



Haverling

LONDON BOROUGH

LOCAL PENSION BOARD AGENDA

4.15 pm

**Tuesday
24 April 2018**

**Committee Room 1
Town Hall**

Members 4: Quorum 3

Mark Holder, Scheme Member Representative (Chair)
Anne Giles, Scheme Member Representative
David Holmes, Employer Representative
Virpi Raivio, Employer Representative

**For information about the meeting please contact:
Victoria Freeman (01708) 433862
Victoria.Freeman@onesource.co.uk 01708 433862**

AGENDA ITEMS

1 CHAIR'S ANNOUNCEMENTS

The Chair will announce details of the arrangements in case of fire or other events that might require the meeting room or building's evacuation.

2 APOLOGIES FOR ABSENCE

(if any) – receive.

3 DISCLOSURE OF INTEREST

Members are invited to disclose any interest in any items on the agenda at this point of the meeting.

Members may still disclose any interest in an item at any time prior to the consideration of the matter.

4 MINUTES OF THE MEETING (Pages 1 - 8)

To approve as correct the minutes of the meeting held on 17 January 2018 (attached) and authorise the Chair to sign them.

5 LIABILITY INSURANCE

To receive a verbal update.

6 COMPLIANCE CHECKLIST (Pages 9 - 32)

Report attached and verbal update to be given by officers.

7 KEY PERFORMANCE INDICATORS (Pages 33 - 34)

Report attached and verbal update to be given by officers.

8 GENERAL DATA PROTECTION REGULATIONS (GDPR)

9 TO RECEIVE FEEDBACK FROM RECENT MEETINGS OF THE PENSIONS COMMITTEE (Pages 35 - 40)

Minutes of the Pensions Committee meeting held on the 13 March 2018 attached.

10 LOCAL PENSION BOARD ANNUAL REPORT

Andrew Beesley
Committee Administration Manager

**MINUTES OF THE MEETING OF THE
LOCAL PENSION BOARD
Committee Room 1, Town Hall, Main Road, Romford
17 January 2018 (4.30 - 5.50 pm)**

Present:

Mark Holder, Scheme Member Representative (Chairman)
David Holmes, Scheme Member Representative
Virpi Raivio, Employer Representative

Officer attendance:

Caroline Berry, Pensions Projects and Contracts Manager, OneSource, LBH
Debbie Ford, Pensions Accountant, Pensions and Procurement
Lillian Thomas, Senior Accountant, Pensions and Procurement

All decisions were taken with no votes against.

21 CHAIR'S ANNOUNCEMENTS

The Chair reminded Members of the action to be taken in an emergency.

22 APOLOGIES FOR ABSENCE

Apologies for absence were received from Anne Giles, Scheme Member Representative.

23 DISCLOSURE OF INTEREST

There were no disclosures of interest.

24 MINUTES OF THE MEETING

The minutes of the meeting were agreed as a correct record and signed by the Chairman, subject to the following amendments:

- Minute No. 12, Minutes of the Meeting refers: It had been agreed that the Pensions and Contract Manager would be the lead officer for all items on the work plan.
- Minute No. 17, LPFA Update on Admin Changes refers: LPFA in the heading to be deleted and replaced with LPP.

25 TRAINING PROGRAMME

Members discussed the requirement to obtain 46 credits and whether this would be attainable. Members were requested to complete the CIPFA knowledge and skills self assessment and the information would be collated

and areas of weakness identified, which would assist in the production of an annual training plan, which would include group and individual training. Current identified areas of weakness included the Myners Principles and pension services procurement and relationship management.

Depending on the availability of Pension Committee members, training may be held before March on responsible investments and Environmental, Social and Corporate Governance (ESG) and its impact on the introduction of low carbon products. New member training would be provided in June/July.

An extraordinary meeting of the Pensions Committee would be held on the 6th March 2018 for members to receive presentations from potential new investment advisors, as the existing contract would expire in March 2018.

Actions:

- i) All board members to review CIPFA knowledge and skills self assessment.
- ii) Chair to email link to members for the Pension Regulator's toolkit for training on the Code of Practice number 14.
- iii) Chair to email DF a list of training requirements to help plan for group training sessions.
- iv) Chair to email training plan template to board members.
- v) Board members to add a couple of areas where they will undertake individual training over the coming year to template and return to Chair.

26 **LIABILITY INSURANCE**

Officers reported that it was likely that members of the Local Pension Board were indemnified under the council's insurance policy, however clarification was needed on the distinction of what constituted an employee and a member.

Action:

Caroline Berry – To chase insurance team and get confirmation whether members of the Local Pension Board are covered for any liabilities within the scope of the councils own indemnity provisions.

27 **COMPLIANCE CHECKLIST**

Members received a document which outlined how the London Borough of Havering complied with The Pensions Regulator's (TPR) Code of Practice No. 14 Governance and Administration of Public Service Pension Schemes (the TPR Code) in relation to the management of the London Borough of

Havering Pension Fund, which is part of the Local Government Pension Scheme (LGPS).

The document highlighted all the key elements of the TPR Code and evidenced whether the London Borough of Havering met these areas of best practice. A Compliance Summary Table was circulated at the meeting and members agreed that Section B, Knowledge and Understanding and Section E, Managing risk and internal controls, would be discussed at the meeting due to a number of TPR requirements being reported as partially compliant.

The following sections were discussed and points noted:

Section B - Knowledge and Understanding

B8 – Are all pension board members investing sufficient time in their learning and development? - Once an annual training plan had been established, the TPR requirement would be fully compliant.

B9 – Does the Fund offer pre-appointment training for new pension board members or mentoring by existing members? – Pre-appointment training had not been offered, however potential new pension board members were invited to discuss the roles and referred to yourpension.org where roles and responsibilities were explained. Induction training had been delivered late to new members and in future would be delivered in a more timely manner to ensure that the TPR requirement was fully compliant. It was agreed that the section be amended to state ‘fully compliant’.

B12 – Have the pension board members completed the Pension Regulator’s toolkit for training on the Code of Practice number 14? – Pension board members were responsible for completing the online training module. It was agreed that this requirement remain at partially compliant as part of ongoing member development.

Section E - Managing risk and internal controls

E1 – Is there an agreed process for identifying and recording scheme risks? - There was a process for identifying and recording scheme risks. Internal controls of the scheme assets included monitoring these quarterly and presenting formal reports to the Pensions Committee and risk was addressed as part of the quarterly monitoring processes. Risk implications were a standard inclusion in the reports to the Pensions Committee and the Local Pension Board. There was a need to ensure that the risk register was maintained and current.

E2 – Does the fund have an adequate process to evaluate risks and establish internal controls? - Work was ongoing with LPP regarding procedures on admission agreements and documenting procedures would be built up over time. Internal documentation was currently under review.

E3 – Does the Administering Authority have a risk register to record all risks identified and action taken? - The risk register had not been updated since June 2015, however it had been identified on officer's work plan to be reviewed.

E4 – Does the Administering Authority review the effectiveness of the risk management and internal control systems of the Fund? – The requirement was non-compliant due to the non-maintenance of the risk register, however once adequate processes were in place to evaluate risks and internal controls established, the requirement would be reassessed. It was requested that once internal controls had been reviewed, that internal audit be asked to carry out a check to ensure that procedures were sufficiently robust.

E5 – Does the Administering Authority regularly review the risk register? – Discussed under E3 above. Once reviewed, the revised Risk Register would be presented to the Pension Committee.

E6 – Is there a standing item on the Pension Board agenda to review scheme risks? – Officers were requested to seek confirmation as to the best method to cover off this requirement.

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? – There were a large range of internal controls in place and these are currently under review.

E8 - Do these procedures apply equally to outsourced services, are internal controls reflected in contracts with their party providers and is there adequate reporting in relation to those controls? – Confirmation to be sought on whether the Council's AVC arrangements with Prudential and Standard Life need to be included in this section. In response to a change in legislation, confirmation as to whether the products remained fit for purpose was required. A review of the AVC providers had started – Officers to determine how to progress this review.

It was requested that an update on actions be provided at the next meeting.

It was agreed that the following priorities be discussed at forthcoming meetings in the following order:

- i) Conflicts of interest (C) and Maintaining Contributions (G)
- ii) Maintaining accurate member data (F) and Providing Information to members and others (H)
- iii) Internal Dispute Resolution (I) and Publishing information about schemes (D)

It was agreed that section A, Reporting Duties and section J, Internal Dispute Resolution were not priorities as they were fully compliant.

Actions:

- i) Once internal controls and an adequate process to evaluate risks are in place, CB to contact Sarah Bryant to suggest internal audit carry out a review to ensure that procedures are sufficiently robust.
- ii) Compliance checklist (E6) – Is there a standing item on the Pension Committee agenda to review scheme risks? To seek confirmation as to what was required – Debbie Ford
- iii) Compliance checklist (E7) - To seek confirmation on whether the AVC arrangements with Prudential and Standard Life need to be included in this section – Caroline Berry

An update on actions from sections B & E of the compliance checklist to be provided at the next meeting – Debbie Ford and Caroline Berry.

28 **LPP UPDATE ON ADMINISTRATION**

The LLP contract went live on the 1 November 2017, with performance being assessed during monthly review meetings. LPP had inherited a backlog of work due to previous staffing issues, it was expected that the high priority cases would be fed into business as usual and these would be cleared by mid February 2018. LPP had been requested to submit a proposal on how the general case backlog would be cleared and an update would be provided at the next meeting. It was confirmed that there had been no immediate impact on an individual as a result of the backlog.

Action:

Caroline Berry - To provide an update on how the backlog would be cleared.

29 **KEY PERFORMANCE INDICATORS**

A reformatted Performance Indicators Quarterly report was circulated at the meeting which was a combination of the KPI's in the LPP contract and their current performance report. It was requested that this new report be presented in this format in future. It was suggested that we could ask LPP to include an additional two indicators to the report to show work in process and work on hold. Caroline Berry will discuss this at the LPP client forum on 5th February and report back. Any other suggestions that members have should be forwarded to Caroline Berry before this date. Clarification would also be sought on 'average elapsed time' and 'average completed time' and definitions would be added to the bottom of the report.

Actions:

Caroline Berry – To get clarification on average elapsed and completed times and complete new report for next board meeting.

Caroline Berry – To capture two additional KPI's, Cases in backlog and complaints.

30 TO RECEIVE FEEDBACK FROM RECENT MEETINGS OF THE PENSIONS COMMITTEE

Members received feedback from the Pension Committee meetings held on the 21 November and the 12 December 2017, during which the following were noted:

Meeting held on the 21 November 2017

- The Committee received a report which reviewed the performance of the custodian, State Street, and the performance of the Actuary, Hymans Roberson and the Investment Advisor for the period October, 2016 to September, 2017 and noted the views of Officers.
- Members had received a report on procurement of actuarial services and investment management consultancy and agreed to join the National Framework for Actuarial, Benefits and Governance Consultancy Services, the National Framework for Investment Management Consultancy Services and to hold the service provider interviews before the Pension Committee as part of the further competition process.
- The Committee received and noted a report on employer outsourcing guide for Havering LGPS scheme employers and a report on the London Borough of Havering's Pension Fund Admissions Policy.
- Members received a report which detailed the Whistleblowing requirements of the Pensions Act, 2004 and noted the results of the annual review and the fact that no breaches had been reported.
- Members had considered a report which informed them of the proposed "closed agreement" admission of Harrison Catering services Ltd into the LB Havering Pension Fund.

Meeting held on the 12 December 2018

- Members had received a report from the Fund's Actuary Hymans Robertson, to illustrate the estimated development of the Pension Fund's funding position from 31 March 2016 to 30 September 2017 and noted the Havering Pension Fund interim funding position update to 30 September 2017, and that no action was required to change the funding plan.

- The Committee had been presented with a summary on the responsible investment activities, of the Fund's investment managers in support of the Committee's ongoing monitoring requirement as set out in the Investment Strategy Statement. The Committee noted the Hymans summary review of fund manager voting and engagement activity and the potential development of the monitoring and review process.
- The Committee had received and noted the Local Pension Board Annual Report 2016/17.
- The Committee received an overview of the performance of the Havering Pension Fund investments for the first quarter to 30 September 2017.
- Members had received and noted a report detailing the incidents and actions taken for the cessation of May Gurney as an employer of the Havering Pension Fund.

Action:

Victoria Freeman – Pension Committee minutes to be circulated with Local Pension Board Agenda in the future.

Chairman

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The Pension Regulator's and Scheme Advisory Board Compliance Checklist

Date of Completion: 30/11/2017

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Introduction

This document outlines how the London Borough of Havering complies with The Pensions Regulator's (TPR) Code of Practice No 14 Governance and Administration of Public Service Pension Schemes (the TPR Code) in relation to the management of the London Borough of Havering Pension Fund which is part of the Local Government Pension Scheme (LGPS). It will be updated regularly by officers of the Fund and reported annually to the Pensions Committee and Pension Board.

This document highlights all the key elements of the TPR Code and evidences whether the London Borough of Havering meets these areas of best practice. The document shows when an element was last checked and whether, at that time, it was considered fully, partially or not compliant. Where an element is partially or not compliant, it highlights any actions that have been identified to improve current practices. Where an element is not yet active, the commentary will generally still highlight where advanced progress is being made.

Those reading this document should be mindful that the TPR Code applies equally to all public service pension schemes and therefore it is generic in nature. There may be a number of elements that are more specifically stipulated within the LGPS legislation and it is not the purpose of this compliance checklist to consider that level of detail.

Key

Frequency of review and last review date: Where a process, policy or practice is officially reviewed at a set interval, the actual interval will be shown as well as the last interval date. However, in many circumstances, processes and procedures are ongoing and part of the day to day operation of the Fund. In these circumstances, an annual check will be carried out to ensure that the ongoing process meets the TPR Code expectations and therefore the date shown will be the date that annual check was carried out and the frequency will be shown as *ongoing (annual check)*.

Completed:

Fully Completed
In Progress
Not Started
Not Yet Relevant

Compliant

Fully Compliant
Partially Compliant
Non Compliant
Not Yet Relevant

Definitions

PSPA134
 LGPS
 TPR
 TPR CODE
 Scheme Manager
 Administering Authority
 LBH
 IDRP
 SAB
 PC
 LPB
 LPP
 MSS
 CMS

Public Service Pensions Act 2013
 Local Government Pension Scheme
 The Pensions Regulator
 The Pensions Regulator's Code of Practice No 14 Governance and administration of public service pension schemes
 This is the London Borough of Havering
 The LGPS specific term for Scheme Manager
 The London Borough of Havering
 Internal Disputes Resolution Procedure
 The National LGPS Scheme Advisory Board
 Pensions Committee
 Local Pensions Board
 Local Pensions Partnership
 Member Self Service
 Case Management System

Summary Dashboard

A dashboard showing the summary of the results of the latest compliance checklist is shown below:

No.	Check	Compliant
Reporting Duties		
A1		
A2		
A3		
Knowledge and Understanding		
B1		
B2		
B3		
B4		
B5		
B6		
B7		
B8		
B9		
B10		
B11		
B12		
Conflicts of Interest		
C1		
C2		
C3		
C4		
C5		
C6		
C7		
C8		
C9		
C10		
C11		
Publishing Information		
D1		
D2		
D3		
D4		
Risk and Internal Controls		
E1		
E2		
E3		
E4		
E5		

E6		
E7		
E8		
Maintaining Accurate Member Data		
F1		
F2		
F3		
F4		
F5		
F6		
F7		
F8		
F9		
F10		
F11		
Maintaining Contributions		
G1		
G2		
G3		
G4		
G5		
G6		
G7		
G8		
G9		
Providing Information to Members and Others		
H1		
H2		
H3		
H4		
H5		
H6		
H7		
H8		
H9		
H10		
H11		
H12		
Internal Dispute Resolution		
I1		
I2		
I3		
I4		

I5		
I6		
I7		
I8		
I9		
Reporting Breaches		
J1		
J2		
J3		

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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.	Ongoing (annual check)	18/10/2017	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 18/10/2017 prior to the deadline of 27/10/2017	Ongoing (annual check)	18/10/2017	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.	Ongoing (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.	Ongoing (annual check)	n/a	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	Ongoing	In progress	Fully compliant		There has been a change to LPB members and induction training needs to be carried out for those members. This has been scheduled for 12 December 2017.
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	Ongoing (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	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 your pension.org. Key documents are published this website.	Ongoing	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.	Ongoing (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	Ongoing	In progress	Partially compliant		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: your pension.org where the roles and responsibilities are set out.	Ongoing	Ongoing	Fully completed	Partially compliant		
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		In progress	Fully compliant		This needs to be reviewed to ensure all members training needs have been identified and addressed
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	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.	Ongoing (annual check)	02/02/2016	In progress	Partially compliant		Will distribute to new board members

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:

TPR Code Ref 62

- 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.

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	Partially compliant		Consider a dedicated training session on this topic or encourage remaining board members to complete the TPR conflict of interest module.
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.	Ongoing (annual check)		In Progress	Partially compliant		This is what should happen but need to check with Legal that this has happened
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).	Ongoing (annual check)	30/11/2017	Fully completed	Partially compliant		Consider including requirement for future members to make declarations at application/pre-appointment stage to minimise risk of appointing potentially conflicted members.
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.	Mar-15	02/02/2016	Fully completed	Non-compliant		Could carry out a review of this process to ensure still fit for purpose
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.	Ongoing (annual check)	30/11/2017	Not Started	Non-compliant		Arrange to include LPB members on the conflicts register
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)		Not Started	Non-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	30/11/2017	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	Partially compliant		Consider a dedicated training session on this topic or encourage remaining board members to complete the TPR conflict of interest module.
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	30/11/2017	Fully completed	Fully compliant	Positions are advertised as they become available.	
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 (annual check)	30/11/2017	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	Ongoing (annual check)	30/11/2017	Fully completed	Fully compliant	Amended as and when the LPB memberships changes.	
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.	Ongoing (annual check)	30/11/2017	Fully completed	Partially compliant		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.	Ongoing (annual check)	30/11/2017	Fully completed	Fully compliant		
D4	Does the Administering Authority publish information about pension board business?	97	All meetings and papers are public, however some items may be restricted.	Ongoing (annual check)	30/11/2017	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	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. Internal Controls operate in the day to day activities that fall under the administration and management of the scheme. 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).	Ongoing	Ongoing	Fully completed	Partially compliant		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
E2	Does the Fund have an adequate process to evaluate risks and establish internal controls?	107	As above	Ongoing	Ongoing	Fully completed	Partially compliant	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.	Consider documenting internal controls
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.	Ongoing (annual check)	23/06/2015	In Progress	Partially compliant		Risk register to be reviewed
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).	Ongoing (annual check)	02/02/2016	Fully completed	Non-compliant	Should we review existing arrangements??	

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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.	Ongoing (annual check)	23/06/2015	Fully completed	Non-compliant		Risk register to be reviewed
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 (annual check)	30/11/2017	In Progress	Non-compliant		Include as standing agenda item for PB
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.	Ongoing (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.	
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	Ongoing (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

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 (annual check)	30/11/2017	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 (annual check)	30/11/2017	Fully completed	Partially 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. Work with employers to transition to new way of submitting data.

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 (annual check)	30/11/2017	Fully completed	Partially compliant		To create a record of all 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 (annual check)	30/11/2017	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 (annual check)	30/11/2017	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 (annual check)	30/11/2017	Fully completed	Fully compliant		This is being looked at to ensure it does not breach the new GDPR coming into force May 18.
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 (annual check)	30/11/2017	Fully completed	Partially compliant		Consider formalising/formally documenting the checking procedures carried out in discussion with LPP
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.	Ongoing (annual check)	30/11/2017	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.	Ongoing (annual check)	30/11/2017	Fully completed	Fully compliant		Ensure, if any future data issues should arise, they are formally documented in an improvement plan.
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.	Ongoing (annual check)	30/11/2017	Fully completed	Partially compliant		Ensure addresses are reconciled with future year end data.
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 (annual check)	30/11/2017	Fully completed	Partially compliant		Ensure all data is sent via a secure email. Check what procedures LPP have in place

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 (annual check)	30/11/2017	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 (annual check)	30/11/2017	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 (annual check)	30/11/2017	Fully completed	Fully compliant		
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.	Ongoing (annual check)	30/11/2017	Fully completed	Partially 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.	Ongoing (annual check)	30/11/2017	Fully completed	Non-compliant		Write a procedure in line with the TPRs suggested approach.
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 (annual check)	30/11/2017	Fully completed	Non-compliant		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 (annual check)	30/11/2017	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.	Ongoing (annual check)	30/11/2017	Fully completed	Partially compliant		Formal process needs to be in place
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 (annual check)	30/11/2017	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.	Ongoing (annual check)	30/11/2017	Fully completed	Partially compliant		Ensure the interfaces are providing accurate information to minimise manual intervention and be aware of any cases that need investigating prior to next years deadline
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.	Ongoing (annual check)	30/11/2017	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).	Ongoing (annual check)	30/11/2017	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.	Ongoing (annual check)	30/11/2016	Fully completed	Partially compliant		Consider updating statements to include the required additional information to ensure they 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. Copies are sent to the pensions team and are received within the required timescales. No check is made to ensure that all AVC members receive a statement.	Ongoing (annual check)	30/11/2016	Fully completed	Partially compliant		Consider checking if a statement is produced by AVC providers for all members where this is expected - use summary information from AVC providers.
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.	Ongoing (annual check)	27/01/2016	In progress	Partially compliant		Monitor response from Standard Life

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 (annual check)	30/11/2017	Fully completed	Partially compliant		Review information being supplied by employers. Timescales should now be adhered to with the implementation of the LPP's CMS.
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 (annual check)	30/11/2017	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 (annual check)	30/11/2017	Fully completed	Non-compliant		To review once the LPP CMS has been fully implemented.
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.	Ongoing (annual check)	30/11/2017	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 (annual check)	27/01/2015	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 (annual check)	30/11/2017	Fully completed	Fully compliant		

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:

- 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.

TPR Code Ref 215

The Act also states that the procedure must include:

- 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.

TPR Code Ref 218

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
11	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.	Ongoing (annual check)	30/11/2017	Fully completed	Fully compliant		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.
12	Does the Administering Authority's process highlight or consider whether a dispute is exempt?	214	This is not currently included in the IDRP factsheet	Ongoing (annual check)	30/11/2017	Fully completed	Non-compliant		This needs to be added to the information currently in the factsheet
13	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.	Ongoing (annual check)	30/11/2017	Fully completed	Fully compliant		

14	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 (annual check)	30/11/2017	Fully completed	Partially compliant		Liaise with employers to agree a stage 1 process (which could be use of the LBH stage 1 appointed person).
15	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	Ongoing (annual check)	30/11/2017	not yet relevant	not yet relevant		This will need to be monitored if IDRPs complaints are received in the future
16	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 (annual check)	30/11/2017	Fully completed	Fully compliant		
17	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	Ongoing (annual check)	30/11/2017	Fully completed	Fully compliant		
18	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.	Ongoing (annual check)	30/11/2017	not yet relevant	not yet relevant		This will need to be monitored if IDRPs complaints are received in the future and can be reported to PB if required
19	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.	Ongoing (annual check)	30/11/2017	not yet relevant	Not yet relevant		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 : your pension.org.uk under member publications- other pension fund documents	Ongoing (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	Ongoing (annual check)	21/11/2017	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).	Ongoing (annual check)	21/11/2017	Fully completed	Fully compliant		

Local Pension Board - Performance Indicators - Quarterly report

		Quarter 3 Performance report Sept 17 - Dec 17				
Performance Standard	Minimum Target	Received	Completed	Completed on time	% On Time	Comments
Provide welcome letter to new members within 3 working days of notification of joining.	95%	153	85	82	96.47	
Calculate transfer in calculations within 4 working days of receiving required documentation	95%	41	10	8	80	
Calculate and pay transfer out calculations within 5 working days of receiving required documentation	90%	37	23	20	86.96	
Act upon request for payment of additional contributions within 10 working days	90%					None received
Respond to general queries/correspondence including updates for, but not limited to, change of address. change of bank account details, Member Self-Service registrations within 5 working days or within timescales set out in Appendix 1	90%	89	47	46	97.87	Does not currently include Member self service requests
Calculate deferred benefit entitlement on leaving within 4 working days of receiving necessary notification of leaving or date of leaving, whichever is later	90%	58	33	17	51.52	
Calculate and pay retirement benefits, including deferred into payment within in 5 days of receiving all required documentation from employer and/or member or date of entitlement, whichever is later	95%	68	25	17	68	
Respond to applications for payment of refunds of contributions within 4 working days of receipt of required documentation	90%	32	13	10	76.92	
Calculate and pay widow/widower pension benefits within 10 working days of receiving all required documentation and once any overpayments have been settled	90%	49	14	9	64.29	Currently includes all deaths, not only those with dependants benefits
Respond to member requests for estimates of benefits within 5 working days following receipt of request	90%	42	29	23	79.31	
Respond to employer requests for estimates of benefits within 5 working days following receipt of request	90%	32	23	9	39.13	
Provide information on request in respect of pension sharing on divorce within legislative timescales (within 5 days of receipt of all relevant information). (a charge to the member will be levied in line with pension sharing on divorce legislation)	100%					Statistics not included until the January report
Implement pension sharing orders within legislative timescales (within 5 days of receipt of all relevant information)	100%					Statistics not included until the January report
Provide annual benefit statements to active and deferred members within legislative timescales	100%					Annual Benefit Statements are produced following completion of the Year End process and by the statutory deadline of 31st August.

Act upon and implement pension increase orders by next available payment date	100%					Pensions Increase date is 09/04/2018
Implement changes to pensioner circumstances by next available payment date	100%					Will need to be incorporated into future reports
Respond to requests for information for reports from DWP, HMRC, DCLG, GAD within legislative timeframes	100%					None received for response by LPP this quarter
Reporting – Provide monthly and quarterly reports to client highlighting performance against SLA's, membership statistics, Annual planner, Technical updates and any other information relevant to the ongoing running of the service within 5 working days after the start of each month and within 10 working days of the end of each quarter	100%					Process/Discussions ongoing to confirm exactly what LBH require LPP to do for this task.
Number of cases in backlog						Work is beng undertaken to establish exact numbers and where the responsibility will sit. Update to be given at the meeting
Complaints						Will need to be incorporated into future reports

**MINUTES OF A MEETING OF THE
PENSIONS COMMITTEE
Committee Room 3A - Town Hall
13 March 2018 (7.00 - 9.42 pm)**

Present:

COUNCILLORS

Conservative Group John Crowder (Chairman), Melvin Wallace and Joshua Chapman

Residents' Group Stephanie Nunn

East Havering Residents Group Clarence Barrett

UKIP David Johnson (Vice Chairman)

OBSERVERS: Andy Hampshire, GMB

The Chairman reminded Members of the action to be taken in an emergency.

43 APOLOGIES FOR ABSENCE AND ANNOUNCEMENT OF SUBSTITUTE MEMBERS

An apology for absence was received from John Giles, Unison Representative.

44 DISCLOSURE OF INTERESTS

There were no declarations made at the meeting.

45 MINUTES OF THE MEETING

The minutes of the meeting held on the 12 December 2017, were agreed as a correct record and signed by the Chairman.

46 PENSION FUND AUDIT PLAN 2017/18

The Committee received an Audit Plan as issued by Ernst and Young LLP for the work they planned to undertake for provision of an audit opinion on the pension fund accounts for the year ending 31 March 2018.

The Audit Plan for the Pensions Fund would be presented to the Audit Committee on the 14 March 2018.

The Account and Audit Regulations 2015 introduced a change in the statutory deadlines from the 2017/18 financial year. The timetable for the

preparation and approval of account would be brought forward with draft accounts needing to be prepared by the 31st May 2018 and audit completion and publication by the 31st July 2018. Officers were confident that the deadline would be met, due to trial completions having been carried out for the past two years.

RESOLVED:

That the Committee noted the report.

47 BUSINESS PLAN/ANNUAL REPORT ON THE WORK OF THE PENSIONS COMMITTEE 2017/18

The Committee received a report which sought to set out the work of the Committee during 2017/18 and the plan of work for the forthcoming three years and of which would form the basis of the Pension Fund Business Plan.

It was explained that CIPFA guidance suggested that the Business Plan be submitted to the committee for consideration and proposed the contents of the document, as outlined in the report under paragraph 1.6.

Members attention was brought to Appendix A which detailed the Training Strategy for the London Borough of Havering Pension Fund. It was explained that if there were a change in Committee membership following the local elections in May 2018, the training plan would be resubmitted once the new committee had been established.

Maintaining expertise, experience and knowledge was a key focus for the committee in order to meet the qualitative test under Markets in Financial Instrument Director (MiFID 11) and firms would undertake an assessment of the expertise, experience and knowledge of the local authority and its pension fund committee in order to be reasonably assured that they were capable of making their own investment decisions and have an understanding of the risks involved before a firm would permit election to professional status. It was noted that all requests for election had been granted for existing investment service providers.

RESOLVED:

The Committee noted the report, which was agreed by the Chair of the Committee in advance of the meeting and which would be referred to the Full Council meeting for consideration.

48 INVESTMENT MANAGEMENT CONSULTANCY SERVICES - EXTENSION TO EXISTING CONTRACT

The Committee received a report which informed of the decision to extend the investment Adviser contract for a further year until 31 March 2019.

The current extended contract would expire on the 31 March 2018 and had the option to extend for a further 12 months.

Following the Committee's decision on the 21 November 2017, a procurement and tendering process had commenced. Subsequently however, the London CIV published a consultation which aimed to clarify its purpose and set out the direction of its future strategy. In view of this announcement, officers in consultation with the Section 151 officer believed that the best outcome at this time was to defer the procurement of an Investment Advisor until 2019 to benefit from service continuity.

RESOLVED:

That the Committee noted the approval of a one year extension of the existing contract for the provision of Investment Advice with Hymans Robertson LLP for the period April 2018 to March 2019.

49 **LONDON CIV - CONSULTATION ON PROPOSED STRATEGY**

Members were presented a report on the London CIV consultation on their proposed strategy. It was explained that a governance review highlighted a number of issues and indicated a need for the LCIV to both change its governance arrangements and clarify its purpose and future strategy. In response, LCIV initiated a consultation on its future strategy and aims including a number of proposals on its governance arrangements and longer term strategy.

Members expressed disappointment with the consultation process and suggested that further information and clarification on the Investments element be undertaken.

During the presentation of the report, officers highlighted the proposed governance and client engagement that would take place (pages 81 and 82 of the report refers).

The LCIV set out three flexible mandates:

- Low Cost: Passive Equity Funds and a Liability Aware Fund.
- Basic: Blended Investment Mandates established across asset classes with LLAs selecting fixed amounts in each according to their Strategic Asset Allocation.
- Enhanced: Blended and Low Cost Investment Mandate established with LCIV providing tactical asset allocation as opportunities arise. LLAs would be able to tailor the amount of discretion afforded to the LCIV in their individual IMA.

Members expressed concern regarding the LCIV's direction of travel for local funds and its decision making on its strategic asset allocation. Officers stated that the LCIV was there to deliver the Fund's strategic asset

allocation and that we will not know for sure whether this can be delivered until the LCIV's proposed client engagement has run its course.

It was noted that neither the Real Asset Management mandate nor Private Debt mandate is presently available from the LCIV.

Members agreed that the Pension Fund would consider the impact of ESG on its investment strategy. It was advised that ESG training would be delayed until views were sought after the May 2018 elections, before making any ESG changes to the Investment Strategy.

Larissa Benbow, Head of Fixed Income, LCIV, was invited to address the committee, during which she provided an update on the CIV to members and outlined the London CIVs priorities for 2018.

Members discussed in depth the LCIV's investment proposal Ms Benbow was able to clarify a number of points from their consultation paper.

During discussion, members raised concern regarding the turnover of executive staff at the LCIV.

RESOLVED: That

- i) The Committee noted and provided comment on the content of the report.**
- ii) The Committee noted the Chairman's response to the LCIV questionnaire on their proposals on its governance arrangements and longer term strategy.**

50 EXCLUSION OF THE PUBLIC

The Committee resolved to exclude the public from the meeting during discussion of the following item on the grounds that if members of the public were present it was likely that, given the nature of the business to be transacted, that there would be disclosure to them of exempt information within the meaning of paragraph 3 of Schedule 12A to the Local Government Act 1972 which could reveal information relating to the financial or business affairs of any particular person (including the authority holding that information) and it was not in the public interest to publish this information.

There were no members of the public or press present for the duration of the meeting.

51 PENSION FUND PERFORMANCE MONITORING FOR THE QUARTER ENDED DECEMBER 2017

The Committee received an overview of the performance of the Havering Pension Fund investments for the quarter to 31 December 2017.

The net return on the Fund's investments for the quarter to 31 December 2017 was 3.2% (or £22m to £715m). This represented an outperformance of 0.9% against the combined tactical benchmark and under performance of 0.7% against the strategic benchmark.

Based on information supplied by the council's performance measures, the total combined fund value at the close of business on 31 December 2017 was £714.81m.

Simon Jones, Senior Investment Consultant, presented the quarterly monitoring report on behalf of Hymans Robertson LLP.

Richard Nelson, Senior Credit Fund Manager, and Rob Nicholson, Client Relationship Director, Royal London, presented an overview of London Borough of Havering's Pension Fund asset allocation.

The Committee thanked the representatives of Hymans Robertson LLP and Royal London, for their presentations.

Resolved: That

- i) The summary of the performance of the Pension Fund within the report, be noted.**
- ii) The Committee considered Hymans performance monitoring report and presentation (Appendix A – Exempt).**
- iii) A presentation from the Fund's Bonds Manager (Royal London), be received (Appendix B – Exempt).**
- iv) The Committee considered the latest quarterly update from the Chair of the Investment Advisory Committee, LCIV (Appendix C – Exempt).**
- v) The Committee considered the quarterly reports provided by each investment manager.**
- vi) The analysis of the cash balances, be noted.**

Chairman

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