LCP's response to the Pensions Regulator's consultation on a new approach to enforcement

11 November 2025

This document sets out LCP's response to the Pensions Regulator's consultation on a new approach to enforcement published on 16 September 2025 (the "Consultation").

Who we are

LCP is a firm of financial, actuarial, and business consultants, specialising in pensions, investment, insurance, energy, health and business analytics. We have over 1,200 people in the UK, including over 190 partners and around 250 qualified actuaries.

The provision of actuarial, investment, covenant, governance, pensions administration and benefits advice, and directly related services, is our core business. About 80% of our work is advising trustees and employers on all aspects of their pension arrangements, including investment strategy. The remaining 20% relates to insurance consulting, energy, health and business analytics. LCP is authorised and regulated by the Financial Conduct Authority for some insurance mediation activities only and is licensed by the Institute and Faculty of Actuaries for a range of investment business activities.

Our comments on your proposals

Thanks for the request to provide feedback on the new enforcement strategy. We have chosen to respond in this format rather than by answering the various questions that you pose.

As you will be aware, your enforcement strategy and associated policy was overhauled only a few years ago (in 2022), and presumably some considerable effort was expended in achieving that result. We are not aware that this material is in need of change at this time, although we appreciate that it should be kept under review.

In your consultation you don't appear to have spelt out why the current approach cannot serve the changing landscape that you identify in your call for the enforcement strategy to change. You also have not set out any shortcomings with the current approach. Rather, you seem to be intending to start with a fresh piece of paper, although it is difficult to see the difference in some areas. For example, in the current 2022 strategy it says "*Through a range of interventions, we aim to achieve good outcomes for savers through the reduction of risk and by preventing or mitigating harm*" and in your latest draft you intend to "*shift from monitoring outputs to delivering real-world outcomes, such as preventing harm, securing redress, and building saver confidence*". Similarly, your current 2022 strategy states "*Any enforcement action we take is targeted, measured and evidence based*" and under the heading of "*Targeted enforcement*" the new policy states "*We will take a proportionate, risk-based approach that concentrates resources on the most serious harm to savers*".

Much of what you say in the proposed approach is high-level and of a general nature and as such it is difficult to spot any failings or take exception to what is said. The interest may come when you start to apply the proposed approach to the detailed policies, which is to come after you have finalised your new strategy. We ask that when you do this you make clear what is changing. We note that you may consult on aspects of specific policies as they are proposed for modification, which we welcome.

We are happy for LCP to be named as a respondent to the consultation and happy for our response to be in the public domain. We are happy for you to reference our comments in any response.

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About Lane Clark & Peacock LLP