

## Disclosure of Senior Managers' Remuneration (Greenbury) 2021

We anticipate that the Greenbury functionality within Pensions Online (POL) will be available from Monday 4 January 2021. This means that all requests for disclosure must be received by NHS Pensions between 4 January 2021 and 26 February 2021 to enable us to provide you with the necessary disclosure information by 1 April 2021. Please note that we are unable to guarantee any requests or queries received after 26 February 2021 will be dealt with by 1 April 2021.

### 1. Who should employers request Greenbury figures for?

The Department of Health and Social Care (DHSC) Group Accounting Manual (GAM) 2020-21 states the remuneration report must disclose information on those persons in senior positions having authority or responsibility for directing or controlling major activities within the group body. This means those who influence the decisions of the entity as a whole rather than the decisions of individual directorates or departments.

The GAM goes on to say:

“The Chief Executive or Accounting/Accountable Officer must be asked to confirm whether this covers more than the executive and non-executive directors (for CCGs – attendees at Governing Body meetings). It is usually considered that the regular attendees of the entity’s board meetings are its senior managers.”

The NHS Foundation Trust Annual Reporting Manual (ARM) defines senior managers as:

‘those persons in senior positions having authority or responsibility for directing or controlling the major activities of the NHS foundation trust’. The chief executive should confirm whether this covers more than the chair, the executive and non-executive directors of the NHS foundation trust (who should be treated as senior managers as a matter of course).

### General Data Protection Regulation

There is a presumption that information about named individuals will be given in all circumstances. However, organisations must inform individuals in advance of the intention to disclose information about them, invite them to see what is intended to be published and notify them they can object under Article 21 of the General Data Protection Regulation (GDPR).

More information regarding this can be found at 3.49 and 3.50 of the GAM and 2.50 and 2.51 of the ARM.

## 2. What will NHS Pensions provide?

We will provide disclosure information for executive directors and other senior managers, as confirmed by the chief executive.

This includes pension, lump sum (if applicable) and the Cash Equivalent Transfer Value (CETV). We will not carry out any calculations for non-executive directors because they do not meet the criteria in the GAM of a senior manager, due to their self-employed or fee based status.

## 3. What if an executive director is also a medical General Practitioner (GP)?

Disclosure information will only be provided where the GP is an employed senior manager or executive director. If the GP is employed (i.e. contract of service) by a Clinical Commissioning Group (CCG) as a senior manager or executive director and pays pension contributions then they will be classed as an Officer for pension purposes and Greenbury disclosure will apply.

If the GP is also engaged under a contract for services arrangement (i.e. self-employed) by a CCG then Greenbury disclosure will not apply to this element of their work. Under this arrangement the GP is afforded Practitioner status which is not included in the calculation of the accrued pension, lump sum (if applicable) and CETV.

If we are asked for disclosure information for a GP and their pension record holds practitioner membership only we will assume they are a non-executive director and no information will be provided. It is important for employers to check that the pension records of their senior managers are correctly updated.

We will provide information based on calculations using Officer membership **only**.

The Greenbury exercise only relates to remuneration in Public Bodies which means GP Practices and most Direction bodies are not required to take part.

## 4. How to submit disclosure information requests for the 2021 Greenbury exercise

Employers must request Greenbury senior manager remuneration disclosures for the 2020/21 financial year via POL screens. We will use these screens to return the requested pension, lump sum (if applicable) and CETV to each employer. Employers will only be able to view their own disclosure requests.

Employers will need to nominate a user and allocate Greenbury access to that user before disclosures can be requested. Employers will be able to use the previous year's user and password details.

If you have any queries about registering a user on POL, please contact the POL Helpline on 0870 011 7108. Any other Greenbury queries should be directed to: [nhsbsa.greenbury@nhs.net](mailto:nhsbsa.greenbury@nhs.net)

The POL screens will also support:

- communication between employers and NHS Pensions concerning Greenbury queries
- requests for re-calculation of Greenbury disclosures
- a comparison of this year's disclosure figures with last year's figures (Show Compare).

The updated POL Guidance for Greenbury is now available on our website at:

<http://www.nhsbsa.nhs.uk/nhs-pensions/>

You will also find:

- guidance notes for Finance, Payroll and pension staff at Annex A, and
- worked example calculations at Annex B, C and D.

## 5. Further information

You can find more information in the GAM 2020/21 which includes mandatory accounting guidance for all bodies within the DHSC accounting boundary as defined in the document completing statutory annual reports and accounts.

<https://www.gov.uk/government/publications/dhsc-group-accounting-manual-2020-to-2021>

The annual reporting guidance in the GAM applies to all bodies within the DHSC accounting boundary with the exception of NHS foundation trusts, who must instead follow the separate NHS Foundation Trust Annual Reporting Manual (ARM).

<https://www.england.nhs.uk/financial-accounting-and-reporting/nhs-foundation-trust-annual-reporting-manual/>

## Annex A

### Disclosure of Senior Managers' Remuneration (Greenbury)

#### Guidance for Finance, Payroll and Pensions staff

##### 1. Introduction

This guidance details the actions that employers must take to meet the specific deadlines for the 2020/21 financial year. Compliance with these actions will assist us in providing you with the required pension information including accrued pension, lump sum (if applicable) and Cash Equivalent Transfer Value (CETV) for the year ending 31 March 2020 so you can complete your accounts.

Calculation of the real increase in pension, lump sum (if applicable) and CETV must be calculated locally.

If the senior manager is a transition member we will provide you with separate pension information for the 1995/2008 Scheme and the 2015 Scheme. You will need to add these figures together to calculate the real increases.

No lump sum will be shown for senior managers who only have membership in the 2015 Scheme or 2008 Section, unless they chose to move their 1995 Section benefits to the 2008 Section under the Choice exercise. Also no CETV will be shown for pensioners and senior managers over Normal Pension Age (NPA).

NPA is age 60 in the 1995 Section, age 65 in the 2008 Section or State Pension Age (SPA) or age 65, whichever is the later, in the 2015 Scheme.

Included at Annex B are examples of how to calculate the real increase. These examples are purely for guidance.

##### 2. Key dates

Requests for information must be received between **4 January 2021** and **26 February 2021** to enable us to provide you with the necessary disclosure information by **1 April 2021**.

We are unable to accept disclosure requests via email or hard copy. The nominated user must send all requests through the POL screens and information will be returned to that user.

### 3. Important note

Employers should ensure that all information is requested between the dates stipulated above and the information we subsequently provide is checked upon receipt.

We cannot guarantee that requests (or queries) received after 26 February 2021 will be dealt with by 1 April 2021.

### 4. Employer action

To ensure that the deadlines are met, it is important for there to be good communication between Finance, who is coordinating the information, and Payroll/Pensions, who are completing the requests via POL. Each department should be aware of the actions relevant to both Finance and Payroll/Pensions.

### 5. Finance action

To provide a list of all senior managers for whom disclosure of pension information may be required and send it to Payroll/Pensions in sufficient time for the nominated user to complete a submission on POL within the deadlines. The list should include senior managers who have withheld their consent to disclosure as this will ensure that employers have the information available in case there is change of mind.

### 6. Payroll/Pensions action

Before the start of the 2020/21 disclosure submission a user will need to be nominated by the employer and their access rights set to allow Greenbury access.

This person could be a new POL user or an existing POL user for whom Greenbury access will be added to their overall access rights. Employers are reminded that they can have only one user with Greenbury access. This is to allow any automated NHS Pensions emails generated to be directed to a single email contact point.

If a different POL user needs to be allocated Greenbury access rights the previous user must have their Greenbury access switched off first, this does not affect any other POL access rights. The new user can then be allocated Greenbury access. Access rights on POL can be set by selection of 'Administer Employer Access' from the main menu when logged in as an administrator.

On receipt of the full list of senior managers, for whom disclosure of pension information is required, you must make sure that the pension record for each senior manager is updated to at least 31 March 2020. This can be done using POL.

Care should be given when providing the correct pensionable pay (we realise that in most cases this will be estimated) If a 1995/2008 Scheme senior manager is whole time you must provide the actual pensionable pay. If the senior manager is part time you must provide the notional whole time pensionable pay.

For a 2015 Scheme senior manager you must provide their pensionable earnings. The pensionable pay or earnings you provide should be for the period 1 April 2020 to 31 March 2021, unless the senior manager joined or left pensionable NHS employment during this period.

**Example 1** - Date of joining pensionable NHS employment is 1 October 2020. The pensionable pay or earnings provided should be for the period 1 October 2020 to 31 March 2021.

**Example 2** - In pensionable NHS employment on 1 April 2020 but then leaves employment on 30 September 2020. The pensionable pay or earnings provided should be for the period 1 April 2020 to 30 September 2020.

If the person has only been a senior manager for part of the period but was employed by you for all of the period, we will require pensionable pay for 1 April 2020 to 31 March 2021.

Where a 1995/2008 Scheme member had tapered protection which ceased during the period, 1 April 2020 to 31 March 2021 and has moved to the 2015 Scheme they will have a final salary link. In addition to the 1995/2008 Scheme pensionable pay for this period we also need pensionable earnings from their start date in the 2015 Scheme to 31 March 2021.

As well as completing the pensionable pay boxes for the 1995/2008 Scheme you must provide the 2015 Scheme pensionable earnings in the comment/query box. We will ask you for this information if you have not included it.

## 7. NHS Pensions action

For requests received between 4 January 2021 and 26 February 2021 we will calculate and supply the accrued pension, lump sum (if applicable) and CETV as at 31 March 2021. We will use the employer grid on POL to supply this information to the nominated user. This is explained in more detail on pages 8 to 12 of the Greenbury POL Guide.

## 8. Making an enquiry

We experience a high volume of calls and queries from employers during the Greenbury exercise. To ensure we deal with your enquiry as quickly and efficiently as possible we ask that you contact us via our dedicated Greenbury email account. An experienced pension administrator on the Greenbury Team will deal with your enquiry and either call you back or respond by email as soon as possible.

The Greenbury Team email address is [nhsbsa.greenbury@nhs.net](mailto:nhsbsa.greenbury@nhs.net)

## 9. Further information

More information can be found in the Pensions Online Guide at: <http://www.nhsbsa.nhs.uk/nhs-pensions>

For more information you should consult the GAM 2020/21  
<https://www.gov.uk/government/publications/dhsc-group-accounting-manual-2020-to-2021>

or, the ARM 2019/20  
<https://www.england.nhs.uk/financial-accounting-and-reporting/nhs-foundation-trust-annual-reporting-manual/>

## Annex B

### B1. Examples to aid completion of Table 2: Pension Benefits

Worked examples of how to calculate the real increase in:

- accrued pension,
- lump sum (if applicable) and
- CETV.

#### B1.1 Example 1: Completion of (a)

*Table 1 Increase in accrued pension where the senior manager was in post for the entire year.*

Accrued pension as at 31 March 2020 (previous year end)	£48,994 (A)
Accrued pension as at 31 March 2021 (current year end)	£54,513 (B)
Accrued pension as at 31 March 2020 (previous year end) plus inflation (@ 1.7%)	£48,994 (A) x 1.017 = £49,826.90(C)
Real increase in accrued pension during current financial year	£54,513 (B) - £49,826.90 (C) = <b>£4,686.10 (D)</b>

Where:

A = accrued pension at normal pension age (NPA) as at 31 March 2020 (previously provided by NHS Pensions)

B = accrued pension at NPA as at 31 March 2021 (to be provided by NHS Pensions)

C = accrued pension at NPA as at 31 March 2020 plus inflation (see note 4 on page 10)

D = real increase in accrued pension at NPA during the financial year

## B 1.2 Example 2: Completion of (b)

Table 2 Increase in accrued lump sum where the senior manager was in post for the entire year.

Accrued lump sum as at 31 March 2020 (previous year end)	£146,982 (A)
Accrued lump sum as at 31 March 2021 (current year end)	£157,839 (B)
Accrued lump sum as at 31 March 2020 (previous year end) plus inflation (@ 1.7 %)	£146,982 (A) x 1.017 = £149,480.69 (C)
Real increase in accrued lump sum during current financial year	£157,839 (B) - £149,480.69 (C) = <b>£8,358.31 (D)</b>

Where:

A = accrued lump sum at NPA as at 31 March 2020 (previously provided by NHS Pensions)

B = accrued lump sum at NPA as at 31 March 2021 (to be provided by NHS Pensions)

C = accrued lump sum at NPA as at 31 March 2020 plus inflation (see note 4 on page 10)

D = real increase in accrued lump sum at NPA during the financial year

## B 1.3 Example 3: Completion of (f)

Table 3 Increase in CETV where the senior manager was in post for the entire year.

CETV as at 31 March 2020 (previous year end)	£500,000 (A)
CETV as at 31 March 2021 (current year end)	£560,000 (B)
CETV as at 31 March 2020 (previous year end) plus inflation (@ 1.7%)	£500,000 (A) x 1.017 = £508,500 (C)
Real increase in CETV during current financial year before deductions	£560,000 (B) - £508,500 (C) = £51,500 (D)
Real increase in CETV during current financial year after deductions	£51,500 (D) - £15,000 (E) = <b>£36,500 (F)</b>

Where the calculation results in a negative figure you should submit zero in column (f).

Where:

A = CETV as at 31 March 2020 (previously provided by NHS Pensions)

B = CETV as at 31 March 2021 (to be provided by NHS Pensions)

C = CETV as at 31 March 2020 plus inflation (see note 4 on page 9)

D = increase in CETV at NPA during the financial year before deductions

E = employee pension contributions for the year (to be extracted from payroll records)

F = real increase to be reported

#### **Please note for all the above examples**

- 1) Where there was no corresponding disclosure in respect of the senior manager in the 2019/20 accounts and no accrued pension, lump sum (if applicable) and CETV as at 31 March 2020 then we will provide this figure on request.
- 2) No lump sum will be shown for senior managers who only have membership in the 2015 Scheme or 2008 Section (unless they chose to move their 1995 Section benefits to the 2008 Section under the Choice exercise).
- 3) No CETV will be shown for pensioners or senior managers over NPA. Age 60 in the 1995 Section, age 65 in the 2008 Section or SPA or age 65, whichever is the later, in the 2015 Scheme.
- 4) The inflation applied to the accrued pension, lump sum (if applicable) and CETV is the percentage (if any) by which the Consumer Prices Index (CPI) for the September before the start of the tax year is higher than it was for the previous September.

The Consumer Prices Index up to September 2019 was 1.7%, therefore, an increase of 1.7% should be applied to pensions and CETV at April 2020.

## Annex C

### C1. Examples where senior manager not in post for the full year.

#### C 1.1 Example 1: Completion of (a)

Table 4 Increase in accrued pension where the senior manager moved into post on 25 June 2020

Accrued pension as at 31 March 2020 (previous year end)	£48,994 (A)
Accrued pension as at 31 March 2021 (current year end)	£55,613 (B)
Accrued pension as at 31 March 2020 (previous year end) plus inflation (@ 1.7%)	£48,994 (A) x 1.017 = £49,826.90 (C)
Real increase in accrued pension during current financial year	£55,613 (B) - £49,826.90 (C) = £5,786.10 (D)
Real increase proportion for the time in post	£5,786.10 (D) x 280/365 (E) = <b>£4,438.65 (F)</b>

Where:

A = accrued pension at NPA as at 31 March 2020 (to be provided by NHS Pensions on request)

B = accrued pension at NPA as at 31 March 2021 (to be provided by NHS Pensions)

C = accrued pension at NPA as at 31 March 2020 plus inflation (see note 4 on page 12)

D = real increase in accrued pension at NPA during the financial year

E = number of days in post as a proportion of the year

F = real increase to be reported

#### Note:

The methodology above should then be applied to the lump sum (if applicable) and CETV calculation respectively – in the case of the CETV calculation a final step should be added to deduct the employee's contributions for the period of employment during the year

## C 1.2 Example 2: Completion of (f)

Table 5 Increase in CETV where the senior manager was in post at 1 April 2020 but left their post on 10 October 2020 to move to a new NHS employer, and continued to accrue pensionable membership.

CETV as at 31 March 2020 (previous year end)	£510,000 (A)
CETV as at 31 March 2021 (current year end)	£560,000 (B)
CETV as at 31 March 2020 (previous year end) plus inflation (@ 1.7%)	£510,000 (A) x 1.017 = £518,670 (C)
Real increase in CETV during current financial year before deductions	£560,000 (B) - £518,670 (C) = £41,330 (D)
Real increase proportion for the time in post before deductions	£41,330 (D) x 193/365 (E) = £21,853.95 (F)
Real increase proportion for the time in post	£21,853.95 (F) - £8,000 (G) = <b>£13,853.95 (H)</b>

Where the calculation results in a negative figure you should submit zero in column (f).

Where:

A = CETV as at 31 March 2020 (previously provided by NHS Pensions)

B = CETV as at 31 March 2021 (to be provided by NHS Pensions)

C = CETV as at 31 March 2020 plus inflation (see note 4 on page 12)

D = real increase in CETV during the financial year before deductions

E = number of days in post as a proportion of the year

F = real increase proportion for the time in post before deductions

G = employee pension contributions for the period of employment during the year (to be extracted from payroll records)

H = real increase to be reported

**Note:**

The methodology above should then be applied to the pension and lump sum calculation respectively but excluding the final step (deduction of employee's contributions)

## C 1.3 Example 3: Completion of (f)

Table 6 Increase in CETV where the senior manager was in post at 1 April 2020 but left the pension scheme on 10 October 2020 therefore accrued no further pensionable membership.

CETV as at 31 March 2020 (previous year end)	£510,000 (A)
CETV as at 31 March 2021 (current year end)	£560,000 (B)
CETV as at 31 March 2020 (previous year end) plus inflation (@ 1.7%)	£510,000 (A) x 1.017 = £518,670 (C)
Real increase in CETV during current financial year before deductions	£560,000 (B) - £518,670 (C) = £41,330 (D)
Real increase in CETV during current financial year after deductions	£41,330 (D) - £8,000 (E) = <b>£33,330 (F)</b>

Where the calculation results in a negative figure you should submit zero in column (f).

Where:

A = CETV as at 31 March 2020 (previously provided by NHS Pensions)

B = CETV as at 31 March 2021 (to be provided by NHS Pensions)

C = CETV as at 31 March 2020 plus inflation (see note 4 on page 12)

D = real increase in CETV during the financial year before deductions

E = employee pension contributions for the period of scheme membership during the year (to be extracted from payroll records)

F = real increase to be reported

**Note: The methodology above should then be applied to the pension and lump sum calculation respectively but excluding the final step (deduction of employee's contributions)**

### Please note for all the above examples

- 1) Where there was no corresponding disclosure in respect of the senior manager in the 2019/20 accounts and no accrued pension, lump sum (if applicable) and CETV as at 31 March 2020 then we will provide this figure on request.

2) No lump sum will be shown for senior managers who only have membership in the 2015 Scheme or 2008 Section (unless they chose to move their 1995 Section benefits to the 2008 Section under the Choice exercise).

3) No CETV will be shown for pensioners or senior managers over NPA. Age 60 in the 1995 Section, age 65 in the 2008 Section or SPA or age 65, whichever is the later, in the 2015 Scheme.

4) The inflation applied to the accrued pension, lump sum (where applicable) and CETV is the percentage (if any) by which the Consumer Prices Index (CPI) for the September before the start of the tax year is higher than it was for the previous September.

The Consumer Prices Index up to September 2019 was 1.7%, therefore, an increase of 1.7% should be applied to pensions and CETV at April 2020

The examples are for guidance only.

## Further information

If you are still unsure of how to calculate the real increase you should consult the GAM 2020/21 or the ARM 2019/20.

For more information you should consult the GAM 2020/21:

<https://www.gov.uk/government/publications/dhsc-group-accounting-manual-2020-to-2021>

or, the ARM at 2019/20

<https://www.england.nhs.uk/financial-accounting-and-reporting/nhs-foundation-trust-annual-reporting-manual/>

## Annex D

### D1. Example to aid completion of Table 1: Single total figure table

#### (e) All pension related benefits

Accounts must also include disclosure information about salaries and allowances. This is separated into six columns. These are:

- column (a) is salary and fees
- column (b) is all taxable benefits
- column (c) is annual performance-related bonuses
- column (d) is long-term performance-related bonuses
- column (e) is all pension-related benefit
- column (f) is a total of the above items.

The Greenbury figures we provide will assist employers with the completion of column (e), to calculate all the senior manager's benefits in the financial year from participating in pension schemes.

This is the aggregate input amounts, calculated using the method set out in section 229 of the Finance Act 2004. This figure will include those benefits accruing to senior managers from their membership of the 1995/2008 Scheme and 2015 Scheme. Any pension contributions made by the senior manager or any transferred in amounts are excluded from this figure.

The amount to be included here is the annual increase (expressed in £2,500 bands) in pension entitlement.

In summary: for the 1995/2008 Scheme and 2015 Scheme the increase is calculated using the following formula:

$$\text{Increase} = ((20 \times \text{PE}) + \text{LSE}) - ((20 \times \text{PB}) + \text{LSB}) - \text{Ees cont}$$

#### Where

PE = the annual rate of unreduced pension that would be payable to the senior manager if they became entitled to it at the end of the financial year

LSE = the amount of unreduced lump sum that would be payable to the senior manager if they became entitled to it at the end of the financial year

PB = the annual rate of unreduced pension, adjusted for inflation, that would be payable to the senior manager if they became entitled to it at the beginning of the financial year

LSB = the amount of unreduced lump sum, adjusted for inflation, that would be payable to the senior manager if they became entitled to it at the beginning of the financial year.

Ees cont = employee pension contributions for the financial year

To adjust PB and LSB for inflation you should use the CPI of 1.7% and multiply the pension and lump sum (if applicable) by the factor of 1.017.

## Example

Accrued pension as at 31 March 2020 (previous year end)	£49,451 (A)
Accrued pension as at 31 March 2021 (current year end)	£52,613 (PE)
Accrued pension as at 31 March 2020 (previous year end) plus inflation (@ 1.7%)	£49,451 (A) x 1.017 = £ 50,291.67 (PB)
Accrued lump sum as at 31 March 2020 (previous year end)	£148,353 (D)
Accrued lump sum as at 31 March 2021 (current year end)	£157,839 (LSE)
Accrued lump sum as at 31 March 2020 (previous year end) plus inflation (@ 1.7%)	£148,353 (D) x 1.017 = £150,875.00 (LSB)
Employee's pension contributions	£15,000 (Ees cont)

PE = £52,613

LSE = £157,839

PB = £49,451 x 1.017 = £50,291.67

LSB = £148,353 x 1.017 = £150,875.00

Ees cont = £15,000

$((20 \times PE) + LSE) - ((20 \times PB) + LSB) - Ees\ cont$

$((20 \times £52,613) + £157,839) - ((20 \times £50,291.67) + £150,875.00) - £15,000 = £38,390.60$

Where the calculation results in a negative figure you should submit zero in column (e).