

PENSIONS ESSENTIALS

January 2026



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ACTUARIAL GUIDANCE ON VIRGIN MEDIA FIX

The Pension Schemes Bill allows for retrospective actuarial confirmation that deeds of amendment potentially caught by Virgin Media would not have prevented a scheme from satisfying the relevant contracting-out requirements. The FRC has issued guidance to assist actuaries in considering whether they can give such confirmations.

Background: The [Pension Schemes Bill](#) provides a “fix” for schemes with deeds of amendment that are potentially void as a result of failing to get actuarial confirmations required by contracting-out legislation. Trustees will be able to ask the scheme actuary (in writing) to confirm that a historic amendment would not have stopped the scheme from satisfying the contracting-out requirements. If the actuary can give the confirmation, the deed will be treated as always having been valid.

The Bill gives the actuary a wide latitude as to the information they can take into account and the approach they can take. As a result, the Financial Reporting Council has [issued guidance](#) to support actuaries.

Trustees should be aware of the gist of the guidance if they are considering asking for confirmation as it relates directly to whether the actuary is likely to be able to give it and what information they may need.

Actuarial guidance: Under the Bill, the actuary must form an opinion as to whether it is “reasonable to conclude” that a relevant amendment would not have prevented the scheme from “continuing to satisfy” the contracting-out test. The guidance encourages actuaries to take a proportionate approach and says:

- “Reasonable to conclude” does not require the actuary to have certainty but to reach a reasoned and justifiable conclusion taking into account all the relevant facts and circumstances after taking a proportionate approach to the gathering of data.
- It is not necessary for the actuary to put themselves in the position of the scheme actuary at the time of the relevant amendment.
- The actuary doesn’t need all the data that would have been available at the date of an amendment, or to determine with certainty if the contracting-out test continued to be met. They will need to exercise judgement as to what information is sufficient and are encouraged to use information that is readily available and can be obtained without incurring a disproportionate amount of effort.
- They will need to have a full understanding of the rule amendment insofar as it could have an impact on the contracting-out test and may wish to consider whether this is sufficient on its own (for example, where the amendment only related to benefits not covered by the contracting-out requirements) or whether more information is required.

Practical points:

- *Watch out for the provisions of the Bill coming into force.*
- *Consider what, if any, amendments might be in scope of the new provisions.*

CONSULTATION ON TRUSTEESHIP

As the pensions landscape changes with the closure of DB schemes and the rise of commercial DC alternatives, the Government is seeking views on how trusteeship and governance can evolve to deliver the best outcome for members. It looks at issues facing trustees, potential risks and challenges, what systemic or regulatory changes may be needed and the position of professional trustees and sole trustees and the standards expected from them.

The [consultation paper](#) takes a wide ranging look at the current trusteeship model and says that at a time of fundamental change, it is important to “take stock” and “examine the current strengths and weaknesses of the existing structures and regulatory frameworks that underpin the system of trusteeship governance”. To this end, the consultation paper considers a number of issues including:

- **Governance:** The paper asks what works well in the current system and whether there are any barriers to good trusteeship. It recognises that professional trustees bring many benefits, but identifies some inherent risks where firms provide not only trustee services but also secretarial, governance and administration services and asks whether additional safeguards are needed to manage these risks. It also asks whether there should be limitations on the number of appointments professional trustees can hold to ensure they have capacity to act quickly when required. Views are also invited on an enhanced code of practice for sole trustees, as there are concerns that decision-making in these cases is in fewer hands and there may be a lack of checks and balances.
- **Trustees and their appointment:** The paper states that there is consensus that diverse trustee boards promote good governance and asks if there is a role for government and regulators to play in helping to attract a diverse and talented pool of individuals to trusteeship. It also looks at whether there should be limits on the length of trustee appointments or on repeat appointments.
- **Skills and knowledge:** There are already requirements for trustees to have knowledge and understanding of key issues and to be conversant with scheme documents. The paper explores what additional requirements should be placed on professional trustees, what skills trustees need to have and whether it would be appropriate for higher standards to be imposed on professional trustees. It also considers whether all trustees should be accredited.
- **Member voice:** As the industry moves towards fewer, larger multi-employer schemes, the member-nominated trustee model which provides a mechanism for providing members’ perspective to trustee boards is becoming less relevant. However, the Government says “*it is important that the voices of members are still taken into account and represented*” and views are invited as to how this can be achieved.

The consultation paper also considers administration, since good administration is important for member outcomes. It invites views on the pros and cons of introducing minimum standards for administrators and on whether they should be registered with and regulated by TPR. It also recognises the potential issues that can be caused if an administrator exits the market and asks how the impacts of this can be controlled.

In addition, the Government notes that it has committed to produce guidance for occupational pension schemes, aimed at clarifying how they can interpret and apply their fiduciary duties when considering wider factors, including systemic risks (such as climate risk) and members’ standards of living, in investment decisions. It will be interesting to see what this guidance ultimately says, since it has the potential to go beyond what we would currently consider trustees need to take into account when exercising investment powers.

Consultation closes on 6 March 2026. Trustees and sponsors should consider whether they wish to respond.

Practical points:

- *Watch out for guidance on fiduciary duties.*
- *Consider whether to respond to consultation.*

CONSULTATION ON VALUE FOR MONEY

The Pension Schemes Bill contains draft legislation which will require in-scope DC arrangements to carry out a detailed value for money assessment, looking at a wide variety of metrics, and take action where value is not provided. The FCA and TPR have issued a joint consultation setting out more detail on what this framework is likely to look like.

The Government and industry regulators have been committed to introducing a new DC Value for Money Framework (VfM) for some time. The framework will set out a standardised test for DC schemes to demonstrate they deliver value, which will focus not just on scheme costs but also on the level of returns and quality of service provided to members.

The [Pension Schemes Bill](#) contains the legislation providing for this framework. The [FCA consulted](#) on what the detail might look like in 2024, and together with TPR has now [responded to that consultation](#) and set out further proposals for discussion. TPR has also published an [overview of the proposed framework](#) for occupational pension schemes.

Timing: The intention is that schemes will be required to submit their new VfM metrics in early 2028, with assessments later that year.

In scope arrangements: The new VfM framework is intended (at least initially) to apply to default arrangements in auto-enrolment schemes or “quasi-default” arrangements. Quasi-default arrangements are arrangements in a pre-auto-enrolment scheme which are akin to a default arrangement and are used by at least 80% of the active and deferred members relating to at least one employer. Arrangements with fewer than 1000 members will only be in scope if they are the sole or largest default arrangement provided by a scheme.

Executive pension plans and small self-administered schemes will be exempt, as will schemes where the trustees have notified TPR that they have decided to wind up, or where a decision has been made to transfer members and evidence has been provided to TPR that an agreement has been made with an alternative provider.

Metrics: It is proposed that a VfM assessment will need to include the following metrics:

- **Investment:** gross investment performance (net only of transaction costs) and investment performance net of all costs and charges for three age cohorts for one, three and five years where available, and 10 years where reasonably practicable to obtain, plus performance net of investment charges (but gross of costs) for one year. Expected net investment returns over the next 10 years across the whole asset portfolio and for each age cohort will also be needed.
- **Asset allocation:** trustees are expected to consider this in the context of potential future performance.
- **Costs and charges:** total costs and charges over one, three and five years where available, and 10 years where it is reasonably practicable to obtain. For the one-year period, the split between service costs and investment charges.
- **Service:** the metrics are based on areas that trustees should already be considering and include areas such as accurate record keeping, promptness and accuracy of core financial transactions and complaints data.
- **Engagement:** initially, the percentage of members who have nominated a beneficiary.

Disclosure: It is proposed that trustees will need to submit these metrics to a centralised database by the end of March each year and publish their assessment of whether their arrangement provides value by the end of October. A link to the VfM database will need to be included on a scheme’s website.

Assessment: The metrics submitted to the VfM database will be used to calculate comparative data and trustees will need to compare their arrangement against this. The comparative data will be based on the data supplied by schemes that are open to new employers and will not include single employer trusts or bespoke (employer-designed) arrangements.

Trustees will need to give their arrangement a rating based on one of the following:

- **Dark green:** Outperforming the comparator group and minimal areas where improvements could be made.
- **Light green:** Delivering value, but areas that could/should be improved.
- **Amber:** Not value but trustees believe improvements are possible within three years.
- **Red:** Not value and a bulk transfer should follow if this is in the best interests of members.

Actions: If an arrangement is rated red or amber, trustees must take action. This will include notifying TPR (within five business days of publishing the assessment) and any employer contributing to the arrangement (within a month), closing to new business where relevant, and submitting action or improvement plans. If the rating is red, members will need to be transferred to arrangements providing value where this is in their best interests.

TPR has urged trustees to consider responding to the consultation to ensure that the new framework is workable. Consultation closes on 8 March 2026.

Practical points:

- Consider responding to consultation.
- Start to consider how required data can be obtained and when.

TARGETED SUPPORT REGIME

It is intended that from April 2026, appropriately authorised firms will be able to give “targeted support” on pensions and investment to individuals based on shared characteristics, rather than fully tailored individual advice. The FCA has issued a policy statement setting out the proposed rules for targeted support which also highlights some issues that trustees who give financial information to members may want to consider.

The FCA has concluded that existing advice and guidance on pensions and investment does not provide individuals with the help they need to make informed decisions. As a result, it has published a [policy statement](#) setting out “near final rules” on a new form of regulated advice, “targeted support”, which is intended to come into force from 6 April 2026.

Targeted support will allow firms to give support to individuals on whether and how to invest or save for their pensions, make recommendations and direct people to products or to take actions with existing products. Targeted support will be designed for groups of consumers with shared characteristics, rather than being based on an individual assessment. It is intended to provide more support than generic information.

Firms providing targeted support will need to comply with a variety of requirements including:

- Identifying consumer segments with shared financial support needs or objectives and, where relevant, common characteristics, in order to deliver suitable ready-made suggestions.
- Communicating the nature of targeted support and the common characteristics of the consumer segment when delivering targeted support.
- Regularly reviewing and monitoring the outcomes of the targeted support service.

Where trustees provide support to members that is solely in relation to in-scheme benefits, this will not fall within the scope of FCA-regulated activities. Where support extends to discussing solutions for members that are FCA-regulated investments and goes beyond providing factual information or guidance, this could potentially amount to a regulated activity, and the FCA reminds trustees that it has [issued joint guidance with TPR](#) which sets out the support trustees may provide to members without needing FCA authorisation.

The statement acknowledges that regulated firms are likely to develop targeted support propositions for members of their own group personal pensions, and where a firm operates a master trust, it and/or the trustees may wish to mirror the way targeted support is provided to group personal pension members. The statement sets out how this might interact with the financial services regime and the issues that should be considered.

It is intended that targeted support will complement the guided retirement proposals in the [Pension Schemes Bill](#) by “helping individuals to be actively supported so they feel confident to make their own choices on how to access their pension benefits in a way that works for them”.

Practical points:

- Review scope of information/advice provided to members from time to time.
- Consider impact of targeted support provisions in a DC context.

PENSIONS OMBUDSMAN

The Pensions Ombudsman has issued a new factsheet for members on overpayments, setting out when they might have a defence to a claim from the scheme that they should repay amounts that have been overpaid.

Factsheet: The Ombudsman has issued [an overpayments factsheet](#) aimed at members. It says that where an overpayment has been made, the scheme will almost always reduce pension to the correct level for the future and will usually seek to recover the amount which has been overpaid. It goes on to explain that there are some defences to repayment:

- **Change of position:** the member will need evidence of spending the extra money on things they wouldn't otherwise have bought, and that they can't recover that money. They must also not have known that they weren't entitled to the money, and there should be no reason why they should have known. It must be unfair to require repayment.
- **EstoppeL:** the member must be able to show that the scheme did something that made them reasonably believe the overpaid amount was correct, and must have made irreversible financial decisions based on this belief. Repayment would be unfair and cause the member to suffer.
- **Delay or 'laches':** where the scheme knew about an overpayment but delayed notifying the member and this caused them loss or disadvantage, the overpayment may not be repayable in relation to the period of delay.
- **Time-limits:** There may be time-limits which prevent an overpayment from being reclaimed.

The Ombudsman says that where a member seeks to rely on a defence, they will need evidence to support their position, and gives examples of the types of evidence that might be acceptable. Evidence will need to be shared with the scheme.

Trustees and administrators should be aware of this guidance and consider whether it might be helpful to share it with members in overpayment cases.

Practical points:

- Consider whether to share factsheet with members when an overpayment has been made.
- Be aware of possible defences to recovery of an overpayment.

CONSULTATION ON CDC CODE OF PRACTICE

The Pensions Regulator is consulting on a new code of practice for collective defined contribution schemes which caters for the introduction of commercial schemes for unconnected employers from the end of July 2026.

Regulations will come into force on 31 July 2026 which, together with existing legislation, set out a new regime for the authorisation and supervision of collective defined contribution schemes (CDC) for employers who are not connected with each other, effectively opening the way for the establishment of commercial CDC schemes.

TPR is responsible for the authorisation and supervision of all CDC schemes and has published a draft code of practice for consultation (which closes on 13 February) in anticipation of the new provisions coming into force. The draft code covers applying for authorisation, the information that will be required, what TPR will take into account when considering applications and TPR's expectations for the conduct and practice of persons with statutory obligations.

It does not cover all aspects of pensions legislation, and trustees are expected to seek the help of advisers to assist them in understanding all of their legal obligations.

Practical points:

- Be aware that the unconnected multi-employer CDC regime is coming into force on 31 July.
- Consider if, in the future, CDC might be an appropriate alternative to existing DC arrangements.

SETTLEMENT IN CASE RELATING TO POTENTIALLY INVALID OF DEEDS OF AMENDMENT

In a recent case the court approved a settlement relating to the potential invalidity of a number of amending deeds over a period of time and a statistical analysis of the likely impact that this would have on member benefits.

A recent case provided an interesting example of how the court can use its powers to approve a settlement when faced with a series of potentially invalid deeds over a number of years, resulting in an almost indeterminable benefit structure and the factors it will take into account when approving such a settlement.

Facts: Between 1993 and 2011 a number of deeds and other documents sought to change the benefits that the Scheme provided. It later emerged that not all of the deeds had been properly executed, section 37 confirmations may not have been obtained and some amendments did not achieve what was intended - increasing benefits rather than reducing them. In some cases, the validity of a later deed depended on the provisions or validity of an earlier deed.

Issue: Discussions had taken place over a number of years to seek a settlement that avoided litigation and achieved a fair outcome for the various stakeholders. The nature of the proposed settlement was complex. The parties wanted to agree that all the deeds at issue would be treated as valid (subject to any amendment constraints). They had also considered the statistical probability that members would have received higher benefits depending on the actual validity of each deed and the impact it would have on later deeds and determined additional benefits for members and beneficiaries based on that probability. The court was asked to approve a settlement and grant Representation Orders to ensure it was binding on all stakeholders.

Decision: The judge was satisfied that the parties had had regard to the interests of all stakeholders. In considering the settlement, the judge said that the “*question is not whether this is the precise settlement that the court would have chosen... [nor] whether some "better" Settlement could be brokered since, given enough time and enough money, that will always be the case. A central question will be whether, having due regard to the interests of all persons covered by the Representation Order, the Settlement is within a range of reasonable settlements.*”

He also said that it was “*appropriate to take into account pragmatic considerations... Settlements offer... beneficiaries... the opportunity to receive additional benefits now, without waiting for years of litigation which might yield them nothing. It also mitigates the Trustee's exposure to still further legal costs*”. The judge considered that the proposed settlement led to a reasonable outcome.

Rectification was also sought to ensure that various deeds worked as intended. In agreeing to the application, the judge set out the key issues which need to be considered in relation to rectification which included:

- A need for a common continuing intention held by the parties which, by mistake, is not reflected in the relevant deed. What matters is the subjective common intention of the parties and where one of them is a corporate entity, it is the subjective intention of the “decision makers” who had the authority to bind it.
- An “outward expression” of the common intention was not necessary in this context as instruments relating to the Scheme are not negotiated in the same way as commercial contracts.
- Documentation was drafted incrementally and trust deeds repeated earlier errors. Rectification of such deeds may be granted if the evidence demonstrates that the intention at the time of a deed’s execution was that it should reflect members’ legal entitlement under an earlier deed as rectified.
- Evidence of how parties conducted themselves after a document is executed is relevant to ascertaining their intention at the time of execution. In particular, if on realising the apparent effect of some wording, the parties to the instrument took some steps to correct it, that is relevant, and indeed significant, evidence.

Practical points:

- Note what is required to rectify a deed.
- Note the statistical approach taken to reach a settlement and consider if relevant.

DATA PROTECTION

The ICO has issued [updated guidance](#) on international data transfers to help organisations determine when and how they can transfer personal data outside of the UK. In addition PASA has [issued guidance](#) on how the Data (Use and Access) Act 2025 might impact pension schemes.

Guidance on international data transfers: People risk losing the protection of UK data protection law if their personal information is transferred or made accessible outside the UK. To protect them, UK GDPR contains rules about transfers of personal information outside the UK and the steps that should be taken to ensure that the data remains secure. These rules apply to the transfer of data by pension schemes in the same way that they apply to other organisations.

The ICO has [updated its guidance](#) on international data transfers. The revised guidance sets out a clear 'three step test' for organisations to identify if they are making transfers covered by the relevant requirements, and an explanation of what to do if they are. For more detail on the changes in guidance [see the blog](#) from our data privacy team.

Data (Use and Access) Act: PASA has issued a paper setting out six areas where the Act could have implications for pension schemes. Two of the areas are particularly worth noting:

- **Subject access requests:** The Act preserves a member's right to access personal data within a month (including requests made by third parties on their behalf); however, it allows the response time to be paused while waiting for clarification or more information. It also confirms searches only need to be 'reasonable and proportionate'.
- **Data protection complaints:** The Act contains new requirements on dealing with data protection complaints, and the ICO has issued [draft guidance](#). Once in force, controllers (including trustees) will need to provide a mechanism for making complaints, acknowledge receipt of them within 30 days, take appropriate steps to respond to a complaint, including making appropriate enquiries and keeping people informed, and tell people the outcome of their complaint "without undue delay". These requirements may mean that data protection complaints should be dealt with separately from other complaints, as the IDRP may not reflect the requirements of the Act.

Practical points:

- Consider if scheme makes overseas transfers of personal data that might engage the guidance.
- Review complaints procedures and consider if additional measures will be required for data protection complaints.

PENSION REGULATOR ACTION IN RELATION TO NORTHERN FOODS SCHEME

The Pensions Regulator has issued [an intervention report](#) in relation to the Northern Foods Scheme arising out of concerns about the employer's continuing ability to support the scheme. A package of support was agreed for the Scheme which included substituting the sponsoring employer with a stronger entity.

The Scheme's sponsoring employer, Northern Foods, was acquired by BHL in 2011, with the acquisition being financed by the issue of corporate bonds. These bonds were redeemed over time by selling businesses belonging to Northern Foods. As the sales led to a reduction in employer covenant available to the Scheme, BHL agreed to put a partial guarantee in place. Further sales led to a further reduction in covenant, although the Scheme did receive some of the proceeds.

TPR was concerned about the material reduction in covenant strength. It determined that BHL had entered into a number of transactions with BPO (with whom they had common shareholders), although there was no evidence that these were not at arm's length. BPO had a strong financial position compared to BHL and TPR concluded that it had benefited directly from the sale of Northern Foods' businesses. TPR issued a warning notice that it would seek financial support for the Scheme from both BPO and BHL, and negotiations ensued which resulted in a package of support for the Scheme, including:

- Replacing the sole statutory employer with BHL's main trading entity.
- Future contributions amounting to around £300 million, which are expected to lead to the Scheme being fully-funded on a prudent low dependency basis by 2034.

- An extended guarantee from BHL to cover all ongoing liabilities, including the Scheme's full section 75 debt.
- An agreement that the Scheme will receive 100% of the net disposal proceeds from one of the smaller of Northern Foods' remaining businesses and 30% from the larger business, if either is sold.
- A guarantee from BPO for contributions due to the Scheme.

TPR says that: "*Along with the scheme's trustee, we believe the likelihood of the scheme's members receiving their full benefits has substantially increased.*"

Practical points:

- *Be aware of the reach of TPR's moral hazard powers beyond an employer's corporate group.*
- *Consider mitigation for any DB scheme if employer covenant is being reduced.*

PENSION SCHEME ADMINISTRATION

The Pensions Regulator has issued updated guidance on its expectations of trustees in relation to scheme administration, the governance processes that they should have in place, how key administration tasks should be approached, what should be included in administration agreements and the monitoring of administrators' performance.

TPR has issued **updated guidance** on how it expects trustees to ensure that their scheme is being properly administered. It goes into considerable detail on the relationship that trustees should have with their administrators, the policies they should have and how they should engage with key administrative practices. The areas covered by the guidance include:

- **Governance:** Trustees should have governance and internal controls in place to ensure benefits are being properly administered and should understand the scope of the administrators' responsibilities and consider and monitor their suitability to perform them. They should also have an administration policy which sets out things such as administration objectives, roles and responsibilities, scope of activities and reporting and monitoring.
- **Member communications:** It is good practice to develop insight about potential issues from the investigation and resolution of member disputes. Trustees should hold administrators to account to ensure this occurs.
- **Contributions and payments:** Schemes should have adequate processes to make sure the payment of contributions, from employers and members are monitored and for dealing with overdue contributions. Where timescales for the investment of contributions cannot be met, trustees should work with the administrator to understand the problem and limit the chances of recurrence.
- **Disaster planning:** Trustees should have a business continuity plan in place, which sets out what actions would be taken if certain events took place that would impact on the running of the administration operation. This should be reviewed at least annually, and tested periodically.
- **Review of administrators:** Trustees should have robust documented arrangements with administrators, and regularly review the suitability of administrators and their performance against these arrangements.

Guidance is also given as to what might be included in administration contracts, reports from administrators, determining performance measures, assessing administrator experience and qualifications and the need for a procedures manual.

Practical points:

- *Consider existing governance frameworks around scheme administration and whether changes are needed.*
- *Consider monitoring and reporting from administrators and whether it meets TPR expectations.*

WATCH LIST

Topic	Details	Relevant dates
1. Collective defined contribution schemes	<p>The Government has issued draft regulations permitting CDC schemes for unconnected employers, paving the way for commercial providers to offer such schemes. It has also consulted on the possibility of allowing trustees to select retirement only CDC arrangements as a default retirement option for members</p>	<p>Regulations intended to come into force in July 2026 on unconnected employer CDC.</p> <p>Consultation on retirement CDC arrangements closed on 4 December 2025.</p> <p>Consultation closes on TPR's CDC code of practice on 13 February 2026.</p>
2. Dashboards	<p>Trustees of the majority of registerable UK schemes with active and/or deferred members will need to ensure that their scheme is connected to the dashboard eco-system over the next 12 months.</p>	<p>Compulsory connection deadline of 31 October 2026 for schemes with 100+ active and/or deferred members at year end between 1 April 2023 and 31 March 2024.</p> <p>Detailed staging timetable set out in DWP guidance.</p>
3. Decumulation options - DC	<p>The Pension Schemes Bill will require trustees to provide access to a default retirement solution for DC members.</p> <p>See 1. above for use of CDC schemes as a solution for these purposes.</p>	<p>Provisions in Pension Schemes Bill due to be enacted in 2026 with regulations also anticipated in 2026.</p> <p>Phased implementation from 2027.</p>
4. Default funds - DC	<p>The Pension Schemes Bill will require multi-employer master trusts and GPPs used for auto-enrolment to have a main default fund with assets of £25 billion. It also sets out a regime for the approval and supervision of such funds.</p>	<p>Provisions in Pension Schemes Bill due to be enacted in 2026. Requirements in force in 2030 with transitional provisions to 2035.</p>
5. Notifiable events on corporate activity - DB	<p>It appears TPR has ceased work on the notifiable events code of practice so it is not clear whether there will be any further developments.</p>	<p>No dates are known as to when or if any progress will be made. It seems this change may have been dropped.</p>
6. Small pots consolidation - DC	<p>The Pension Schemes Bill provides for the consolidation of dormant DC pots of £1000 or less. Consolidators are likely to be DC master trusts.</p>	<p>Provisions in Pension Schemes Bill due to be enacted in 2026. Consolidators selected in 2029 and consolidation to start in 2030.</p>
7. Superfunds - DB	<p>The Pension Schemes Bill sets out a framework for the authorisation and supervision of superfunds and transfers to them.</p> <p>The possibility of a public consolidator is still being considered.</p>	<p>Provisions in Pension Schemes Bill due to be enacted in 2026 with regulations anticipated in 2027. Coming into force in 2028 alongside a new code of practice.</p>

Topic	Details	Relevant dates
8. Surplus - DB	<p>The Pension Schemes Bill will repeal the requirement to have passed a resolution before April 2016 to retain a power to distribute ongoing surplus and include a new statutory power to amend scheme rules to allow a refund.</p>	<p>Provisions in Pension Schemes Bill due to be enacted in 2026 with draft regulations also anticipated in 2026. Requirements in force in 2027 and guidance issued.</p>
9. Tax issues	<p>Draft legislation has been published in relation to inheritance tax (IHT) on inherited benefits and death benefits (excluding lump sum death in service benefits and dependants' scheme pensions).</p> <p>The 2025 budget has announced a cap on salary sacrifice arrangements for pension contributions of £2000.</p>	<p>Final-form legislation is anticipated to be included in the next Finance Bill, to be issued following the 2025 Budget. IHT changes are anticipated from 6 April 2027.</p> <p>These proposals are due to be implemented in April 2029.</p>
10. Value for money - DC	<p>Pension Schemes Bill allows for regulations to set out a new value for money framework for occupational pension schemes.</p>	<p>Provisions in Pension Schemes Bill due to be enacted in 2026 with regulations also anticipated in 2026. First new assessments and published data in 2028.</p> <p>Joint consultation on TPR/FCA proposals closes on 8 March 2026.</p>
11. Virgin Media remediation - DB	<p>Pension Schemes Bill will allow actuaries to retrospectively certify an amendment to contracted-out benefits where historic confirmation cannot now be found.</p>	<p>Bill due to be enacted in 2026.</p>

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