Pensions Weekly Update – 9 October 2024

Here is our weekly summary of key legal and regulatory developments relevant to occupational pension schemes that you might have missed, with links for further information.

We start this week's update with a reminder of a couple of deadlines, where action may be required.

- The Pension Protection Fund (PPF) has started to issue invoices for levy year 2024-2025. Electronic invoices will be issued to the person who is named as the PPF levy contact on the pension scheme return. Trustees and administrators may wish to check that their PPF levy contact is up to date on Exchange.
- We are approaching one of the common deadlines for publishing annual implementation statements. A pension scheme with a scheme year which ended 31 March 2024 will need to ensure that the implementation statement (as of 31 March 2024) is published online, in a publicly available format, by 31 October 2024. We suggest you search online for your scheme ahead of the deadline to check that there are no barriers which prevent your implementation statement from being publicly available.
- The Royal Mail Collective Pension Plan launched this week. Squire Patton Boggs advised RMCPP Trustees Limited on its role as Trustee of the Plan, the UK's first – and so far, only – collective defined contribution (CDC) plan. Partner Wendy Hunter commented that navigating the new legislation and obtaining The Pensions Regulator's (TPR) authorisation has been "an exciting and challenging journey." Our press release contains more details.
- CDC is certainly a hot topic this week, with the Department for Work and Pensions (DWP) issuing a consultation on draft legislation to extend CDC provision to whole-life unconnected multiple employer schemes and other related provisions. The consultation closes on 19 November 2024.
- The Pensions Policy Institute (PPI) has published a deep dive into investment in infrastructure, as part of a series of deep dives sponsored by the Association of British Insurers. It notes that infrastructure assets still form a small minority of current asset allocations (at around one to three percent of pension scheme assets under management), but that growth is expected. While defined benefit (DB) schemes are investing in infrastructure assets, defined contribution (DC) schemes need to "develop scale and specialist management capabilities to make infrastructure an attractive and cost-effective component of their asset mix".
- The DWP has produced two reports relating to member engagement. The first report is the result of research undertaken by Ipsos UK into lessons on pensions engagement. It includes interviews with six pensions or financial specialists across the UK, Western Europe and Israel, as well as research using ChatGPT. The second report aims to understand how members of DC pension schemes might contribute to the transition to net zero through their choice of funds by examining whether

and how they can be engaged with directing their pension savings towards more environmentally sustainable investments.

- In our latest blog post, Zoya Alam examines three noteworthy tribunal decisions where TPR's rigid application of penalties has come under scrutiny.