The Highland Council
Comhairle na Gàidhealtachd

6 November 2025

Local Government, Housing and Planning Committee
The Scottish Parliament
Edinburgh
EH99 1SP

For attention: Ariane Burgess, MSP

Dear Ariane

Thank you for your letter dated 10th October requesting the views of the Highland Pension Fund (HPF) on the Pensions Bill and whether it would be desirable to exercise the new regulatory powers to follow the approach proposed in England and Wales or in other ways.

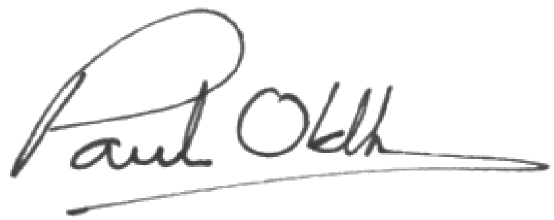
On behalf of HPF, I acknowledge and appreciate that the Government has lodged a Legislative Consent Memorandum in order to future proof the scheme and may potentially look to adopt some of the English and Welsh legislation.

In my role as Chair and representing the HPF Pensions Committee, I would like to highlight the excellent position that the Scottish Local Government Pension Schemes (LGPS) are in following the 2023 triennial actuarial valuation. It was reassuring to see the Government Actuary section 13 report that highlighted that "the aggregate funding position of the scheme has improved markedly" and early indications are that the position is set to improve further at the valuation in 2026. On behalf of HPF, I would not want to see any structural change that could adversely and/or materially impact Scottish LGPS pensions funds, investment returns, employee contributions and employer contributions.

Regardless of legislative change, in my role as Pensions Committee Chair I am aware that strong networks exist across the Scottish LGPS, with significant collaboration across the 11 Scottish Funds and a focus on achieving best value for all LGPS members and employers.

If future proposals are to be brought forward using the Legislative Consent, on behalf of HPF I would like assurances that there will be a formal, comprehensive and robust consultation completed.  As part of this consultation process, I would expect the Scheme Advisory Board and all Scottish LGPS Pensions Committee, Pensions Board and other appropriate stakeholders to be formally consulted on proposals.

Yours sincerely



**Paul Oldham**
Chair, Investment Sub Committee
Highland Council Pension Fund