

A - Reporting Duties

Note the requirements in this section are not included in the TPR Code but they are a fundamental to the relationship with TPR.

Legal Requirements

All public service pension schemes have to be registered with TPR. On request from TPR, schemes must submit a scheme return, containing prescribed information. The Scheme Manager must also keep TPR informed of any changes to registrable scheme details.

Note the requirements in section A are not included in the TPR Code but are a requirement for all schemes.

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
A1	Is your scheme registered with the Pension Regulator?	n/a	Yes - Caroline Berry (Pensions Projects and Contracts Manager) is the contact on the registration.	n/a already registered		Fully completed	Fully compliant		
A2	Is the information held on the Pensions Regulator's website about the scheme up-to-date?	n/a	The scheme return was submitted to TPR with details of all scheme employers.	Annual check	05/11/2018	Fully completed	Fully compliant	To be updated as and when a new employer joins the Fund.	
A3	Have you completed this latest Scheme Return in the required timescale?	n/a	The scheme return was submitted on 05/11/2018 prior to the deadline of 06/11/2018	Annual check	05/11/2018	Fully completed	Fully compliant		

B - Knowledge and Understanding

Legal Requirements

A member of the pension board of a public service pension scheme must be conversant with:

- the rules of the scheme, and
- any document recording policy about the administration of the scheme which is for the time being adopted in relation to the scheme.

TPR Code Ref 34

A member of a pension board must have knowledge and understanding of:

- the law relating to pensions, and
- any other matters which are prescribed in regulations.

TPR Code Ref 35

The degree of knowledge and understanding required is that appropriate for the purposes of enabling the individual to properly exercise the functions of a member of the pension board.

TPR Code Ref 36

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
B1	Are there policies and arrangements in place to support pension board members in acquiring and retaining knowledge and understanding?	38	A joint training strategy has been developed and was agreed by the Pensions Committee on the 24 November 2015 and presented to the Local Pension Board (LPB) at its meeting on the 6 January 2016. The Training Strategy covers both committee and board members. To assist in achieving the training strategy objectives the fund will aim for full compliance with the CIPFA Knowledge and Skills Framework. Training policy is available on website (under the committee meeting date) and training undertaken is detailed in the annual report.	Annual check	24/11/2015	Fully completed	Fully compliant	The training register is maintained through out the year and published annually in the annual report.	The CIPFA Knowledge and Skills self assessment form becomes a personalised training plan for each member and will be used to document areas of learning and continued development. These need to be reviewed and updated to reflect member changes in the Committee and the LPB. Training policy needs review.
B2	Has a person been designated to take responsibility for ensuring the framework is developed and implemented?	38	On a day to day basis the Pension Fund Manager (Onesource Pensions and Treasury) maintains compliance with the policy and annual reporting. Training is also arranged by Pensions Administration as applicable.	As and when required		Fully completed	Fully compliant		
B3	Is the Fund providing assistance to pension board members to determine the degree of knowledge and understanding required?	48	The CIPFA Knowledge and Skills self assessment was undertaken when the LPB was first set up. The LPB also undertook induction training held by Hymans (generic to the LGPS) and followed up by officers (Havering Pension Fund focus). Ongoing training is provided and attendance published in the Pension fund Annual report.	Ongoing		Fully completed	Fully compliant		Induction training has been carried out for all existing board members.
B4	Are the roles and responsibilities of pension boards and members of pension board clearly set out in scheme documentation?	47	The roles and responsibilities are set out in the Board Members Terms of Reference. They are also published on the Havering website: yourpension.org.uk/Havering-Publications/Local-Pension-Board . There is a dedicated section covering LPB that includes Board members, Guidance, Government consultation, legislation and board roles	Annual check	30/11/2017	Fully completed	Fully compliant		
B5	Are pension board members aware of their legal responsibility in terms of Knowledge and Understanding?	50	This is detailed in Terms of Reference which were provided and discussed at the first LPB meeting (12/8/15). The Training Strategy also outlines the legal requirements relating to their knowledge and skills.	Ongoing		Fully completed	Fully compliant		

B6	Have all pension board members got access to copies of the scheme rules and relevant Fund documentation?	40	Annual report is presented to the LPB each year and also available to view online on the Havering website yourpension.org.uk . Key documents are published this website.	Ongoing		Fully completed	Fully compliant		
B7	Is there an up-to-date list of the Fund specific documents with which pension board members need to be conversant in?	46	LBH Has created and will maintain a list of documents that the Board members will need to be conversant with.	Annual check	30/11/2017	Fully completed	Fully compliant	To be updated as and when required	
B8	Are all pension board members investing sufficient time in their learning and development?	55	A number of training sessions have been arranged and attendance to date is good. A log is maintained of who has attended training and this is published in the annual report. The CIPFA Knowledge and Skills Framework self-assessment form will also become a personalised training plan for each member and will be used to document areas of learning and continued development.	Ongoing		Fully completed	Fully compliant	Will be compliant once the training plan is drawn up	This needs to be reviewed to ensure all members training needs have been identified and addressed
B9	Does the Fund offer pre-appointment training for new pension board members or mentoring by existing members?	56	Pre-appointment training has not been offered (nor is mentoring), but potential members were invited to discuss the roles and referred to the Havering website: yourpension.org.uk where the roles and responsibilities are set out.	As and when required		Fully completed	Fully compliant	Induction courses designed to meet needs of new members	
B10	Is there a process in place for regularly assessing the pension board members' level of knowledge and understanding is sufficient for their role, responsibilities and duties?	57	See comments in B3 - the knowledge and skills analysis will be carried out annually, albeit to date not all LPB members have completed it.	Annual check	30/11/2017	Fully completed	Fully compliant		
B11	Are records of learning activities being maintained?	60	A log is maintained of who has attended training and this is published in the annual report.	Annual check	19/09/2017	Fully completed	Fully compliant		
B12	Have the pension board members completed the Pension Regulator's toolkit for training on the Code of Practice number 14?	59	The Pensions regulator online toolkit has been distributed to the LPB members. Some of the LPB members have completed some of the modules and this has been recorded in the training log.	Annual check	02/02/2016	In progress	Partially compliant		All members are working towards completing the Pensions Regulator online toolkit.

C - Conflicts of interest

Legal Requirements

The Public Service Pensions Act 2013 sets out the legal requirements for scheme managers and pension boards for conflicts of interest. In relation to the pension board, scheme regulations must include provision requiring the scheme manager to be satisfied:

- that a person to be appointed as a member of the pension board does not have a conflict of interest and
- from time to time, that none of the members of the pension board has a conflict of interest.

TPR Code Ref 62

Scheme regulations must require each member or proposed member of a pension board to provide the scheme manager with such information as the scheme manager reasonably requires for the purposes of meeting the requirements referred to above.

TPR Code Ref 63

Scheme regulations must include provision requiring the pension board to include employer representatives and member representatives in equal numbers.

TPR Code Ref 64

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
C1	Does the Fund have a conflict of interest policy and procedure, which includes identifying, monitoring and managing potential conflicts of interest?	76	A conflicts of interest Policy for the Local Pension Board (LPB) was adopted at a Council meeting held on the 25 March 2015. This is available to view on Havering pensions website under the section dedicated to the Local Pension Board.	Ongoing		Fully completed	fully compliant		
C2	Do pension board members have a clear understanding of their role, the circumstances in which they may have a conflict of interest and how to manage potential conflicts?	78	The LPB are aware of their roles and responsibilities and some of the LPB members have completed the TPR online toolkit module covering conflicts of interest.	On set up		Fully completed	fully compliant		As at 24.04.18 AG/MH and VR have completed most of the TPR on line toolkit covering conflicts of interest.
C3	Have all Pension Board members provided appropriate information for the Administering Authority to determine whether a conflict exists (on appointment and from time to time)?	79	The Council maintain appropriate records of declared conflicts of interest and manage any potential conflicts to ensure they do not become actual or perceived conflicts of interest. Records will be lodged in advance of the Board Member's appointment and will be maintained by the Council's Monitoring Officer.	Annual check		Fully completed	fully compliant		Prior to application, in the advertisement, applicants are referred to the website yourpension.org.uk where the Board Roles holds the Conflicts of Interest Policy and Code of Conduct. These explain the required processes for declaring conflicts. On appointment members are required to declare any conflicts. The Declaration of Interests is a standing item on the agenda at each board meeting.
C4	Does the appointment process for pension board members require disclosure of interests and responsibilities which could become conflicts of interest?	80	There is a duty on all prospective Local Pension Board members to declare interests prior to their appointment to the Board. No declarations to date in the appointment process under any pension Fund requirement (this is looked at once appointed by way of the Council Code of Conduct declaration).	Annual check	30/11/2017	Fully completed	fully compliant		"There is a requirement for future members to make declarations/conflicts of interest at application/pre- appointment stage to minimise risk of appointing potentially conflicted members. Register of interest forms have been completed by all board members - Conflicts of interest equates to declarations. Declaration is a standing item on the agenda."

C5	Is the conflicts policy regularly reviewed?	76	There is an agreed and documented conflicts policy and procedure which includes identifying monitoring and managing potential conflicts of interest and keep under review from time to time.	As and when required		Fully completed	fully compliant		A review of the conflicts policy is carried out at the change or appointment of a board member.
C6	Does the Fund have a conflicts register and it is circulated for ongoing review and published?	84	There is a conflicts register that covers all Councillors that is reviewed annually and published on the Havering Website. This does not currently include LBP members.			Fully completed	fully compliant		Declaration of interest is a standing item on the agenda and when a conflict arises this will be disclosed. There is no requirement for LPB members to publish their declarations of interest on the Council website.
C7	Is appropriate information included in the register?	84	This needs to be checked against TPR recommended elements as well as any other information considered of use.	Ongoing (annual check)		In Progress	Partially compliant		Ensure the conflicts register includes all recommended items.
C8	Is there a standing item on the agenda for declaring conflicts of interest?	85	There is a standing item on each LPB agenda	Ongoing		Fully completed	fully compliant		
C9	Do those involved know how to report a conflict of interest?	78	There is an agreed and documented conflicts policy and procedure which includes identifying monitoring and managing potential conflicts of interest.	Ongoing		Fully completed	fully compliant		As at 24.04.18 AG/MH and VR have completed the TPR on line toolkit covering conflicts of interest.
C10	Is the number of employer and member representatives on the board in line with legal requirements?	90	The board is made up of 2 member representatives and 2 employer representatives which meets the minimum legal requirements. All positions are currently filled.	Ongoing		Fully completed	Fully compliant	Positions are advertised as they become available. Vacancy from September 2018 has been filled	
C11	Is the board made up of the appropriate mix of representatives in order to minimise potential conflicts?	91	The Board is made up of a suitable scheme representation.	Ongoing		Fully completed	Fully compliant		

D - Publishing information about schemes

Legal Requirements

The scheme manager for a public service scheme must publish information about the pension board for the scheme(s) and keep that information up-to-date.

TPR Code Ref 92

The information must include:

TPR Code Ref 93

- who the members of the pension board are
- representation on the board of members of the scheme(s), and
- the matters falling within the pension board’s responsibility

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
D1	Does the Administering Authority publish information about the pension board?	95	Both the Havering and the LBH pensions website provide information relating the LPB Members	As and when required		Fully completed	Fully compliant	Amended as and when the LPB memberships changes.	To be updated once new appointment has been finalised (Nov 18)
D2	Does the Administering Authority publish other useful related information about the pension board?	96	The pensions website provides the names and contact details of the LPB members but does not currently quote job titles or provide details of any other relevant positions held by the members. The website includes information regarding the roles and responsibilities of both scheme member and scheme employer roles and the terms of reference. The appointment process is not currently on the website, however adverts for new representatives are uploaded onto the site when applicable which give the required information.	As and when required		In Progress	Partially compliant	Website now includes boigraphies for 3 of the current board members	The website should be updated to include job titles and any other relevant roles held by the LPB members.
D3	Is all the information about the Pension Board kept up to date?	98	All the information currently held on the website is up to date.	As and when required		Fully completed	Fully compliant		To be updated once new appointment has been finalised (Nov 18)
D4	Does the Administering Authority publish information about pension board business?	97	All meetings and papers are pubic, however some items may be restricted.	As and when required		Fully completed	Fully compliant		

E - Managing risk and internal controls

Legal Requirements

The scheme manager must establish and operate internal controls which adequately ensure the scheme is administered and managed in accordance with the scheme rules and the requirements of the law.

TPR Code Ref 101

Internal controls are defined in the legislation as:

TPR Code Ref 102

- arrangements and procedures to be followed in the administration and management of the scheme
- systems and arrangements for monitoring that administration and management
- arrangements and procedures to be followed for the safe custody and security of the assets of the scheme

The legal requirements apply equally where a scheme outsources services connected with the running of the scheme.

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach/ Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
E1	Is there an agreed process for identifying and recording scheme risks?	105	<p>The Administering Authority’s overall policy on risk is to identify all risks to the Fund and to consider the position both in aggregate and at an individual risk level. The Administering Authority monitors the potential risks to the Fund, and will take appropriate action to mitigate the impact of these on the fund wherever possible. Risks are identified and assessed in line with the Authority’s risk management process, with risks being identified within Service Plans.</p> <p>Internal Controls operate in the day to day activities that fall under the administration and management of the scheme.</p> <p>Internal controls of the scheme assets include monitoring these quarterly and presenting formal reports to the Pensions Committee and risk is addressed as part of the quarterly monitoring processes. Risk implications are a standard inclusion in reports to the Pensions Committee and the Local Pension Board (LPB).</p>	Ongoing		In Progress	Partially compliant	<p>LPP will work with the LBH to review agreed Policies, and provide advice to ensure they are kept fully up to date in line with LGPS Regulations and other key legislation. LPP will provide support as necessary, including the provision of training where required.</p> <p>The Pension Fund scheme manager produced a risk register based on 7 areas of risk. Risks have been identified based on failure to comply, manage, govern sign up new employers and to detect fraud within the LB Havering pension fund. Using a traffic light system to highlight areas of high, medium and low risk. In order to place reliance on the Pension Fund processes, internal controls are continually reconciled and reviewed whereby risk areas may be detected and also if actions to reduce risk have been taken, thus the traffic light system be updated.</p> <p>Using processes such as *internal audit walk through process</p>	<p>Pensions Administration has been outsourced to the LPP who have in place a Risk officer. We will work with the Risk officer to strengthen arrangements around risk for Pensions Administration</p>

E1	Is there an agreed process for identifying and recording scheme risks? (continued)	105		Ongoing		In Progress	Partially compliant	<p>*LPP admin provider performance indicators are processed monthly and reported to LPB</p> <p>*admin error rates are monitored</p> <p>*an Investment Strategy review is carried out re fund managers performance. They are interviewed and performance is monitored and reviewed, at committee meetings PF Committee members interview and question fund managers on their performance - assets and liabilities are taken into account as are market conditions</p> <p>*the risk register is a living document and is reviewed annually.</p>	
E2	Does the Fund have an adequate process to evaluate risks and establish internal controls?	107	As above	Ongoing		In Progress	Partially compliant	<p>It is recognised that there are good internal controls in place in many areas but there is no formal identification/documentation of these. There is a Risk Register for the purpose of monitoring risk.</p>	Consider documenting internal controls. IA to walk through in September 18
E3	Does the Administering Authority have a risk register to record all risks identified and action taken?	108	A Risk Register was adopted in June 2015 to record identified risks and required action. It is included in the Annual Report. The LPP are currently in the process of compiling an employer level risk register to assess the employers in the LBH Fund.	Annual check	30/11/2018	Fully completed	Fully compliant	Risk register reviewed and agreed by Pensions Committee November 2018	
E4	Does the Administering Authority review the effectiveness of the risk management and internal control systems of the Fund?	110	There is no formal process for the review of the effectiveness of the internal controls we have identified. However as identified below (E7) there are substantial internal controls in place including a number of ongoing monitoring areas that are reported to Pensions Committee (investment matters and administration).	Annual check	02/02/2016	In Progress	Partially compliant	<p>By reviewing the risk register we can determine whether mitigations or actions to take forward since the previous risk register review are still live or have been actioned. Whereby the register and the traffic light system will be updated.</p> <p>Internal audit to carry out process of review of internal controls in 18/19.</p> <p>Scheme manager monitors LPP 's processes and reviews their reports to ensure the effectiveness of the internal controls. To be reviewed in line with the risks identified in future.</p>	Internal Audit is arranged to take place September 18 to review Pensions Admin Internal Controls. Terms of Reference have been agreed and audit will now commence in December

E5	Does the Administering Authority regularly review the risk register?	115	A Risk Register was adopted in June 2015 to record identified risks and required action. No review of the Risk Register has taken place since its adoption in June 2015. Employer level risk will be assessed regularly by LPP to ensure that risks employers pose to the fund do not materialise.	Annual check	30/11/2018	Fully completed	Fully compliant	Risk register reviewed and agreed by Pensions Committee November 2018	
E6	Is there a standing item on the Pension Board agenda to review scheme risks?		There is not currently a standing agenda item on Board or Committee meetings for risk discussions although it has been agreed this should be added.	Ongoing		In Progress	Non-compliant		The Investment report submitted to Pensions Committee will always include a risk assessment. Once the current version of the Pension Fund Risk Register has been updated this will be added to the LPBoard agenda as a standing item
E7	Does the Administering Authority have adequate systems, arrangements and procedures (internal controls) in place for the administration and management of the Fund and are they documented?	116	There are a large range of internal controls in place. Some examples are: Restricted access to the building Altair (pension admin system) is tested at a national level. Has a 2 tier login. Former Staff logins disabled. System backed up regularly, hosted externally and retained offsite. Calculations are independently checked when payments made. National Fraud Initiative checks Annual benefit statements request members check their details. Payments made via BACS wherever possible. Filters for spam email etc. Triennial valuation identifies data issues which are resolved. Quarterly reconciliation of payments in and out and pension fund strain costs. Bank reconciliation with the paperwork notifying of the payments. The LPP will develop a covenant assessment programme for relevant Fund employers, analysing their financial position, prospects and ability to pay necessary employer contributions. LPP will also document existing processes and procedures for Admission, Cessation, Bond Renewal and covenant checks with a clear outline of responsibility, allowing these processes to be regularly reviewed.	Annual check	30/11/2017	In Progress	Partially compliant	LPP will work with the LBH to review agreed Policies, and provide advice to ensure they are kept fully up to date in line with LGPS Regulations and other key legislation. LPP will provide support as necessary, including the provision of training where required. There are many controls in place and LBH may consider these to be sufficient to feel comfortable that these address all material fund risks. However, until a formal risk register is in place, it is unclear whether the controls in place are adequate.	Add a page at beginning of admin procedure manual to set out which staff is authorised to do which tasks (i.e. checking etc.). Formal documentation of internal controls in place as part of risk management policy/register. To be assessed as part of the internal audit
E8	Do these procedures apply equally to outsourced services, are internal controls reflected in contracts with third party providers and is there adequate reporting in relation to those controls?	119	LBH and LPP are working together to ensure that all internal controls are reflected in the work that LPP are doing although it is recognised that there are good controls in place	Annual check)	30/11/2017	In Progress	Partially compliant		Establish whether our AVC arrangements with Prudential and Standard Life need to be included in this section - no as not an outsourced service. Internal audit will provide confirmation that controls are in place

F - Administration and Scheme Record Keeping

Legal Requirements

Scheme managers must keep records of information relating to:

- member information
- transactions, and
- pension board meetings and decisions.

TPR Code Ref 122

The legal requirements are set out in the Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014 ('the Record Keeping Regulations').

TPR Code Ref 123

The Data Protection Act 1998 and the data protection principles set out additional requirements for using, holding and handling personal information. Other requirements are set out in the:

- Pensions Act 1995 and 2004
- Pensions Act 2008 and the Employers' Duties (Registration and Compliance) Regulations 2010
- Occupational Pension Schemes (Scheme Administration) Regulations 1996 (SI 1996/1715)
- Registered Pension Schemes (Provision of Information) Regulations 2006 (SI 2006/567)

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
F1	Do member records hold the information required as defined in the Record Keeping Regulations and is it accurate?	126	LBH use Altair as their main administration system. It records all member and beneficiary information set out in Record Keeping Regulations.	Ongoing		Fully completed	Fully compliant		
F2	Does the Fund have the appropriate processes in place so employers can provide timely and accurate information?	128/129	Not all procedures are formally documented. However, at the beginning of the year all employers are provided with an updated contribution table, a guide to accompany the monthly return spreadsheet explaining in full the format and requirements, where further guidance can be found and the required timescales. Similar information is supplied each February regarding the End of Year requirements. Meeting are offered to all scheme employers to cover the requirements. Monthly new starter interfaces are in place between the LBH Payroll system and Altair. Employers not using the LBH payroll complete a standard monthly pay and contribution spreadsheet and a changes spreadsheet. They are expected to complete new starter and leaver forms. There is some concern over the accuracy of pay data for some employers. New employers admitted to the pension fund, or anyone outsourcing their payroll are met with to ensure they are aware of their responsibilities as a scheme employer. LBH has produced a Booklet for New Academies, that is easily adapted to fit other situations, that is used as a guide for the meetings. All the above mentioned documents are available on the pension scheme website.	Ongoing		Fully completed	Fully compliant	There will be a change in the way data is supplied following the outsourcing of the pension function to LPP, who use a more automated data collection method.	Pension Administration Strategy (PAS) to be put in place if agreed by Scheme Manager. Work with employers to transition to new way of submitting data. Your Fund training has now been offered to all scheme employers.

F3	Does the Fund keep records of and reconcile transactions as required by the Record Keeping Regulations?	131/132	The specific requirements of the record keeping regulations are adhered to except that employer contributions are not recorded to the member record on Altair although these are recorded at employer level by Pension Fund Accounts and the data can be obtained for all members if required. Other points identified of note are: Pension increases are calculated and detailed in One Oracle. Record keeping would benefit from an exercise to reconcile One Oracle payroll to Altair to check for discrepancies. Information regarding payments that are written off is not currently stored centrally.	Ongoing		In Progress	Partially compliant		To create a record of all overpayments that are written off - A policy is now in place effective March 19 and a record is kept by LPP of overpayments that are written off. To liaise with LPP to reconcile One Oracle to Altair
F4	Are records kept of pension board meetings as required by the Record Keeping Regulations?	133	This is the responsibility of the Clerk for Committee and all details are posted on LBH website.	Ongoing		Fully completed	Fully compliant		
F5	Are records kept of decisions made by the pension board, outside of meetings as required by the Record Keeping Regulations?	134	The LPB does not make decisions outside of normal meetings	Ongoing		Fully completed	Fully compliant		
F6	Are records retained for as long as they are needed?	135	Records are retained indefinitely, i.e. no member records are archived or removed from the systems as there is enough storage capacity to retain them and it is considered necessary to do so. There are no remaining paper files, all historic files have been scanned onto an electronic system.	Ongoing		Fully completed	Fully compliant	Under GDPR, pension records can be held indefinitely	
F7	Does the Administering Authority have policies and processes to monitor data on an ongoing basis?	136	There is no formal policy or documented procedure for the checks that are carried out, but there is confidence in the accuracy and completeness of the vast majority of data required. Checks that are carried out include: - Annual posting of contributions, where checks are made with data versus member records to pick up any anomalies - There are no formal "common" data (as defined by TPR) checks, but Altair won't allow a record to be set up with common data items so this is not felt to be regularly necessary. - Triennial valuation exercise - amend records on 3 yearly basis if any issues identified by the actuaries automated data portal. - 2 yearly National Fraud Initiative exercise is carried out to identify deceased members. - Payslips sent in April/May and October and then at other times if changes in amounts occur. When payslips are returned the team then investigates any possible address errors or sends life certificates. - Any payments, retirements, transfers etc., checked by a second team member. - Use of the DWP 'Tell Us Once' system. There are some instances where no checking is carried out. This is under review as part of the transition to the LPP.	Ongoing		In Progress	Partially compliant		Consider formalising/formally documenting the checking procedures carried out in discussion with LPP and as part of the forthcoming internal audit review
F8	Does the Administering Authority carry out a data review at least annually?	138	A full data check is carried out each year end to ensure accurate record keeping.	Annual check	30/06/2018	Fully completed	Fully compliant		

F9	Is a data improvement plan in place which is being monitored with a defined end date?	141	There is currently no plan in place as no significant data issues have been identified. It is noted that should any future issues arise, a plan would be set out with a formal process in place and a defined end date.	Annual check		In Progress	Partially compliant		Data scores have now been received and are very good. However a formal data improvement plan needs to be written. UPDATE - a draft plan has been written but needs formalising
F10	Are processes and policies in place to reconcile scheme data with employer data?	142	The year end process ensures that scheme data is reconciled against employer, although this does not currently include postal or email addresses.	Annual check	30/06/2018	Fully completed	Fully compliant		Ensure addresses are reconciled with future year end data. Part of due diligence checks.
F11	Do the Administering Authority's member data processes meet the requirements of the Data Protection Act 1998 and the data protection principles?	143	The data processes meet the requirements with regard to what is held, how it is used and how long it can be held for. However, information is not always sent or received securely via email. A new process needs to be introduced in discussion with the LPP. Focal point is used for secure data transfer to and from the Scheme Actuary.	Ongoing		Fully completed	Fully compliant	All data is now sent securely either password protected, via Egress, Mimecast or Your Fund.	LBH IT are also looking at introducing Share Point which will provide another secure platform that can be used

G - Maintaining contributions

Legal requirements

Contributions must be paid as detailed below, and where not done, they should be reported to TPR in circumstances where the scheme manager has reasonable cause to believe that the failure is likely to be of material significance to TPR in the exercise of any of its functions. Reporting must be carried out as detailed below.

TPR Code Ref 147-149

Contribution Type		Contributions must be paid		Reporting a failure	
Employer		On or before the due date as defined by the scheme regulations		To TPR: As soon as reasonably practicable	
Employee		Paid within the prescribed period (19 th day of the month, or 22nd day if paid electronically) or earlier date if required by the scheme regulations		To TPR: Within a reasonable period – 10 working days	

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
G1	Does the Fund have procedures and processes in place to identify payment failures?	150	A comprehensive monitoring spreadsheet is maintained for each employer with an external payroll to identify late payments. LBH does not currently have any problems with late payments.	Ongoing		Fully completed	Fully compliant		
G2	Do those processes and procedures include a contributions monitoring record to determine whether contributions are paid on time and in full?	156/157	This is incorporated into the monitoring spreadsheet. It helps identify if there is a late payment, as the sheet includes entries for date received which is provided by the Cashiers Team on a weekly basis. The spreadsheet would therefore indicate if an employer was a continual/regular late payment offender. In relation to payments being made in full, there are checks carried on both employer and employee contribution amount. These are generally carried out at total level per month, i.e. no individual spot checks unless there appears to be a bigger problem. In addition, at the start of the financial year, the employer contribution rates are checked against those being deducted to ensure they match the Valuation Rates and Adjustments Certificate. The revised employee contribution bands are circulated to all employers once they have been confirmed by the LGA.	Ongoing		Fully completed	Fully compliant		
G3	Do those processes and procedures include monitoring payments against the contributions monitoring record on an ongoing basis?	161	For employers with an external payroll, the money paid in and verified by the bank statement is compared to the totals on the monthly data submissions. The Pension Fund Accounts Team reconcile the data and money received into the pension fund against the One Oracle payroll system.	Ongoing		Fully completed	Fully compliant	Pensions accountants regularly check the contributions income for ees and ers against the valuation information provided by the actuary to ensure correct % payments re received on a monthly basis. Any discrepancies are investigated.	Internal audit are due to walk through the processes in September 18 to ensure internal controls are effective in this area.
G4	Are these procedures regularly reviewed to ensure they are effective?		Other than via internal and external audit (which should identify areas for concern), the processes are not regularly reviewed. There are relatively few employers in the Fund and a good relationship exists with them, so the risk of deliberate underpayment or fraudulent behaviour is considered to be minor.	As and when required	30/11/2018	Fully completed	Fully compliant		

G5	Do the Administering Authority's processes include managing overdue contributions in line with TPR's suggested approach?	163	There is no formal procedure in place as LBH has very few late payments. It is recognised however, that this is a requirement.	Annual check	30/11/2018	Fully completed	Fully compliant		Procedure note written. Charging policy reviewed and submitted to December 2018 Pensions Committee and S151 officer for agreement
G6	Does the Fund maintain a record of any investigations and communications with employers?	170	Any communication between the pension fund and an employer regarding contributions is not currently held centrally.	Ongoing		Fully completed	Fully compliant	Record Created and stored with monthly monitoring spreadsheet	Create a central record of all employer contribution related investigations.
G7	Do employers provide sufficient information to monitor contributions and is this in accordance with the LGPS regulations?	164	The monthly pay and contribution return, provided by employers with external payrolls, has all required information, including splits for 50:50 scheme members, and guidance for the accurate completion of the return. Monthly reports are supplied to the Pension Fund Accounts Team regarding the LBH paid employers.	Ongoing		Fully completed	Fully compliant		
G8	Is there a satisfactory process in place to assess the materiality of any payment failures and ensure that those which are material are reported to the Regulator within a reasonable period?	173	Payments which are paid within 2-5 days of their due date are not considered material. LBH have had no instances of late payments so far this year. It is considered that the relevant teams would know how to escalate any payment breaches but a formal process is not currently documented and so this is considered as an area for improvement.	Annual check	30/11/2018	Fully completed	fully compliant		Procedure note written. Charging policy reviewed and submitted to December 2018 Pensions Committee and S151 officer for agreement
G9	If the administration of contributions outsourced to a service provider, is there a process in place to obtain regular information on the payment of contributions to the scheme?	167	AVCs are paid to AVC providers. Checks are carried out at the end of year to ensure the contributions paid match the totals received by the AVC providers.	Ongoing		Fully completed	Fully compliant		

H - Providing information to members and others

Legal requirements

The law requires schemes to disclose information about benefits and scheme administration to scheme members and others. This includes requirements relating to benefit statements and certain other information which must be provided under the requirements of the 2013 Act, HM Treasury directions and the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 ('the Disclosure Regulations 2013'). In addition to these duties, there are other legal requirements relating to the provision of information to members and others under other legislation.

TPR Code Ref 187

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
H1	Has an annual benefit statement been provided to all active members within the required timescales?	188	Active and deferred benefit statements were issued by 31st August 2017. There were a few that were not issued due to having queries on the record.	Annual check	31/08/2018	Fully completed	Fully compliant	LPP confirmed that 100% of active and deferred benefit statements were sent by the statutory deadline of 31/08/18	
H2	Do these meet the legal requirements in relation to format?	188	The statements used are the Heywoods template, which when read with the covering letter and factsheet, do provide all the required information.	Annual check	31/08/2018	Fully completed	Fully compliant		
H3	Has a benefit statement been provided to all active, deferred and pension credit members who have requested one within the required timescales?	191	Deferred Benefits Statements are produced annually as part of the year end process (ie members do not need to request a statement).	Annual check	31/08/2018	Fully completed	Fully compliant		
H4	Does this meet the legal requirements in relation to format?	192	The statements need updating to ensure they contain all the relevant information. They are currently missing; the start date, method of calculation and the pensionable remuneration.	Annual check	31/08/2018	Fully completed	Fully compliant	2018 Statements are fully compliant	
H5	Has an annual benefit statement been provided to all members with AVCs within the required timescales?	194	The statements are sent directly to the members by the AVC providers.	Annual check	30/11/2018	Fully completed	Fully compliant	Providers have confirmed that they are compliant with this point.	
H6	Do these meet the legal requirements in relation to format?	195	The Prudential have confirmed that their statements are fully compliant. I am awaiting a response from Standard Life regarding their statements.	Annual check	30/11/2018	Fully completed	Fully compliant	Providers have confirmed that they are compliant with this point.	

H7	Is basic scheme information provided to all new and prospective members within the required timescales?	200	The admin team write to all new scheme members once the new record has been created on the pensions system. The letter gives the address for the pensions website that has full details of the scheme. There are some instances where the timescales have not been met. The team are not always aware of new members from externally paid employers if a new starter form is not supplied. The appointment letter sent to LBH employees references the pension scheme and website but it is not known whether other employers provide any information.	Ongoing		Fully completed	Fully compliant	Schedule 1 of the LPP contract states that admissions must be completed within 3 working days. This is monitored via the monthly KPI reports	
H8	Does this meet the legal requirements in relation to format?	200	All scheme information is available on the Havering pensions website. There is a guide to the scheme which provides the required information other than: - The statement regarding whether a charge may be made - although no charges are applied to LGPS benefits - There are other guides and factsheets, including the IDRP leaflet.	Ongoing		Fully completed	Fully compliant		
H9	Is all other information provided in accordance with the legal timescales?	201	It is not possible to confirm whether disclosure timescales are being met. Internal monitoring of KPI's shows poor results as the pensions team has been significantly understaffed for a long period of time. Timescales and the capacity for monitoring them will improve under the new LPP contract.	Ongoing		In Progress	partially compliant	CMS is now implemented monthly monitoring is taking place to ensure that KPI's continue to improve.	Checks to be undertaken to ensure compliance with Disclosure Regs. To be written into monitoring checklists. UPDATE - disclosure timescales monitored as part of monhly checks
H10	Where any information is only provided electronically (i.e. instead of any hard copy) does it comply with the legal requirements?	203	Annual Benefit Statements are provided online. Disclosure requirements were met and members have the opportunity to elect to receive a paper copy. Initial contact with new members is via mail and recommends signing up to the Member Self Service (MSS) facility to be able to access future statements. Hard copies of documents can be provided of intranet material if required. Correspondence with members via email is carried out at member request.	Annual check	31/08/2018	Fully completed	Fully compliant		
H11	Does the Administering Authority aim to design and deliver communications in a way that ensures scheme members are able to engage with their pension provision?	207	The pensions team actively promotes the use of MSS in both correspondence and in conversation, to ensure that members are aware of the service. Communications are kept as clear as possible and always include contact details for further clarification.	Ongoing		Fully completed	Fully compliant		Standard letters will be reviewed by LPP as part of the process to bring Havering in line with its other clients.
H12	Does the Administering Authority use a tracing service?	208	LBH use the DWP tracing service	Ongoing		Fully completed	Fully compliant		LBH will be working with LPP to review and ensure we are using the most cost effective method

I - Internal Dispute Resolution

Legal requirements

The Pensions Act 1995 requires scheme managers to set up and implement an Internal Dispute Resolution Procedure (IDRP) to help resolve disputes between the scheme manager and people with an interest in the scheme.

TPR Code Ref 213

The Act states that a person has an interest in the scheme if they:

TPR Code Ref 215

- are a member or beneficiary
- are a prospective member
- have ceased to be a member, beneficiary or prospective member
- claim to be any of the above and the dispute relates to this claim.

The Act also states that the procedure must include:

TPR Code Ref 218

- how an application is to be made
- what must be included in an application
- how decisions are to be reached and notified
- a specified period (which is reasonable) within which applications must be made.

The procedure may require people with an interest in the scheme to first refer matters in dispute to a ‘specified person’ in order for that person to consider and give their decision on those matters. This decision may then be confirmed or replaced by the decision taken by the scheme manager after reconsideration of the matters. However, legislation provides flexibility for scheme managers to decide the details of these.

TPR Code Ref 216

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
I1	Has the Administering Authority put in place an internal dispute resolution procedure?	213	There is a formal process in place. This is documented in the IDRP factsheet which is available from the pensions team or on the pensions website. The factsheet details the 2 different steps and provides the required contact details for each stage and information regarding TPAS and the Pensions Ombudsman.	Annual check	30/11/2018	Fully completed	Fully compliant	IDRP Process has been reviewed and only minor amendments were required	IDRP could be updated to ensure it is up to date, and includes all required and additional helpful information. Current version is based on old DCLG sample.
I2	Does the Administering Authority’s process highlight or consider whether a dispute is exempt?	214	This is not currently included in the IDRP factsheet	Annual check	30/11/2018	Fully completed	Fully compliant	There is now a section to cover exempt disputes	
I3	Does the information made available to applicants about the procedure clearly state the procedure and process to apply for a dispute to be resolved including: - who it applies to - who the specified person (stage 1) is - the timescales for making applications - who to contact with a dispute - the information that an applicant must include - the process by which decisions are reached?	224	The IDRP Factsheet includes all specified information along with a form for the person with an interest in the scheme to complete.	Annual check	30/11/2018	Fully completed	Fully compliant		

I4	Has the Administering Authority ensured that employers who make first stage decisions also have IDRPs in place?		Some of our scheme employers have published their stage 1 IDRPs adjudicator details along with their scheme discretions, available on the pension scheme website. This has not been followed up with all employers	Ongoing		In Progress	Partially compliant		Liaise with employers to agree a stage 1 process (which could be use of the LBH stage 1 appointed person).
I5	Are the timescales in the procedure adhered to including sending an acknowledgment on receipt of an application?	228	LBH has very few IDRPs cases to be able to evidence whether timescales are adhered to. It is acknowledged this this will need to be monitored in future	As and when required		Fully completed	Fully compliant		This will need to be monitored if IDRPs complaints are received in the future
I6	Does the Administering Authority notify and advertise the procedure appropriately?	235	There is a paragraph in all standard letters for notification of benefits and new starters. The guide is also on the pensions website	Ongoing		Fully completed	Fully compliant		
I7	Are the notification requirements in relation to TPAS and the Pensions Ombudsman being adhered to?	238	The TPAS and Ombudsman details are provided at the required stages	Annual check	30/11/2018	Fully completed	Fully compliant		
I8	Does the Administering Authority regularly assess the effectiveness of its arrangements?	234	No formal reporting as such is in place. LBH have very few IDRPs cases they are almost exclusively Tier 3 Ill health cases.	As and when required		Fully completed	Fully compliant		This will need to be monitored if IDRPs complaints are received in the future and can be reported to PB if required
I9	Does the Administering Authority regularly assess the effectiveness where employers carry out a stage one process?	234	No formal reporting as such is in place. Our employers have very few IDRPs cases they are almost exclusively Tier 3 Ill health cases.	As and when required		Fully completed	Fully compliant		This will need to be monitored if IDRPs complaints are received in the future and can be reported to PB if required

J - Reporting breaches of the law

Legal Requirements

Certain people are required to report breaches of the law to the regulator where they have reasonable cause to believe that:

TPR Code Ref 241

- a legal duty which is relevant to the administration of the scheme has not been, or is not being, complied with
- the failure to comply is likely to be of material significance to the regulator in the exercise of any of its functions.

People who are subject to the reporting requirement ('reporters') for public service pension schemes are:

TPR Code Ref 242

- scheme managers
- members of pension boards
- any person who is otherwise involved in the administration of a public service pension scheme
- employers: in the case of a multi-employer scheme, any participating employer who becomes aware of a breach should consider their statutory duty to report, regardless of whether the breach relates to, or affects, members who are its employees or those of other employers
- professional advisers including auditors, actuaries, legal advisers and fund managers: not all public service pension schemes are subject to the same legal requirements to appoint professional advisers, but nonetheless the regulator expects that all schemes will have professional advisers, either resulting from other legal requirements or simply as a matter of practice
- any person who is otherwise involved in advising the managers of the scheme in relation to the scheme.

The report must be made in writing as soon as reasonably practicable.

TPR Code Ref 243

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
J1	Is the Administering Authority satisfied that those responsible for reporting breaches under the legal requirements and TPR guidance understand the requirements?	244	Staff in place in the relevant sections have been informed of the reporting procedures and are reminded regularly of the process via notes on pay slips and an internal global email service. The reporting arrangements are also published in on the Havering website : yourpension.org.uk under member publications- other pension fund documents	Annual check	21/11/2017	Fully completed	Fully compliant		
J2	Does the Administering Authority have appropriate procedures in place to meet their legal obligations for identifying and assessing breaches?	245	A procedure for reporting breaches has been in place since 2005 and a report is presented annually to the Pensions Committee which includes the reporting arrangements and whether any breaches occurred and reported to TPR	Annual check	30/11/2018	Fully completed	Fully compliant		
J3	Are breaches being recorded in accordance with the agreed procedures?	246	As above (J2). The named officer for reporting issues to within Havering is currently the Interim Statutory Section 151 Officer. The Interim Statutory Section 151 Officer will maintain a system to record breaches even if they are not reported to the Pensions Regulator (the principal reason for this is that the record of past breaches may be relevant in deciding whether to report future breaches).	Annual check	30/11/2018	Fully completed	Fully compliant		