

Law Debenture response — key positions

We strongly support TPR’s shift toward measuring success by the retirement income people actually receive. But **sustainable income must mean adequate income** — supporting a reasonable standard of living and retaining its real value over time.

This is a shared system responsibility — across employers, members, trustees, and regulators. TPR’s strategy should be explicit that the system as a whole will be measured against that standard, not trustees alone.

Three areas Where targeted TPR action will drive member outcomes



DC retirement income & CDC

Trustees must own default decumulation design, not just accumulation.

Pre-retirement engagement — particularly around five years out — is the productive window. CDC governance must treat honest member communications as a core trustee obligation from day one.



Value for Money

Trustee independence is material to VFM assessment quality.

J-curve cost profiles must not penalise productive finance investment. The herding risk is driven by blunt rating consequences — a below-green rating should trigger dialogue, not an automatic bar on new members.



Technology & AI

The risk is passive adoption, not misuse.

Trustees must interrogate AI outputs, scrutinise vendors, and retain genuine fiduciary responsibility. Governance frameworks and trustee capability standards must evolve in step with the growing role of AI in scheme decisions.

Two structural questions The industry must also address



DB endgame governance

The endgame decision landscape has expanded materially.

TPR must set clear expectations for journey plan quality and endgame vehicle due diligence — and address directly the structural conflicts that arise when a trustee is affiliated with advisers who have a commercial stake in the outcome.



Defining genuine independence

“Professional trustee” encompasses three fundamentally different models.

Genuinely independent firms, integrated advisory businesses, and sole independent practitioners carry categorically different conflict profiles. TPR’s governance paper must define independence structurally — not declaratorily.

ABOUT LAW DEBENTURE

198

trust-based schemes as trustee or co-trustee

£317bn

aggregate scheme assets under trusteeship

6.1m

members across DB and DC schemes

Our schemes span DB and DC across the full spectrum of size, complexity, and maturity. Our model is built on **structural independence from strategic advisory services**. We welcome the opportunity to contribute to the governance paper, AI approach paper, and VFM secondary legislation that follow from TPR’s strategy.

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