

Scottish Borders Council Pension Fund Business Plan 2025/2026-2027/2028



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About the Pension Fund

This section gives an overview of our services.

Local Government Pension Scheme

- Scottish Borders Council an Administering Authority for the Local Government Pension Scheme (LGPS)
- Defined Benefit Pension Scheme
- Shortlisted for UK Pension Awards Fund of the Year 2025
- LGC-LGPS (Small) Fund of the year Winners 2024
- Shortlisted for LAPF Small Fund of the year 2024
- LAPF LGPS Fund of the Year (Assets under £2.5 billion)
 Winners 2021

Pension Fund Funding & Investments

- £994m Net Investment Assets under management
- 134% of estimated liabilities as 31 March 2023 funded
 per Triennial Actuarial Valuation
- 23 Investment Managers managing funds 40 different mandates
- Investments in Equities, Gilts & Bonds, Alternative Assets, Private Credit, Property, infrastructure and impact mandates.
- Accounting and Administration of Investments undertaken by the Pension and Investments Team
- · AVC option provided by Standard Life



Pension Fund Governance

- Regulatory compliance support provided by Pension Board
- Financial Scrutiny undertaken by Audit Committee
- Supported by external Custodian, Actuary, Investment Adviser and Independent Professional Observer
- Governance arrangements set out in Governance Policy and Compliance Statement
- Functions of Administering Authority overseen by Pension Fund Committee

Pensions Administration

- 13,166 members 4,859 actively contributing to the Fund
- 5,145 pensioners in receipt of LGPS pension from the scheme amounting to £36.1m p.a. in pension benefit payments
- 17 Employer Bodies –Scottish Borders Council with 91.49% of the membership
- Administration of Pension Benefits undertaken by the Council's HR Shared Services Team



What we *must* do

This section gives an overview of the most significant legislative requirements affecting our services. This list is not exhaustive.

Legislative power	Duty to	Other Directive(s)	Mandatory	Discretionary
General Code of Practice (March 2024)	The General Code consists of 51 shorter modules and consolidates and replaces 10 of TPR's existing codes of practice on the governance and administration of pension schemes	Guidance Published by The Pensions Regulator	✓	
Public Service Pensions Act 2013	Sets out the parameters of the Public Service Pension Schemes, the design of the benefits and the governance arrangements including the identification of The Pensions Regulator as the regulator for Public Service Pension Schemes.	Guidance Published by The Pensions Regulator	✓	
Local Government Pension Scheme (Scotland) Regulations 2018 and subsequent Amendments	Sets out the benefits payable and the duties of the Council as administering authority of for a pension scheme for persons working in local government service		✓	
Local Government Pension Scheme (Management and Investment of Funds) (Scotland) Regulations 2016	Sets out the parameters around the management and investment of the pension assets and the creation of a separate bank account.		✓	
Local Government Pension Scheme (Governance) (Scotland) Regulations 2015	Sets out the requirements for Scheme Advisory Boards and Pension Boards		✓	
Local Government Pension Scheme (Transitional Provisions and Savings) (Scotland)	Sets out the transitional arrangements for the Council in relation to the transition to the new scheme set out in the 2014 regulations		✓	

Business Plan 2025/2026-2027/2028

Key: Legislative power, i.e. by statute, Duty to, i.e. list of main legal duties, Other Directive(s), i.e. not covered by statute, Mandatory, i.e. we have to, Discretionary, i.e. we have the power to but not required to, Partnership / Service Level Agreement (SLA), i.e. done in partnership / on behalf of

Our Aims and Objectives

Primary Aim of the Pension Fund

To provide for members' pension and lump sum benefits on their retirement or for their dependants' benefits on death before or after retirement, on a defined benefits basis.

Achieved through the following Objectives:

Funding Objectives of the Pension Fund

- > Set levels of employer contribution that will **build up a fund of assets that will be sufficient to meet all future benefit payments** from the Fund; and
- > Build up the required assets in such a way that produces levels of **employer contribution that are as stable** as possible. through:
 - Ensuring effective and efficient management of employer's liabilities; and
 - Allowing the return from investments to be maximised within reasonable risk parameters.

Pensions Administration Objectives of the Pension Fund

- Deliver a High-Quality Pension Service to Members through:
 - Continually developing and improving efficient working arrangements, making use of digital means where possible; and
 - Striving to exceed the Fund's service standards

Governance Objectives of the Pension Fund

Ensure that Scottish Borders Pension Fund is managed effectively, transparently and in compliance with regulations



Our Successes, Areas for Improvement and Self-Assessment

This section gives an overview of our recent successes and areas of service delivery that could be improved, as well as feedback we have received.

	Successes	Areas for Improvement/Development
	 Annual Benefit Statements issued on time via Members Self Service for active and deferred members. Completed GMP Reconciliation Project. Ongoing review of manual off-system processes to ensure they are fit for purpose and making use of technology where possible. 	Continue to improve engagement with Employers and potential scheme members via website and Members Self Service portal. Changes to the models of service delivery will require increased focus on the admitted bodies and their agreements.
Pensions Administration	 Processed payments to pensioners in accordance with recognised timelines in all instances. 	Implementation of I-connect to increase automation of provision of employer information to the Fund.
	 Provision of member details to Fund Actuary as required to support Annual Reporting. 	Digitisation of historic scheme member records.
	 Recalculation of Pension Benefits following delayed implementation of Pay Award for SBC scheme members. 	Continue the preparation for McCloud, Goodwin and Pensions Dashboard.
Pension Funding and	• 3-year performance to March 2024 with investment returns of 3.2% on a rolling 3-year annualised basis compared to a benchmark of 8.4%.	Further develop the Funds policy and continue with Responsible Investment Strategy.
Investment	 1 year performance of 9.1% against benchmark of 12.5%, in volatile market conditions. 	Continue to adhere to TCFD reporting requirements.



	Successes	Areas for Improvement/Development
	 Review and improvement to Responsible investment including completion of 2024 Responsible Investment Metrics and Target Report. 	Continue to reduce Investment Risk and number of Investment Managers.
Pension Funding and Investment	Review of strategic asset allocation and good progress on its implementation.	
	Completion of 2023/24 Training program.	 Continue to develop the knowledge and skills for all members of Pensions Committee and Board; training day to be organised for Q3 2025.
	 Development of the standalone Pension Fund Risk Management Policy and Strategy 2024-2026 (approved in March 2024). Quarterly review and reporting cycle of refreshed Risk Register by Risk Category. 	Updating of all Policy and Strategy documents in line with the legislative changes.
	No actions arising from External Audit of the Annual Report & Accounts 2023/24.	Review results of General Code compliance checker and formulate plan to address any required actions.
Pension Fund Governance	Completion of General Code compliance checker; results will be used to determine level of compliance and actions required for 2024/25.	 Embedding the new risk review and reporting arrangements in line with the Risk Management Policy and Strategy 2024-2026.
	Signatories of Stewardship Code for 3 consecutive years.	Complete actions outlined from Stewardship Code.
	Issued Scheme Newsletter March 2024 and March 2025.	Continue to produce Scheme Newsletter on an annual basis.

Managing Our Performance

This section gives an outline of how performance will be measured, monitored and managed.

Pension Administration

- The **Pension Administration Strategy** (approved in March 2025) sets out the service standards that Employers can expect from the Fund and those expected from each Employer within the Fund.
- The annual performance against these service standards and performance measures set out in the Pensions Administration Strategy will be reported to the joint Pension Fund Committee/Pension Board meeting and then incorporated into the Fund's Annual Report and Accounts.

Investment Performance

- The **Statement of Investment Principles** (approved March 2025) sets out the target long-term annual investment return for the Fund's assets of at least 5.2%. It also details the performance targets for each of the investment fund managers used by the Fund to benchmark returns, the service standards that Employers can expect from the Fund, and those expected from each Employer within the Fund.
- The quarterly performance report by the Investment Adviser is reviewed at the joint Pension Fund Committee/Board meetings. In addition, all of the investment managers attend at least one of the 4 monthly meeting of the Pension Fund Investment and Performance Sub-Committee to present a more comprehensive update on their performance.
- The Fund's Annual Report and Accounts will report the annual position and the annualised three year rolling average performance of the Fund and compare this against the Fund's benchmark and other Local Authority Pension Fund performance.

Funding Levels

- The **Funding Strategy Statement** (approved March 2025) sets a target of 100% funding level and stable employer contributions; this is assessed every three years by the Fund's Actuary.
- The last triennial valuation was undertaken as at 31 March 2023 and reported a certified 134% funding level and stability of employer contributions. for open and active employer bodies.

Governance

• The Fund is required to report on its Governance in the Fund's Annual Report and Accounts. This includes an Annual Governance Statement and a Governance Compliance Statement.

Statutory returns

The Fund makes a number of statutory and other returns to Scottish Government, the Scheme Advisory Board and third-party agencies. organisations, including the Office of National Statistics.

Benchmarking

Finally, the Fund is committed to assessing how it is performing and uses an independent performance service to provide additional analysis to assess investment performance relative to the market at a Fund, asset class and investment manager level.

Officers participate in the Scottish Pensions Liaison and Investments & Governance Groups which shares good practice and gather comparative data on administration and investments across the 11 Scottish LGPS Funds.

The following Table provides an analysis of how the Fund's investments performed against the Fund's own benchmark:

Return on Investment as at 31 March	1 year rol	ling return	3 year rolling return	
2025	Fund %	Benchmark %	Fund %	Benchmark
Total Fund	2.9%	5.9%	2.3%	6.8%
Global Equities	2.8%	5.9%	5.7%	8.4%
UK Equities	7.0%	10.4%	3.8%	7.2%
Bonds	0.4%	0.9%	-1.2%	-1.1%
Alternatives	3.2%	8.6%	3.6%	8.7%
Property	7.6%	6.0%	-3.3%	8.1%
Cash	-	-	-	-



Business Action Plan

Actions Successfully completed 2024/25.

What we achieved 2024/25... (Objectives)

Set levels of employer contribution that will build up a fund of assets that will be sufficient to meet all future benefit payments from the Fund and invest in assets that grows the Fund's assets in a such a way that produces levels of employer contribution that are as stable as possible.

Key Tasks	Ref	Actions	Completed		
Review Pension Strategies informed by	Triennia	al Valuation Results			
Triennial Valuation	GP1	No actions for 2024/25			
Approval and implementation of Triennial Valuation employer contribution results, including update of Funding Strategy Statement	GP2	No actions for 2024/25			
Contributions Review and Cessations Policies for review after each cycle	GP3	No actions for 2024/25			
Maximise Investment Performance					
Monitor and report investment performance	IOR1	Fund Investment Performance at Benchmark on quarterly basis	Presented quarterly to joint meeting of Pension Fund Committee and Board		

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Key Tasks	Ref	Actions	Completed
Maximise Investment Performance			
Review and approve updated strategic asset allocation	IOR2	Review and approve updated strategic asset allocation	Completed and approved by Committee 24 September 2024
Implementation of approved strategic asset allocation	IOR3	Agree plan for implementation of approved strategic asset allocation	Completed and approved by Committee 12 December 2024

What we achieved 2024/25... (Objective)

Deliver a High-Quality Pension Service to Members

Key Tasks	Ref	Actions	Completed
Develop and implement an effective Co	mmunicati	on Strategy for the Pension Fund	
Review Communication Strategy and Action Plan in line with best practice and technological advancements.	SP1	Review of Communications strategy and action plan	Revised strategy approved 23 September 2024
Continue to proactively manage and engage Pension Fund Employers	SP2	Hold Annual Employer Liaison Meeting	Regular communication and employer meeting to be held 20 March 2025

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Key Tasks	Ref	Actions	Completed			
Develop and implement an effective C	Develop and implement an effective Communication Strategy for the Pension Fund					
Review all forms and communication material, including annual benefit statements.	SP3	Annual review of all forms, communication material, including annual benefit statements	Annual Benefit statements were reviewed prior to production and loading to MSS. Other forms continue to be reviewed with a view to digitising wherever possible			
Annual Newsletter	SP4	Annual Newsletter to be distributed.	Annual newsletter to be distributed March 2025.			
Ensure stability of Employers						
Review of Employer covenants	SP5	Review of admission agreement and employer guarantees	This remains an outstanding action.			
Complete full reconciliation of Guaranteed Minimum Pension (GMP) amounts between Fund and HMRC		Complete full reconciliation of Guaranteed Minimum Pension between Fund & HMRC	Completed with amendments made to systems, increased payments applied and communicated to the scheme member			
Review of Common and Specific Data following annual review and return to The Pension Regulator.	SP6	Submit return to The Pensions Regulator by required date	Scheme results reviewed and updates made to data where applicable			
Consider the implications of the McCloud case.	SP7	Review all guidance and communication on McCloud case implications.	Changes have either been made or are in progress for the remaining employers. All Scottish LGPS Funds are meeting monthly to ensure consistency of approach in line with regulations			

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Key Tasks	Ref	Actions	Completed
Ensure stability of Employers			
Consider the implications of the Goodwin case.	SP8	Review all guidance and communication on Goodwin case implications.	No further guidance issued
Pensions Dashboard	SP9	Requirement to connect to the Pensions Dashboard by October 2025	Contract has been signed with Heywood as our ISP provider. Work on the DPIA is well progressed (should be completed before the end of the year). Plans in place with provider to carry out Test connections and set matching criteria ahead of the Live connection date.
Overpayment Policy	SP10	Overpayment Policy	Policy approved 13 December 2022, review carried out during 2023/24 with no changes required, will remain under annual review.
Review Privacy Notice	SP11	Review the Privacy Notice to ensure this is in line with current data requirements.	Reviewed during 2023/24, will require further review with future legislative requirements. Will be updated to reflect changes for the Pensions Dashboard and Data Readiness checking.
Data Readiness check to be carried out ahead of Pensions Dashboard connection, then on an annual basis	SP12	Improve the quality of Data in preparation for the Pensions Dashboard	Contract has been signed with Heywood. Currently going through the DPIA process. Plan is to have this completed and implemented ahead of the Pensions Dashboard connection date to enhance the quality of data held for members.



Key Tasks	Ref	Actions	Completed
Promotion of self-service facility			
Promotion of Self-Service facility	SP13	Promotion of self service to all active and deferred members	Initially rolled out in August 2021, continuing to promote the benefits of the system to all active and deferred members through various communication channels with all Admitted Bodies
Upgrade on Member Self Service	SP14	No actions for 2024/25	We have received an End of Life (EOL) notice from Heywood for the current version, plans being developed to test and move over to new version ahead of the EOL date
System improvements to support home we	orking		
Consider Implementation of workflow – must be proportionate to the size of the Administration Team	SP15	No actions for 2024/25	This remains an outstanding action.
Implementation if i-Connect.	SP16	No actions for 2024/25	This remains an outstanding action.
Digitisation of historical records	SP17	No actions for 2024/25	This remains an outstanding action.
Promotion of online payslips and P60's	SP18	Promotion of self service to all active and deferred members	Increase in the number of Pensioners who are accessing payslips online. Will continue to promote this to all pensioners who have not yet signed up and include details in communication to new pensioners.



What we achieved 2024/25... (Objective)

Ensure that Scottish Borders Pension Fund is managed effectively, transparently and in compliance with regulation

Key Tasks	Ref	Actions	Completed
Continue to develop robust governance	and risl	k management	
Pension Fund Committee approval of Governance Policy and Compliance Statement	GP4	Review of Governance Policy and Compliance Statement	Revised strategy approved 21 June 2024
Training Needs Self-Assessment Levels for Pension Fund Committee and Board used to define Annual Training Plan Pension Fund Committee approval of Training Policy and Training Programme	GP5	Pension Fund Committee approval of Training Policy and Training Programme	Completed and approved 2 Sept 2024
Annual Report and Accounts production and approval by Audit Scotland and Pension Fund Committee and Board with aim to achieve unqualified Audit Opinion.	GP6	Annual Report and Accounts produced and approved by Audit Scotland and Pension Fund Committee and Board. Unqualified Audit Opinion obtained.	Completed and approved 23 Sept 2024
Review and update Responsible Investment Policy and annual reporting.	IOR4	Review current and developing best practice for responsible investment.	Responsible Investment plan and TCFD reporting updated and approved 12 December 2024.



Key Tasks	Ref	Actions	Completed				
Continue to develop robust governance and risk management							
Pension Fund Committee approval of Pensions Administration Strategy	GP7	Pension Fund Committee approval of Pensions Administration Strategy	Completed and approved 6 March 2025.				
General Code Compliance Tracker	GP8	Pension Fund Committee approval of General Code Compliance Tracker	Completed and approved 6 March 2025				
Risk Register Review and update.	RA1	Quarterly review and reporting cycle of refreshed Risk Register by Risk Category.	Quarterly review and reporting cycle of refreshed Risk Register by Risk Category during 2024/25.				
Develop the new standalone Pension Fund Risk Management Policy and Strategy 2024-2026	RA2	Pension Fund Committee approval of Pension Fund Risk Management Policy and Strategy 2024-2026	Completed March 2024				
Internal Audit assurance and advisory services.	RA3	Progress on Delivery of Internal Audit Annual Plan 2024/25 presented to Pension Fund Committee on 12 December 2024	Internal Audit Annual Plan 2024/25 completed 31 March 2025 and Internal Audit Annual Assurance Report 2024/25 to be presented at PFC in June 2025.				
Stewardship Code application renewal	GP9	Completed	Submitted to FCA October 2024 – Successful renewal confirmed February 2025.				
CEM Benchmarking	IOR5	Complete Benchmarking exercise to independently compare costs of our investments compared to other Pension Funds.	Completed and presented to at joint meeting of Pension Fund Committee and Board on 6 March 2025				
Produce Conflicts of Interest Policy for the Pension Fund	GP10	Pension Fund Committee approval of Conflicts of Interest Policy	Completed and approved 12 December 2024				
	Ref	Actions	Completed				

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Key Tasks			
Continue to develop robust governance	and risl	k management	
Produce Breaches Policy for the Pension Fund	GP11	Pension Fund Committee approval of Breaches Policy	Completed and approved 12 December 2024
Produce Escalation Policy for the Pension Fund	GP12	Pension Fund Committee approval of Escalation Policy	Completed and approved 12 December 2024
Produce Internal Dispute Resolution Procedure (IDRP)	GP13	Pension Fund Committee approval of Internal Dispute Resolution Procedure	Completed and approved by Committee 6 March 2025
Review services provided by IT provider	s to ens	sure data is secure and adheres to cyber sec	curity requirements
Request assurance of cyber security policy being in place from Heywood	RA4	Obtain Annual Assurance from Supplier	Assurance information provided by Heywood
Request assurance of cyber security policy being in place from CGI on an annual basis	RA5	Obtain Annual Assurance from Supplier	Request submitted to IT Management Team
Request assurance of cyber security policy being in place from Hymans Robertson on an annual basis	RA6	Obtain Annual Assurance from Supplier	Assurance information provided by Hymans Robertson
Review services provided externally to e	ensure t	hat these represent best value to the Fund	
Undertake procurement exercise for Custodian	GP14	No actions for 2024/25	
Undertake procurement exercise for Actuary	GP15	Procurement process started for new Fund Actuary Contract.	
Undertake procurement exercise for Investment Consultant	GP16	No actions for 2024/25	
Undertake review of provision of Pension Administration system		No actions for 2024/25	Contract extended for a further 5 years as agreed at the 23 September 2024 meeting



This section gives an overview of the ACTIONS that will be undertaken to achieve our objectives, the PERFORMANCE INDICATORS that will show whether we have achieved our objectives and the RISKS that will detail what may stop us from achieving our objectives.

What we will achieve 2025/26-2027/28 ... (Objectives)

Set levels of employer contribution that will build up a fund of assets that will be sufficient to meet all future benefit payments from the Fund and invest in assets that grows the Fund's assets in a such a way that produces levels of employer contribution that are as stable as possible

Ref	Key Tasks	Owner	25/26	26/27	27/28	Integrated Impact Assessment
Revie	w Pension Strategies informed	by Triennial Valuati	on Results			
GP1	Undertake and complete Triennial valuation.	HRSS Manager PI&A Manager		•		•
GP2	Approval and implementation of Triennial Valuation employer contribution results, including update of Funding Strategy Statement	HRSS Manager PI&A Manager	•	•	•	•
GP3	Contributions Review and Cessations Policies for review after each cycle	HRSS Manager PI&A Manager		•		



Ref	Key Tasks	Owner	25/26	26/27	27/28	Integrated Impact Assessment
Maxin	nise Investment Performance					
IOR1	Monitor and report investment performance.	PI&A Manager	•	•	•	
IOR2	Review Strategic asset allocation following completion of triennial valuation.	PI&A Manager		•		
IOR3	Implementation of approved strategic asset allocation	PI&A Manager	•	•	•	

How v	ve will know we have achieved our objective … (Performan	Non-recurring Quarterly Annually	
Revie	w Pension Strategies informed by Triennial Valuation Resu	ilts	
GP1	Triennial Actuarial Valuation Funding Level of assets against liabilities	100%	As at 31/3/2026 reported by 31/03/2027.
GP2	Data provision review to meet the requirements of Actuary.	By 30/09/2026	As above
GP2	Pension Fund Committee approval of Funding Strategy Statement	By 31/03/2027	As above



How v	ve will know we have achieved our objective (Performan	ce Indicator) Target	Non-recurring	Quarterly	Annually
Revie	พ Pension Strategies informed by Triennial Valuation Resu	ılts			
GP3	Contributions Review and Cessations Policies for review after each cycle	By 31/03/2027			
Maxim	ise Investment Performance				
IOR1	Fund Investment Performance at Benchmark	Attain or Exceed Benchmark return on annualised 3 Year Rolling Basis		•	•
IOR2	Undertake full review of strategic asset allocation.	By 30/09/2025			•
IOR3	Agree and action plan for implementation of approved strategic asset allocation.	By 31/12/2025			•



What we want to achieve 2025/26-2027/28... (Objective)

Deliver a High-Quality Pension Service to Members

Ref	Key Tasks op and implement an effective Comm	Owner unication Strategy fo	25/26 or the Pension	26/27 Fund	27/28	Integrated Impact Assessment
SP1	Review Communication Strategy and Action Plan in line with best practice and technological advancements.	HRSS Manager	•	•	•	•
SP2	Continue to proactively manage and engage Pension Fund Employers	HRSS Manager	•	•	•	
SP3	Review all forms and communication material, including annual benefit statements.	HRSS Manager PI&A Manager	•	•	•	•
SP4	Annual Newsletter	HRSS Manager PI&A Manager	•	•	•	
Ensur	e stability of Employers					
SP5	Review of Employer covenants	HRSS Manager	•			
SP6	Review of Common and Specific Data following annual review and return to The Pension Regulator	HRSS Manager	•		•	
SP7	Consider the implications of the McCloud case	HRSS Manager	•			

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Ref	Key Tasks	Owner	25/26	26/27	27/28	Integrated Impact Assessment
Ensur	e stability of Employers					
SP8	Consider the implications of the Goodwin case.	HRSS Manager	•			
SP9	Information requirements for Dashboard and Implement by connection date.	HRSS Manager	•			
SP10	Review Overpayment Policy	HRSS Manager	•	•	•	
SP11	Review Privacy Notice	HRSS Manager	•	•	•	
SP12	Data Readiness check	HRSS Manager	•	•	•	
Promo	otion of self-service facility					
SP13	Promotion and Improvement of self- service facility	HRSS Manager	•	•	•	
SP14	Upgrade on Member Self Service	HRSS Manager	•			



Ref	Key Tasks	Owner	25/26	26/27	27/28	Integrated Impact Assessment
Syster	n improvements to support home wo	rking				
SP15	Consider implementation of workflow	HRSS Manager	•			
SP16	Implementation of i-Connect for large employers.	HRSS Manager	•	•		
SP17	Digitisation of historical records	HRSS Manager	•			
SP18	Continued promotion of availably for online payslip and P60's	HRSS Manager	•	•	•	

How v	ve will know we have achieved our objective (Performance Indicato	r) Target	Non-recurring Quarterly Annually
Devel	op and implement an effective Communication Strategy for the Pension	on Fund	
SP1	Review of Communications strategy and action plan	30/09/2025	•
SP2	Hold Annual Employer Liaison Meeting	31/03/2025	•
SP3	Annual review of all forms, communication material, including annual benefit statements	31/08/2025	•

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How	ve will know we have achieved our objective … (Performance Indicato	r) Target	Non-recurring Quarterly	Annually				
Devel	Develop and implement an effective Communication Strategy for the Pension Fund							
SP4	Development and publication of newsletter for publication and inclusion on Pension Fund website	31/03/2025		•				
Ensur	e stability of Employers							
SP5	Review of admission agreement and employer guarantees	31/12/2025	•					
SP6	Review of Common and Specific Data following annual review and return to The Pension Regulator.	31/12/2025	•					
SP7	Review all guidance and communication on McCloud case implications.	30/09/2025	•					
SP8	Review all guidance and communication on Goodwin case implications	31/03/2026	•					
SP9	Review all guidance and communication of Pensions Dashboard, engaging with Pension Admin system provider as necessary.	31/10/2025		•				
SP10	Review Overpayment Policy to ensure appropriate governance arrangements are in place.	31/03/2026		•				
SP11	Review the Privacy Notice to ensure this is in line with current data requirements	31/03/2026		•				

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How w	ve will know we have achieved our objective (Performance Indicatorially	r) Target	Non-recurring Quarterly
	e stability of Employers		
SP12	Data Readiness check to be carried out ahead of Pensions Dashboard connection, then on an annual basis	31/10/2025	•
Promo	otion of self-service facility		
SP13	Promotion of self service to all active and deferred members	31/08/2025	•
SP14	Consider implementation of updated version of Self Service on a like for like basis, this will be determined by cost and/or the sunsetting of the current version.	31/03/2026	•
Syster	n improvements to support home working		
SP15	Consider Implementation of workflow – must be proportionate to the size of the Administration Team	31/03/2026	•
SP16	Implementation if i-Connect	31/03/2027	•
SP17	Digitisation of historical records	31/03/2027	•
SP18	Promotion of online payslips and P60's	31/03/2026	•



What we want to achieve 2025/26-2027/28... (Objective)

Ensure that Scottish Borders Pension Fund is managed effectively, transparently and in compliance with regulation

Ref	Key Tasks	Owner	25/26	26/27	27/28	Integrated Impact Assessment		
	Continue to develop robust governance and risk management							
GP4	Review and update Governance Policy and Compliance Statement	PI&A Manager	•	•	•	•		
GP5	Develop and deliver officers and members Training Programme	PI&A Manager	•	•	•			
GP6	Annual Report and Accounts production and approval by Audit Scotland and Pension Fund Committee and Board with aim to achieve unqualified Audit Opinion.	PI&A Manager	•	•	•			
IOR4	Implement monitoring per Responsible Investment Policy	PI&A Manager	•	•	•			
GP7	Review and update Pensions Administration Strategy	PI&A Manager	•	•	•	•		
GP8	Continuous review and compliance with The Pension Regulator "General Code	PI&A Manager	•	•	•			

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Ref	Key Tasks	Owner	25/26	26/27	27/28	Integrated Impact Assessment
	ue to develop robust governance an		10/10	_0,_1	21720	71000001110111
RA1	Quarterly review, update and reporting of the Pension Fund Risk Register by Risk Category	PI&A Manager COA&R	•	•	•	
RA2	Review and update of the Pension Fund Risk Management Policy and Strategy 2027-2029	COA&R		•		Yes
RA3	Internal Audit Review	PI&A Manager	•	•	•	
GP9	Stewardship Code application renewal	PI&A Manager	•	•	•	
IOR5	CEM Benchmarking	PI&A Manager	•	•	•	
GP10	Review Conflicts of Interest Policy for the Pension Fund	PI&A Manager	•	•	•	
GP11	Review Breaches Policy for the Pension Fund	PI&A Manager	•	•	•	
GP12	Review Escalation Policy for the Pension Fund	PI&A Manager	•	•	•	
GP13	Produce Internal Dispute Resolution Procedure (IDRP)	HRSS Manager	•			



Dof	Voy Tooks	Owner	25/26	26/27	27/20	Integrated Impact
Ref Contin	Key Tasks ue to develop robust governance an	Owner d risk management	25/26	26/27	27/28	Assessment
RA4	Request assurance of cyber security policy being in place from Aquila Heywood on an annual basis	HRSS Manager	•	•	•	
RA5	Request assurance of cyber security policy being in place from CGI on an annual basis	HRSS Manager	•	•	•	
RA6	Request assurance of cyber security policy being in place from Hymans Robertson on an annual basis	HRSS Manager	•	•	•	
Review	v services provided externally to ens	ure that these repres	ent best value	to the Fund		
GP14	Undertake procurement exercise for Custodian	PI&A Manager		•		
GP15	Undertake procurement exercise for Actuary	HRSS Manager PI&A Manager	•			
GP16	Undertake procurement exercise for Investment Consultant	PI&A Manager			•	



How w	re will know we have achieved our objective … (Performance Indicato	r) Target	Non-recurring Quarterly					
Continue to develop robust governance and risk management								
GP4	Pension Fund Committee approval of Governance Policy and Compliance Statement	30/06/2025		•				
GP5	Training Needs Self-Assessment Levels for Pension Fund Committee and Board used to define Annual Training Plan Pension Fund Committee approval of Training Policy and Training Programme	30/06/2025		•				
GP6	Annual Report and Accounts produced and approved by Audit Scotland and Pension Fund Committee and Board. Unqualified Audit Opinion obtained.	30/09/2025		•				
IOR4	Responsible investment monitoring report	31/12/2025						
GP7	Pension Fund Committee approval of Pensions Administration Strategy	31/03/2026		•				
GP8	Continuous review General Code compliance tracker	31/03/2026	•					
RA1	Quarterly review, update, and reporting of the Pension Fund Risk Register by Risk Category	31/03/2026	•					



How w	e will know we have achieved our objective … (Performance Indicator lly	r) Target	Non-recurring	Quarterly				
Contin	Continue to develop robust governance and risk management							
RA2	Update of the Pension Fund Risk Management Policy and Strategy 2027-2029	31/03/2027						
RA3	Internal Audit assurance and advisory work completed on a quarterly basis. Internal Audit Annual Plan to be agreed at March meeting of Pension Fund Committee in advance of the upcoming year. Internal Audit Annual Assurance Report to be presented at June meeting of Pension Fund Committee to inform the annual governance review of the SBC Pension Fund.	31/03/2026		•	•			
GP9	Stewardship Code application renewal	31/10/2026			•			
IOR5	CEM Benchmarking	31/03/2026			•			
GP10	Review Conflicts of Interest Policy for the Pension Fund	31/12/2026			•			
GP11	Review Breaches Policy for the Pension Fund	31/12/2026			•			
GP12	Review Escalation Policy for the Pension Fund	31/12/2026			•			
GP13	Produce Internal Dispute Resolution Procedure (IDRP)	31/03/2025			•			
Review services provided by IT providers to ensure data is secure and adheres to cyber security requirements								
RA4	Request assurance of cyber security policy being in place from Aquila Heywood on an annual basis	30/09/2025			•			

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How w	re will know we have achieved our objective (Performance Indicato	or) Target	Non-recurring	Quarterly				
Review	Review services provided by IT providers to ensure data is secure and adheres to cyber security requirements							
RA5	Request assurance of cyber security policy being in place from CGI on an annual basis	30/09/2025			•			
RA6	Request assurance of cyber security policy being in place from Hymans Robertson on an annual basis	30/09/2025			•			
Review	Review services provided externally to ensure that these represent best value to the Fund							
GP14	Undertake procurement exercise for Custodian	30/09/2025	•					
GP15	Undertake procurement exercise for Actuary.	30/06/2025	•					
GP16	Undertake procurement exercise for Investment Consultant	31/03/2026	•					