



12 February 2026

Agenda Item: 5

REPORT OF THE SERVICE DIRECTOR, CUSTOMERS, GOVERNANCE AND EMPLOYEES

PENSIONS ADMINISTRATION PRIVACY NOTICE AND RETENTION SCHEDULE

Purpose of the Report

1. The report informs Nottinghamshire Pension Fund Committee of the updated privacy notice for pensions administration and gives members assurance that it reflects new requirements associated with the pensions dashboard programme.

Information

2. In the UK, data protection is governed by the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Everyone responsible for using personal data must make sure the information is:
 - Used fairly, lawfully and transparently
 - Used for specified, explicit purposes
 - Used in a way that is adequate, relevant and limited to only what is necessary
 - Accurate and, where necessary, kept up to date
 - Kept for no longer than is necessary
 - Handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage
3. Additional protections are in place for sensitive data.
4. Individuals also have rights in respect of their data, which include the right to:
 - Be informed about how their data is being used
 - Access their personal data
 - Have incorrect data updated
 - Have data erased
 - Stop or restrict the processing of their data
 - Data portability
 - Object to how their data is being processed in certain circumstances

5. Individuals also have rights where an organisation uses their personal data for automated decision-making processes or profiling.
6. Organisations publish privacy notices that set out how they handle and process personal data, including an explanation of the reason personal is collected, what they plan to do with it, how long they will keep it and whether it will be shared with any other organisation. They also set out data subjects' rights over the use of their personal data.
7. In line with the requirements placed on it regarding data, Nottinghamshire Pension Fund's Pensions Administration Team publishes a privacy notice, which explains how the Fund collects, shares and uses the personal data of its members and their beneficiaries and their rights in relation to their data.
8. The Local Government Association commissioned a template privacy notice (a full notice and a short-form privacy notice). The notices enable administering authorities, in their capacity as a controller of personal data relating to the Local Government Pension Scheme fund for which they are responsible, to satisfy their obligation under data protection legislation to inform affected individuals what personal data is held and how it is used for the purposes of the pension fund.
9. Osborne Clarke LLP was commissioned to review the templates at the end of 2025 in light of updated legislation and requirements placed on Funds. In December 2025, the LGA shared the revised templates for the full privacy notice and the short form privacy notice. Funds then personalise them to reflect their local arrangements. The full privacy notice for Nottinghamshire is attached as **Appendix A** to this report, and the short-form version is attached as **Appendix B**.
10. The templates take account of guidance issued by the Information Commissioner and the European Data Protection Board. The reviewed documents incorporate changes relevant to the requirement for Funds to connect to the Pensions Dashboard (pursuant to the Pensions Dashboards Regulations 2022) and changes made under UK data protection law by the Data (Use and Access Act) 2025.

Communications

11. The updated privacy notice will be published on the Fund's website. Members will be made aware of the updated privacy notice through several communication routes including a message on the pensioners March payslip, an article within the annual pensioner leaflet and a link to the privacy notice on correspondence sent out to members. Scheme Employers will be updated on the revised privacy notice by the Employer Support & Compliance Team.

Other Options Considered

12. As a data controller, the Fund must ensure that it has privacy notices in place, setting out how it will manage and process personal data. If the privacy notices are not updated to reflect changes in legislation and practice, the Fund would be in breach of data protection requirements.

Reason/s for Recommendation/s

13. The updated privacy notices ensure that the Fund complies with its data protection obligations, and reflect the new responsibilities to which it will be subject as part of the implementation of the pensions dashboard programme

Statutory and Policy Implications

14. This report has been compiled after consideration of implications in respect of crime and disorder, data protection and information governance, finance, human resources, human rights, the NHS Constitution (public health services), the public sector equality duty, safeguarding of children and adults at risk, service users, smarter working, sustainability and the environment and where such implications are material they are described below. Appropriate consultation has been undertaken and advice sought on these issues as required.

Financial Implications

15. There are no financial implications arising as a result of this report, however failure to meet any requirements placed on the Fund regarding the handling and processing of data could lead to fines being levied against it.

Legal Implications

16. There are no legal implications arising as a result of this report; however, the Fund may face regulatory penalty by the Information Commissioner's Office or the Pensions Regulator if it fails to meet any requirements placed on it regarding the handling and processing of data.

Local Government Reorganisation Implications

17. There are no local government reorganisation implications arising as a result of this report.

Data Protection and Information Governance

18. As part of its responsibilities as a data processor, Nottinghamshire Pension Fund must publish a privacy notice that sets out its legal basis for processing data and individuals rights in respect of their data that the Fund holds. The Funds privacy notices are kept under review to ensure they remain fit for purpose and reflect any new activities or ways of working.

RECOMMENDATION

1) That Nottinghamshire Pension Fund notes the updated full privacy notice and short form privacy notice attached as **Appendix A** and **Appendix B** of this report.

Marjorie Toward

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Legal Comments (KK 04/02/25)

19. The proposal in this report is within the remit of the Nottinghamshire Pension Fund Committee.

Financial Comments (TMR 28/01/25)

20. The financial implications are set out in paragraph 15.

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

- None

Electoral Division(s) and Member(s) Affected

- All