' salaries, including salary on-costs, have been charged to the Fund on the basis of time spent on scheme administration and investment related business. The fees of the Fund's general investment managers have been accounted for on the basis contained within their management agreements. Investment management fees are accounted for on an accruals basis.

Expenses

7. Expenses are accounted for on an accruals basis.

Cash

8. Cash held in bank accounts and other readily accessible cash funds is classified under cash balances as it is viewed that these funds are not held for investment purposes but to allow for effective cash management. Cash that has been deposited for a fixed period and as such as an investment, has been included under cash deposits.

Listed Private Equity

9. The fund holds a number of investments in listed private equity companies. These are included under equities as the investment is in a company that undertakes private equity related activities rather than an investment in a specific fund that makes private equity investments. This is consistent with the treatment of other equity investments as the fund does not split out any other categories from within equities, for example retail stocks.

Management Fees

10. Management fees have been accounted for based on the latest guidance from the Chartered Institute of Public Finance & Accountancy. Fees have been accounted for where the pension fund has a direct contractual obligation to pay them. This means where fees are deducted in a pooled fund they have been accounted for, but in a fund of funds the fees for the underlying funds are not included only those the pension fund pays to the fund of funds manager.

Note 4 – Critical Judgements in Applying Accounting Policies

Unquoted Private Equity Investments

Determining the fair value of unquoted private equity investments is highly subjective in nature. Unquoted private equity investments are valued by the investment managers using various valuation techniques and this involves the use of significant judgements by the managers. The value of unquoted private equity, private debt and infrastructure investments at 31 March 2025 was £547.051m (£496.162m at 31 March 2024).

Pension Fund Liability

The pension fund liability is calculated every three years by the Fund's actuary, with annual updates in the intervening years. Methods and assumptions consistent with IAS19 are used in the calculations. Assumptions underpinning the valuations are agreed with the actuary and are summarised in Note 27. The estimate of the liability is therefore subject to significant variances based on changes to the assumptions used.

Note 5 – Assumptions Made About the Future and Other Major Sources of Estimation Uncertainty

The preparation of financial statements requires management to make judgements, estimates and assumptions that affect the amounts reported for assets and liabilities as at the balance sheet date, and the amounts reported for the revenues and expenses during the year. However, the nature of estimation means that actual outcomes could differ from those estimates.

The key judgements and estimation uncertainties that have a significant risk of causing material adjustments to the carrying amounts of assets and liabilities within the next financial year are:-

Item	Uncertainties	Potential Impact
Actuarial Present Value of Promised Retirement Benefits	Estimation of the net liability to pay pensions depends on a number of complex judgements relating to the discount rate used, the rate at which salaries are projected to increase, changes in retirement ages, mortality rates and expected returns on fund assets. The fund engages an actuarial firm to provide expert advice on the assumptions to be applied.	The actuarial present value of promised retirement benefits included in the financial statements is £2,871m There is a risk that this figure is under, or overstated in Note 24 to the accounts. Sensitivities to the key assumptions are as follows: A 0.1% p.a. increase in the pension increase rate would result in an approximate 2% increase to liabilities (£49m). A 0.1% p.a. increase in the salary increase rate would result in an approximate increase to liabilities of 0.1% (£2m). A 0.1% decrease in the real discount rate would result in an approximate 2% increase to liabilities (£51m). A one-year increase in member life expectancy would approximately increase the liabilities by 4% (£115m).
Unquoted Private Equity	Unquoted private equity and infrastructure investments are valued at fair value using recognised valuation techniques. Due to the assumptions involved in this process there is a degree of estimation involved in the valuation.	Unquoted private equity, private debt and infrastructure investments included in the financial statements total £547.051m. There is a risk these investments are under, or overstated in the accounts. The Pension Fund relies on specialists to perform the valuations and does not have the information (i.e. the assumptions that were used in each case) to produce sensitivity calculations. Further details are included in Note 25.

Note 6 - Contributions

	2024/25 £'000	2023/24 £'000
Employers		
Normal	-96,191	-88,354
Augmentation	0	0
Deficit Funding	-5,634	-16,040
Costs of Early Retirement	-3,604	-207
	-105,429	**-104,601**
Members		
Normal & Additional*	-33,983	**-31,328**
Total	**-139,412**	**-135,929**

*Local Government Scheme Additional Employees contributions are invested within the Fund, unlike AVCs which are held separately, as disclosed in Note 21.

Lump sum pre-payments in respect of contributions for the period 01/04/23-31/03/26 totalling £10.780m were received during 2023/24.

Deficit recovery contributions are paid by employers based on the maximum 22 year recovery period set out in the Funding Strategy Statement. Where appropriate, the Actuary has shortened the recovery period for some employers to maintain as near stable contribution rates for those employers, in line with the Regulations.

	Employer Contributions		Members Contributions	
	2024/25 £'000	2023/24 £'000	2024/25 £'000	2023/24 £'000
Oxfordshire County Council	-42,935	-38,227	-13,409	-12,733
Scheduled Bodies	-54,055	-58,818	-17,834	-16,052
Resolution Bodies	-5,709	-5,161	-1,829	-1,652
Community Admission Bodies	-1,242	-1,168	-437	-401
Transferee Admission Bodies	-1,488	-1,227	-474	-490
Total	**-105,429**	**-104,601**	**-33,983**	**-31,328**

Note 7 - Transfers In

	2024/25 £'000	2023/24 £'000
Individual Transfers In from other schemes	-27,574	-17,260
Group Transfers In from other schemes	0	0
Total	**-27,574**	**-17,260**

Note 8 - Benefits

	2024/25 £'000	2023/24 £'000
Pensions Payable	106,189	95,768
Lump Sums – Retirement Grants	20,492	16,071
Lump Sums – Death Grants	2,971	2,954
Total	**129,652**	**114,793**

	Pensions Payable		Lump Sums	
	2024/25 £'000	2023/24 £'000	2024/25 £'000	2023/24 £'000
Oxfordshire County Council	50,658	46,254	10,140	6,933
Scheduled Bodies	46,032	41,255	10,289	8,897
Resolution Bodies	2,104	1,706	1,274	1,822
Community Admission Bodies	5,608	5,042	1,230	996
Transferee Admission Bodies	1,787	1,511	530	377
Total	**106,189**	**95,768**	**23,463**	**19,025**

Note 9 – Payments to and on account of leavers

	2024/25 £'000	2023/24 £'000
Refunds of Contributions	634	652
Payments for members joining state scheme	-3	-3
Group Transfers Out to other schemes	0	0
Individual Transfers Out to other schemes	17,027	11,482
Total	**17,658**	**12,131**

Note 10 – Management Expenses

	2024/25 £'000	2023/24 £'000
Administrative Costs	3,320	2,906
Investment Management Expenses	18,606	18,140
Oversight & Governance Costs	2,063	1,630
Total	**23,989**	**22,676**

Within oversight and governance costs are fees paid to the Pension Fund's external auditors of £0.115m (2023/24 £0.025m) for the audit of the Pension Fund's Annual Report and Accounts.
A further breakdown of Investment Management Expenses is in Note 12.

Note 11 - Investment Income

	2024/25 £'000	2023/24 £'000
Equity Dividends	-4,222	-4,295
Pooled Property Investments	-8,105	-7,061
Pooled Investments – Unit Trusts & Other Managed Funds	-13,635	-10,034
Interest on cash deposits	-3,500	-2,867
	-29,462	**-24,257**
Irrecoverable withholding tax - equities	8	-2
Total	**-29,454**	**-24,259**

Note 12 - Investment Management Expenses

	2024/25 £'000	2023/24 £'000
Management Fees	18,580	18,091
Custody Fees	26	49
Total	**18,606**	**18,140**

Investment Management & Custody Fees are generally calculated on a fixed scale basis with applicable rates applied to the market value of the assets managed. See Note 3 for details of the accounting treatment of management fees.

Note 13 - Related Party Transactions

The Pension Fund is required to disclose material transactions with related parties, and bodies or individuals that have the potential to control or influence the Pension Fund, or to be controlled or influenced by the Pension Fund. Disclosure of these transactions allows readers to assess the extent to which the Pension Fund might have been constrained in its ability to operate independently or might have secured the ability to limit another party's ability to bargain freely with the Pension Fund.

Members of the Pension Fund Committee and the post of Service Manager (Pensions) are the key management personnel involved with the Pension Fund. During 2024/25, the Committee consisted of five County Councillors (voting members), four employer representatives and a scheme member representative. Members of the Pension Fund Committee are disclosed in the Pension Fund Report and Accounts. An amount of £0.129m was paid to Oxfordshire County Council in respect of key management compensation during the financial year as follows:

	2024/25 £'000	2023/24 £'000
Short Term Benefits*	111	108
Long Term/Post Retirement Benefits	18	18
Total	**129**	**126**

*Includes allowances paid to the Chairman of the Pension Fund Committee

These figures represent the relevant proportion of the salary and employer pension contributions for the key Council staff, reflecting their work for the Pension Fund

As the County Council is the designated statutory body responsible for administrating the Oxfordshire Pension Fund, it is a related party.

For the 12 months ended 31 March 2025, employer contributions to the Pension Fund from the County Council were £42.935m (2023/24 £38.227m). At 31 March 2025 there were receivables of in respect of contributions due from the County Council of £4.778m (2023/24 £4.289m) and payables due to the County Council of £0.214m (2023/24 £0.187m).

The County Council was reimbursed £1.983m (2023/24 £1.936m) by the Pension Fund for administration costs incurred by the County Council on behalf of the Pension Fund

Brunel Pension Partnership Ltd (Company Number 10429110)

Brunel Pension Partnership Ltd (BPP Ltd) was formed on the 14th October 2016 and oversees the investment of pension fund assets for the following LGPS funds: Avon, Buckinghamshire. Cornwall, Devon, Dorset, Environment Agency, Gloucestershire, Oxfordshire, Somerset, and Wiltshire.

Each of the nine Administering Authorities, including Oxfordshire County Council, and the Environment Agency own 10% of BPP Ltd. Pension Fund transactions with BPP Ltd are as follows:

	2024/25 £'000	2023/24 £'000
Income	0	0
Expenditure	1,499	1,313
Receivables	0	0
Payables	0	0

Note 14 - Investments

	Value at 31.3.2025 £'000	Value at 31.3.2024 £'000
Investment Assets		
Equities	197,361	177,643
Pooled Funds:		
- Fixed Income	141,217	135,566
- Index Linked	206,005	229,819
- Global Equity	1,572,984	1,596,696
- UK Equity	393,805	359,128
- Private Equity	256,495	246,528
- Private Debt	88,599	68,410
- Infrastructure Funds	201,956	181,224
- Multi Asset Credit Fund	162,980	150,332
Pooled Property Investments	326,101	315,717
Cash Deposits	7,557	5,753
Loans	15,000	0
Long-Term Investments	840	840
Investment Income Due	1,977	1,979
Amounts Receivable for Sales	0	114
Total Investment Assets	**3,572,877**	**3,469,749**
Investment Liabilities		
Management Expenses Due	0	-4
Amounts Payable for Purchases	0	0
Total Investment Liabilities	**-3**	**-4**
Net Investment Assets	**3,572,874**	**3,469,745**

Note 14a – Reconciliation of Movements in Investments and Derivatives

	Value at 1 April 2024	Purchases at Cost & Derivative Payments	Sales Proceeds & Derivative Receipts	Change in Market Value	Cash Movement	Increase in Receivables/ (Payables)	Value at 31 March 2025
	£'000	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**
Equities	177,643	2,205	0	17,513			197,361
Pooled Investments	2,967,703	68,196	-79,045	67,187			3,024,041
Pooled Property Investments	315,717	17,591	-6,189	-1,018			326,101
Long-Term Investments	840	0	0	0			840
Derivative Contracts FX	0	6	-1	-5			0
Futures	0	0	0	0			0
Other Investment Balances							
Loans	0	0	0	0	15,000		15,000
Cash Deposits	5,753	15,721	-13,912	-199	194		7,557
Amounts Receivable for Sales of Investments	114	0	0	0		-114	0
Investment Income Due	1,979	0	0	0		-2	1,977
Amounts Payable for Purchases of Investments & Management Expenses	-4	0	0	0	0	1	-3
Total	**3,469,745**	**103,719**	**-99,147**	**83,478**	**15,194**	**-115**	**3,572,874**

Transaction costs are borne by the scheme in relation to transactions in pooled investment vehicles. However, such costs are taken into account in calculating the bid/offer spread of these investments and are not therefore separately identifiable.

There have been no employer-related investments at any time during the year.

	Value at 1 April 2023	Purchases at Cost & Derivative Payments	Sales Proceeds & Derivative Receipts	Change in Market Value	Cash Move-ment	Increase in Receivables/ (Payables)	Value at 31 March 2024
	£’000	**£’000**	**£’000**	**£’000**	**£’000**	**£’000**	**£’000**
Equities	145,099	3,319	-16,279	45,504			177,643
Pooled Investments	2,684,400	500,902	-533,351	315,752			2,967,703
Pooled Property Investments	276,454	100,158	-43,227	-17,668			315,717
Long-Term Investments	840	0	0	0			840
Derivative Contracts							
FX	0	2		-2			0
Futures Other Investment Balances	0	0		0			0
Cash Deposits	11,952	33,565	-39,470	-173	-121		5,753
Amounts Receivable for Sales of Investments	0	0	0	0		114	114
Investment Income Due	1,888	0	0	0		91	1,979
Amounts Payable for Purchases of Investments & Management Expenses	-66	0	0	0		62	-4
Total	**3,120,567**	**637,946**	**-632,327**	**343,413**	**-121**	**267**	**3,469,745**

Note 14b - Analysis of Investments (Excluding Derivative Contracts, Cash Deposits and Other Investment Balances)

Long-Term Investments Assets

	2024/25 £'000	2023/24 £'000
Brunel Pension Partnership Ltd	840	840
Total	**840**	**840**

Equity Investments

	2024/25 £'000	2023/24 £'000
UK Equities	197,044	177,319
Overseas Listed Equities:		
Europe	317	324
Total	**197,361**	**177,643**

Pooled Investment Vehicles

	2024/25 £'000	2023/24 £'000
UK Registered Managed Funds - Property	115,186	105,841
Non UK Registered Managed Funds - Property	47,046	51,895
UK Registered Managed Funds - Other	2,340,818	2,346,147
Non UK Registered Managed Funds - Other	683,223	621,556
UK Registered Property Unit Trusts	103,118	99,305
Non UK Registered Property Unit Trusts	60,751	58,676
Total	**3,150,142**	**3,283,420**

Total Investments (excluding derivative contracts, Cash Deposits and Other Investment Balances)

	2024/25 £'000	2023/24 £'000
	3,348,343	**3,461,903**

Note 14c - Other Investment Balances

	2024/25 £'000	2023/24 £'000
Receivables		
Sale of Investments	0	114
Dividend & Interest Accrued	1,735	1,750
Inland Revenue	242	229
	1,977	**2,093**
Payables		
Management Fees	0	0
Custodian Fees	-3	-4
	-3	**-4**
Total	**1,974**	2,089

Loans

	2024/25 £'000	2023/24 £'000
Short - Term Loans	15,000	0
Total		

Cash Deposits

	2024/25 £'000	2023/24 £'000
Non-Sterling Cash Deposits	7,557	5,753
Total	**7,557**	**5,753**

The following investments represent more than 5% of the net assets of the scheme

	2024/25 £'000	% of Total Fund	2023/24 £'000	% of Total Fund
FTSE PAB Developed Equity Index Fund	618,659	16.95	628,606	17.75
Brunel GBL Sustainable Mutual Fund	599,037	16.41	615,574	17.38
Brunel UK Equity Fund	393,805	10.79	359,128	10.14
Brunel HG ALP GLB EQ	355,287	9.73	352,516	9.95
Blackrock Aquila Life Fund	206,005	5.64	229,819	6.49

Note 15 - Current Assets

	2024/25 £'000	2023/24 £'000
Receivables:		
Employer Contributions	7,882	7,828
Employee Contributions	2,678	2,627
Rechargeable Benefits	1,512	1,215
Transferred Benefits	5,429	2,115
Cost of Early Retirement	131	87
Inland Revenue	31	197
Other	179	1,525
Cash Balances	62,543	58,920
Total	**80,385**	**74,514**

Note 16 - Current Liabilities

	2024/25 £'000	2023/24 £'000
Transferred Benefits	-808	-260
Benefits Payable	-618	-1,156
Inland Revenue	-1,883	-1,519
Employer Contributions	-3	-2
Staff Costs	-166	-155
Consultancy	-48	-21
Other	-70	-122
Total	**-3,596**	**-3,235**

Note 17 - Long-Term Assets

	2024/25 £'000	2023/24 £'000
Employer Contributions	409	410
Total	**409**	**410**

Note 18 - Assets under External Management

The market value of assets under external fund management amounted to £3,281.566m as at 31 March 2025. The table below gives a breakdown of this sum and shows the market value of assets under management with each external manager.

Fund Manager	31/03/2025 Market Value		31/03/2024 Market Value	
	£'000	%	£'000	%
Brunel Pension Partnership	3,212,874	97.90	3,131,009	97.30
Adams Street Partners	44,080	1.34	57,317	1.78
Partners Group	24,728	0.76	29,462	0.92
Total	**3,281,682**	**100.00**	**3,217,788**	**100.00**

Note 19 - Top 5 Holdings

Value of the Fund's Top Five Holdings at 31 March 2025	£'000	% of Fund
HG Capital Trust Plc	99,996	2.7
3i Group Plc	34,294	0.9
Patria Private Equity Trust Plc	29,299	0.8
CT Private Equity Trust Plc	22,650	0.6
ICG Enterprise Trust Plc	10,708	0.3

Note 20 - Taxation

The scheme is a 'registered pension scheme' for tax purposes under the Finance Act 2004. As such the Fund is exempt from UK income tax on interest received and from capital gains tax on the proceeds of investments sold. However, the Fund cannot reclaim certain amounts of withholding taxes relating to overseas investment income which are suffered in the country of origin.

Note 21 - Additional Voluntary Contributions

	Market Value 31 March 2025 £'000	Market Value 31 March 2024 £'000
Prudential	12,512	13,030

AVC contributions of £1.265m were paid directly to the Fund's AVC providers during the year (2023/24 - £1.070m).

The AVC provider to the Fund is Legal & General (previously Prudential). The assets of these investments are held separately from the Fund. The AVC provider secures additional benefits on a money purchase basis for those members electing to pay additional voluntary contributions. Members participating in this arrangement each receive an annual statement confirming the amounts held in their account and the movements in the year. The Administering Authority does not handle these monies. Instead, if employees decide to pay AVCs their employer (the member body) sends them to Legal & General.

Note 22 – Contingent Liabilities and Capital Commitments

As at 31 March 2025 the fund had outstanding capital commitments (investments) totalling £194.950m (31 March 2024 - £237.493m). These commitments relate to outstanding call payments due on unquoted limited partnership funds held in the pooled investments and pooled property fund elements of the investment portfolio. The amounts 'called' by these funds are irregular in both size and timing from the date of the original commitment due to the nature of the investments.

Note 23 – Investment Strategy Statement

Oxfordshire County Council Pension Fund has an Investment Strategy Statement. This is published in the Pension Fund Annual Report and Accounts which is circulated to all scheme employers and is also available on the Council's webpage.

Note 24 – Actuarial Present Value of Promised Retirement Benefits

	2025 £'000	2024 £'000
Present Value of Funded Obligation	2,871	3,290

The net decrease of £419m from March 2024 can in part be explained by the normal changes over the year as new benefits are accrued and previous benefits paid out. This explains an increase in the present value of the Funded Obligation of £109m (2024 - £226m increase). There has been a decrease in the present value of the Funded Obligation of £528m (2023 - £214m decrease) reflecting changes in the financial assumptions used by the actuary as a consequence of changes in the financial markets. The key change in financial assumptions was:

- An increase in the discount rate to 5.80% from 4.85% (net effect a decrease in Present Value of Funded Obligation).

When the LGPS benefit structure was reformed in 2014, transitional protections were applied to certain older members close to normal retirement age. The benefits accrued from 1 April 2014 by these members are subject to an 'underpin' which means that they cannot be lower than what they would have received under the previous benefit structure. The underpin ensures that these members do not lose out from the introduction of the new scheme, by effectively giving them the better of the benefits from the old and new schemes.

In December 2018 the Court of Appeal upheld a ruling ("McCloud/Sargeant") that similar transitional protections in the Judges' and Firefighters' Pension Schemes were unlawful on the grounds of age discrimination. The implications of the ruling are expected to apply to the LGPS (and other public service schemes) as well. The UK Government requested leave to appeal to the Supreme Court but this was denied at the end of June 2019. LGPS benefits accrued from 2014 may therefore need to be enhanced so that all members, regardless of age, will benefit from the underpin. Alternatively, restitution may be achieved in a different way, for example by paying compensation. In either case, the clear expectation is that many more members would see an enhanced benefit rather than just those currently subject to these protections. There will therefore be a retrospective increase to members' benefits, which in turn will give rise to a past service cost for the Fund employers.

Quantifying the impact of the judgement at this stage is very difficult because it will depend on the compensation awarded, members' future salary increases, length of service and retirement age, and whether (and when) members withdraw from active service. Salary increases in particular can vary significantly from year to year and from member to member depending on factors such as budget restraint, job performance and career progression. The Government Actuary's Department (GAD) has estimated that the impact for the LGPS as a whole could be to increase active member liabilities by 3.2%, based on a given set of actuarial assumptions. A full description of the data, methodology and assumptions underlying these estimates is given in GAD's paper, dated 10 June 2019.

The Fund's actuary has adjusted GAD's estimate to better reflect the Oxfordshire County Council Pension Fund's local assumptions, particularly salary increases and withdrawal rates. The revised estimate is that total liabilities (i.e. the increase in active members' liabilities expressed in terms of the employer's total membership) could be 0.5% higher as at 31 March 2021, an increase of approximately £6m.

These numbers are high level estimates based on scheme level calculations and depend on several key assumptions.

In June 2023, the UK High Court (Virgin Media Limited v NTL Pension Trustees II Limited) ruled that certain historical amendments for contracted-out defined benefit schemes we invalid if they were not accompanied by the correct actuarial confirmation. The judgement has now been upheld by the Court of Appeal.

The Local Government Pension Scheme is a contracted out defined benefit scheme and amendments have been made during the period 1996 to 2016 which could impact member benefits. Work is being performed by the Government Actuary's Department as the Local Government Pension Scheme actuary to assess whether section 37 certificates are in place for all amendments and some of these have been confirmed however, at the date of these financial statements, the full assessment is not yet complete. Until this analysis is complete, we are unable to conclude whether there is any impact on the assessed actuarial present value of promised retirement benefits under IAS26, or if it can be reliably estimated. As a result, Oxfordshire County Council Pension Fund does not consider it necessary to make any allowance for the potential impact of the Virgin Media case in the disclosure of the actuarial present value of promised retirement benefits in its financial statements.

Note 25 – Financial Instruments

Note 25a - Classification of Financial Instruments

The following table analyses the carrying amounts of financial assets and liabilities by category and net assets statement heading. No financial assets were reclassified during the accounting period.

	2024/25			2023/24		
	Fair Value through Profit & Loss £'000	Financial Assets at Amortised Cost £'000	Financial Liabilities at Amortised Cost £'000	Fair Value through Profit & Loss £'000	Financial Assets at Amortised Cost £'000	Financial Liabilities at Amortised Cost £'000
Financial Assets						
Equities	197,631			177,643		
Pooled Investments	3,024,041			2,967,703		
Pooled Property Investments	326,101			315,717		
Derivatives	0			0		
Loan		15,000				
Cash		70,100			64,673	
Long-Term Investments	840			840		
Other Investment Balances	1,465			1,864		
Receivables		90			1,003	
	3,550,078	**85,190**	**0**	**3,463,767**	**65,676**	**0**
Financial Liabilities						
Derivatives	0			0		
Other Investment Balances	-3			-4		
Payables			-277			-256
	-3	**0**	**-277**	**-4**	**0**	**-256**
Total	**3,550,075**	**85,190**	**-277**	**3,463,763**	**65,676**	**-256**

Note 25b – Net Gains and Losses on Financial Instruments

	31-Mar-25 £'000	31-Mar-24 £'000
Financial Assets		
Fair Value through Profit and Loss	83,677	343,586
Loans and Receivables	0	0
Financial Assets at Amortised Cost	-199	-173
Financial Liabilities		
Fair Value through Profit and Loss	0	0
Financial Liabilities Measured at Amortised Cost	0	0
Total	**83,478**	**343,413**

Note 25c – Valuation of Financial Instruments Carried at Fair Value

Financial instruments have been classified in to one of the following three categories to reflect the level of uncertainty in estimating their fair values:

Level 1
Fair value is derived from quoted prices (unadjusted) in active markets for identical assets or liabilities.
Level 2
Fair value is based on inputs other than quoted prices included within Level 1 that are observable either directly (i.e., from prices) or indirectly (i.e., derived from prices).
Level 3
Fair value is determined by reference to valuation techniques using inputs that are not observable in the market.

Level 2 includes pooled funds where the valuation is based on the bid price, where bid and offer prices are published, or the net asset value provided by the issuing fund. Within Level 2 there are also listed private equity investments where the market for the security is not deemed active; for these investments the valuation is based on the most recently available bid price in the market.

Included within Level 3 are pooled private equity investments made in Limited Liability Partnerships where fair value is determined using valuation techniques which involve significant judgements by fund managers due to the unquoted nature of the underlying fund investments. The valuations are obtained from the audited financial statements of the issuing funds and are normally adjusted for cashflows where data does not cover the full financial year for the Pension Fund.

Some listed private equity investments have been included within Level 3 of the hierarchy where it has been determined that the market for the fund is inactive. These listed private equity investments are valued using the most recently available bid price in the market.

Categorisation of financial instruments within the levels is based on the lowest level input that is significant to the fair value measurement of the instrument.

The following table presents the Fund's financial assets and liabilities within the fair value hierarchy

Value at 31 March 2025	Level 1 £'000	Level 2 £'000	Level 3 £'000	Total £'000
Financial Assets				
Financial Assets at Fair Value through Profit & Loss	36,029	2,476,662	1,037,387	3,550,078
Financial Assets at Amortised Cost	85,190	0		85,190
Total Financial Assets	**121,219**	**2,476,662**	**1,037,387**	**3,635,268**
Financial Liabilities				
Financial Liabilities at Fair Value through Profit & Loss	-3	0	0	-3
Financial Liabilities at Amortised Cost	-277	0	0	-277
Total Financial Liabilities	-280	0	0	-280
Net Financial Assets	**120,939**	**2,476,662**	**1,037,387**	**3,634,988**

Value at 31 March 2024	Level 1 £'000	Level 2 £'000	Level 3 £'000	Total £'000
Financial Assets				
Financial Assets at Fair Value through Profit & Loss	28,505	2,471,707	963,555	3,463,767
Financial Assets at Amortised Cost	65,676	0	0	65,676
Total Financial Assets	**94,181**	**2,471,707**	**963,555**	**3,529,443**
Financial Liabilities				
Financial Liabilities at Fair Value through Profit & Loss	-4	0	0	-4
Financial Liabilities at Amortised Cost	-256	0	0	-256
Total Financial Liabilities	**-260**	**0**	**0**	**-260**
Net Financial Assets	**93,921**	**2,471,707**	**963,555**	**3,529,183**

Reconciliation of Movement in Level 3 Financial Instruments

	UK Equities £'000	Pooled Private Equity Funds £'000	Pooled Property Funds £'000	Pooled Infrastructure Funds £'000	Pooled Private Debt Funds £'000	Multi Asset Credit Funds £'000	Long-Term Investments £'000
Market Value 31 March 2024	**504**	**246,528**	**315,717**	**181,224**	**68,410**	**150,332**	**840**
Transfers In							
Transfers Out							
Purchases		123,680	14,259	26,137	22,508		
Sales		-29,347	-6,169	-8,608	-1,572		
Unrealised Gains/(Losses)	-89	-94,257	1,701	3,349	-747	12,648	
Realised Gains/(Losses)		9,891	593	-146	0		
Market Value 31 March 2025	**415**	**256,495**	**326,101**	**201,956**	**88,599**	**162,980**	**840**

	UK Equities £'000	Pooled Private Equity Funds £'000	Pooled Property Funds £'000	Pooled Infrastructure Funds £'000	Pooled Private Debt Funds £'000	Multi Asset Credit Funds £'000	Long-Term Investments £'000
Market Value 31 March 2023	**679**	**218,892**	**276,454**	**130,261**	**40,443**	**134,500**	**840**
Transfers In	0	0	0	0	0	0	0
Transfers Out	0	0	0	0	0	0	0
Purchases	0	61,376	65,019	57,268	29,239	0	0
Sales	0	-36,444	-8,476	-7,288	-847	0	0
Unrealised Gains/(Losses)	-175	-16,431	-16,291	1,088	-425	15,832	0
Realised Gains/(Losses)	0	19,135	-989	-105	0	0	0
Market Value 31 March 2024	**504**	**246,528**	**315,717**	**181,224**	**68,410**	**150,332**	**840**

Level 3 Sensitivities

Level 3 Investments	Valuation Range +/-	Value at 31 March 2025 £'000	Valuation on Increase £'000	Valuation on Decrease £'000
UK Equities	10%	415	457	374
Pooled Private Equity Funds	10%	256,495	282,145	230,846
Pooled Property Funds	3%	326,101	335,885	316,319
Pooled Infrastructure Funds	5%	201,956	212,054	191,858
Pooled Private Debt Funds	5%	88,599	93,029	84,169
Multi Asset Credit Funds	5%	162,980	171,129	154,831
Long-Term Investments	0%	840	840	840

Level 3 Investments	Valuation Range +/-	Value at 31 March 2024 £'000	Valuation on Increase £'000	Valuation on Decrease £'000
UK Equities	10%	504	555	454
Pooled Private Equity Funds	10%	246,528	271,181	221,875
Pooled Property Funds	3%	315,717	325,189	306,246
Pooled Infrastructure Funds	5%	181,224	190,285	172,162
Pooled Private Debt Funds	5%	68,410	71,831	64,990
Multi Asset Credit Funds	5%	150,332	157,848	142,815
Long-Term Investments	0%	840	840	840

Note 26 – Risk

The Pension Fund is subject to risk in terms of its key responsibility to meet the pension liabilities of the scheme members as they become due. These risks relate to the value of both the assets and the liabilities of the Fund and the timing of when the payment of the liabilities becomes due.

At a strategic level, the main tools used by the Pension Fund to manage risk are:

- The triennial Fund Valuation which reviews the assets and liabilities of the Fund, and resets employer contribution rates to target a 100% Funding Level. The 2022 Valuation estimated that the current Funding Level is 111%.
- The Investment Strategy Statement which sets out the Fund's approach to the investment of funds, and sets out the approach to the mitigation of investment risk.
- The review of the Strategic Asset Allocation to ensure it is appropriately aligned to the Fund's liability profile and to ensure compliance with the Investment Strategy Statement.
- The regular review of the performance of all Fund Managers.

Key elements of the approach to managing the investment risk as set out in the Investment Strategy Statement include:

- Maintaining an element of the asset allocation in assets such as fixed income securities, the behaviour of which closely mirrors that of the Fund's liabilities. The allocation to liability matching assets is regularly reviewed with the intention that the allocation will increase as the maturity of the fund increases, as was the case following the 2016 valuation. Whilst the Fund maintains a high proportion of active members where the payment of liabilities is not due for many decades and remains cashflow positive, the Fund can afford to seek the higher investment returns associated with the more volatile and illiquid asset classes.

- Maintaining an element of the asset allocation in passive equity funds which removes the risk associated with poor manager performance (though retaining the market risk).
- Ensuring a diversification amongst asset classes, and in particular an allocation to alternative asset classes for which performance has historically not correlated to equity performance.
- Ensuring a diversification of Fund Managers and investment styles (e.g. some with a growth philosophy, some with a value philosophy) to mitigate the risk of poor manager performance impacting on asset values.
- The Fund's policy on ensuring Environmental Social & Governance factors are taken into account in investment decisions. During 2019/20 the Fund developed a Climate Change Policy dealing with how it will manage climate change related risks and opportunities. The policy was developed as the Fund sees climate change as single most significant risk to long-term investment performance given its systemic nature.

The key risks associated with the level of liabilities stem from the level of initial pension benefit payable, the indexation of this benefit and the time the benefit is in payment for. These risks largely lie outside the control of the Pension Fund. Changes to the scheme were made in 2014 with the aim of making the scheme more sustainable including; linking the normal retirement age to future estimates of life expectancy to bring stability to the length of time benefits are in payment, a change in the calculation of benefits to career average revalued earnings to avoid the sudden hike possible in final benefits possible under a final salary scheme, and a switch in the basis of indexation to CPI which is generally lower than the RPI alternative.

The Actuary, when completing the 2022 Valuation, undertook sensitivity analysis calculations to look at the impact on potential liabilities and the funding level. A variation of 0.1% per annum in the discount rate would move the calculated funding level from 111% down to 109% or up to 113%. A change in the CPI assumption of 0.2% per annum would lead to a reduction in the funding level to 108% or an increase to 115%. A change to the rate of mortality improvement of 0.25% would move the funding level down to 110% or up to 112%.

In terms of the investment in the various Financial Instruments open to the Pension Fund, the Fund is exposed to the following risks:

- Credit risk – the possibility of financial loss stemming from other parties no longer being able to make payments or meet contractual obligations to the Pension Fund.
- Liquidity Risk – the possibility that the Pension Fund might not have the funds available to meet its payment commitments as they fall due.
- Market Risk – the possibility that the Pension Fund may suffer financial loss as a consequence of changes in such measures as interest rates, market prices, and foreign currency exchange rates.

Credit Risk

The Pension Fund's credit risk is largely associated with the Fund's investments in Fixed Interest and Index Linked Securities, Cash Deposits and Short Term Loans, where there is a risk that the other parties may fail to meet the interest or dividend payments due, or fail to return the Fund's investment at the end of the investment period.

At 31 March 2025 the Fund's exposure to credit risk predominantly related to the following investments:

Investment Category	31 March 2025 £'000	31 March 2024 £'000
UK Corporate Bonds	141,217	135,566
UK Index Linked Gilts	206,005	229,819
Multi Asset Credit Funds	162,980	150,332
Non-Sterling Cash Deposits	7,557	5,753
Cash Balances	62,543	58,920
Loans	15,000	0
Total	**595,302**	**580,390**

The Pension Fund manages the credit risk by ensuring a diversification of investments both in terms of product and in terms of redemption dates, whilst limiting investments made to sub-investment grade bonds to those made through pooled funds. Corporate Bonds are held through a pooled fund vehicle and up to 15% of holdings can be invested in sub-investment grade bonds. Cash held in sterling at 31 March 2025 was deposited in short-term notice cash accounts and money market funds as shown in the table below:

	Rating	Balance at 31 March 2025 £'000	Rating	Balance at 31 March 2024 £'000
Money Market Funds				
Aberdeen Standard	AAA	25,000	AAA	7,420
State Street Global Advisors	AAA	42,712	AAA	56,181
Bank Current Accounts				
Lloyds Bank Plc	AA-	1,446	A+	340
Santander UK Plc	A+	0	A+	5
State Street Bank & Trust Co	AA+	942	AA+	727
Total		**70,100**		**64,673**

The Pension fund has no experience of default against which to quantify the credit risk against the current investments.

Liquidity Risk

Liquidity risk represents the risk that the Fund will be unable to meet its financial obligations as they fall due. At the present time, the liquidity risk is seen, relatively, as the greatest threat to the Pension Fund, although the absolute risk itself is still seen to be very low, particularly in the short term.

During 2024/25 the Pension Fund received/accrued income related to dealings with members of £167.0m (2023/24 £153.2m) and incurred expenditure related to dealings with members of £172.5m (2023/24 £149.6m). There were further receipts/accruals of £29.5m (2023/24 £24.3m) in respect of investment income, against which need to be set taxes of £0m (2023/24 £0m). The net inflow was therefore £24.0m (2023/24 £27.9m).

The figures show that the Fund is still cashflow positive at the whole fund level. A cash flow forecast is maintained for the Fund to understand and manage the timing of the Fund's cash flows. On a daily basis, the Fund holds a minimum of £40m of cash in call accounts and money market funds to meet benefit payments due, drawdowns from fund managers, and other payments due from the Fund. The Fund has also looked at longer-term cashflow forecasts to gain a greater understanding of when the balance of pension payments and contributions may become negative so as to consider how this may affect the Fund's investment strategy in the future. The Fund has already taken some steps in this regard including allocating to the Secured Income portfolio offered by Brunel Pension Partnership.

The Fund would need to experience a significant change in either the levels of contributions received, and/or the levels of benefits payable, as well as the loss of all current investment income, before it might be required to liquidate assets at financial loss.

There are risks in this area going forward as a result of continuing reductions in public expenditure, and the resulting impact on active scheme membership. The reductions in public sector expenditure will impact on the liquidity of the Pension Fund both in terms of a reduction in contributions receivable as the workforce shrinks, as well as an increase in benefits payable as staff above the age of 55 are made redundant and become entitled to early payment of their pension. There are changes to the Scheme being consulted on that could impact on scheme membership levels although these changes would be expected to impact gradually over time. In addition, some employers are adopting models that have the potential to reduce scheme membership.
However, as noted above, for the Fund to reach a position where it is forced to sell assets and therefore face a potential financial loss, (as well as to forego future investment returns which have been assumed to meet pension liabilities in the future), the net movement in cash would need to be of a scale deemed unlikely in the medium-term. The Pension Fund will seek to mitigate these risks through working with employers to understand the potential for any significant membership changes and by monitoring the fund's cashflows. The fund will also provide advice to the Government on the impact of any proposals for change, as well providing clear communication to current scheme members of the on-going benefits of scheme membership and the personal risks to their future financial prospects of opting out at this time.

Market Risk

The whole of the Pension Fund's investment asset base is subject to financial loss through market risk, which includes the impact of changes in interest rates, movements in market prices and movements in foreign currency rates. However, as noted above under the liquidity risk, these financial losses are not automatically realised, as all assets held by the Pension Fund are done so on a long-term basis. Subject to the liquidity risk above, it is likely to be many

years into the future before any assets will be required to be realised, during which time market risk will have the opportunity to even itself out.
Market risk is generally managed through diversification of investments within the portfolio in terms of asset types, geographical and industry sectors, and individual securities.

Whilst widespread recession will drive down the value of the Fund's assets and therefore funding level in the short term, this will have no direct bearing on the long-term position of the Fund, nor the contribution rates for individual employers. Under the LGPS Regulations, the Fund Actuary is required to maintain as near stable contribution rate as possible, and as such the Valuation is based on long term assumptions about asset values, with all short-term movements smoothed to reflect the long-term trends.

Interest Rate Risk
The direct exposure of the fund to interest rate risk and the impact of a 100 basis point movement in interest rates are presented in the table below. This analysis assumes that all other variables remain constant:

Asset Type	Carrying Amount as at 31 March 2025	Change in Year in the Net Assets Available to Pay Benefits	
		1%	-1%
	£'000	£'000	£'000
Cash and Cash Equivalents	7,557	76	-76
Cash Balances	62,543	625	-625
Bonds	347,221	3,472	-3,472
Multi Asset Credit Funds	162,980	1,630	-1,630
Total Change in Assets Available	**595,301**	**5,953**	**-5,953**

Asset Type	Carrying Amount as at 31 March 2024	Change in Year in the Net Assets Available to Pay Benefits	
		1%	-1%
	£'000	£'000	£'000
Cash and Cash Equivalents	5,753	58	-58
Cash Balances	58,920	589	-589
Bonds	365,385	3,654	-3,654
Multi Asset Credit Funds	150,332	1,503	-1,503
Total Change in Assets Available	**580,390**	**5,804**	**-5,804**

In the short term, interest rate risk is difficult to quantify in that it impacts directly on both the price of fixed interest and index linked securities as well as the discount factor used to value liabilities. Increases in interest rates which will drive down security prices and asset values will also reduce the future pension liabilities and therefore improve funding levels rather than worsen them.

Currency Risk

Currency risk concerns the risk that the fair value of future cash flows of a financial instrument will fluctuate due to changes in foreign exchange rates. The Fund is exposed to foreign exchange risk on financial instruments that are denominated in currencies other than the Fund's functional currency (£GBP).

The table below shows the impact a 10.0% weakening/strengthening of the pound against the various currencies would have on the assets available to pay benefits.
This analysis assumes that all other variables remain constant.

Currency Exposure - Asset Type	Asset Values as at 31 March 2025	Change in Year in the Net Assets Available to Pay Benefits	
		10.00%	-10.00%
	£'000	£'000	£'000
Overseas Equities	317	32	-32
Pooled Global Equities	1,572,984	157,298	-157,298
Pooled Private Equity (LLPs)	196,799	19,680	-19,680
Pooled Property	58,341	5,834	-5,834
Infrastructure	30,135	3,013	-3,013
Cash	6,628	663	-663
Total Change in Assets Available	**1,865,204**	**186,520**	**-186,520**

Currency Exposure - Asset Type	Asset Values as at 31 March 2024	Change in Year in the Net Assets Available to Pay Benefits	
		10.00%	-10.00%
	£'000	£'000	£'000
Overseas Equities	324	32	-32
Pooled Global Equities	1,596,696	159,670	-159,670
Pooled Private Equity (LLPs)	193,353	19,336	-19,336
Pooled Property	63,541	6,354	-6,354
Infrastructure	51,910	5,191	-5,191
Cash	5,753	575	-575
Total Change in Assets Available	**1,911,577**	**191,158**	**-191,158**

Other Price Risk

Other price risk represents the risk that the value of financial instruments will fluctuate as a result of changes in market prices, other than those arising from interest rate risk or foreign exchange risk.

All investments in securities present a risk of loss of capital. The maximum risk is the fair value of the financial instrument.

The effect of various movements in market price are presented in the table below along with the effect on total assets available to pay benefits assuming all other factors remain constant:

Asset Type	Value as at 31 March 2025 £'000	Percentage Change %	Value on Increase £'000	Value on Decrease £'000
UK Equities	197,044	10.0	216,749	177,340
Pooled UK Equities	393,805	10.0	433,186	354,425
Global Equities	317	10.0	349	285
Pooled Global Equities	1,572,984	10.0	1,730,282	1,415,685
Pooled Corporate Bonds	141,217	5.0	148,277	134,156
Infrastructure	201,956	5.0	212,054	191,858
Pooled Private Equity (LLPs)	256,495	10.0	282,145	230,846
Pooled Property	326,101	3.0	335,884	316,318
Multi Asset Credit Fund	162,980	5.0	171,129	154,831
Index Linked Pooled Fund	206,005	5.0	216,305	195,704
Private Debt	88,599	5.0	93,029	84,169
Long-Term Investments	840	0.00	840	840
Cash	70,100	0.00	70,100	70,100
Loans	15,000	0.00	15,000	15,000
Total Assets Available to Pay Benefits	**3,633,443**		**3,925,329**	**3,341,557**

	Value as at 31 March 2024	Percentage Change	Value on Increase	Value on Decrease
Asset Type	**£'000**	**%**	**£'000**	**£'000**
UK Equities	177,319	10.0	195,051	159,587
Pooled UK Equities	359,128	10.0	395,040	323,215
Global Equities	324	10.0	356	292
Pooled Global Equities	1,596,696	10.0	1,756,366	1,437,027
Pooled Corporate Bonds	135,566	5.0	142,344	128,788
Infrastructure	181,224	5.0	190,285	172,162
Pooled Private Equity (LLPs)	246,528	10.0	271,181	221,875
Pooled Property	315,717	3.0	325,188	306,245
Multi Asset Credit Fund	150,332	5.0	157,848	142,815
Index Linked Pooled Fund	229,819	5.0	241,310	218,328
Private Debt	68,410	5.0	71,831	64,990
Long-Term Investments	840	0.00	840	840
Cash	64,673	0.00	64,673	64,673
Total Assets Available to Pay Benefits	**3,526,576**		**3,812,313**	**3,240,837**

Note 27 - Actuarial Valuation

The contribution rates within the 2024/25 Pension Fund Accounts were determined at the actuarial valuation carried out as at 31 March 2022.
This valuation showed that the required level of contributions to be paid to the Fund by the County Council for the year ended 31 March 2025 was 19.9% of Pensionable Pay. The corresponding rates of contribution that are required from the major participating employers for this period are:

	% Pay	Additional Monetary Amounts £'000
South Oxfordshire District Council	17.8	411
West Oxfordshire District Council	17.6	766
Cherwell District Council	15.9	-
Oxford City Council	13.4	-
Vale of White Horse District Council	17.8	767
Oxford Brookes University	19.2	-

The funding policy of the scheme is set out in the Funding Strategy Statement and can be summarised as follows:-

- To enable Employer contribution rates to be kept as stable as possible and affordable for the Fund's Employers.
- To make sure the Fund is always able to meet all its liabilities as they fall due.
- To manage Employers' liabilities effectively.
- To enable the income from investments to be maximised within reasonable risk parameters.

The actuarial method used to calculate the future service contribution rate for Employers was a risk-based approach. The risk-based approach uses an Asset Liability Model to project each employer's future benefit payments, contributions and investment returns into the future under 5,000 possible economic scenarios. Future inflation (and therefore benefit payments) and investment returns for each asset class (and therefore asset values) are variables in the projections.

By projecting the evolution of an employer's assets and benefit payments 5,000 times, a contribution rate can be set that results in a sufficient number of the future projections being successful i.e. meeting the funding target by the funding time horizon.

The market value of the Fund's assets at the 2022 valuation date was £3,280m representing 111% of the Fund's accrued liabilities, allowing for future pay increases. The Actuary has certified contribution rates for all Fund employers from 1 April 2023 which, subject to the financial assumptions contained in the valuation, would result in the deficit being recovered over a period of no more than 20 years.
The main financial assumptions were as follows:

Assumptions for the 2022 Valuation	Annual Rate %
Pension Increases	2.7
Salary Increases	2.7
Discount Rate	4.6

Assumptions are also made on the number of leavers, retirements and deaths. One of the important assumptions is the mortality of existing and future pensioners. Mortality rates have been based on up to date national standard tables adjusted for the recent experience of the Oxfordshire County Council Pension Fund and make allowance for an expectation of further improvements in mortality rates in the future.

Oxfordshire County Council Pension Fund (“the Fund”) Actuarial Statement for 2024/25

This statement has been prepared in accordance with Regulation 57(1)(d) of the Local Government Pension Scheme Regulations 2013. It has been prepared at the request of the Administering Authority of the Fund for the purpose of complying with the aforementioned regulation.

Description of Funding Policy

The funding policy is set out in the Administering Authority’s Funding Strategy Statement (FSS), dated December 2022. In summary, the key funding principles are as follows:

• take a prudent long-term view to secure the regulatory requirement for long-term solvency, with sufficient funds to pay benefits to members and their dependants

• use a balanced investment strategy to meet the regulatory requirement for long-term cost efficiency (where efficiency in this context means to minimise cash contributions from employers in the long term)

• where appropriate, ensure stable employer contribution rates

• reflect different employers’ characteristics to set their contribution rates, using a transparent funding strategy

• use reasonable measures to reduce the risk of an employer defaulting on its pension obligations

• manage the fund in line with the stated ESG policies.

The FSS sets out how the Administering Authority seeks to balance the conflicting aims of securing the solvency of the Fund and keeping employer contributions stable. For employers whose covenant was considered by the Administering Authority to be sufficiently strong, contributions have been stabilised to have a sufficiently high likelihood of achieving the funding target over 20 years. Asset-liability modelling has been carried out which demonstrate that if these contribution rates are paid and future contribution changes are constrained as set out in the FSS, there is at least a 70% likelihood that the Fund will achieve the funding target over 20 years.

Funding Position as at the last formal funding valuation

The most recent actuarial valuation carried out under Regulation 62 of the Local Government Pension Scheme Regulations 2013 was as at 31 March 2022. This valuation revealed that the Fund’s assets, which at 31 March 2022 were valued at £3,280 million, were sufficient to meet 111% of the liabilities (i.e. the present value of promised retirement benefits) accrued up to that date. The resulting surplus at the 2022 valuation was £329 million.

Each employer had contribution requirements set at the valuation, with the aim of achieving their funding target within a time horizon and likelihood measure as per the FSS. Individual employers’ contributions for the period 1 April 2023 to 31 March 2026 were set in accordance with the Fund’s funding policy as set out in its FSS.

Principal Actuarial Assumptions and Method used to value the liabilities

Full details of the methods and assumptions used are described in the 2022 valuation report and FSS.

Method

The liabilities were assessed using an accrued benefits method which takes into account pensionable membership up to the valuation date; and makes an allowance for expected future salary growth to retirement or expected earlier date of leaving pensionable membership.

Assumptions

A market-related approach was taken to valuing the liabilities, for consistency with the valuation of the Fund assets at their market value.

The key financial assumptions adopted for the 2022 valuation were as follows:

Financial assumptions	31 March 2022
Discount rate	4.6% pa
Salary increase assumption	2.7% pa
Benefit increase assumption (CPI)	2.7% pa

The key demographic assumption was the allowance made for longevity. The life expectancy assumptions are based on the Fund's VitaCurves with improvements in line with the CMI 2021 model, with a 0% weighting of 2021 (and 2020) data, standard smoothing (Sk7), initial adjustment of 0.25% and a long term rate of 1.50% p.a. Based on these assumptions, the average future life expectancies at age 65 are as follows:

	Males	Females
Current Pensioners	22.3 years	24.9 years
Future Pensioners*	23.0 years	26.3 years

*Aged 45 at the 2022 Valuation.

Copies of the 2022 valuation report and Funding Strategy Statement are available on request from the Administering Authority to the Fund and on the Fund’s website.

Experience over the period since 31 March 2022

Markets were disrupted by the ongoing war in Ukraine and inflationary pressures in 2022 and 2023, impacting on investment returns achieved by the Fund’s assets. Asset performance improved in 2024 and early 2025; however the recent increase in US tariffs on imports has caused significant market volatility. The peak of this market volatility was experienced immediately after 31 March 2025, however, generally lower than expected asset returns were experienced in the month immediately prior to this.

High levels of inflation in the UK (compared to recent experience) have resulted in higher than expected LGPS benefit increases of 10.1% in April 2023 and 6.7% in April 2024. However, inflation has reduced towards historical levels and the Bank of England’s target (2% pa), with LGPS benefits increasing by 1.7% in April 2025.

There has been a significant shift in the wider economic environment since 2022, resulting in generally higher expected future investment returns and a reduction in the value placed on the Fund’s liabilities. Overall, the funding position is likely to be stronger than at the previous formal valuation at 31 March 2022.

The next actuarial valuation will be carried out as at 31 March 2025, and will be finalised by 31 March 2026. The FSS will also be reviewed at that time, and a revised version will come into effect from 1 April 2026.

Adrian Loughlin FFA C.Act
For and on behalf of Hymans Robertson LLP

09 May 2025

SUMMARY OF BENEFITS AT MARCH 2025

Introduction

Membership of the Local Government Pension Scheme (LGPS) secures entitlement to benefits that are determined by statute, contained within the LGPS Regulations. The regulations current for this year's report were effective from April 2014. A summary of the main benefit structure follows. There is further specific information in the sections, making up an Employee Guide currently held on the pension pages of the County public website.
www.oxfordshire.gov.uk/lgpsmembersguide

• Employers' Discretion

The regulations require each employer within the Oxfordshire Fund to determine their own local policy in specific areas. These policy statements have to be published and kept under review.
The specific areas include how employers will exercise discretionary powers to, award additional pension for a member, agreement to flexible retirement on request of the member ,setting up a shared cost AVC scheme, and waiving the reduction to a pension which is being paid early.

• Retirement

The 2014 scheme reintroduced the 2 year vesting period to qualify for any benefit other than that following a death in service. The scheme retirement age is linked to State Pension Age (SPA) for men and women, membership of the scheme continues when employment continues after SPA. All pensions contributions must cease before the 75th birthday.
Scheme benefits can be taken voluntarily after leaving employment from age 55, but the benefit payable will be reduced. Alternatively when retirement is deferred until after SPA, the benefit will be increased.

The regulations confirm 'normal retirement age' to be the personal state retirement age but not before age 65, but protection is offered to those members who previously had the entitlement for earlier retirement with an unreduced benefit. The protections offered are limited according to the age of the member and may not apply on the whole of their membership.

The earliest age for payment of pensions is age 55 and from April 2014 employer's approval is no longer required.

Flexible retirement options, from age 55 were introduced from April 2006. A person could reduce their hours or grade and request a payment of pension while continuing in employment. Employers have to agree to the whole arrangement.

Ill health retirement – the Regulations provide 3 tiers of benefit depending upon the likelihood of the member being able to obtain gainful employment in the future. An employer's assessment for ill health pension is based upon capability to carry out duties of the member's current job and must be supported by appropriate independent medical certification.

From age 55, unreduced benefits are payable immediately when an employer terminates employment due to a redundancy or efficiency dismissal.

• Benefits

A retirement benefit, whether payable immediately or deferred, consists of an annual retirement pension and lump sum retirement grant for membership to 31 March 2008 and an annual retirement pension on membership from April 2008 (see below). However there is an option for members to convert pension to lump sum retirement grant. The minimum period of membership to qualify for retirement benefits is 2 years. The standard pension calculation, for membership to 31 March 2008, is 1/80 of final years' pensionable pay for each year of membership and the retirement grant is 3/80 of final year's pensionable pay for each year of membership. From 1 April 2008 to 31 March 2014 the standard calculation is 1/60 of final years' pensionable pay for each year of membership. From April 2014 the standard calculation is pay x 1/49 for the year with annual pension revaluation. NB Where members choose to pay into the 50/50 section of the scheme their accrual for that period will be pay x 1/98 and not 1/49 as shown.

Example - retirement in 2020

25 years membership to 31 March 2014 and then six years in the 'new scheme', 'final pay' and career average pay £15,000 as at 31 March 2020

Annual Pension

20 years x 1/80 x £15,000 = **£3,750**

5 years x 1/60 x £15,000 = **£1,250**

£15,000 x 6/49 = **£1,836.73**

Retirement Grant

20 years x 3/80 x £15,000 = **£11,250**

Members can choose at retirement to exchange pension for a larger retirement grant lump sum. AVC funds can also be used to provide a larger tax free lump sum. This combined lump sum can be up to 25 percent of the member's individual total pension fund value.

There are differences for elected members: Final pay is derived from career average pay and the benefit calculation remains for the time being as 1/80 for annual pension and 3/80 retirement grant. Elected members can only remain in the LGPS for their current period of office, and is not available for newly elected councillors.

• Liability to pay future benefits

The Pension Fund financial statements provide information about the financial position, performance and financial arrangements of the Fund. They are intended to show the results of the stewardship and management, that is the accountability of management for the resources entrusted to it, and of the disposition of its assets at the period end. The only items that are required to be excluded by regulations are liabilities to pay pensions and other benefits in the future, which are reported upon in the actuary's statement.

• Increasing Benefits

Scheme members have several options as to how they increase their benefits, additional contributions to the LGPS or by contributing to the group AVC scheme arranged with the Prudential.

Additional Regular contributions (ARC's) to the LGPS to buy additional pension and set up before 1 April 2014 may continue but opening a new ARC is not possible.

Additional Pension Contributions (APC) gives members the opportunity to buy additional pension of up to £6,675. Payment can be made by a one off, or regular monthly payments.

Prudential AVCs. A member's additional contributions are invested by the Prudential to enable an annuity to be bought at retirement either from the Prudential, on the open market or as a top up pension with the LGPS. In certain protected circumstances the AVC value may also be used to buy additional LGPS membership

Members may also make their own arrangements using a stakeholder pension or an FSAVC.

• Death

Following a death in service a death grant of up to three times pensionable pay is payable. There are no minimum service requirements to qualify, but there are limits to the total of death grant payable if the member also has pensions on payment or in deferment. Scheme members are recommended to keep their 'expression of wish' nominations current.

• Pensions are due to the eligible survivors: partners and /or children. The pension due to survivors reflects the changing regulations and the partnership status. Whilst the regulations no longer require prior nomination of co-habitees,

eligibility must be determined before making payment. Widows' and Widowers' Pension; Civil Partners' Pension; Nominated co-habiting partners' Pension
The formula for pensions for surviving partners is 1/160 of the members' final year's pensionable pay for the allowable membership to 31 March 2014 with enhancements assessed under the CARE scheme from 1 April 2014 until the members state retirement age.

For a widow or widower married before the member left employment all of membership can be used.

For civil partners and cohabiting partners only membership from 6 April 1988 is allowable for pension calculations.

INVESTMENT STRATEGY STATEMENT

The Pension Fund's Investment Statement in effect at 31 March 2025 is available at the following link: Investment Strategy Statement (oxfordshire.gov.uk).

The Pension Fund's Climate Change Policy, which forms an annex to the Investment Strategy Statement, in effect at 31 March 2025 is available at the following link: OCCPF Climate Change Policy (oxfordshire.gov.uk).

GOVERNANCE POLICY STATEMENT

The Pension Fund's Governance Policy Statement in effect at 31 March 2025 is available at the following link: Oxfordshire Pension Fund

FUNDING STRATEGY STATEMENT

The Pension Fund's Funding Strategy Statement in effect at 31 March 2025 is available at the following link: FundingStrategyStatement.pdf (oxfordshire.gov.uk).

COMMUNICATIONS POLICY STATEMENT

The Pension Fund's Communications Policy Statement in effect at 31 March 2025 is available at the following link: Communication Policy (oxfordshire.gov.uk)

COMMUNICATION

The Pension Fund Committee approved a Communication Strategy, which sets out the fund's communication policy with all employing bodies, contributors and pensioners. The following initiatives are currently in place: -

- **Annual Report and Accounts** – The investment team circulate this document to all Oxfordshire County Council Directors and all employing bodies. It is also available on line from the website page. Copies are available for public inspection in the main Oxfordshire public libraries.
- **Summary of Report and Accounts Leaflet** – The Pension Fund Investment Manager selects sections from the main document to incorporate into an issue of Reporting Pensions for all current members. Pensioners receive the fund information with their annual newsletter.
- **Annual Pension Fund Forum** – An annual event for all employers in the fund, with an open invitation to submit topics for discussion and to send representatives. The forum is to keep employing bodies informed of topical issues and events that have occurred in the last year and also to give them the opportunity to raise any questions in relation to the Pension Fund.
- **Pensions Employer/User Group** – This is a meeting held quarterly for all employing bodies within the Oxfordshire Fund. The purpose of the group is to inform, consult and discuss LGPS matters such as changes in legislation, the results of the actuarial valuation and other policy changes. We will continue with the recently revised format of presenting on specific subjects at these meetings.
- **Employee Guide to LGPS** – presents aspects of the scheme to all members as a series of short subject leaflets. Taken together they provide a full guide for members, but individually offer broad information on specific subjects. The leaflets are available from the Oxfordshire County Council Pension Fund website or on request from Pension Services.
- **Brief Guide to the LGPS** - a reduced version of the scheme guide, with main points available for all from the website. We encourage all employers to link their starting information for new employees to this guide.
- **Reports by Beneficiaries Representative** – The beneficiaries' representative attends all Pension Fund Committee meetings as an observer. He has no voting rights but is allowed to speak with the permission of the Chairman. The Representative's report after each meeting is circulated to all employers for their staff, and is also on the pensions website pages.
- **Reporting Pensions** – a quarterly newsletter distributed, with the assistance of fund employers to scheme members and those eligible to join the fund. These pick up major changes to the LGPS and ensure that Oxfordshire County Council Pension Fund complies with the Disclosure of Information Regulations.
- **Website** – Pages for the Oxfordshire County Council Pension Fund are located on the County's public website. They offer access to administration and investment information, including Pension Fund Committee reports and minutes. Fund Employers can find detailed Administration information as an online toolkit to support their role in the fund. All members; current, pensioners, and deferred, have dedicated sections, with links to newsletters, guides, and national websites.

- **Intranet** - is not maintained by Pension Services as it reflects the decisions and policies of the County Council as a fund employer. Their pages also provide links and access to the Pension Fund website. Other fund employers also provide information on their intra-net sites for employees.
- **Talking Pensions –** This is an informal monthly newssheet for all employers in the Oxfordshire Fund distributed to all Human Resources and Payroll contacts.
- **Annual Benefit Statements -** Pension Services issue statements to current members and to members who have left the scheme with an entitlement to pension but not to an immediate payment. Additional information to the Statement is available from the website.
- **Administration principles -** we encourage all new employers to attend a meeting to help acquaint themselves to our requirements and importantly, their responsibilities within the scheme.

USEFUL CONTACTS AND ADDRESSES

BENEFIT ADMINISTRATION

Pension Services
Oxfordshire County Council
4640 Kingsgate
Cascade Way
Oxford Business Park South
Oxford, OX4 2SU

Telephone:
0330 024 1359
email:
pension.services@oxfordshire.gov.uk

ACCOUNTS AND INVESTMENTS

Financial Manager – Pension Fund Investments
Corporate Services
Oxfordshire County Council
County Hall
Oxford, OX1 1ND

email:
pension.investments@oxfordshire.gov.uk

BENEFICIARIES REPRESENTATIVE

c/o Pension Services
Oxfordshire County Council
4640 Kingsgate
Cascade Way
Oxford Business Park South
Oxford
OX4 2SU

SPECIFIED PERSON FOR ADJUDICATION OF DISPUTES PROCEDURE
Disputes to be sent to:-

Pensions Services Manager
Oxfordshire County Council
4640 Kingsgate
Cascade Way
Oxford Business Park South
Oxford, OX4 2SU

Email: vicki.green@oxfordshire.gov.uk

The Pensions Regulator
Napier House
Trafalgar Place
Brighton
BN1 4DW 0345 600 1011
www.thepensionsregulator.gov.uk

Pension Tracing Service
The Pension Service 9
Mail Handling Site A
Wolverhampton
WV98 1LU 0800 731 0193
www.gov.uk/find-pension-contact-details

The Pensions Advisory Service (TPAS)
11 Belgrave Road
London
SW1V 1RB 0800 011 3797
www.pensionsadvisoryservice.org.uk

Pensions Ombudsman
10 South Colonnade
Canary Wharf, London
E14 4PU 0207 630 2200
www.pensions-ombudsman.org.uk

This page is intentionally left blank

PENSION FUND COMMITTEE

5 September 2025

REVIEW OF THE ANNUAL BUSINESS PLAN 2025/26

Report by the Executive Director of Resources & Section 151 Officer

RECOMMENDATION

1. **The Committee is RECOMMENDED to:**

    i) Review the progress against each of the key service priorities as set out in the report; and
    ii) Agree any further actions to be taken to address those areas not currently on target to deliver the required objectives.

Introduction

2. The report reviews the progress against the key service priorities set in the business plan for the Pension Fund for 2025/26 as agreed by this Committee in March 2025.

3. The key objectives for the Oxfordshire Pension Fund as set out in the Business Plan for 2025/26 remain consistent with those agreed for previous years, with one slight update to reflect the Fund's improved funding position.

4. The overall objectives are summarised as:

    - To fulfil our fiduciary duty to all key stakeholders
    - To administer pension benefits in accordance with the LGPS regulations, and the guidance set out by the Pensions Regulator
    - To maintain a funding level above 100%
    - To ensure there are sufficient liquid resources to meet the liabilities of the Fund as they fall due, and
    - To maintain as near stable and affordable employer contribution rates as possible

5. The service priorities for the year do not typically include the business as usual activity which will continue alongside the activities included in the service priorities. Business as usual activities are monitored as part of the Administration Report, the Governance and Communications Report and the report on Investment Performance.

Key Service Priorities – Review of 2025/26

6. There were 4 key service priorities included in the 2025/26 plan each with a number of key measures of success. The 4 key service priorities were:
    - Deliver further improvements to the governance arrangements of the Fund

- Deliver further operational effectiveness of the service delivery/administration function, including delivery of regulatory changes.
- Develop further the Fund's Investment and Funding service.
- Deliver service enhancements and cost reductions through increased use of technology.

7. The latest position on each is set out in the paragraphs below. The assessment criteria for each measure of success is as follows:

    - Green – measures of success met, or on target to be met
    - Amber – progress made, but further actions required to ensure measures of success delivered
    - Red – insufficient progress or insufficient actions identified to deliver measures of success

6. <u>Deliver further improvements to the governance arrangements of the Fund.</u> The position against the 5 agreed actions are set out in the table below.

Actions	**Measure of Success**	**Key Progress Achieved**	**Outstanding Actions**
Continue to develop and implement the **Workforce Strategy** AMBER	Complete the review of staffing needs Complete the identification of gaps in resource and skills Career pathways defined to support retention (to be completed in line with other OCC service areas during 2025) LGPS Academy rolled out across the team	Workforce Strategy in place Preparation of JD's on new roles underway Temporary staff sourced to support summer holiday cover and then wider development into more senior roles Engaged Aon for salary benchmarking Participation in Hymans salary survey	Work with OCC on job architecture to align with Council roles, postponed until end of 2025 Develop revised role profiles in line with OCC Advertise for new roles LGPS Academy rolled out across the team
Continue to work on **General Code** compliance and provide external scrutiny/review. GREEN	Review of GCOP compliance completed by officers end of March 2025	Independent review by Hymans has been completed on first phase of modules and timetable agreed for	Next steps to complete phase two of independent review

	Independent review completed by end of summer 2025 Reviews demonstrate Fund is meeting Regulatory Requirements and TPR expectations	further review on remaining modules	
Monitor, review and implement **Good Governance Review** outcomes once known GREEN	Governance review complete and plan in place to implement recommended changes (dates to be confirmed once Government confirms outcomes)	Response from Government on the fit for the future consultation received which included the Good Governance Review	Awaiting legislation and associated guidance for implementation
National Knowledge Assessment (NKA) and Knowledge and Understanding GREEN	All Committee and Board members complete TPR Toolkit Maintain NKA score from previous year All Committee and Board members enrolled on LOLA and complete 50% of modules	New Committee Members have attended induction training or are in the process of attending/watching training and will start working towards completing the required modules Valuation training provided in August 2025	Completion of TPR toolkit Enrol and commence working through LOLA In-person training day in October 2025
Local Government Reform - tracking and responding to potential risks and resource implications GREEN	Respond effectively to Government consultations Keep Committee and Board regularly consulted and updated Identify stakeholders impacted and track any associated risks through risk register	Ongoing monitoring as reforms develop	N/A

7. The 4 actions under this objective have all been rated green, largely due to waiting on external factors such as Government responses.

8. The Workforce Strategy action has been assessed as amber, indicating that while progress is evident, significant challenges persist. In particular, the attraction and retention of staff at Oxfordshire and within the LGPS sector more widely remains an issue. Following the request from Committee at the June meeting, we are undertaking pay benchmarking with an external specialist. In addition, to this we are taking part in the Hymans' salary survey.

9. Deliver further operational effectiveness of the service delivery/administration function, including delivery of regulatory changes. There were also 6 specific actions set out in the 2025/26 Business Plan in respect of this priority. The progress against these in set out in the table below.

Actions	Measure of Success	Key Progress Achieved	Outstanding Actions
Implement **McCloud** (data and IT requirements) AMBER	Process in place to confirm calculations carried out correctly and within SLA timeframes Issue all Annual Benefit Statements containing McCloud information with Plain English explanation by 31 August 2025	Significant progress made in the last 6 months, more information is included in the Administration Report later in the agenda for this meeting Extension to 2026 required for a small number of complex cases	Work continues towards the 31 August Annual Benefit Statement deadline, due to timing of reporting to Committee a verbal update will be provided at September Committee
Monitor and improve **Common Data** scores GREEN	Maintain data score at 95% Aim to exceed 95% and increase to 98%	Continued focus on data quality with employers and internal Fund processes Common Data review due later this year	N/A
Employer Engagement/Client Relationship (including escalation process/fines) GREEN	Contributions reconciled monthly Member data reconciled monthly Late data and/or contributions pursued within 1 week - large employers, smaller employers within 2 weeks	Focus moving to employer engagement and relationship management to maintain progress Employer Services Manager role approved to drive service forward	Advertise Employer Services Manager role Draft user guide to improve employer knowledge and understanding of responsibilities

	Employer survey introduced Develop Employer Services team Improve employer knowledge and understanding of responsibilities through provision of a user guide Review and update of all Fund provided employer policies/processes and procedures completed	Review of employer policies has commenced Employer surveys are being issued	
Customer Satisfaction - (Compliments/complaints/feedback) [Employer and Member] GREEN	Improve scores from member surveys Reduce number of upheld complaints from members Improve scores from employer surveys	Monitoring of scores on member survey and collation of data underway Employer surveys are being issued	Build into reports to Committee
Day to Day delivery of BAU activities GREEN	Administration SLAs – ▪ Call to helpdesk answered within 40 seconds ▪ Deaths processed in 10 days Reported KPI's all above 80%	Progress is being made, see Administration Report later in this meeting	N/A
Implement Government **tax changes**. GREEN	Full process map developed, reviewed and implemented	On track, awaiting Government implementation	N/A

10. Out of 6 key actions, 5 are rated as green, this is largely due to awaiting guidance from government and progress being made against each objective where possible.

11. We have continued to rate the McCloud action as amber; this is due to the significant progress has been made since the previous Committee. However, given the challenging timescales, resource constraints with the administration team over the summer period and complexity of remaining McCloud cases an extension to August 2026 will be requested for a small number of complex cases remaining.

12. Develop further the Fund's Investment and Funding service: There were 6 actions set for this service priority within the Business Plan, and progress against these measures is set out below.

Actions	Measure of Success	Key Progress Achieved	Outstanding Actions
Deliver the **2025 Valuation** GREEN	Data provided to Actuary by requested date Less than 5% data quality queried by Actuary (actual % will be reported to Committee/Board) Maintain stability of costs i.e. employer contributions Achieve consensus around valuation assumptions with Committee by end of June 2025	Data provision to Scheme Actuary completed Draft Funding Strategy Statement covered later in the agenda of this meeting, for comment, prior to consultation with employers Training delivered to Committee and Board Members	Engagement with smaller employers Review of Funding Strategy Statement (and associated policies) and employer consultation Data quality report from Actuary to be provided to Committee
Cashflow modelling - Committee to see more information on how the Fund handle cashflow GREEN	Cashflow modelling policy introduced in 25/26 - with regular reporting, built into existing report	Ongoing monitoring of the cashflow position is in place	Cashflow model to be reviewed in light of decisions made throughout 2025 Valuation process Cashflow monitoring policy to be developed
Strategic Asset Allocation	Asset Allocation decided with scope for swift response to developing	Initial scope of work has been agreed and detailed	Review work with Independent Investment

SAA (subject to consultation) GREEN	risk and opportunity, March 2026 Consultation with key stakeholders	review work by Apex has commenced	Adviser (IIA) to develop proposed SAA for consultation Investment Strategy Statement (ISS) Review Consult key stakeholders Finalise SAA for sign off in March 2026 Committee
Implement **Government Policy** GREEN	Response issued to relevant consultations Take leading role through SPOG/PLSA and other cross industry groups in responding to consultations New Regulations complied with ahead of deadline (where practically possible)	Consultation response issued on *"Local Government Pension Scheme in England and Wales: Access and Fairness"* Fit for future consultation response received, although further details are to be worked through and pension bill has passed the second reading In response to the letter received from Government 9 April regarding Brunel, work commenced at pace, see report on LGPS Pooling Reform later in the agenda	Submit in-principle decision to Government ahead of 30 September 2025 deadline Work closely with stakeholders on new pooling arrangements, to meet Government deadline of 31 March 2026
Responsible Investment Policy development GREEN	Leading/recognised accreditation scores within Stewardship Code	An update will be provided under the Corporate Governance and Socially Responsible Investment item on the agenda	N/A
Value for Money analysis GREEN	Ensure analysis is completed (active vs. passive) and next steps agreed Cost transparency reviewed	This will be included as part of SAA work and selection of new pooling partner	N/A

13. All 5 actions are rated green, largely due to work progressing well in all areas.

14. Implement Government policy is rated as green, this is due that whilst timescales remain challenging, we remain on course for an in-principle decision ahead of the 30 September 2025 deadline. The March 2026 deadline for management of all assets to be pooled is more ambitious, however Fund officers believe this deadline will be met as we work closely and at pace with our new investment pool.

15. A consultation was published on 15 May 2025, Local Government Pension Scheme in England and Wales: Access and Fairness. The consultation, the link in included below:

Local Government Pension Scheme in England and Wales: Access and fairness - GOV.UK

16. The consultation covers a range of areas. Key areas impact both the Fund and participating employers and are detailed below:
    a. **Survivor pensions and death grants**
    b. **Gender Pension Gap**
    c. **Out-outs**
    d. **Forfeiture**
    e. **McCloud**
    f. **Transfers of Additional Voluntary Contributions (AVCs)**
    g. **Lifetime Allowance (LTA)**
    h. **Refunds**

17. Due to the detailed technical nature Fund officers have drafted a response to the 52 questions and circulated this for information to Committee and Board. Fund officers have also communicated with employers to ensure they are aware of the proposals, some of which would add additional costs to an employer's payroll, as such employers may have responded separately from the Fund response.

18. Deliver service enhancements and cost reductions through increased use of technology. There were 5 actions set for this service priority within the Business Plan, and progress against these measures is set out below.

Actions	Measure of Success	Key Progress Achieved	Outstanding Actions
Website development and launch RED	Website domain and host agreed by mid-2025 New website launched by end of the scheme year (March 2026) Overwhelmingly	Limited progress achieved to date, meeting held at senior level with IT Services to agree a plan of action. Significant resources challenges within IT Services have	Development, internal testing, user acceptance testing and communications to launch new website

	positive feedback from users Accessible requirements completed - WCAG 2.2 requirements, useable on all devices (mobile, computer etc)	impacted the website development, on going dialogue to find alternative ways of delivering the website. March 2026 deadline looks increasingly challenging.	
Implement Pensions **Dashboard** GREEN	ISP contract in place – by March 2025 Connected to ecosystem by mid-October 2025 for both pension benefits and Additional Voluntary Contributions (AVCs) Report updates to Committee/Board and provide information on how successful connection has been	ISP contract in place and set up of dashboard progressing All except one Pension Regulator code has been received	Connection, testing and launch of dashboard Meetings on matching criteria and AVC data connection are due to be held in September 2025
Development of **iConnect** - continue to utilise further improvements to the service GREEN	Patches implemented on release day Regular engagement with Heywoods maintained to understand upcoming improvements and how to utilise them Training delivered to relevant officers	Steady progress on a number of system updates and service enhancements	Work with Heywoods to support integration of AI into Fund processes
Ensure all technology used is **compatible with Windows 11** GREEN	Engage support of host authority IT Team Complete review of all devices and software Replace those not compatible with Windows 11 by 30 September 2025	Updates have started to take place along with replacement of hardware to ensure compatibility with Windows 11	N/A
Other developments	MSS development implemented	Steady progress on a number of system	Work with Heywoods to

– MSS, address checker, electronic pension payslips, EA2P, bank account verification GREEN	Increased members uptake and online activity Positive user feedback in surveys received	updates and service enhancements	support integration of AI into Fund processes Increased members uptake and online activity

19. 4 out of the 5 actions are rated green, largely due to work progressing well in these areas. 1 action, website development has increased from amber to red due to limited progress made to date, making the March 2026 deadline for the new website delivery look increasingly unlikely to be met. This has been due to resource challenges within IT Services as several other major projects are taking place. However, discussions have taken place, and a number of actions agreed to plan a way forward, seeking alternative ways to deliver the website.

Budget 2025/26

20. The budget for 2025/26 was agreed at £26,742,000 as part of the Business Plan at Committee on 7 March 2025.

2025/26 Pension Fund Budget - Q1 Update

	Budget	**YTD**	**%**	**Forecast Outturn**	**Variance**
	2025/26	**2025/26**		**2025/26**	**2025/26**
	£'000	**£'000**		**£'000**	**£'000**
Administrative Expenses					
Administrative Employee Costs	2,067	424	20%	2,067	0
Support Services Including ICT	1,193	524	44%	1,193	0
Printing & Stationary	78	56	72%	78	0
Advisory & Consultancy Fees	5	0	0%	5	0
Other	60	-1	-1%	60	0
Total Administrative Expenses	**3,403**	**1,003**	**29%**	**3,403**	**0**
Investment Management Expenses					
Management Fees	20,500	5,000	24%	20,000	-500
Custody Fees	30	3	11%	30	0
Brunel Contract Costs	1,630	827	51%	1,630	0

Total Investment Management Expenses	**22,160**	**5,831**	**26%**	**21,660**	**-500**
Oversight & Governance					
Investment & Governance Employee Costs	470	85	18%	400	-70
Support Services Including ICT	13	0	0%	13	0
Actuarial Fees	350	121	34%	292	-58
External Audit Fees	100	71	71%	100	0
Internal Audit Fees	19	0	0%	9	-10
Advisory & Consultancy Fees	110	8	7%	70	-40
Committee and Board Costs	25	0	0%	24	-1
Subscriptions and Memberships	92	13	14%	20	-72
Total Oversight & Governance Expenses	**1,179**	**297**	**25%**	**928**	**-251**
Total Pension Fund Budget	**26,742**	**7,130**	**27%**	**25,991**	**-751**

21. On Investment Management, Oversight and Governance a point to highlight is costs related to Brunel are likely to change. However, at this stage, it remains too early to confirm the financial impact of Government policy requiring the Fund to identify a new pooling partner.

Training Plan

22. Part D of the Business Plan set out the broad Training Plan for Committee and Board Members. This reflects the Knowledge Assessment and feedback from Committee and Board members in 2024. We had pre-Committee training at the June meeting from Brunel, also a training session with the Scheme Actuary during August and Fund officers are working on the agenda for the joint in-person training day with another Pension Fund in October.

23. The Plan also includes reference to the on-line training offered by Hymans Robertson which all Members are encouraged to complete, a list of recommended external courses and conferences which Members are invited to consider as well as the offer of individual sessions with officers and the development of a specific training plan to meet individual needs.

24. Should you need any further information and for any questions, please contact Anna Lloyd our Governance and Communications Officer.

Lorna Baxter
Executive Director of Resources & Section 151 Officer

Appendix: N/A

Background papers: N/A

Contact Officer: Mark Smith, Head of Pensions, 01865 328734,
mark.smith@oxfordshire.gov.uk

August 2025

Division(s): n/a

ITEM 9

PENSION FUND COMMITTEE – 5 SEPTEMBER 2025

RISK REGISTER

Report by the Executive Director of Resources & Section 151 Officer

RECOMMENDATION

1. **The Committee is RECOMMENDED to note the latest risk register and accept that the risk register covers all key risks to the achievement of their statutory responsibilities, and that the mitigation plans, where required, are appropriate**.

Introduction

2. The risk register sets out the current risk scores in terms of impact and likelihood, and a target level of risk and a mitigation action plan to address those risks that are currently not at their target score. The risk register can be found at **APPENDIX 1**. This report sets out any progress on the mitigation actions agreed for those risks not yet at target and identifies any changes to the risks which have arisen since the register was last reviewed.

Comments from the Pension Board

3. The Local Pension Board did review and consider the risk register at its last meeting on the 4 July 2025, however there were no comments for consideration.

Latest Position on Existing Risks/New Risks

New Emerging Risks

4. Having carried out a holistic review of all the current risks – it was determined that there are no new known emerging risks to assess and mitigate. However, similar to last quarter, fund officers recognise that there are still various central government initiatives which have been launched or are currently on-going. These may potentially result in emerging risks that the fund has to consider. These initiatives include:

   i) The 'LGPS: Fit for the Future' consultation
   ii) Local Government devolution and reorganisation
   iii) New Fair Deal

The fund is closely monitoring each of these initiatives to ensure that any potential risks to the fund are quickly identified, such that mitigating actions can be agreed and actioned swiftly. Any such risks would be presented to Committee/Board on the risk register.

Increasing Risk

5. Risk 19 – 'Failure of Pooled Vehicle to meet local objectives' – has increased from a green rating to a red rating. Changes requested for strategic asset allocations are implemented gradually. As such, the asset allocation amendment agreed by the committee for 'UK Equity' have not been implemented yet. With pooling reform currently on-going, the change to the required asset allocation will need to be implemented by the fund's new pool.

Reducing Risk

6. Risk 12 – 'Insufficient resources from Committee to deliver responsibilities' – has been reduced from an amber rating to a green rating. The committee has supported the fund with additional resources as and when necessary, particularly with projects such as McCloud. Hence, it has been decided to reduce the risk rating for this particular risk.

Risks removed from the Risk Register

7. None of the risks were removed from the Risk Register.

Same Risk Rating

8. Risk 14 – 'Insufficient Skills and Knowledge amongst Board Members' – this has remained at an amber rating. The Board results from the National Knowledge Assessment 2024, warrants the risk remaining at an amber rating. The training plan for 2025/26 will seek to address the necessary training requirements for the Board.

9. Risk 15 – 'Insufficient Skills and Knowledge amongst officers' – the team continues to experience challenges in recruiting to lower-level management posts. As such, this risk has been assessed as remaining at an amber score of 6.

10. Risk 18 – 'Failure to Meet Government Requirements on Pooling' – further to the outcome of the 'Fit for the Future' Consultation, central government have mandated pooling reforms. The fund is working towards meeting the requirements with regards to pooling, however the risk still requires oversight to ensure that the government requirements are met. The risk was assessed a remaining at an amber score of 10.

11. Risk 21 – 'Insufficient Resource and/or Data to comply with consequences of McCloud Judgement & Sergeant' – most of the cases have been updated to meet the statutory requirements. Regulatory discretions have been applied for the remaining cases. An extension till August 2026 would apply to these cases. As such, this risk has been assessed as remaining at an amber rating at present.

12. Risk 24 – 'Impact of a potential turnover of Pension Fund Committee members as a result of the election' – the elections took place in May 2025 and there are a significant number of new members on the committee. A training plan is in place to mitigate any potential risks, however it remains at an amber rating.

13. All other risks have been assessed as remaining the same as last quarter and are at the target risk rating.

14. Finally, it is worth pointing out that Risk 4 – 'Under performance of asset managers or asset classes', is still currently assessed as green and on target. However, with the new central government position with regards to Brunel, it is becoming clear that recruitment and retention of staff is becoming difficult for Brunel. This has not immediately resulted in any direct impact on this specific risk and hence it is still a green and on target. However, this is a recognition that this risk is being closely monitored.

15. The Pension Fund Committee are asked to note the Risk Register.

Lorna Baxter
Executive Director of Resources & Section 151 Officer

Contact Officer: Mukhtar Master, Governance and Communications Manager
Tel: 07732 826419

September 2025

This page is intentionally left blank

APPENDIX 1

Risk Register

Identification of Risks:

These are the risks that threaten the achievement of the Pension Services objectives. Risks have been analysed between:

- Funding, including delivering the funding strategy;
- Investment;
- Governance
- Operational; and
- Regulatory.

Key to Scoring

	Impact	Financial	Reputation	Performance
5	Most severe	Over £100m	Ministerial intervention, Public inquiry, remembered for years	Achievement of Council priority
4	Major	Between £10m and £100m	Adverse national media interest or sustained local media interest	Council priority impaired or service priority not achieved
3	Moderate	Between £1m and £10m	One off local media interest	Impact contained within directorate or service priority impaired.
2	Minor	Between £100k and £500k	A number of complaints but no media interest	Little impact on service priorities but operations disrupted
1	Insignificant	Under £100k	Minor complaints	Operational objectives not met, no impact on service priorities.

Likelihood

4	Very likely	This risk is very likely to occur (over 75% probability)
3	Likely	There is a distinct likelihood that this will happen (40%-75%)
2	Possible	There a possibility that this could happen (10% - 40%)
1	Unlikely	This is not likely to happen but it could (less than 10% probability)

RAG Status/Direction of Travel

	Risk requires urgent attention
	Risks needs to be kept under regular review
	Risk does not require any attention in short term
↑	Overall Risk Rating Score is Increasing (Higher risk)
↔	Risk Rating Score is Stable
↓	Overall Risk Rating Score is Reducing (Improving Position)

APPENDIX 1

Ref	Risk	Scheme	Risk Category	Cause	Impact	Risk Owner	Controls in Place to Mitigate Risk	Current Risk Rating			RAG Status and Direction of Travel	Further Actions Required	Date for completion of Action	Target Risk Rating			Date of Review	Comment
								Impact	Likelihood	Score				Impact	Likelihood	Score		
1	Investment Strategy not aligned with Pension Liability Profile	LGPS	Investment	Pension Liabilities and asset attributes not understood and matched.	Long Term - Pension deficit not closed.	Head of Fund	Triennial Asset Allocation Review after Valuation.	4	1	4	↔			4	1	4	Sep 2025	At Target
2	Investment Strategy not aligned with Pension Liability Profile	LGPS	Investment	Pension Liabilities and asset attributes not understood and matched.	Short Term – Insufficient Funds to Pay Pensions.	Head of Fund	Monthly cash flow monitoring and retention of cash reserves.	4	1	4	↔			4	1	4	Sep 2025	At Target
3	Investment Strategy not aligned with Pension Liability Profile	LGPS	Investment	Poor understanding of Scheme Member choices.	Long Term - Pension deficit not closed. Short Term – Insufficient Funds to Pay Pensions.	Head of Fund	Monthly cash flow monitoring and retention of cash reserves.	3	1	3	↔			3	1	3	Sep 2025	At Target
4	Under performance of asset managers or asset classes	LGPS	Investment	Loss of key staff and change of investment approach at Brunel or underlying Fund Managers.	Long Term - Pension deficit not closed.	Financial Manager	Quarterly assurance review with Brunel. Diversification of asset allocations. As an open defined benefit scheme – investments are long-term.	3	2	6	↔	Monitoring of staff turnover at Brunel still taking place. The prospective CIO did not join Brunel. Retention strategy being discussed with client group in light of recent government proposals. The Chair of the Board of Brunel has departed.	On-going	3	2	6	Sep 2025	At Target
5	Actual results vary to key financial assumptions in Valuation	LGPS	Funding	Market Forces	Long Term - Pension deficit not closed.	Head of Fund	Actuarial model is based on 5,000 economic scenarios, rather than specific financial assumptions. As an open defined benefit scheme – investments are long-term.	3	2	6	↔			3	2	6	Sep 2025	At Target

APPENDIX 1

6	Under performance of pension investments due to ESG factors, including climate change.	LGPS	Investment	Failure to consider long term financial impact of ESG issues	Long Term - Pension deficit not closed.	Financial Manager	The Fund has an RI Policy requiring ESG factors to be considered in all investment decisions. The Fund have a Climate Change Policy and implementation plan.	4	1	4	↔			4	1	4	Sep 2025	At Target
7	Loss of Funds through fraud or misappropriation.	LGPS	Investment	Poor Control Processes within Fund Managers and/or Custodian	Long Term - Pension deficit not closed	Financial Manager	Review of Annual Internal Controls Report from each Fund Manager. Clear separation of duties.	3	1	3	↔			3	1	3	Sep 2025	At Target
8	Employer Default – LGPS	LGPS	Funding	Market Forces, increased contribution rates, budget reductions	Deficit Falls to be Met by Other Employers	Pension Services Manager	All new employers set up with ceding employer under-writing deficit, or bond put in place. Contribution escalation policy provides early indicator/warning.	3	2	6	↔			3	2	6	Sep 2025	At Target
9	Inaccurate or out of date pension liability data	LGPS	Funding	Late or Incomplete Returns from Employers	Errors in Pension Liability Profile impacting on Risks 1 and 2 above.	Pension Services Manager	Monitoring of Monthly returns	3	1	3	↔			3	1	3	Sep 2025	At Target
10	Inaccurate or out of date pension liability data from Employer	LGPS	Operational	Late or Incomplete Returns from Employers	Late Payment of Pension Benefits.	Pension Services Manager	Monitoring of Monthly returns. Direct contact with employers on individual basis.	3	1	3	↔			3	1	3	Sep 2025	At Target
11	Inaccurate or out of date pension liability data from Employer	LGPS	Operational	Late or Incomplete Returns from Employers	Improvement Notice and/or Fines issued by Pension Regulator.	Pension Services Manager	Monitoring of Monthly returns. Direct contact with employers on individual basis.	4	1	4	↔			4	1	4	Sep 2025	At Target
12	Insufficient resources from Committee to deliver responsibilities	LGPS	Operational	Budget Reductions	Breach of Regulation	Head of Fund	Annual Budget Review as part of Business Plan.	4	1	4	↓	Committee have supported with additional resources wherever required particularly with regards to McCloud and any other on-going projects.	On-going	4	1	4	Sep 2025	At Target

APPENDIX 1

13	Insufficient Skills and Knowledge on Committee	LGPS	Operational	Poor Training Programme. New Committee Members.	Breach of Regulation. Loss of Professional Investor Status under MIFID II	Head of Fund	Training Review	4	1	4	↔	Implement new training plan 25/26 based on the outcomes of the National Knowledge Assessment from Hymans	On-going	4	1	4	Sep 2025	At target
14	Insufficient Skills and Knowledge amongst Board Members	LGPS	Operational	Turnover of Board membership	Insufficient Scrutiny of work of Pension Fund Committee leading to Breach of Regulations	Head of Fund	Training Policy	4	2	8	↔	Implement new training plan 25/26 based on the outcomes of the National Knowledge Assessment from Hymans	On-going	4	1	4	Sep 2025	Above target
15	Insufficient Skills and Knowledge amongst officers	LGPS	Operational	Poor Training Programme and/or high staff turnover. Pay grades not reflecting market rates and affecting recruitment and retention.	Breach of Regulation, errors in Payments and ineffective scheme member engagement. Inability to effectively meet RI and Climate related objectives.	Head of Fund	Training Plan. Control checklists. Use of staff from 3rd party agencies	3	2	6	↔	The Workforce Strategy and workforce planning is to be completed and changes to workforce agreed and implemented. Additional posts soon to be recruited to.	On-going On-going	3	1	3	Sep 2025	Above target
16	Key System Failure	LGPS	Operational	Technical failure	Inability to process pension payments	Pension Services Manager	Disaster Recovery Programme, and Cyber Security Policy	4	1	4	↔	Quarterly Meetings with ICT Cybersecurity Lead have been established. Business Continuity plan has been completed.	On going	4	1	4	Sep 2025	At Target
17	Breach of Data Security	LGPS / FPS	Operational	Poor Controls	Breach of Regulation, including GDPR	Pension Services Manager	Security Controls, passwords etc. GDPR Privacy Policy and Cyber Security Policy.	4	1	4	↔			4	1	4	Sep 2025	At Target
18	Failure to Meet Government Requirements on Pooling	LGPS	Governance	Inability to agree proposals with other administering authorities.	Direct Intervention by Secretary of State	Head of Fund	Full engagement within Brunel Partnership	5	2	10	↔	Decisions are being made with regards to the Government proposals. The decisions are subject to agreement.	Sep 2025	5	1	5	Sep 2025	Above Target
19	Failure of Pooled Vehicle to meet local objectives	LGPS	Investment	Sub-Funds agreed not consistent with our liability profile.	Long Term - Pension deficit not closed	Head of Fund	Full engagement within Brunel Partnership	4	4	16	↑	Asset allocation did not occur as agreed by committee (UK equity). This is due to pooling reform by central government. This will need to	Dec 25	4	1	4	Sep 2025	Above Target

APPENDIX 1

												be implemented by the new pool.						
20	Significant change in liability profile or cash flow as a consequence of Structural Changes	LGPS	Funding	Significant Transfers Out from the Oxfordshire Fund, leading to loss of current contributions income.	Insufficient cash to pay pensions requiring a change to investment strategy and an increase in employer contributions	Head of Fund	Engagement with key projects to ensure impacts fully understood	4	1	4	↔	Increased focus on cashflow monitoring going forward. Monitoring developments in Local Government re-organisations.	On going	4	1	4	Sep 2025	At Target
21	Insufficient Resource and/or Data to comply with consequences of McCloud Judgement & Sergeant.	LGPS / FPS	Operational	Significant requirement to retrospectively re-calculate member benefits	Breach of Regulation and Errors in Payments	Pension Services Manager	Re-organising this work between the whole team based on existing skill sets.	4	2	8	↔	Most of the cases have been updated to meet the statutory requirements. Regulatory discretions have been applied for the remaining cases. Extension until August 2026 would apply to these cases.	On-Going	4	1	4	Sep 2025	Above target
22	Loss of strategic direction	LGPS / FPS	Governance	Loss of key person	Short term lack of direction on key strategic issues	Head of Fund	Establishment of a Governance & Communications Team provides the resilience that the fund requires.	2	1	2	↔			2	1	2	Sep 2025	At Target
23	Impact of Pension Scams	LGPS FPS	Operational	Failure to follow TPR guidance for transfers out.	Financial loss to members. Potential cost to Fund for making good any loss. Potential TPR sanctions and reputational damage.	Pension Services Manager	TPR guidance for transfers out and the forthcoming regulations in the General Code of Practice. All processes are in line with the above.	3	1	3	↔			3	1	3	Sep 2025	At target
24	Impact of a potential turnover of Pension Fund Committee members as a result of the election.	LGPS FPS	Governance	Council Election in May 2025 and natural turnover leading to significantly new Pension Fund Committee members	Significant deterioration of knowledge and skills of the Pension Fund Committee. Impaired decision making due to lack of knowledge and skills.	Head of Fund	Additional resources devoted to ensure that Pension Fund Committee members are trained appropriately. Additional support for decision making possibly through a third-party or	4	2	8	↔	The training plan for 2025/26 to establish actions to implement the mitigations outlined. Quarterly updates to be provided to Committee.	on-going	4	1	4	Sep 2025	Above target

							the Pension Board.											

Division(s): n/a

ITEM 10

PENSION FUND COMMITTEE – 5 SEPTEMBER 2025

GOVERNANCE & COMMUNICATIONS REPORT

Report by the Executive Director of Resources & Section 151 Officer

RECOMMENDATION

1. **The Committee is RECOMMENDED to:**

   i) **Note Hymans Oversight & Challenge Report regarding the fund's General Code of Practice compliance work for 2024/25.**
   ii) **Note the Fund's update on General Code of Practice Compliance 2025/26.**
   iii) **Note the Committee and Board training update.**
   iv) **Note the latest quarter's breaches for the fund.**
   v) **Note the communications update.**

General Code of Practice – Hymans Oversight & Challenge Report

2. The new General Code of Practice consists of 51 modules which relate to 5 main areas:

   i) Governing Body – 18 modules
   ii) Funding and Investments – 2 modules
   iii) Administration – 10 modules
   iv) Communications and Disclosure – 11 modules
   v) Reporting to TPR – 4 modules.

3. Not all of the 51 modules apply to the LGPS. It was deemed that 37 of the 51 modules applied to the LGPS and as such it was decided to review 20 modules in 2024/25 and the remaining 17 modules in 2025/26.

4. Hymans have conducted an independent review of our results for 2024/25 and their findings can be found at **APPENDIX 1**.

5. The overall summary position of Hymans for the fund is that – '**it is our opinion that OPF appears to be in a good position against the requirements of the General Code of Practice**'.

6. The fund achieved a compliance rating of 100% for 18 modules and 67% and 50% respectfully for the remaining 2 modules. Hymans have recommended that the fund develop a plan to address the requirements of the two modules, namely 'general principles for member communications' and 'cyber controls'.

General Code of Practice Compliance 2025/26

7. During 2025/26 the Oxfordshire Pension Fund is working to review compliance against the remaining 17 modules. To this end, the fund have developed a plan to ensure compliance against these 17 modules. A visual plan has been developed which shows progress against the key stages of the plan with a red/amber/green (RAG) rating to show the current status of each key stage of the plan. This plan can be seen at **APPENDIX 2**.

8. Summary of the progress to the end of August 2025:

   i) Currently 5 modules have been reviewed.

   ii) 4 of the 5 modules have been assessed as green for being fully compliant. One module is amber because some requirements remaining outstanding, namely the 'conflict of interest module'.

   iii) The actions from the 'Oversight & Challenge' have been scheduled into the workplan for 2025/26.

Committee and Board training update

9. The training requirements for the fund's committee and board is set out in the fund's Governance Policy.

10. The summary training position is as follows:

Summary of Committee and Board Member Training	
Pre-committee induction completed	7/7 councillors 5/5 board members
1st year mandatory training already undertaken	2/7 councillors 1/1 pension scheme member rep 5/5 board members
1st year mandatory training – TPR Toolkit route confirmed – to be completed by 31 December 2025	3/5 new councillors
1st year mandatory training – LGA Fundamentals training course confirmed	1/5 new councillors
1st year mandatory training – training course route to be confirmed	1/5 new councillors
LGPS Pooling Symposium – May 2025	1/5 board members
PLSA Local Authority Conference – June 2025	1/1 pension scheme member rep 1/5 board members
Pre-committee training: Intro to Pooling delivered by Brunel – 06/06/2025	7/8 committee members 2/5 board members

Confirmed read Hymans LGPS guide June 2025	5/8 committee members 4/5 board members
Valuation training delivered by Hymans Robertson - 06/08/2025	5/8 committee members 4/5 board members

11. Pension Fund Committee: all members have completed the mandatory induction required, and all but one member of the committee have undertaken or have confirmed their course route for the mandatory training.

12. Local Pension Board: all members have completed both their induction and mandatory training.

13. In previous years, the National Knowledge Assessment and the Knowledge Progress Assessment have been run in alternating years. In autumn 2024, our committee and board members participated in the National Knowledge Assessment. Hymans Robertson have decided not to run the Knowledge Progress Assessment this year and given the new committee members will be undertaking mandatory training in the next few months, fund officers have agreed not to seek an alternative.

14. However, we provide all pension fund committee and local pension board members with access to the LGPS Online Learning Academy (LOLA) which is Hymans Robertson's online modular course. Members are highly recommended to complete these modules during the course of 2025/26 in preparation for the National Knowledge Assessment in autumn 2026. Completion of LOLA modules will be reported to committee and board in early to mid-2026.

15. Upcoming training to note: in-person training day for the Oxfordshire and Gloucestershire committees and boards on 30 October at De Vere Cotswold Water Park Hotel. Full agenda and details to follow.

Breaches for the period April to June 2025

16. There are various legislative and regulatory requirements for Pension Funds regarding breaches which include the Pensions Act 2004, the UK General Data Protection Regulation (UK GDPR) and the Pension Regulator's General Code of Practice (GCOP).

17. The following table shows the number of breaches in the last quarter – April to June 2025.

	2024/5			2025/6	
Breach Type	**Jul-Sept (Q2)**	**Oct-Dec (Q3)**	**Jan-Mar (Q4)**	**Apr-Jun (Q1)**	**Total**
Contribution - GCOP	21	10	32	17	80
Data - GCOP	35	35	48	39	157
Other - GCOP	1	0	0	0	1
Data - GDPR	1	1	1	3	6
Total	58	46	81	59	

Escalations in Q1					
Type of Breach	**Contribution (GCOP)**	**Data (GCOP)**	**Other (GCOP)**	**Data (GDPR)**	**Total**
Number escalated	0	2	0	2	**4**
Number resolved	0	2	0	2	**4**
Number carried over to next quarter	0	0	0	0	**0**

Code of Practice Breaches

A breach is recorded every time a contributions payment or data return is submitted after the 19th of the month following payroll. A breach is also recorded when an employer fails to provide member data or information to the administration team in line with the escalation policy.

In Q1, four cases were escalated to a Team Leader. All Code of Practice breaches, including those escalated, have been resolved.

Data Breaches

Three data breaches occurred in Q1, which were assessed and closed by the Information Management Team.

None of the breaches were materially significant and as such were not reported to either The Pensions Regulator or the Information Commissioner.

Communications Update

18. As well as business as usual, the Communications Team have been working on the following activities:

i) Review of the Fund website. There have been some difficulties in progressing the project while discussions take place at senior level.

In April, the web team declined to support the project and recommended engaging external providers instead. However, the team believes there are compelling reasons to work with internal colleagues, for example in relation to cyber security, governance, and compliance with accessibility regulations. The matter was escalated in April, and we are currently still awaiting a decision. Meanwhile, the original deadline of March 2026 looks increasingly challenging.

ii) Preparation for the Employer meeting in September – the agenda will focus on current projects, eg the valuation, the access and fairness consultation, investment pooling.

19. Business as usual includes regular cycle of newsletters for members and employers, preparation for deferred and active benefit statements, including changes required for McCloud remedy, attendance at national and local Communications Working Groups and sub groups, surveys, documentation reviews, organising and running talks, seminars and training.

Lorna Baxter
Executive Director of Resources & Section 151 Officer

Contact Officer: Mukhtar Master, Governance and Communications Manager
Tel: 07732 826419

September 2025

This page is intentionally left blank

Oxfordshire Pension Fund

TPR General Code of Practice Compliance Report

August 2025

Andrew McKerns, Michael Burton and Claire McDines

LGPS Governance, Administration and Projects Team
For and on behalf of Hymans Robertson LLP

Contents

TPR General Code of Practice Compliance Report

Page

1 Fund Compliance Position 1
2 Methodology 4
3 Self-Assessment 4
4 Challenge and Oversight 4
5 Summary 5
6 Next steps 5
7 Notes 5

Appendices

Appendix 1 - Summary of Desktop Assessment Outputs
Appendix 2 - Examples of additional evidence to be considered for inclusion in the self-assessment

1 Fund Compliance Position

On 27 March 2024 The Pensions Regulator's (TPR) new General Code of Practice (GCOP) came into force. The GCOP consolidates and refreshes previous Codes into a single Code for all pension schemes. For Public Service Pension Schemes the GCOP replaces Code of Practice 14 (Governance and Administration of Public Service Pension Schemes).

To support LGPS funds with assessing their compliance with GCOP we created our GCOP Checker Tool which has been used by Oxfordshire Pension Fund (OPF) to complete a partial self-assessment.

- The GCOP is split into 5 sections with a total of 14 LGPS relevant chapters.
- Within these chapters there are 37 modules which are applicable to LGPS Funds.
- In 2024/25, OPF Officers reviewed 20 of these modules as shown in the table below.
- Work has also commenced on a further 17 modules, which Officers will report on at a future date.

The remaining modules will be assessed as part of a **second stage assessment in 2025/26.**

Chapter	Module	Review Status	OPF Self-assessment – 'full' compliance position
Board Structure and Activities	Recruitment and appointment to the governing body	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Knowledge and understanding	Knowledge and understanding	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
	Governance of knowledge and understanding	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%

Chapter	Module	Review Status	OPF Self-assessment – 'full' compliance position
Advisors and service providers	Managing advisers and service providers	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Risk Management	Assurance reports on internal controls	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
	Scheme continuity planning	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Funding and Investment	Climate change	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Scheme Administration	Planning and maintaining administration	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Information Handling	Financial transactions	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
	Record keeping	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
	Data monitoring and improvement	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
IT	Maintenance of IT systems	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
	Cyber controls	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	67% (1 requirement of 3 is partially compliant, 2 are fully compliant)

Chapter	Module	Review Status	OPF Self-assessment – 'full' compliance position
Contributions	Receiving contributions	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
	Monitoring contributions	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
	Resolving overdue contributions	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Information to members	General principles for member communication	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	50% (1 requirement of 2 is partially compliant, the other is fully compliant)
	Notification of right to cash transfer sum or contribution refund	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Public Information	Publishing scheme information (PSPS)	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Reporting to TPR: Whistleblowing – reporting breaches of the law	Reporting payment failures	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%

2 Methodology

To carry out the self-assessment, OPF Officers carried out a review of the modules above. This involved reviewing the requirements of GCOP set against the available evidence of fund compliance, such as OPF's policies and procedures. Based on this evidence, Officers indicated if they believed OPF was either **fully compliant**, **partially compliant** or **non-compliant** with each requirement.

The OPF GCOP Checker Tool was then shared with Hymans Robertson. The content was reviewed by 2 consultants who considered whether the evidence proposed by Officers appeared to support the purported level of compliance. This analysis was then checked by a senior consultant. The consultants met with representatives of OPF and based on their analysis, discussed and challenged the rationale behind the self-assessment. This helped Officers ensure they are comfortable with the compliance levels they had decided upon.

This report has been produced to detail the findings of those two stages. It assists Officers with onward reporting of their self-assessment GCOP position to both the Pension Board and Pension Committee and the development of an action plan.

3 Self-Assessment

The self-assessment concluded that of the 20 modules assessed there were 2 modules with a 50%-67% full compliance rate and the remaining modules are fully compliant at 100%. In each of the modules not deemed to be at full compliance, OPF Officers noted there was partial compliance and in each instance took an action to remedy this.

Officers noted there were outstanding actions relating to 16 of the requirements laid down in the GCOP. Of these, 2 requirements were noted by OPF Officers as being partially compliant. The remaining actions related to areas where Officers assessed the Fund to be fully compliant and are striving for enhanced levels of compliance.

4 Challenge and Oversight

OPF Officers held a challenge and oversight meeting with representatives of Hymans Robertson on 16 July 2025. The purpose of the meeting was to provide Officers, and by extension Board and Committee, with an increased comfort in the OPF's GCOP Compliance position. Following these discussions, Officers identified further areas for improvement that could be made both in ensuring compliance with GCOP and ensuring all evidence is noted to aid future compliance reviews.

From the meeting it was identified that there were 24 requirements where further steps could be taken, in addition to those previously identified by Officers. The majority of these steps relate to the logging of additional, existing evidence. It was also recommended that Officers add links and note where evidence can be located. This is to make future reviews less time consuming.

As an example, we suggested Officers take an action to note the Board Constitution covers the recruitment process in the list of evidence.

For one of the requirements - communicating with members about the late payment of contributions - Officers undertook to re-consider the Fund's compliance level. For the purpose of this report, we have not been informed if a different position has been taken so have retained the original self-assessed compliance grading provided by Officers.

5 Summary

Based on the information provided and our discussions with Officers, it is our opinion that OPF appears to be in a good position against the requirements of the General Code of Practice. It is our opinion that OPF holds a strong bank of evidence to demonstrate their self-assessed compliance position. Officers have followed a robust process to assess their compliance levels by utilising Hymans Robertson consultants to stress test Officer opinions and identify (where appropriate) gaps in evidence.

To confirm, Hymans Robertson are not able to certify a 'compliance position' for the Oxfordshire Pension Fund. However, we have been able to provide challenge and oversight, which can be used as evidence of a robust GCOP review process undertaken by Fund Officers.

6 Next steps

It is TPRs expectation that funds create an action plan to rectify requirements where full compliance has **not** been reached. It is recommended that Officers create a plan to complete the identified actions and agree a prioritisation process with the Pension Committee. Hymans Robertson anticipates supporting the Fund with its review of the areas of GCOP not considered as part of this review in 2026.

7 Notes

Hymans Desktop Assessment of Compliance

The results of the desktop review of the self-assessment are summarised in **Appendix 1** with a more detailed spreadsheet provided to officers. The desktop assessment concluded that the evidence provided in support of the self-assessment included:

- The documents which we would have anticipated, albeit we suggested additional documents for some requirements.
- Reference to the documents which we anticipated albeit some of those documents were not available for our review.

Challenge and Oversight Outputs

As a result of the challenge and oversight meeting OPF officers are comfortable with the assessment position, with only one requirement to be re-considered. Further supporting evidence and comments will be added to the self-assessment tool including, but not limited to, that listed in **Appendix 2**.

The meeting provided reassurance to officers that OPF is, in their opinion, largely compliant with the requirements assessed at this stage, however some areas were identified as requiring further work to ensure compliance is fully met and evidenced. These include:

- **IT and Cyber** – the Fund has an action to review contracts for data recovery arrangements to ensure best practice is met. It is apparent that officers **do** feed into the Oxfordshire County Council disaster recovery plan, however work is required to evidence this.
- **Information to members** – officers are in the process of ensuring that the general principles for member communications meet the requirements of the Occupational and Personal Pension Schemes (Disclosures of Information) Regulations 2013.
- **Oversight of internal controls** – where the Fund relies on a third party, including the Local Authority, for the provision of services, it needs to ensure it has oversight and input to ensure the internal controls operating are fit for purpose and the Fund is achieving value for its members.

Prepared by: -

Andrew McKerns, Michael Burton and Claire McDines

LGPS Governance, Administration and Projects Team

For and on behalf of Hymans Robertson LLP

Hymans Robertson LLP - Reliance and limitations

This advice has been prepared for Oxfordshire County Council as Administering Authority of the Oxfordshire Pension Fund for the purpose set out in this report. It has not been prepared for use for any other purpose and should not be so used. The advice should not be disclosed to any third party except as required by law or regulatory obligation or with our prior written consent. We accept no liability where the advice is used by or disclosed to a third party unless we have expressly accepted such liability in writing. Where this is permitted, the advice may only be released or otherwise disclosed in a complete form which fully discloses our advice and the basis on which it is given.

Appendix 1 - Summary of Desktop Assessment Outputs

Code Section and Chapter	Desktop Assessment Comments
Governing Body	
1. Board Structure and Activities	This section was partially assessed by Officers. This is to be completed by Officers in the year ahead. In our opinion, in the main the evidence provided in this section demonstrates GCOP requirement expectations. We have suggested adding additional documents to bolster evidence, in particular any details of guidance and instructions sent to the Committee Chair.
2. Knowledge and Understanding	This section was fully assessed by Officers. The evidence provided in this section strongly displays GCOP requirement expectations. We suggested including additional evidence such as the training plan, knowledge assessment and any bespoke training provided to Committee and Board members.
3. Advisers and Service Providers	This section was fully assessed by Officers. This only contains 'best practice' requirements, with a substantial amount of detail included for each requirement. The evidence provided appears to sufficiently demonstrate GCOP requirement expectations. However, we identified additional evidence that could be included to confirm OPF's input to the administering authority's procurement process.
4. Risk Management	This section was partially assessed by Officers. We largely agree with the rating and evidence, though 5 sections were identified as not providing enough information. The internal controls section in particular need further documented evidence to demonstrate the good practice being carried out at the Fund.
5. Scheme Governance	This section has **not** been assessed by Officers.
Funding and Investment	
6. Investment	Only one requirement in this section has been assessed. We agreed the self-assessed compliance rating for this requirement and the evidence provided appears sufficient.
Administration	
7. Scheme Administration	This section was fully assessed by Officers. The evidence provided in this section, in our opinion, strongly demonstrates GCOP requirement expectations.

8. Information Handling	This section was partially assessed by Officers. In the main, the evidence provided demonstrates GCOP requirement expectations. However, we suggest further evidence is required to establish the controls in place around financial transactions and data loss prevention.
9. IT & Cyber	This section was fully assessed by Officers. We recommend further evidence should be included to demonstrate OPF's input to cyber controls and monitoring. We agree the partial compliance rating for the best practice requirement and the actions planned by OPF Officers.
10. Contributions	This section was fully assessed by Officers. We recommend including further evidence to demonstrate the reconciliation process and how contributions and write offs are logged.
Communications and Disclosure	
11. Information to Members	This section was partially assessed by Officers. In the main, the evidence provided strongly demonstrates GCOP requirement expectations We recommend including timescale for requirement of partial compliance.
12. Public Information	This section was partially assessed by Officers. The evidence provided in this section strongly demonstrates GCOP requirement expectations.
Reporting to TPR	
13. Regular Reports	This section has not been assessed by Officers.
14. Reporting Breaches	This section was partially assessed by Officers. We suggest revisiting the requirement to report late contribution payments to members as we don't feel this requirement is being fully met.

Appendix 2 - Examples of additional evidence to be considered for inclusion in the self-assessment

- Existing assessments such as LGPS Online Learning Academy reporting and National Knowledge Assessment Results
- Induction packs issued to new Local Pension Board members
- Instructions or guidance issued to Pension Committee Chair
- Standard induction information for members
- Procurement information
- Audit reports (external and internal)
- Procedure notes for administration processes
- Data quality check reports
- Disaster recovery plan
- Cyber assurance reports provided by Oxfordshire County Council and third-party providers
- Training plans for officers
- Contribution log and reconciliation process note
- Breaches log

Oxfordshire Pension Fund
General Code of Practice Action Plan 2025/6

Project Stage	#	Action/task	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26
Project Maintenance	1	Review other LGPS fund committee/board reports for updates on their GCOP compliance													
Project Maintenance	2	Prioritise modules based on levels of requirement													
Carry Forward 24/5	3a	Cyber controls					Review Actions		Review Actions						
Carry Forward 24/5	3b	General principles for member communications	Review Actions	Review Actions		Review Actions			Review Actions						
Module Review 1	4	Role of the governing body													
Module Review 1	5	Meetings and decision-making													
Module Review 1	6	Appointment and role of the chair													
Module Review 2	7	Conflicts of interest							Review Actions						
Module Review 2	8	Internal controls													
Module Review 3	9	Identifying, evaluating and recording risks													
Module Review 3	10	Systems of governance													
Module Review 4	11	Benefit information statements (PSPS)													
Module Review 4	12	Scams													
Module Review 4	13	Dispute resolution procedures													
Module Review 5	14	Registrable information and scheme returns													
Module Review 5	15	How to report													
Module Review 5	16	Who must report													
Module Review 5	17	Decision to report													
Module Review 6	18	Transfers out													
Module Review 6	19	Investment governance													
Module Review 6	20	Investment monitoring													
Oversight and Challenge Project (Parts I & II) with Hymans Robertson															
3rd Party Review	21	Project plan and timetable agreed													
3rd Party Review Part I	22	Compliance checker with 23/37 modules reviewed, plus accompanying evidence, shared with Hymans Robertson													
3rd Party Review Part I	23	Hymans Robertson completes review of evidence and holds oversight meeting with Fund Officers													
3rd Party Review Part I	24	Hymans Robertson provides report of findings to be presented to PFC.													
3rd Party Review Part I	25	Fund officers take forward actions arising from the Oversight and Challenge report													
3rd Party Review Part II	26	Oversight and Challenge Project Part II will be undertaken in 2026/27, covering the final 14/37 modules.													

Scheduled tasks
Oversight and Challenge Project Part I
Oversight and Challenge Project Part II
Completed
Some requirements/actions still outstanding
Requirements/actions overdue

This page is intentionally left blank

Division(s): n/a

ITEM 10

PENSION FUND COMMITTEE

05 September 2025

ADMINISTRATION REPORT

Report by Executive Director Resources and Section 151 Officer

RECOMMENDATION

1. **The Committee is RECOMMENDED to note the position of the McCloud project and the decision to exercise the discretion provided by the LGPS (Information) Regulations 2024 not to reflect McCloud in some of the 2025 annual benefit statements.**

Executive Summary

2. This report updates the Committee on the key administration topics including service performance, statutory compliance, staffing, debt recovery and write offs in the last quarter.

Service Performance

Benefit Administration

3. Appendix 1 confirms the new case volumes in the last quarter, April to June 2025.

4. There were 6,603 new cases created, plus a carry forward of 2,025 cases from the previous period, totalling 8,628 cases to complete. The team completed 62.1% of the cases leaving a carry forward of 2,845 cases.

5. Most cases relate to members leaving and new starters, which makes up just under 50% of the benefit administration team's work.

6. Appendix 2 shows the work completed by the benefit administration team in the last quarter, April to June 2025. The team completed 5,356 cases, of which 75.2% were completed within Service Level Agreement (SLA), an increase of 4% from the previous quarter.

7. The team priority is the payment of benefits, which is evidenced here where most work is completed above 95% in SLA.

8. Appendix 3 provides comparative figures of the completed and outstanding statistics between April to June 2024 and April to June 2025.

9. A new reporting system within the pension software has been developed within the team in the last six months, which highlighted a considerable proportion of work relating to leaver cases not being reported previously.

10. The statistics show whilst the team have completed broadly the same number of cases, the number of new cases has increased. These statistics will help review and understand the resource required to meet the increasing workload.

11. Appendix 4 contains the telephone statistics for the period April to June 2025.

12. Appendix 5 shows a comparison of the telephone statistics between April to June 2024 and April to June 2025. The team have increased the number of calls answered by 11% on the previous year.

13. There have been no pension scams reported in the last quarter April to June 2025. All transfer payments made from the scheme are checked vigilantly to ensure due diligence checks have been conducted correctly.

Statutory Returns

14. A breach report will be submitted to the Pension Regulator by 30 September 2025 in connection with the Fire Scheme Active and Deferred benefit statements affected by the fire scheme remedy which were not issued by 31 March 2025, due to outstanding regulation queries and complexities with the cases.

Fire Service Administration

15. Appendix 6 shows the Firefighter Scheme administration statistics for the last quarter April to June 2025. The team completed 121 cases of which 82.88% were completed within SLA deadline, an increase of 1.88% from the previous quarter.

16. The complexity of the work of the Fire Scheme requires ongoing training and the additional projects Fire Remedy and Second Options add to the complexity of this work. This has contributed in some cases falling outside the SLA deadlines.

Employer Monthly Returns

17. In the last quarter April to June 2025, the team verified 97% of monthly data returns within service level agreement (SLA). There were 3% of returns (15 employers) not vetted due to on-going data queries with the employer and changes in payroll providers requiring further work to ensure data submitted is correct.

18. The team had 177 tasks outstanding on 30 June 2025, 18 of which relate to 2024-25. Most tasks (144) were created in May; these were not completed within SLA due to the team resource focusing on end of year work.

19. In the last quarter, to 30 June 2025 there were:
    - 0 new admissions
    - 2 academy conversions
    - 3 closure valuations

End of Year

20. At the point of writing this report, 554 (2%) of annual benefit statements relating to 89 employers have been issued and 17,994 (80%) are currently in the process of being run.

21. There are 35 members with outstanding queries to be resolved with the employers. These are being closely monitored and will be escalated as necessary to ensure records are correct to issue statements by 31 August 2025.

22. The additional complexities with the McCloud figures and communication is challenging, and the team are working hard to ensure we meet the deadline to issue all statements by 31 August 2025.

Member Self Service

23. Appendix 7 confirms the Member Self-service sign up as of 30 June 2025. The statistics are split into categories registered, not registered (where no positive election has been made) and opted not to use.

24. There has been no significant movement in these statistics over the last year. A communication push to sign up will be tied into the project for the installation of the upgraded member self-service, Engage, due to go live in January 2026.

Financial Implications

Transfers

25. In the last quarter April to June 2025, a report on the values of transfers paid in and out of the fund confirmed £4.6 million was transferred into the fund and £7.5 million was transferred out of the fund, of which £400k related to payments made to non-Local Government Authorities.

26. The table below provides a breakdown of the values and numbers of transfers out payments made to non-Local Authorities in the last quarter April to June 2025.

Value	Number of payments made	Total Amount Transferred
Under £10k	11	£41,043.37
£10k to £25k	8	£123,777.82
£25k to £50k	2	£63,198.02
£50k to £100k	0	0
£100k to £250k	1	£169,127.80
Over £250k	0	0

27. The total paid out is £82,041 less than the last quarter January to March 2025, and most payments remain on the lower values. There are no concerns to report.

Invoices Outstanding

28. On 30 June 2025, there were 4 outstanding invoices amounting to £180,027.61, 4 invoices of which are overdue amounting to £124,994.47 and have been referred to legal to pursue.

Employer Contribution Monitoring

29. In the quarter April to June 2025, 5 payments were made past the statutory deadline of 22nd of the month following payroll. These relate to 3 small employers affecting a total of 6 members, none of which require further action at this point but are being monitored.

30. The deadline for returns has been historically 19th of the month in our Administration Strategy. Most employers submit their returns electronically, and the statutory guidance for electronic returns is 22nd of the following month. Only those employers making late payments after 22nd of the month will be included in this report going forward.

Complaints

31. The table below shows number of complaints for the previous financial year 2024-25 and in the last quarter of the current financial year April to June 2025.

Year	Informal	Resolved	IDRP Stage 1	Upheld	IDRP Stage 2	Upheld	TPO
2024/25	27	24	4	2	1	0	1
2025/26	9	6	6	2	0	0	0

32. The common nature of complaints is around payment of pensions and

processes. These are reviewed on an individual basis under the relevant regulations that apply to the member and any flaw identified in our process that is reviewed.

Legal Implications

Pension Dashboard Project

33. Appendix 8 confirms the current position of Pension Dashboard project plan.

34. There are two areas not on track, showing as 75% complete. This relates to the pension dashboard registration codes that are issued by The Pension Regulator (TPR). There is one code outstanding for the Firefighters scheme; this is being followed up with TPR.

35. Meetings will be held from September onwards to finalise decisions on matching criteria and AVC data connection so that we are connected to the Dashboard by 31 October 2025.

McCloud Project

36. Appendix 9 confirms the position of the McCloud Project.

37. The team have completed 96% (9,596) status 1 and 4 cases which will include the McCloud protection in the 2025 Annual Benefit Statements.

38. An application to exercise the discretion under the LGPS (Information Regulations 2024 not to include the McCloud protection in the figures in the 2025 Annual Benefit Statements for a small group of members, allowing us to extend the implementation to 31 August 2026.

39. All affected members will be notified of their position in the 2025 Annual Benefit Statements, in line with the disclosure regulations.

40. The deadline for completing the McCloud project is 31 August 2025, however the statutory requirement only applies to the annual benefit statements. It is recommended that a project plan is developed to detail the reasons the cases were not complete and a plan on how these will be completed by 31 August 2026.

41. Appendix 10 confirms the extended McCloud project plan, which details the areas of work outstanding and timeframes for completion of the project.

42. It should be noted that whilst every effort has been made to identify all members in scope of the McCloud remedy, there will be further cases identified going forward and this has been built into the day-to-day processes within the benefit administration team.

Age Discrimination Remedy – Fire Service

43. At the point of writing this report there are 12 active and deferred statements outstanding, 6 are awaiting regulatory guidance, and 6 are awaiting further information in relation to pension rights held with another body or Fire Authority.

44. Statements for pensions in payment where all rights were under the 1992 or 2006 schemes were issued in March 2025 for most pensioners. There are 35 pensioner cases remaining; 18 of these are immediate detriment cases where we are waiting guidance on how to review. 17 are existing pensioners who will be contacted as soon as possible. A breach will be reported to the Pension Regulator for these cases.

On-call Second Options Exercise – Fire Service

45. Payment of pension benefits due is underway, with 23 pensioners having received their benefits to date (£1.2 million paid gross to date).

46. The work is proving to be complex, with many different scenarios. Advice has been issued and is also being sought from LGA in cases where further guidance is required, or where action to take is not clear.

47. A consultation on extending the deadline for completion of the work to 31 March 2026, and proposed amendments to existing regulations has closed and the outcome is still awaited. Confirmation has been received that the deadline will be extended until at least 31 March 2026.

48. Follow up communications need to be issued for those who have not yet received their quotations to confirm revised timescales.

49. Work will be prioritised into 3 groups: Cohort 1 cases (78 remaining) plan to be completed by the end of September. Cohort 2 cases (19) completed by the end of October 2025 and the remaining Cohort 3 cases (133) completed by February 2026.

50. Once the amending legislation has been received, and clarity on this has also been received, we will also need to review eligible cases, and where necessary, send revised quotes, or contact relatives of deceased members.

Staffing

51. The team are carrying vacancies of 2 Pension Support Officers, 2 Senior Administrator and 3 Administrators. Two agency staff have been appointed to cover the work of the Pension Support Officer; these will also support the wider team whilst the other vacancies are recruited.

52. Recruitment remains challenging as candidates increasingly use AI for applications, complicating shortlisting and leading to less successful interviews.

53. Advice is being sought on how these difficulties are overcome, and other options are being explored, including the increased use of automation in the system, to reduce the amount of manual intervention freeing up time to focus on developing staff to process the work.

Lorna Baxter

Annex:	1 – Benefit Administration Statistics 2 – E-mail statistics 3 – Telephone statistics 4 – MSS Registration statistics 5 – Pension Dashboard project plan 6 – McCloud statistics
Background papers:	Nil
Contact Officer:	Vicki Green, Pension Administration Manager, 01865 323660, vicki.green@oxfordshire.gov.uk

September 2025

This page is intentionally left blank

HYMANS ROBERTSON

Oxfordshire Pension Fund

TPR General Code of Practice Compliance Report

August 2025

Andrew McKerns, Michael Burton and Claire McDines

LGPS Governance, Administration and Projects Team
For and on behalf of Hymans Robertson LLP

Contents

TPR General Code of Practice Compliance Report

		Page
1	Fund Compliance Position	1
2	Methodology	4
3	Self-Assessment	4
4	Challenge and Oversight	4
5	Summary	5
6	Next steps	5
7	Notes	5

Appendices

Appendix 1 - Summary of Desktop Assessment Outputs

Appendix 2 - Examples of additional evidence to be considered for inclusion in the self-assessment

1 Fund Compliance Position

On 27 March 2024 The Pensions Regulator's (TPR) new General Code of Practice (GCOP) came into force. The GCOP consolidates and refreshes previous Codes into a single Code for all pension schemes. For Public Service Pension Schemes the GCOP replaces Code of Practice 14 (Governance and Administration of Public Service Pension Schemes).

To support LGPS funds with assessing their compliance with GCOP we created our GCOP Checker Tool which has been used by Oxfordshire Pension Fund (OPF) to complete a partial self-assessment.

- The GCOP is split into 5 sections with a total of 14 LGPS relevant chapters.
- Within these chapters there are 37 modules which are applicable to LGPS Funds.
- In 2024/25, OPF Officers reviewed 20 of these modules as shown in the table below.
- Work has also commenced on a further 17 modules, which Officers will report on at a future date.

The remaining modules will be assessed as part of a **second stage assessment in 2025/26.**

Chapter	Module	Review Status	OPF Self-assessment – 'full' compliance position
Board Structure and Activities	Recruitment and appointment to the governing body	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Knowledge and understanding	Knowledge and understanding	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
	Governance of knowledge and understanding	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%

Chapter	Module	Review Status	OPF Self-assessment – 'full' compliance position
Advisors and service providers	Managing advisers and service providers	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Risk Management	Assurance reports on internal controls	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
	Scheme continuity planning	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Funding and Investment	Climate change	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Scheme Administration	Planning and maintaining administration	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Information Handling	Financial transactions	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
	Record keeping	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
	Data monitoring and improvement	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
IT	Maintenance of IT systems	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
	Cyber controls	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	67% (1 requirement of 3 is partially compliant, 2 are fully compliant)

Chapter	Module	Review Status	OPF Self-assessment – 'full' compliance position
Contributions	Receiving contributions	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
	Monitoring contributions	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
	Resolving overdue contributions	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Information to members	General principles for member communication	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	50% (1 requirement of 2 is partially compliant, the other is fully compliant)
	Notification of right to cash transfer sum or contribution refund	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Public Information	Publishing scheme information (PSPS)	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%
Reporting to TPR: Whistleblowing – reporting breaches of the law	Reporting payment failures	Assessed by OPF and reviewed by Hymans Robertson - 2024/25	100%

2 Methodology

To carry out the self-assessment, OPF Officers carried out a review of the modules above. This involved reviewing the requirements of GCOP set against the available evidence of fund compliance, such as OPF's policies and procedures. Based on this evidence, Officers indicated if they believed OPF was either **fully compliant**, **partially compliant** or **non-compliant** with each requirement.

The OPF GCOP Checker Tool was then shared with Hymans Robertson. The content was reviewed by 2 consultants who considered whether the evidence proposed by Officers appeared to support the purported level of compliance. This analysis was then checked by a senior consultant. The consultants met with representatives of OPF and based on their analysis, discussed and challenged the rationale behind the self-assessment. This helped Officers ensure they are comfortable with the compliance levels they had decided upon.

This report has been produced to detail the findings of those two stages. It assists Officers with onward reporting of their self-assessment GCOP position to both the Pension Board and Pension Committee and the development of an action plan.

3 Self-Assessment

The self-assessment concluded that of the 20 modules assessed there were 2 modules with a 50%-67% full compliance rate and the remaining modules are fully compliant at 100%. In each of the modules not deemed to be at full compliance, OPF Officers noted there was partial compliance and in each instance took an action to remedy this.

Officers noted there were outstanding actions relating to 16 of the requirements laid down in the GCOP. Of these, 2 requirements were noted by OPF Officers as being partially compliant. The remaining actions related to areas where Officers assessed the Fund to be fully compliant and are striving for enhanced levels of compliance.

4 Challenge and Oversight

OPF Officers held a challenge and oversight meeting with representatives of Hymans Robertson on 16 July 2025. The purpose of the meeting was to provide Officers, and by extension Board and Committee, with an increased comfort in the OPF's GCOP Compliance position. Following these discussions, Officers identified further areas for improvement that could be made both in ensuring compliance with GCOP and ensuring all evidence is noted to aid future compliance reviews.

From the meeting it was identified that there were 24 requirements where further steps could be taken, in addition to those previously identified by Officers. The majority of these steps relate to the logging of additional, existing evidence. It was also recommended that Officers add links and note where evidence can be located. This is to make future reviews less time consuming.

As an example, we suggested Officers take an action to note the Board Constitution covers the recruitment process in the list of evidence.

For one of the requirements - communicating with members about the late payment of contributions - Officers undertook to re-consider the Fund's compliance level. For the purpose of this report, we have not been informed if a different position has been taken so have retained the original self-assessed compliance grading provided by Officers.

5 Summary

Based on the information provided and our discussions with Officers, it is our opinion that OPF appears to be in a good position against the requirements of the General Code of Practice. It is our opinion that OPF holds a strong bank of evidence to demonstrate their self-assessed compliance position. Officers have followed a robust process to assess their compliance levels by utilising Hymans Robertson consultants to stress test Officer opinions and identify (where appropriate) gaps in evidence.

To confirm, Hymans Robertson are not able to certify a 'compliance position' for the Oxfordshire Pension Fund. However, we have been able to provide challenge and oversight, which can be used as evidence of a robust GCOP review process undertaken by Fund Officers.

6 Next steps

It is TPRs expectation that funds create an action plan to rectify requirements where full compliance has **not** been reached. It is recommended that Officers create a plan to complete the identified actions and agree a prioritisation process with the Pension Committee. Hymans Robertson anticipates supporting the Fund with its review of the areas of GCOP not considered as part of this review in 2026.

7 Notes

Hymans Desktop Assessment of Compliance

The results of the desktop review of the self-assessment are summarised in **Appendix 1** with a more detailed spreadsheet provided to officers. The desktop assessment concluded that the evidence provided in support of the self-assessment included:

- The documents which we would have anticipated, albeit we suggested additional documents for some requirements.
- Reference to the documents which we anticipated albeit some of those documents were not available for our review.

Challenge and Oversight Outputs

As a result of the challenge and oversight meeting OPF officers are comfortable with the assessment position, with only one requirement to be re-considered. Further supporting evidence and comments will be added to the self-assessment tool including, but not limited to, that listed in **Appendix 2**.

The meeting provided reassurance to officers that OPF is, in their opinion, largely compliant with the requirements assessed at this stage, however some areas were identified as requiring further work to ensure compliance is fully met and evidenced. These include:

- **IT and Cyber** – the Fund has an action to review contracts for data recovery arrangements to ensure best practice is met. It is apparent that officers **do** feed into the Oxfordshire County Council disaster recovery plan, however work is required to evidence this.
- **Information to members** – officers are in the process of ensuring that the general principles for member communications meet the requirements of the Occupational and Personal Pension Schemes (Disclosures of Information) Regulations 2013.
- **Oversight of internal controls** – where the Fund relies on a third party, including the Local Authority, for the provision of services, it needs to ensure it has oversight and input to ensure the internal controls operating are fit for purpose and the Fund is achieving value for its members.

Prepared by: -

Andrew McKerns, Michael Burton and Claire McDines

LGPS Governance, Administration and Projects Team

For and on behalf of Hymans Robertson LLP

Hymans Robertson LLP - Reliance and limitations

This advice has been prepared for Oxfordshire County Council as Administering Authority of the Oxfordshire Pension Fund for the purpose set out in this report. It has not been prepared for use for any other purpose and should not be so used. The advice should not be disclosed to any third party except as required by law or regulatory obligation or with our prior written consent. We accept no liability where the advice is used by or disclosed to a third party unless we have expressly accepted such liability in writing. Where this is permitted, the advice may only be released or otherwise disclosed in a complete form which fully discloses our advice and the basis on which it is given.

Appendix 1 - Summary of Desktop Assessment Outputs

Code Section and Chapter	Desktop Assessment Comments
Governing Body	
1. Board Structure and Activities	This section was partially assessed by Officers. This is to be completed by Officers in the year ahead. In our opinion, in the main the evidence provided in this section demonstrates GCOP requirement expectations. We have suggested adding additional documents to bolster evidence, in particular any details of guidance and instructions sent to the Committee Chair.
2. Knowledge and Understanding	This section was fully assessed by Officers. The evidence provided in this section strongly displays GCOP requirement expectations. We suggested including additional evidence such as the training plan, knowledge assessment and any bespoke training provided to Committee and Board members.
3. Advisers and Service Providers	This section was fully assessed by Officers. This only contains ‘best practice’ requirements, with a substantial amount of detail included for each requirement. The evidence provided appears to sufficiently demonstrate GCOP requirement expectations. However, we identified additional evidence that could be included to confirm OPF’s input to the administering authority’s procurement process.
4. Risk Management	This section was partially assessed by Officers. We largely agree with the rating and evidence, though 5 sections were identified as not providing enough information. The internal controls section in particular need further documented evidence to demonstrate the good practice being carried out at the Fund.
5. Scheme Governance	This section has **not** been assessed by Officers.
Funding and Investment	
6. Investment	Only one requirement in this section has been assessed. We agreed the self-assessed compliance rating for this requirement and the evidence provided appears sufficient.
Administration	
7. Scheme Administration	This section was fully assessed by Officers. The evidence provided in this section, in our opinion, strongly demonstrates GCOP requirement expectations.

8. Information Handling	This section was partially assessed by Officers. In the main, the evidence provided demonstrates GCOP requirement expectations. However, we suggest further evidence is required to establish the controls in place around financial transactions and data loss prevention.
9. IT & Cyber	This section was fully assessed by Officers. We recommend further evidence should be included to demonstrate OPF's input to cyber controls and monitoring. We agree the partial compliance rating for the best practice requirement and the actions planned by OPF Officers.
10. Contributions	This section was fully assessed by Officers. We recommend including further evidence to demonstrate the reconciliation process and how contributions and write offs are logged.
Communications and Disclosure	
11. Information to Members	This section was partially assessed by Officers. In the main, the evidence provided strongly demonstrates GCOP requirement expectations We recommend including timescale for requirement of partial compliance.
12. Public Information	This section was partially assessed by Officers. The evidence provided in this section strongly demonstrates GCOP requirement expectations.
Reporting to TPR	
13. Regular Reports	This section has not been assessed by Officers.
14. Reporting Breaches	This section was partially assessed by Officers. We suggest revisiting the requirement to report late contribution payments to members as we don't feel this requirement is being fully met.

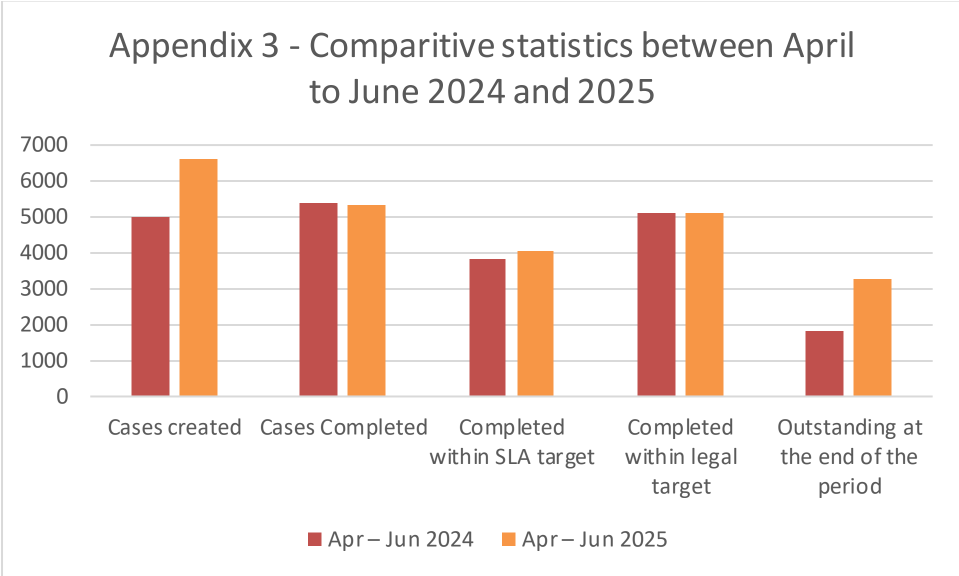
Appendix 2 - Examples of additional evidence to be considered for inclusion in the self-assessment

- Existing assessments such as LGPS Online Learning Academy reporting and National Knowledge Assessment Results
- Induction packs issued to new Local Pension Board members
- Instructions or guidance issued to Pension Committee Chair
- Standard induction information for members
- Procurement information
- Audit reports (external and internal)
- Procedure notes for administration processes
- Data quality check reports
- Disaster recovery plan
- Cyber assurance reports provided by Oxfordshire County Council and third-party providers
- Training plans for officers
- Contribution log and reconciliation process note
- Breaches log

Subcategory	Complete at End of Period	# Completed Within Customer Target	% Complete Within Customer Target	# Completed Within KPI Target	% Complete Within KPI Target	# Completed Within Legally Required Response Time	% Complete Within Legal Target
Grand Total	**5,356**	**4,030**	**75.2%**	**4,013**	**74.9%**	**5,113**	**95.5%**
B1: Communication issued with acknowledgement of death of active, deferred, pensioner and dependent member	153	147	96.1%	93	60.8%	153	100.0%
B2: Communication issued confirming benefits payable	142	124	87.3%	124	87.3%	141	99.3%
B2: Communication issued confirming benefits payable (frozen refund)	2	2	100.0%	2	100.0%	2	100.0%
B2: Communication issued confirming payment of death grant	32	32	100.0%	32	100.0%	32	100.0%
B3: Communication issued to deferred member with confirmation of pension and lump sum options (actual)	264	256	97.0%	256	97.0%	263	99.6%
B3: Communication issued to deferred member with pension and lump sum options (quotation)	159	155	97.5%	155	97.5%	158	99.4%
B4: Communication issued to active member with confirmation of pension and lump sum options (actual)	119	97	81.5%	97	81.5%	115	96.6%
B4: Communication issued to active member with pension and lump sum options (quotation)	12	11	91.7%	11	91.7%	12	100.0%
B4: Communication issued to confirm recalculated benefits (actual)	15	5	33.3%	5	33.3%	15	100.0%
B5: Communication issued with deferred benefit options	426	152	35.7%	133	31.2%	247	58.0%
B5: Communication issued with frozen refund options	292	90	30.8%	70	24.0%	235	80.5%
B5: Communication issued with recalculated deferred benefit options	12	2	16.7%	3	25.0%	12	100.0%
B5: Communication issued with recalculated frozen refund options	18	7	38.9%	9	50.0%	18	100.0%
B6: Communication issued to scheme member providing quotation of interfund in	150	87	58.0%	109	72.7%	150	100.0%
B6: Communication issued to scheme member with completion of interfund in	93	76	81.7%	82	88.2%	93	100.0%
B7: Communication issued to scheme member with completion of interfund out	3	3	100.0%	3	100.0%	3	100.0%
B7: Communication issued to scheme memberproviding quotation of interfund out	51	41	80.4%	45	88.2%	51	100.0%
B8: Payment of refund	221	209	94.6%	216	97.7%	221	100.0%
B9: Divorce quotation	42	36	85.7%	42	100.0%	42	100.0%
B10: Communication issued following actual divorce proceedings i.e application of a Pension Sharing Order	0	0		0		0	
B11: Member estimates requested by scheme member and employer	146	109	74.7%	127	87.0%	146	100.0%
B12: Communication issued to new starters	1,088	1,088	100.0%	1,088	100.0%	1,088	100.0%
B13: Communication issued to member who has rejoined the scheme (Actual)	218	57	26.1%	39	17.9%	218	100.0%
B13: Communication issued to member who has rejoined the scheme (Quote)	46	12	26.1%	4	8.7%	46	100.0%
B14: Transfers in (including club transfers) Actual	22	21	95.5%	22	100.0%	22	100.0%
B14: Transfers in (including club transfers) Quotation	25	8	32.0%	20	80.0%	25	100.0%
B15: Transfers out (including club transfers) Actual	1	0	0.0%	0	0.0%	1	100.0%
B15: Transfers out (including club transfers) Quotation	124	65	52.4%	87	70.2%	124	100.0%
B16: Communication issued to members to confirm set up of additional contributions	21	19	90.5%	20	95.2%	21	100.0%
B17: Trivial commutation paperwork issued to member (payment)	4	3	75.0%	3	75.0%	4	100.0%
B17: Trivial commutation paperwork issued to member (quotation)	36	25	69.4%	25	69.4%	36	100.0%
B18: Communication issued with concurrent merge options	172	38	22.1%	38	22.1%	172	100.0%
B19: Communication with member and provider for additional voluntary contributions	3	3	100.0%	3	100.0%	3	100.0%
B20: Pension enquiry received from customer (member, 3rd party)	695	514	74.0%	514	74.0%	695	100.0%
B21: Updating member's personal details	236	229	97.0%	229	97.0%	236	100.0%
B22: Communication sent to members chasing decision on frozen refund	158	158	100.0%	158	100.0%	158	100.0%
B22: Initial request issued to previous LG fund for interfund information	155	149	96.1%	149	96.1%	155	100.0%

This page is intentionally left blank

Appendix 3 - Benefit Administration Comparative Statistics



Period	Cases created	Cases Completed	Completed within SLA target	SLA %	Completed within legal target	Legal %	Outstanding at the end of the period
Apr – Jun 2024	5010	5381	3837	71%	5090	95%	1816
Apr – Jun 2025	6,603	5,356	4,028	75.2%	5,113	95.5%	3,272

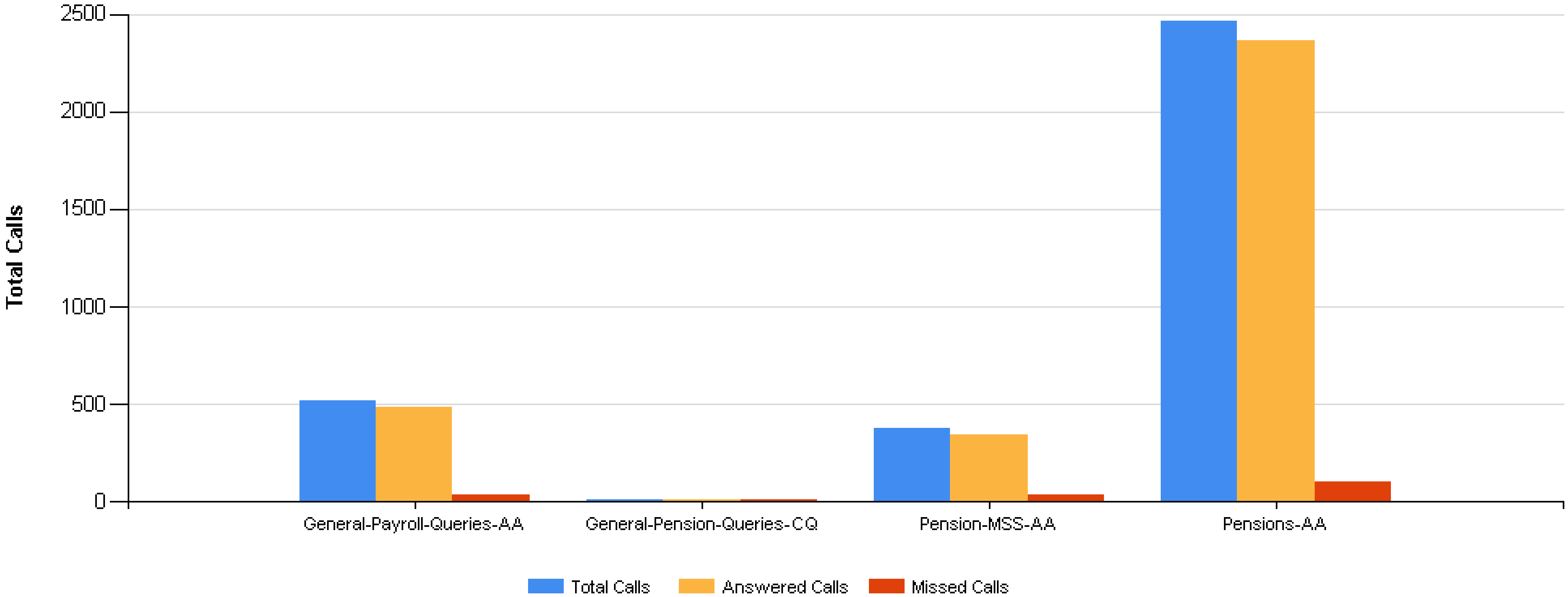
This page is intentionally left blank

Summary grouped by Auto attendants, Queue

01/04/2025 - 30/06/2025 (UTC+00:00) Dublin, Edinburgh, Lisbon, London

Call Direction Out In Internal

Page 203



Auto attendant	Queue name	Total Calls	Answered Calls	Answered Calls %	Missed Calls	Missed Calls %	Incoming Calls	Internal Calls	VM Calls	Answered Calls RT 0-60sec	Answered with RT over 61sec	Avg Ring time	Total Duration	Avg Duration
General-Payroll-Queries-AA	Pensions-Systems-Team-CQ	519	483	93.06	36	6.94	519	0	71	411	72	0:00:22	24:30:07	0:03:02

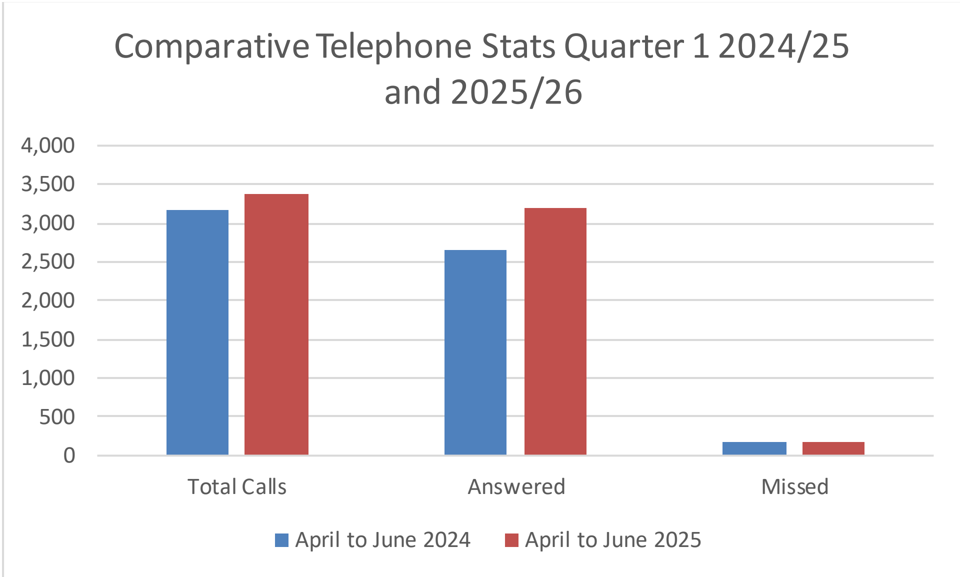
Summary grouped by Auto attendants, Queue

01/04/2025 - 30/06/2025 (UTC+00:00) Dublin, Edinburgh, Lisbon, London

Call Direction Out In Internal

General-Pension-Queries-CQ	General-Pension-Queries-CQ	12	5	41.67	7	58.33	12	0	2	3	2	0:00:32	0:07:00	0:01:24
Pension-MSS-AA	Pension-MSS-CQ	375	339	90.40	36	9.60	375	0	82	247	92	0:00:37	16:36:46	0:02:56
Pensions-AA	pension-benefit-administration-CQ	1901	1813	95.37	88	4.63	1899	2	509	1053	760	0:00:57	129:45:15	0:04:17
Pensions-AA	Pension-employer-team-CQ	142	135	95.07	7	4.93	142	0	100	75	60	0:00:58	3:33:42	0:01:34
Pensions-AA	pension-Fire-Service-Pension-Scheme-CQ	36	35	97.22	1	2.78	36	0	25	14	21	0:00:57	1:22:11	0:02:20
Pensions-AA	pension-payroll-CQ	277	276	99.64	1	0.36	277	0	131	192	84	0:00:52	11:06:18	0:02:24
Pensions-AA	pension-self-service-CQ	107	107	100.00	0	0.00	107	0	46	50	57	0:00:57	4:22:52	0:02:27
Total for 3369 calls														
		3369	**3193**	**94.78**	**176**	**5.22**	**3367**	**2**	**966**	**2045**	**1148**	**0:00:49**	**191:24:11**	**0:03:35**

Appendix 5 – Telephone Statistics



Period	Total Calls	Answered	Missed	% Answered
April to June 2024	3,158	2,649	171	84%
April to June 2025	3,369	3,193	176	95%

This page is intentionally left blank

Monthly SLA Statistics

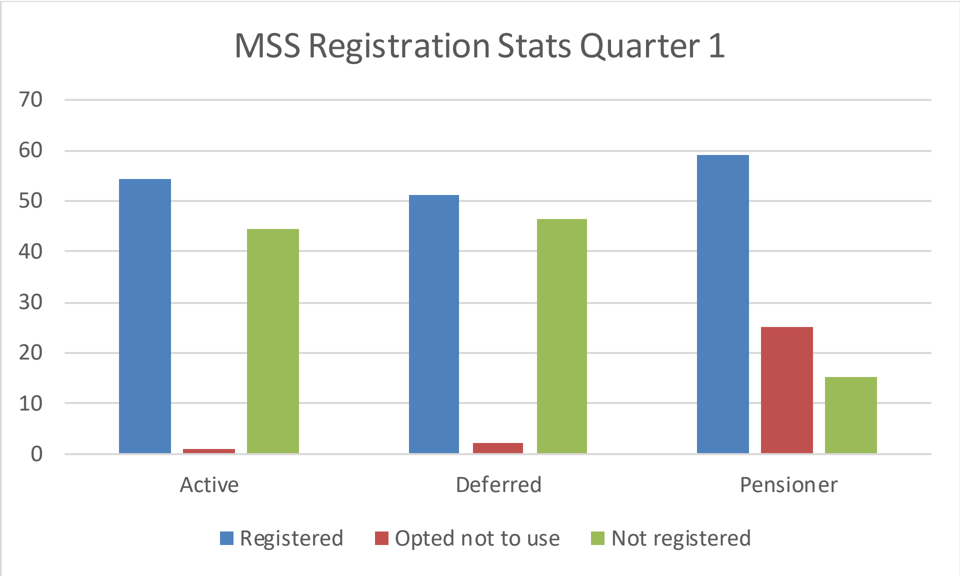
Subject	SLA Target	Apr to June 25 Total number completed	Number achieved within target	Number over target	% Achieved in SLA deadline
Deaths	**95%**	5	0	5	0.00%
Retirement Quote	**95%**	2	1	1	50.00%
Retirement Actual	**95%**	3	3	0	100.00%
Divorce	**95%**	0	0	0	0.00%
After retirement adjustments	**90%**	3	3	0	100.00%
Payroll Input	**95%**	39	39	0	100.00%
Transfer In	**90%**	2	0	2	0.00%
Transfer out	**95%**	2	0	2	0.00%
Member Estimate	**95%**	6	2	4	33.33%
Additional Conts	**95%**	4	3	1	75.00%
HR Estimate	**90%**	0	0	0	0.00%
Refunds	**90%**	1	0	1	0.00%
Re-employments	**95%**	3	1	2	33.33%
Leavers	**95%**	14	12	2	85.71%
Member Queries	**90%**	35	30	5	85.71%
Pension Saving Statement / AA	**95%**	1	1	0	100.00%
Remedy	**95%**	1	1	0	100.00%
New Starters	**95%**	25	25	0	100.00%
IDRP	**95%**	0	0	0	0.00%
Member changes	**90%**	0	0	0	0.00%
Totals / Average Overall		146	121	25	**82.88%**

SLA not met

Standard SLA met

This page is intentionally left blank

Appendix 7 – Member Self-Service Statistics



Quarter 1 – at June 2025

	Active		Deferred		Pensioner	
Registered	12,355	54.36%	15,460	51.24%	12,201	59.04%
Opted not to use	266	1.17%	640	2.12%	5,152	24.93%
Not registered	10,107	44.47%	14,075	46.65%	3,147	15.23%

Benchmark - at March 2025

	Active		Deferred		Pensioner	
Registered	12,185	54.16%	15,511	51.5%	11,924	59.17%
Opted not to use	268	1.19%	651	2.16%	5,157	25.59%
Not registered	10,046	44.65%	13,957	46.34%	1,923	9.54%

This page is intentionally left blank

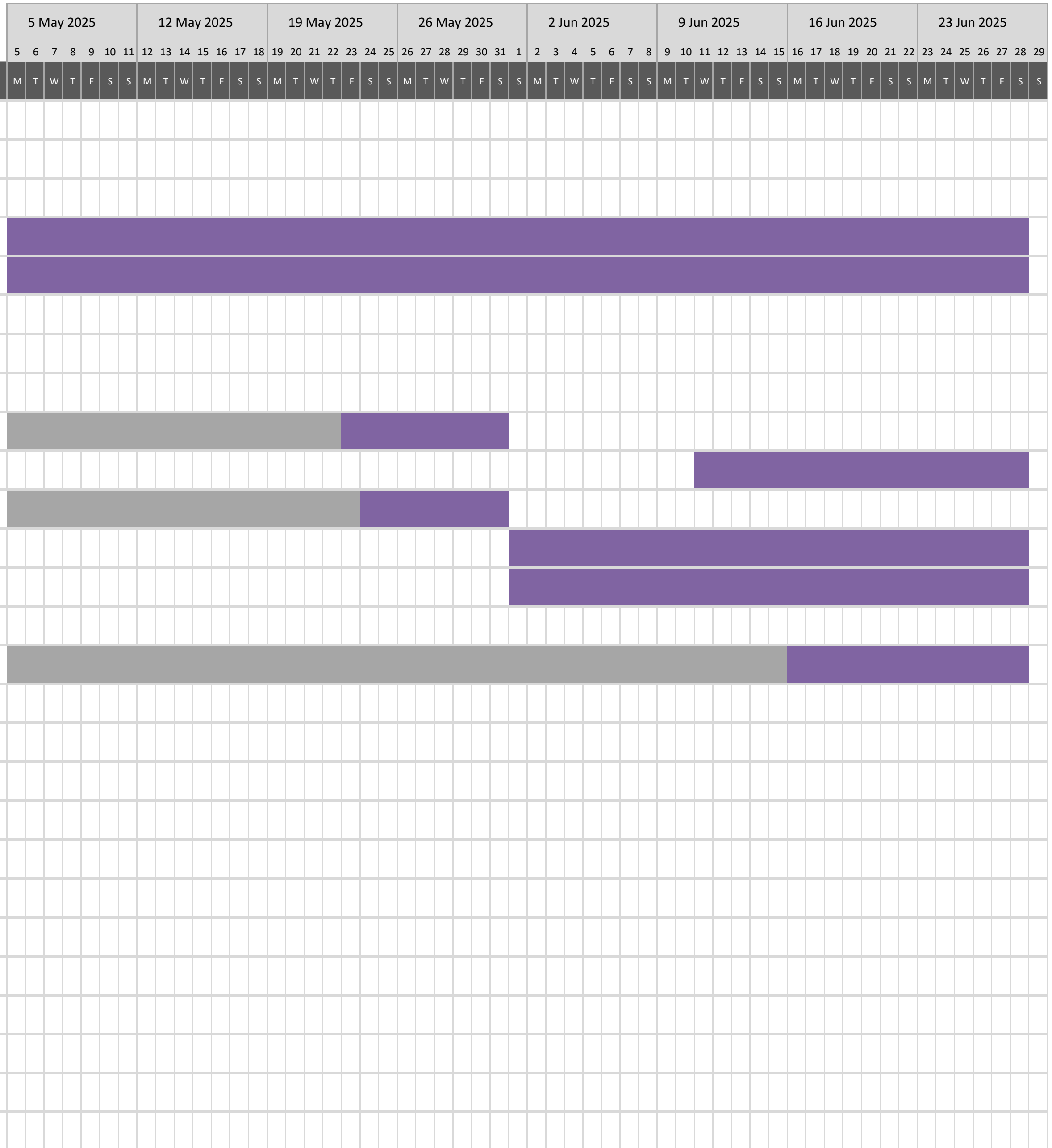
Pension Dashboard

Oxfordshire Pension Fund

Project Start: Sat, 01/06/2024

Display Week: 50

TASK	ASSIGNED TO	PROGRESS	START	END
Planning				
Project Scoping	R Salsbury	100%	1/6/24	30/6/24
ISP Scoping / Decision	M Smith / V Green	100%	17/6/24	31/3/25
Committee / Pension Board updates	V Green	n/a	1/9/24	31/3/26
Monthly updates at Manager meetings	R Salsbury	n/a	1/6/24	31/3/26
Testing - our connection deadline is 31/10/25				
ISP Connection set up in Test Service		100%	1/3/25	29/4/25
Test sending data to ISP		100%	29/4/25	29/4/25
Test matching criteria	Systems Team	75%	29/4/25	31/5/25
Determine Matching criteria - timings tbc	Managers	0%	11/6/25	30/9/25
Codes received from TPR for 4 schemes	R Salsbury	75%	1/5/25	31/5/25
Register with MaPS Governance Register (when	R Salsbury / V Green	0%	1/6/25	31/10/25
Set up and Complete Internal Controls Register	R Salsbury / V Green	0%	1/6/25	31/10/25
Heywood Phase 2 work to complete connection	Heywood / R Salsbury	0%	1/8/25	31/8/25
AVC (L&G and Prudential) - data connection tbc	R Salsbury / V Green	25%	1/5/25	31/10/25
Go Live Planning				
Enquiries - who will deal with these		0%	1/11/25	31/3/26
Workflow - what changes required		0%	1/11/25	31/3/26
Comms - what required for scheme members		0%	1/11/25	31/3/26
Employer communication - what involved		0%	1/11/25	31/3/26
Decide on frequesncy of upload to ISP		0%	1/11/25	31/3/26
Go Live execution				
Dashboards Available point - 6 months notice will be given by Central Government		0%	tbc	tbc
Decide who will deal with queries - resource?		0%	tbc	tbc
Team Training		0%	tbc	tbc
Processes documented		0%	tbc	tbc

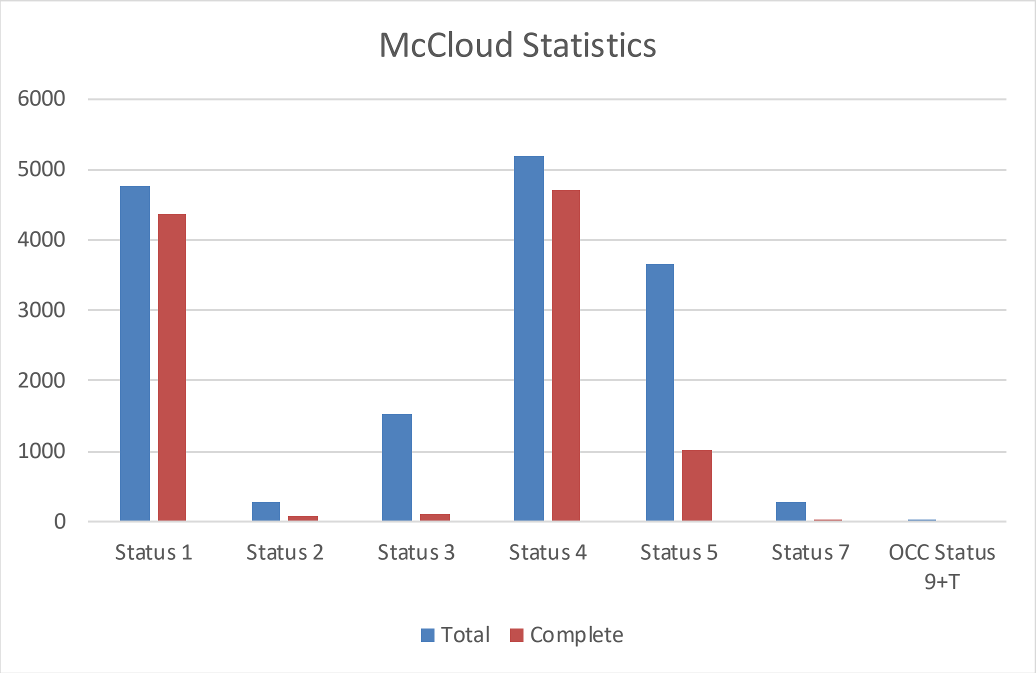


Display Week: 50

					5 May 2025							12 May 2025							19 May 2025							26 May 2025							2 Jun 2025							9 Jun 2025							16 Jun 2025							23 Jun 2025						
					5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29
TASK	ASSIGNED TO	PROGRESS	START	END	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S
Record operational information statistics		0%	tbc	tbc																																																				
Breach reporting process to document		0%	tbc	tbc																																																				
Workflows set up		0%	tbc	tbc																																																				
Insert new rows ABOVE this one																																																												

Page 212

Appendix 9 – McCloud Project



All Employers	Total Records in Scope	Total Records Completed	% Completed
Status 1	4759	4605	96%
Status 2	286	111	40%
Status 3	1516	212	14%
Status 4	5197	5033	97%
Status 5	3672	3053	83%
Status 7	278	53	19%
Status 9+T	16	5	31%
Totals	15724	13072	83%

This page is intentionally left blank

Appendix 10 – Extended McCloud Project Plan

McCloud	Updated 11/08/2025					
			Extended Project Start:	11/08/2025		
TASK	**No of Cases**	**Owner**	**RAG status**	**PROGRESS**	**START**	**DEADLINE**
Data Rectification for ABS						
OCC status 1	26	Tiff/ Cathy	G	0%	11/08/2025	31/08/26
Non-OCC status 1 & 4	211	Vicki/ Tiff / Cathy	G	0%	11/08/2025	31/08/26
Interfunds to review /update with correct hours from previous fund	TBC	TBC	G	0%	11/08/2025	31/08/26
Data rectification for Pensioners						
Write to Pensioners to notify of delay in rectification	3,668	Vicki	R	0%	11/08/2025	31/08/25
OCC status 5	137	Gil	G	0%	11/08/2025	31/12/25
Non-OCC & OBU Status 5	164	Steph / Tiff	G	0%	11/08/2025	31/12/25
Recalculate pension payments for those who have an underpin	TBC	TBC	G	0%	01/01/26	31/03/26
Data rectification for deaths						
OCC status 7	112	Gil	G	0%	11/08/2025	31/03/26
Non-OCC & OBU status 7	116	Steph / Tiff	G	0%	11/08/2025	31/03/26
Recalculate death payments for those who have an underpin	TBC	TBC	G	0%	11/08/2025	30/06/26
Data rectification exit payments (transfer out and refunds)						
OCC status 3	776	Gil	G	0%	11/08/2025	31/08/26
Non-OCC & OBU status 3	535	Steph/ Tiff/ Cathy	G	0%	11/08/2025	31/08/26
Recalculate transfer out payments for those who have an underpin	TBC	TBC	G	0%	11/08/2025	31/08/26
Recalculate refund payments for those who have an underpin	TBC	TBC	G	0%	11/08/2025	31/08/26
Recalculate Interfund payments for those who have an underpin	TBC	TBC	G	0%	11/08/2025	31/08/26
Pension Software Issues preventing McCloud Calculation						
Club transfer in	TBC	Rach /Vicki	G	0%	11/08/2025	31/08/26
Pension debit members	16	Rach / Vicki	G	0.0%	11/08/2025	31/08/26
System errors to resolve	54	Rach / Vicki	G	0.0%	11/08/2025	31/08/26

This page is intentionally left blank

Agenda Item 15

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Agenda Item 16

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank