

Pensions Radar

Pensions Radar is a quarterly listing of expected future changes in UK law affecting work-based pension schemes.

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September 2026

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Legislative and regulatory developments

The following are forthcoming developments with known or expected dates:

DB scheme funding and investment

DB schemes are required in connection with their next valuation to have a 'funding and investment strategy' for ensuring that benefits can be provided over the long term. After determining or revising such a strategy, trustees have to prepare a 'statement of strategy', to be agreed with the sponsoring employer. All valuations have to be submitted to the Pensions Regulator, whether or not the scheme is in deficit. See [WHiP Issues 97](#) and [108](#).

Complementing these changes is a Pensions Regulator code of practice and updated covenant guidance. The Regulator has also published its 'fast track' parameters which forms part of its guidance on its regulatory approach. There is a digital platform for submitting documents to the Regulator. See [WHiP Issues 99, 111](#) and [113](#).

Pensions Regulator general code of practice and own risk assessments

The Pensions Regulator has consolidated and updated ten of its codes of practice in a 'General code of practice'.

The General Code also includes new content on scheme governance: this relates to the broadening of internal controls requirements to require occupational pension schemes to "establish and operate an effective system of governance including internal controls", which must be "proportionate to the size, nature, scale and complexity of the activities of the occupational pension scheme". Schemes with 100 or more members also need to undertake an "own risk assessment" of their system of governance at least every three years.

See our [briefings](#) on the various aspects of the Code.

AFFECTS

Occupational DB schemes

Occupational, personal and public service pension schemes

KEY DATE

Valuations with effective dates on and after 22 September 2024

Deadline for completing first ORA: for most schemes, within 12 months of the last day of the first scheme year beginning after 28 March 2024 (e.g. 31 March 2026, where a scheme has a year end of 31 March)

Pensions dashboards

The Government has published guidance including a staged timetable for pension schemes and providers to connect to the pensions dashboards ecosystem and be in a position to process 'find' and 'view' requests. The guidance follows the original plan for staged connection dates, ahead of the legal deadline of 31 October 2026. Schemes are required to "have regard to" the guidance. Dates are determined based on scheme type and number of non-pensioner members. See [WHiP Issues 105](#) and [108](#).

Schemes have been urged to prepare for connection in good time. See our article [10 actions for getting to grips with pensions dashboards](#).

Occupational pension schemes with 100 or more non-pensioner members and public service pension schemes

Starting from 30 April 2025 (based on scheme type and number of non-pensioner members), with an ultimate statutory deadline of 31 October 2026

Corporate directors / failure to prevent fraud / identity verification

Company law statutes include provisions which are of potential relevance to pension scheme trustee companies. These include a ban on corporate directors (i.e. a company acting as a director of another company) and a new offence of failure to prevent fraud. There are likely to be exemptions and transitional measures, details of which are awaited but which may help trustee companies. For example, a trustee (or other) company may be outside the corporate directors ban where it has a director which is a company (for example, an independent trustee firm) but the directors of that firm are all natural persons. See [WHiP Issues 112](#) and [113](#).

The Economic Crime and Corporate Transparency Act 2023 (ECCTA) also includes new requirements for the identity verification of all directors, LLP members and 'people with significant control' of UK companies and LLPs. See our briefing [New UK identity verification requirements under ECCTA](#).

Corporate trustee companies

From 1 September 2025 for the new offence; unknown for the ban on corporate directors.

From 18 November 2025 for new directors; a 12-month transition period applies to existing directors and PSCs, during which existing directors will need to confirm they have verified their identity at the same time as they file their next annual confirmation statement.

Targeted support

The FCA has published final rules for targeted support in pensions and retail investments and applications for targeted support permissions have opened. See [WHiP Issues 117](#) and [119](#).

FCA-regulated pension providers

6 April 2026

Section 37 / regulation 42 certificates

In a case involving a Virgin Media group pension scheme, the Court of Appeal ruled against the employer on the consequences of a deed amending a contracted-out pension scheme not having been accompanied by the actuary's confirmation required under section 37 of the Pension Schemes Act 1993. See [Court of Appeal upholds requirement for written actuarial confirmation when contracted-out benefits were changed](#) and [Q&As briefing](#).

The Pension Schemes Act 2026 contains provisions which are now in force which sets out a mechanism which enables affected pension schemes to retrospectively obtain written actuarial confirmation that historical benefit changes met the necessary standards where they meet the conditions to be a "potentially remediable alteration". The Financial Reporting Council has also issued Technical Actuarial Guidance to assist scheme actuaries in providing such confirmation. See [WHiP Issues 118](#), [119](#) and [120](#).

Trustees of occupational DB schemes which were contracted-out at any time after 5 April 1997

29 April 2026

In a separate case, *Verity Trustees Limited v Wood*, the High Court is considering further questions in this area and other issues around amending scheme rules.

Data protection complaints

Trustees need to ensure that their processes for handling data protection complaints meet new rules under the Data (Use and Access) Act 2025. The new rules are designed to facilitate complaints being made directly to data controllers and include mandatory information requirements and timeframes, including a requirement to acknowledge complaints within 30 days of receipt. Responses must be provided without undue delay. See our [What the UK's data protection reforms mean for pension trustees](#) briefing.

As data controllers, trustees of all occupational pension schemes

19 June 2026

Unconnected multi-employer collective DC expansion

The Government has made regulations to extend collective money purchase pension provision beyond single or connected employer schemes. The regulations set out the regulatory regime for unconnected, multi-employer "whole-life" schemes (i.e. schemes providing accrual and paying benefits). The Pensions Regulator has also laid a "new-look" CDC code of practice before Parliament which will extend the existing CDC Code to cover the authorisation and supervision of unconnected multi-employer CDC schemes. The preservation requirements have also been amended to allow transfers of DC benefits without member consent to authorised CDC schemes. See [WHiP Issues 122](#) and [123](#)

Occupational pension schemes providing CDC benefits which are used by two or more unconnected employers

31 July 2026

PPF and FAS to provide pre-97 increases

The Pension Schemes Act 2026 contains provision for members of the Pension Protection Fund and Financial Assistance Scheme to receive increases linked to the Consumer Prices Index, capped at 2.5% a year, on benefits earned before April 1997. Increases will be prospective only and will apply where a scheme's original governing documentation contained a right to pre-97 or GMP increases. See [WHiP Issue 119](#).

Occupational DB schemes for which the PPF has assumed responsibility

1 January 2027

Pension scheme investment duties

The DWP is working on non-statutory guidance to support trustees of occupational pension schemes in their performance of their fiduciary duties when investing pension scheme assets. It is designed to support trustee decision-making but will not have any statutory or regulatory force as a power to issue statutory guidance was not included in the Pension Schemes Act 2026. Consultation on the draft guidance is expected in 2026, with the final version expected to be published in early 2027. See [WHiP Issue 121](#).

Occupational pension schemes

January to March 2027

Second Pensions Commission report

The Pension Commission will make recommendations to Government "mapping out a path to a pensions system that is truly adequate, in the broadest sense of that word". Its interim report was published in May 2026. The latest State pension age review is likely to report at the same time, though it is not required by law until March 2029. See [WHiP Issue 123](#).

Entire UK pensions system

Spring 2027

Inheritance tax on lump sum death benefits

The Government is bringing most unused pension funds and death benefits into a person's estate for inheritance tax purposes. Death in service benefits and dependants' pensions will be excluded. The relevant provisions are contained in the newly enacted Finance Act 2026. The regulations that detail the information trustees must share with personal representatives and beneficiaries were made on 13 July 2026. HMRC has

Trustees and managers of registered pension schemes, qualifying non-UK pension

6 April 2027

confirmed further regulations will be made later this year. They are also publishing technical notes to help industry prepare. See [WHiP Issues 113, 117, 119, 122 and 124](#).

DB Surplus extraction

The Pension Schemes Act 2026 includes provisions designed to make it easier for schemes to make payments of surplus to employers, where trustees agree and subject to the existing 25% tax charge. This is intended to encourage schemes to consider running on and investing in equities and private markets, rather than de-risking, with the possibility of benefit enhancements for members. See [WHiP Issue 117](#). Draft legislation has been consulted upon setting out the conditions that DB schemes will need to meet before a surplus payment can be made. See [WHiP Issue 123](#).

Draft legislation to be included in the Finance Bill 2026/7 has also been published and includes provision to allow direct lump sum payments of surplus to be paid as authorised payments to members and beneficiaries. See [WHiP Issue 124](#).

GMP conversion

HMRC is consulting on technical amendments to the calculation of pension input amounts where there has been a GMP conversion exercise. Under current rules, when pension schemes equalise GMPs using the D2 method approved in *Lloyds Banking Group Pension Trustees Limited v Lloyds Bank Plc* (2018), deferred members may lose their Deferred Member Carve-Out (DMCO) protection and thus face unexpected annual allowance tax charges. The regulations ensure that DMCO protection is maintained following GMP conversion, regardless of the equalisation method used. See [WHiP Issue 123](#).

DC value for money

The last Government, Pensions Regulator and FCA confirmed the outline of a new framework on metrics, standards and disclosures for value for money assessments in DC occupational pension schemes and personal pensions. An FCA consultation followed. The Government has included legislation in the Pension Schemes Act 2026 and a further joint FCA and Pensions Regulator consultation on the proposed regime closed on 8 March 2026.

DC scheme trustees and independent governance committees of workplace personal pension schemes will be required to assess in detail, compare and disclose the value for money that their scheme provides. This will involve much more than consideration of just costs and charges. The Government and regulators aim to help trustees to make more informed investment and governance decisions and employers to compare options for pension provision, whilst also driving competition.

See [What's Happening in DC – Pension Schemes Bill special](#), [WHiP Issue 120](#) and [Value for money back under the spotlight](#) briefing.

Normal minimum pension age to be raised to 57

The normal minimum pension age for registered pension schemes will be 57 (rather than 55) with effect on and from 6 April 2028. HMRC has consulted on draft regulations to provide some protection for members with existing rights to draw benefits earlier. Trustees who have not already done so should inform members at the next opportunity of any change to the age from which they are able to access benefits under the scheme rules. See [WHiP Issues 94, 122 and 124](#).

schemes and section 615(3) schemes

Occupational DB schemes which are not in wind-up

6 April 2027

Trustees of occupational DB schemes which were contracted-out at any time between 17 May 1990 and 6 April 1997

6 April 2027

Occupational and workplace personal pension DC schemes. Regime will apply to default funds of qualifying automatic-enrolment schemes and legacy "quasi-defaults" which predate automatic enrolment

2028

Registered pension schemes

6 April 2028

DB consolidator schemes

The last Government consulted on proposals for legislation on the authorisation and supervision of DB consolidator schemes, or "superfunds", which are intended to operate in some circumstances as an alternative to buy-out. In the meantime, Pensions Regulator guidance applies. The Pension Schemes Act 2026 includes legislation for this and draft regulations are expected to be published between January and April 2027. There will not at this stage be a public consolidator (although this is still under consideration), only private sector options. See [WHiP Issues 117](#) and [124](#).

Occupational
DB schemes

October 2028

Retirement CDC

Consultation on whether to introduce decumulation-only (or retirement CDC) arrangements in the future closed on 4 December 2025. Draft regulations to introduce retirement CDC schemes are expected to be published for consultation before the end of 2026, coming into force in Q4 2028. See [What's Happening in DC - Pension Schemes Act 2026 special](#).

Occupational
DC schemes

Q4 2028

Lifetime allowance statutory override ends

A statutory override has the effect that scheme rule references to the lifetime allowance continue to have effect following and notwithstanding its abolition on 5 April 2024. This ceases to apply on 5 April 2029, so scheme rules may need to be amended before then, where possible. See [WHiP Issue 108](#).

Registered
pension
schemes

5 April 2029

National Insurance tax relief on salary sacrificed pension contributions

NIC tax relief on pension contributions made through salary sacrifice will be capped so that it is only available for up to £2,000 of contributions a year. Salary sacrificed pension contributions above £2,000 will be subject to employer and employee NICs, like other employee pension contributions. The Government has included legislation on this in the National Insurance Contributions (Employer Pensions Contributions) Act 2026. Much of the detail remains to be contained in future regulations. See our [Autumn Budget 2025 briefing](#) and [WHiP Issue 119](#).

Employers
who give
employees a
choice
between cash
and pension
contributions

6 April 2029

DC decumulation solutions

The last Government proposed a duty on DC schemes to offer decumulation products or services meeting the needs of a generality of their members, to include a collective DC option (see retirement CDC above). This will be implemented under the Pension Schemes Act 2026 and will require schemes to design a default solution (drawdown/annuity/hybrid/CDC) for members who don't make an active choice. Consultation on the draft regulations and FCA rules is expected between July and September 2027 with Pensions Regulator guidance expected later. See [What's Happening in DC – Pension Schemes Act 2026 special](#).

Occupational
DC and FCA
regulated
workplace
schemes

2029 for master
trusts and FCA
regulated workplace
schemes; 2030 for
other occupational
DC schemes

RPI reform

The UK Statistics Authority is expected to align the Retail Prices Index with the Consumer Prices Index including owner-occupied housing costs (CPIH) when it is able to do so unilaterally, which is from February 2030. The last Government declined to consent to earlier reform and a judicial review challenge failed. See [WHiP Issues 78](#), [81](#), [86](#) and [98](#).

Occupational
pension
schemes

February 2030

Small DC pots

The last Government proposed a 'multiple default consolidator' model for dealing with deferred DC pots of less than £1,000. A small number of authorised schemes, expected to be predominantly master trusts, will act as consolidators. The Government has included legislation on this in the Pension Schemes Act 2026 and is consulting on the adoption of a "hybrid" federated delivery model, under which schemes and consolidators exchange data directly, governed by a central oversight body. See our briefing [Small Pots, Big Questions: 10 key answers on the pensions consolidation regime](#).

Occupational and workplace personal pension DC schemes used for automatic enrolment

April to June 2030

DC 'megafunds'

To bring about consolidation of the master trust and group personal pension market into 'megafunds', the Pension Schemes Act 2026 will amend the quality requirements for automatic enrolment qualifying schemes in respect of such schemes, to require scale in default funds. The Government takes the view that larger scale results in more professional investment and investment in a broader range of asset classes, including in private markets.

The Government has indicated that £25 billion scale will have to be met by "main scale default arrangements" by 2030, or by 2035 where transitional relief is granted.

See our briefing [What's Happening in DC – Pension Schemes Act 2026 special](#).

Authorised master trusts and DC workplace pension schemes. Regime will apply to default funds of qualifying automatic-enrolment schemes

2030/2035

Private market investment

Included in the Pension Schemes Act 2026's provisions concerning master trust and GPP 'megafunds' is the power effectively to force such arrangements to invest at least a prescribed percentage of their assets in particular private market asset classes, including in the UK. The Government says that the power to introduce such mandation, which will be repealed by the end of 2032 if not exercised by then, would only be used if industry initiatives do not result in enough private market investment. See our briefing [What's Happening in DC – Pension Schemes Act 2026 special](#) and [WHiP 122](#).

Authorised master trusts and DC workplace pension schemes. Requirement will apply to default funds of qualifying automatic enrolment schemes

2030 / 2035

Data transfers to the EEA

The European Commission's June 2021 adequacy statement regarding protections for personal data transferred from the European Economic Area (EEA) to the UK was renewed on 19 December 2025 and will now run until 27 December 2031, with the possibility of renewal. See [WHiP Issue 120](#).

Data controllers and processors

27 December 2031

Ongoing and recurring events

The following are events that are ongoing or recurring:

Automatic re-enrolment

Every three years

Every three years, an employer must carry out an exercise to re-enrol, into an automatic enrolment scheme, eligible jobholders who opted out after they were automatically enrolled. This duty first arises three years from the employer's staging date, when automatic enrolment was first required, and there is a six-month window around that anniversary during which the exercise must be carried out. It must then be repeated every three years. See our briefing note [Automatic re-enrolment](#).

State pension ages rising

Until 2046 (with implications already for schemes with bridging pensions or state pension offsets)

State pension age for both men and women is rising to age 68 by 2046 but this is due to be reviewed. See [WHiP Issues 102](#) and [117](#). The increase from 66 to 67 has been brought forward by eight years, to take place between 2026 and 2028.

See our briefing note [Bridging pensions – state pension age issues](#), on the issues that rising state pension ages can cause for schemes that attempt to integrate with the state pension.

Expected developments with no confirmed date

The following are expected legislative and regulatory developments for which there is no confirmed date:

Statutory transfer conditions

The Government is consulting on proposed amendments to legislation to address the risks of fraud within SSASs as well as making long called for changes to the existing transfer conditions to address the operational issues seen since they were first introduced on 30 November 2021. The consultation closed on 21 July 2026. See [WHiP Issue 123](#).

Changes to flexible apportionment arrangements

The Pensions Minister has announced that the Government will review the regulations governing flexible apportionment arrangements (**FAAs**) in light of the deal announced in December 2025 under which Aberdeen Group agreed to replace Stagecoach as sponsoring employer of the £1.2bn Stagecoach Group Pension Scheme under a FAA. There is currently no indication of timescales. See [WHiP Issue 123](#).

Climate change transition plans

The Government's consultation on how to introduce climate-related transition plan requirements for a range of UK-regulated financial institutions, including pension funds, closed on 17 September 2025 and a response is awaited. It asked for views on how new transition plan requirements should integrate with the existing climate-related reporting requirements for larger pension schemes.

The Pensions Regulator has been asked to assess the practicalities of transition plans for pension schemes. It will also be convening an industry working group, which is expected to present its findings to the Government later this year. See [WHiP Issue 117](#).

DC chair's statements

The last Government was discussing potential improvements to the DC chair's governance statement requirements with the Pensions Regulator and industry representatives. The value for money framework proposals (see above) are, however, expected to result in the chair's statement requirements being phased out. The last Government was also considering giving the Regulator discretion over fines for non-compliance, which are currently mandatory. See [WHiP Issue 88](#). We wait to see what will happen to these initiatives.

Trustee register

There is expected to be a register of trustees, to help the Pensions Regulator to communicate and collect information. See [WHiP Issue 106](#).

Automatic enrolment extensions

The last Government proposed significant changes to the scope of the automatic enrolment duties from the "mid-2020s", including extending automatic enrolment to 18 to 21 year-olds and removal of the lower pensionable pay threshold, subject to finding ways to make these changes affordable. A statute introduced powers to make the changes but they have not been made. See [WHiP Issue 105](#). The Pensions Commission (see above) will doubtless now be considering this as part of its work.

GMPs and sex discrimination

Judgments in the *Lloyds Banking Group* case have provided some clarity about the need to equalise benefits to remove the discriminatory effects of GMPs and about the obligations on trustees as regards past transfers-out. See our briefing notes [GMP equalisation: court ruling](#) and [GMP equalisation – where are we now?](#).

The Government previously stated its intention to legislate to remove the need for a claimant to point to a comparator of the opposite sex in order to establish unlawful discrimination. Implementation was delayed, however, pending the *Lloyds* litigation and consideration of a combined value-equalisation and GMP-conversion process. There has been no news on progress on this.

HMRC published newsletters in [February 2020](#), [July 2020](#), [April 2022](#) and [June 2022](#) on tax issues relating to GMP equalisation adjustments (respectively on: dual records adjustments to pension benefits; adjustments to lump sum payments; transfer corrections and GMP conversion; and tax on pension arrears and interest).

An industry group has been considering issues for trustees and administrators and has issued [guidance notes](#) on various aspects.

A statute on GMP conversion, intended to make it easier to use that facility alongside equalisation, was passed in 2022. The substantive legislative changes are left to regulations, a draft of which is currently being consulted upon. The regulations will not apply to conversions completed prior to the regulations coming into force and do not affect those schemes that have started the process of consulting their members regarding GMP conversion at the time the regulations come into force. See [WHiP Issues 93](#) and [95](#).

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