## Equal Opportunities for People with Disabilities Pension Scheme

## Chair’s Statement on DC Governance from 31 March 2022 to 31 March 2023

This is the Equal Opportunities for People with Disabilities Pension Scheme Chair’s Statement (‘Statement’) which has been prepared by the Trustees of the Equal Opportunities for People with Disabilities Pension Scheme (‘the Scheme’). This Statement has been prepared to demonstrate how the Scheme has complied with the new DC governance standards introduced on 6 April 2015 under The Occupational Pension Schemes (Charges and Governance) Regulations 2015.

This Statement relates to the period from 31 March 2022 to 31 March 2023 and covers the following key areas:

1. Scheme Management, including The Trustee’s compliance with the statutory Trustee Knowledge and Understanding (‘TKU’) requirements;
2. Investment governance of the Scheme’s default arrangement;
3. Charges, transaction costs and value for money within the Scheme;
4. Administration, including the processing of core Scheme financial transactions;
5. The Trustee Board.

Any material developments since the year-end have also been noted, where the Trustees feel that they help in describing the ongoing governance of the Scheme.

# Scheme Management

Trustee Knowledge and Understanding

01 May 2009 the Shaw Trust merged with Templeco 661 Limited (formerly Equal Opportunities for People with Disabilities) as part of this merger deed Shaw Trust took on the business and assets of Templeco 661 Limited.

At this time the Scheme was paid up and had been since December 2004.

In 2010 the Change in Deed of Substitution of this scheme recognised that all parties to the deed were unable to locate copy of the Trust deed and scheme rules.

On 26 March 2013 the Shaw Trust was advised that Mr Peter Wood who was a Trustee of this Scheme had passed away. The Shaw Trust was unable to obtain information pertaining to the Scheme for an extended period of time as there was one remaining Trustee of the Scheme Mr Ian Hutt that was no longer an employee of the Shaw Trust. Mr Ian Hutt confirmed to the Shaw Trust that the Scheme’s administrators (Berry, Birch and Noble) had gone into liquidation. Phoenix Life who took over the administration are not able to provide any scheme rules and we were advised by Mr Ian Hutt that

documents should have been transferred.

29 March 2016 Shaw Trust appointed Mr Jude Sheeran and Mr Mark Earl as Trustees of the Scheme. Mr Jude Sheeran left the Shaw Trust’s employment on 30 June 2016.

Mr Mark Earl remains the Employer appointed Trustee of the Scheme. Mark is the Chief People Officer for the Shaw Trust.

The Shaw Trust has sought advice from the Shaw Trust’s financial advisers concerning the Scheme and the Trustee and Shaw Trust consider that the Scheme should be wound up.

Conflicts of duty or interest and Risk Management

The Scheme is currently administered by Phoenix Life Ltd (formally Scottish Mutual). The Shaw Trust has a Financial Adviser.

There is no formally documented Risk Register or Trustees Conflicts of Interest Register. This is known to the Trustee but the issue has been placed on hold in the expectation that the Scheme will be wound up.

# Investment governance and Scheme’s default arrangement

The Scheme does not have a default investment strategy. The Scheme has been paid up since 2004. There is no Statement of Investment Principles associated to the scheme due to the size of the scheme.

This has not been reviewed in anticipation that the Scheme will be wound up.

# Charges, transaction costs and value for money

For scheme year ends falling after 31 December 2021, certain schemes must carry out a more detailed value for members assessment. This involves self-assessing the quality of the administration and governance with reference to seven key metrics and comparing their costs and charges and net returns against three other schemes.

This is applicable if the scheme has:

* less than £100 million total assets according to the most recent audited accounts
* operated for at least three years
* a most recent year-end that falls after 31 December 2021

And:

* has not notified the Pensions Regulator that it is in the process of winding up.

The Scheme meets the above and a value for members assessment was due to be undertaken.

However, the Trustees considered the criteria for the Value for Money Test and determined that it was unlikely that the Scheme would pass the Value for Money test without considerable modifications. Therefore, the Trustee will undertake a review of the Scheme with a view to determining whether the Scheme should continue in its current form.

The Trustees are aware that the Pensions Regulator has produced a revised DC Code of Practice No.13 and a number of “How to” guides, including a guide relating to ‘Value for Members’.

# Administration

Processing core financial transactions

The scheme is administered by Phoenix Life Limited. Phoenix Life Limited is part of Phoenix group holdings which has around 6 million policy holders and £76 billion of assets help by the Group’s life companies. The Phoenix group specialises in managing closed pension funds.

The Trust’s financial adviser is an authority body on the Scheme and communicates directly with the scheme Administrators, Phoenix Life Ltd.

The Trustee is not aware of any agreed Service Level Agreements with Phoenix Life however any administrative queries are resolved in a sufficient time period by Phoenix Life. There have been no administrative issues throughout the period of this statement.

This area has not been further reviewed in anticipation that the Scheme will be wound up.

**Material Developments since the year-end**

The Principal Employer has engaged with its financial adviser in order to begin a process for winding up the scheme.

This Statement regarding the governance standards of the Equal Opportunities for People with Disabilities Pension Scheme has been approved by the Trustees.

Signed:

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**TRUSTEE**

**Dated: 10 December 2023**

*Signed by the Trustee of the Equal Opportunities for People with Disabilities Pension* Scheme