

Disclosure of Senior Managers' Remuneration (Greenbury) 2024

The Greenbury functionality within Pensions Online (POL) is available from Monday 15 January 2024. All requests for disclosure must be received by NHS Pensions from 15 January 2024 to 28 February 2024 so we can provide you with the necessary information to meet your reporting timescales. Please note that we are unable to guarantee any requests or queries received after 28 February 2024.

1. Who should employers request disclosure figures for?

The Department of Health and Social Care (DHSC) Group Accounting Manual (GAM) 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. 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 ARM goes on to say. ‘such persons will include advisory and non-executive board members’.

2. 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 in the GAM and the ARM. Links to these documents can be found at the end of this guidance note.

3. The Public Service Pension Scheme Remedy – (McCloud)

Pension disclosures for members affected by the public service pensions.

On 1 April 2015, the government made changes to public service pension schemes which treated members differently based on their age. The public service pensions remedy puts this right and removes the age discrimination for the remedy period, between 1 April 2015 and 31 March 2022. Part 1 of the remedy closed the 1995/2008 Scheme on 31 March 2022, with active members becoming members of the 2015 Scheme on 1 April 2022. For Part 2 of the remedy, eligible members had their membership during the remedy period in the 2015 Scheme moved back into the 1995/2008 Scheme on 1 October 2023. This is called 'rollback'.

Where a member who is a senior manager is affected by rollback the benefits in respect of their pensionable service during the remedy period are valued as being in the 1995/2008 Scheme. This means you may notice a difference between the benefits and Cash Equivalent Transfer Value (CETV) we quote for this year as compared to the benefits and CETV we quoted for year ending 2023.

Where this results in negative real increase in pension, lump sum or CETV the negative figures must not be shown and a zero must be substituted. This is consistent with the guidance for negative figures in the single total figure table in the GAM and the guidance for calculating components of both table 1 and 2 in this Greenbury Guidance.

Where rollback relating to the public service pensions remedy requires a zero to be disclosed a footnote should be included stating "xxxxx is affected by the Public Service Pensions Remedy and their membership between 1 April 2015 and 31 March 2022 was moved back into the 1995/2008 Scheme on 1 October 2023. Negative values are not disclosed in this table but are substituted for a zero."

If you would like to read the latest information about the remedy, please visit www.nhsbsa.nhs.uk/changes-public-service-pensions

If you are unsure if the senior manager is affected by remedy please visit [Understanding if your NHS Pension is affected by changes to public sector pensions | NHSBSA](#) where there is useful information to assist with this.

4. CETV factor increase

The factors used to calculate a CETV increased on 30 March 2023. This will affect the calculation of the real increase in CETV. You may wish to include a note in your report to explain this.

5. Information NHS Pensions will provide.

We will provide disclosure information for executive directors and other senior managers, as confirmed by the chief executive. As mentioned above, where a senior manager is affected by 'rollback' the benefits in respect of their pensionable service during the remedy period are valued as being in the 1995/2008 Scheme.

This includes pension, lump sum (if applicable) and the Cash Equivalent Transfer Value (CETV).

6. Where 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) 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) 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.

7. How to submit disclosure information requests for the 2024 Greenbury exercise

Employers must request Greenbury senior manager remuneration disclosures for the 2023/24 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.

The POL screens 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.

Note: You should avoid using the comments box on POL unless necessary as this prevents cases running through the system automatically. If an individual was included in the disclosure exercise last year the previous year's figures will be provided. Employers do not need to request this information via the comment box.

8. Further information

You can find more information in the GAM 2023/24 which includes mandatory accounting guidance for all bodies within the DHSC accounting boundary as defined in the document completing statutory annual reports and accounts.

[DHSC group accounting manual 2023 to 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/dhsc_group_accounting_manual_2023_to_2024.pdf)

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).

[NHS England » NHS foundation trust annual reporting manual \(FT ARM\)](https://www.nhs.uk/consult/iaopenpage/123456)

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 2023/24 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 2024 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 has membership in more than one NHS Pension Scheme, 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 15 January 2024 and 28 February 2024 to enable us to provide you with the necessary disclosure information.

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 requests (or queries) received after 28 February 2024.

4. Employer action

To ensure deadlines are met, communication between Finance, who is coordinating the information, and Payroll/Pensions, who are completing the requests via POL is required. 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 2023/24 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 2023. This can be done using POL.

Care should be given when providing the correct pensionable pay and earnings (we realise that in most cases this will be estimated). The pensionable pay or earnings you provide should be for the period 1 April 2023 to 31 March 2024, unless the senior manager joined

or left pensionable NHS employment during this period. If the 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 and hours worked.

Example 1 - Date of joining pensionable NHS employment is 1 October 2023. The pensionable pay or earnings provided should be for the period 1 October 2023 to 31 March 2024.

Example 2 - In pensionable NHS employment on 1 April 2023 and leaves employment on 30 September 2023. The pensionable pay or earnings provided should be for the period 1 April 2023 to 30 September 2023.

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 2023 to 31 March 2024.

All existing 1995/2008 Scheme members moved to the 2015 Scheme on 1 April 2022 and will have a final salary link to their 1995/2008 scheme benefits unless a break of over 5 years has occurred.

7. NHS Pensions action

We will calculate and supply the accrued pension, lump sum (if applicable) and CETV at 31 March 2024. 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.

9. Further information

More information can be found in the Pensions Online Guide at:

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

Or in the DHSC group accounting manual or separate NHS Foundation Trust Annual Reporting Manual (ARM).

[DHSC group accounting manual 2023 to 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

[NHS England » NHS foundation trust annual reporting manual \(FT ARM\)](#)

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) (Pension benefits table)

Increase in accrued pension where the senior manager was in post for the entire year.	
Accrued pension as at 31 March 2023 (previous year end)	£19,500 (A)
Accrued pension as at 31 March 2024 (current year end)	£22,341.50 (B)
Accrued pension as at 31 March 2023 (previous year end) plus inflation (@ 10.1%)	$£19,500 (A) \times 1.101 = £21,469.50(C)$
Real increase in accrued pension during current financial year	$£22,341.50 (B) - £21,469.50 (C) = \mathbf{£872.00 (D)}$

Where:

A = accrued pension at normal pension age (NPA) as at 31 March 2023 (previously provided by NHS Pensions)

B = accrued pension at NPA as at 31 March 2024 (to be provided by NHS Pensions)

C = accrued pension at NPA as at 31 March 2023 plus inflation (see note 4 on page 10)

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

Where the calculation results in a negative figure you should submit a zero

B 1.2 Example 2: Completion of (b) (Pension benefits table)

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

Accrued lump sum as at 31 March 2023 (previous year end)	£27,500 (A)
Accrued lump sum as at 31 March 2024 (current year end)	£65,000 (B)
Accrued lump sum as at 31 March 2023 (previous year end) plus inflation (@ 10.1 %)	$£27,500 (A) \times 1.101 = £30,277.50 (C)$

Real increase in accrued lump sum during current financial year	$\pounds 65,000$ (B) - $\pounds 30,277.50$ (C) = $\pounds 34,722.50$ (D)
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Where:

A = accrued lump sum at NPA as at 31 March 2023 (previously provided by NHS Pensions)
B = accrued lump sum at NPA as at 31 March 2024 (to be provided by NHS Pensions)
C = accrued lump sum at NPA as at 31 March 2023 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) (Pension benefits table)

Increase in CETV where the senior manager was in post for the entire year.	
CETV as at 31 March 2023 (previous year end)	$\pounds 516,000$ (A)
CETV as at 31 March 2024 (current year end)	$\pounds 627,936$ (B)
CETV as at 31 March 2023 (previous year end) plus inflation (@ 10.1%)	$\pounds 516,000$ (A) x 1.101 = $\pounds 568,116$ (C)
Real increase in CETV during current financial year before deductions	$\pounds 627,936$ (B) - $\pounds 568,116$ (C) = $\pounds 59,820$ (D)
Real increase in CETV during current financial year after deductions	$\pounds 59,820$ (D) - $\pounds 11,000$ (E) = $\pounds 48,820$ (F)
Where the calculation results in a negative figure you should submit a zero	

Where:

A = CETV as at 31 March 2023 (previously provided by NHS Pensions)
B = CETV as at 31 March 2024 (to be provided by NHS Pensions)
C = CETV as at 31 March 2023 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 2022/23 accounts and no accrued pension, lump sum (if applicable) and CETV as at 31 March 2023 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 2022 was 10.1%, therefore, an increase of 10.1% should be applied to pensions and CETV at April 2023.

Annex C

C1. Examples where senior manager not in post for the full year but has previous NHS Pension Scheme membership.

C 1.1 Example 1: Completion of (a) (Pension benefits table)

Increase in accrued pension where the senior manager moved into post on 1 July 2023	
Accrued pension as at 31 March 2023 (previous year end)	£48,994 (A)
Accrued pension as at 31 March 2024 (current year end)	£55,613 (B)
Accrued pension as at 31 March 2023 (previous year end) plus inflation (@ 10.1%)	£48,994 (A) x 1.101 = £53,942.39 (C)
Real increase in accrued pension during current financial year	£55,613 (B) - £53,942.39 (C) = £1,670.61 (D)
Real increase proportion for the time in post	£1,670.61 (D) x 274/365 (E) = £1,254.10 (F)

Where:

A = accrued pension at NPA as at 31 March 2023 (to be provided by NHS Pensions on request)

B = accrued pension at NPA as at 31 March 2024 (to be provided by NHS Pensions)

C = accrued pension at NPA as at 31 March 2023 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) (Pension benefit table)

Increase in CETV where the senior manager was in post at 1 April 2023, left their post on 30 June 2023 to move to a new NHS employer, continuing to accrue pensionable membership.	
CETV as at 31 March 2023 (previous year end)	£760,000 (A)
CETV as at 31 March 2024 (current year end)	£850,000 (B)
CETV as at 31 March 2023 (previous year end) plus inflation (@ 10.1%)	£760,000 (A) x 1.101 = £836,760 (C)
Real increase in CETV during current financial year before deductions	£850,000 (B) - £836,760 (C) = £13,240 (D)
Real increase proportion for the time in post before deductions	£13,240 (D) x 91/365 (E) = £3,300.93 (F)
Real increase proportion for the time in post	£3,300.93 (F) - £4,000 (G) = £- 699.07 (H)
Where the calculation results in a negative figure you should submit zero in column (f).	

Where:

A = CETV as at 31 March 2023 (previously provided by NHS Pensions)

B = CETV as at 31 March 2024 (to be provided by NHS Pensions)

C = CETV as at 31 March 2023 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 your employment (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) (Pension benefits table)

Increase in CETV where the senior manager was in post at 1 April 2023 but left the pension scheme on 10 October 2023 and did not re-join therefore accrued no further pensionable membership.	
CETV as at 31 March 2023 (previous year end)	£760,000 (A)
CETV as at 31 March 2024 (current year end)	£876,000 (B)
CETV as at 31 March 2023 (previous year end) plus inflation (@ 10.1%)	£760,000 (A) x 1.101 = £836,760 (C)
Real increase in CETV during current financial year before deductions	£876,000 (B) - £836,760 (C) = £39,240 (D)
Real increase in CETV during current financial year after deductions	£39,240 (D) - £9,000 (E) = £30,240 (F)
Where the calculation results in a negative figure you should submit zero in column (f).	

Where:

A = CETV as at 31 March 2023 (previously provided by NHS Pensions)

B = CETV as at 31 March 2024 (to be provided by NHS Pensions)

C = CETV as at 31 March 2023 plus inflation (see note 4 on page 12)

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

E = employee pension contributions for your period of scheme membership (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 2022/23 accounts and no accrued pension, lump sum (if applicable) and CETV as at 31 March 2023 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 2022 was 10.1%, therefore, an increase of 10.1% should be applied to pensions and CETV at April 2023

The examples are for guidance only.

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 (in bands of £5,000)
- column (b) is all taxable benefits (total to the nearest £100)
- column (c) is annual performance-related bonuses (in bands of £5,000)
- column (d) is long-term performance-related bonuses (in bands of £5,000)
- column (e) is all pension-related benefit (in bands of £2,500)
- column (f) is a total of the above items. (in bands of £5,000)

(as detailed in 3.155 of the GAM)

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 10.1% and multiply the pension and lump sum (if applicable) by the factor of 1.101.

Example

Accrued pension as at 31 March 2023 (previous year end)	£45,000 (A)
Accrued pension as at 31 March 2024 (current year end)	£48,000 (PE)
Accrued pension as at 31 March 2023 (previous year end) plus inflation (@ 10.1%)	£45,000 (A) x 1.101 = £49,545 (PB)
Accrued lump sum as at 31 March 2023 (previous year end)	£135,000 (D)
Accrued lump sum as at 31 March 2024 (current year end)	£144,000 (LSE)
Accrued lump sum as at 31 March 2023 (previous year end) plus inflation (@ 10.1%)	£135,000 (D) x 1.101 = £148,635 (LSB)
Employee's pension contributions	£19,000 (Ees cont)

PE = £48,000

LSE = £144,000

PB = £45,000 x 1.101 = £49,545

LSB = £135 x 1.101 = £148,635

Ees cont = £19,000

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

$((20 \times £48,000) + £144,000) - ((20 \times £49,545) + £148,635) - £19,000$

$(£1,104,000) - (£1,139,535) - £19,000 = -£54,535$

Where the calculation results in a negative figure you should submit a zero