



# Haverling

LONDON BOROUGH

## LOCAL PENSION BOARD AGENDA

**4.00 pm**

**Tuesday  
18 December 2018**

**Committee Room 1,  
Town Hall, Main Road,  
Romford**

Members 4: Quorum 3

Mark Holder, Scheme Member Representative  
Anne Giles, Scheme Member Representative  
David Holmes, Employer Representative  
Denise Broom, 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 - 16)**

To approve as correct the minutes of the meeting held on 21 August 2018 (attached) and authorise the Chair to sign them; and to receive the notes of the inquorate meeting held on the 20 October 2018.

### **5 COMPLIANCE CHECKLIST (Pages 17 - 56)**

### **6 KEY PERFORMANCE INDICATORS (Pages 57 - 76)**

### **7 INTERNAL DISPUTE RESOLUTION PROCESS UPDATE**

### **8 LPP INTERNAL AUDIT**

### **9 PENSION REGULATOR SCHEME SURVEY**

### **10 TO RECEIVE FEEDBACK FROM RECENT MEETINGS OF THE PENSIONS COMMITTEE**

### **11 BOARD MEMBERSHIP AND RECRUITMENT**

### **12 WORK PLAN**

**Andrew Beesley**  
**Head of Democratic Services**

**MINUTES OF THE MEETING OF THE  
LOCAL PENSION BOARD  
Committee Room 2 - Town Hall  
21 August 2018 (4.00 - 5.46 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 Manager, Pensions and Treasury  
Lillian Thomas, Pensions Accountant, Pensions and Treasury  
James Curtis, LPP (part of the meeting)

**49 CHAIR'S ANNOUNCEMENTS**

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

**50 APOLOGIES FOR ABSENCE**

An apology for absence was received from Anne Giles, Scheme Member Representative.

**51 DISCLOSURE OF INTEREST**

There were no disclosures of interest.

**52 MINUTES OF THE MEETING**

The minutes of the ordinary meeting held on the 24 April 2018 were agreed as a correct record and signed by the Chairman. The following matters arose from the minutes of the previous meeting, which were not covered elsewhere on the agenda:

- Minute No. 34(i): It was confirmed that all board members had reviewed the CIPFA knowledge and skills self assessment and sent confirmation of completion to Debbie Ford.
- Minute No. 34(ii): Various training event invitations had been circulated to members.
- Minute No. 34(iii): Minute No.58 refers.
- Minute No. 35: It was confirmed that Local Pension Board members were covered for liabilities within the scope of the council's own

indemnity provisions. A confirmation letter was awaited from the insurance company.

- Minute No. 36 (C5): Members were advised that Democratic Services were responsible for holding details of members declarations.
- Minute No. 36 (C6): It was requested that Local Pension Board members declarations not be published on website.
- Minute No. 36 (G1): An explanation to be provided of the process in place to identify late payments. Action to be carried forward.
- Minute No. 36 (G5): Members had suggested that when the Charging Policy was next reviewed, that reference be included to charging a fee for administration for processing late payments and interest charges. Action to be carried forward - Caroline Berry.
- Minute No. 37: Minute No.60 refers.
- Minute No. 40: It was confirmed that the Annual Report had been agreed by members at the Annual General Meeting on the 18 June 2018 and presented to the Pensions Committee on the 24 July 2018.

The minutes of the Annual General meeting held on the 18 June 2018 were agreed as a correct record and signed by the Chairman. There were no matters arising from the minutes of the previous meeting, which were not covered elsewhere on the agenda.

Members received, and noted, the feedback from the meeting of the Pensions Committee held on the 24 July 2018 and the Special Pensions Committee meeting held on the 20 August 2018.

Members requested that the work plan be included as a standing item on future agendas.

**Actions:**

- i) **Minute No. 36 (G1): An explanation to be provided of the process in place to identify late payments. Action to be carried forward – Caroline Berry.**
- ii) **Minute No. 36 (G5): Members had suggested that when the Charging Policy was next reviewed, that reference be included to charging a fee for administration for processing late payments and interest charges. Action to be carried forward - Caroline Berry.**
- iii) **Work plan be included as a standing item on future agendas – Victoria Freeman**

53 **LATEST KEY PERFORMANCE INDICATOR REPORT**

The latest KPI report was circulated and presented by James Curtis (LPP).

In addition to the PRoWS Statistical document for April 2018, members received the three month statistics at the meeting.

The focus for LPP was on processing Deaths, Retirements and Estimates (employer), with improvements having been seen in all areas. There had been 681 overdue cases as of the 1 June 2018, and this had reduced to 94 as of the 21 August 2018. There were currently no overdue Retirement or Death cases. The focus was on ensuring that all cases were processed by their due date in addition to reducing the backlog of cases. Benefit statements would be made available to members on the 31 August 2018, generating additional work for officers.

There were a number of questions around improvements and clarifications on the report and these are covered in the section below.

54 **NEW KEY PERFORMANCE INDICATOR REPORT**

The London Borough of Newham monthly report for February 2018 was circulated at the meeting for members to view the format of report produced by the Local Pensions Partnership (LPP).

Members liked the style of the new report which made it a lot clearer on the position of each of the categories measured.

Members requested that all cases be allocated on the report to provide a complete picture of performance. That descriptions be made clearer and if necessary an appendix giving more detailed information on all heading descriptions. Members requested a separate report on cases on hold and the reasons why they were on hold.

Members requested that the SLA target be shown on the report to make it clear whether we were achieving agreed targets.

Members requested a cumulative position to be included on the report calculating the cumulative position from the 1<sup>st</sup> April 2018, as an annual cumulative performance report was the agreed method of reporting performance to the Pensions committee.

Members requested that the performance report to be completed with the Septembers data in the new format and this added as a standing item on future agendas.

**Action: To produce new report for next board meeting to review - LPP**

55 **COMPLIANCE CHECKLIST**

The following sections were discussed and points noted:

Section F – Administration and Scheme Record Keeping

F1 – Do member records hold the information required as defined in the Record Keeping Regulations and is it accurate? Members agreed that the requirement was fully compliant.

F2 – Does the Fund have the appropriate processes in place so employers can provide timely and accurate information? Officers were working on training provision for 'Your Fund', with LPP to initially provide training to Havering, as the largest employer in the scheme. When available, the Pension Administration Policy would be presented to the Pension Committee, for approval, although this was not currently a high priority.

F3 – Does the Fund keep records or and reconcile transactions as required by the Record Keeping Regulations? Caroline Berry would discuss the process of recording those overpayments that were written off with Sarah Bryant and would report back to members.

F4 – Are records kept of pension board meetings as required by the Record Keeping Regulations? Members agreed that the requirement was fully compliant.

F5 – Are records kept of decisions made by the pension board, outside of meetings as required by the Record Keeping Regulations? Members agreed that the requirement was fully compliant.

F6 – Are records retained for as long as they are needed? It was confirmed that legally records could be retained indefinitely and would not breach the General Data Protection Regulations.

F7 – Does the Administrating Authority have policies and processes to monitor data on an ongoing basis? The formal monitoring of data and checks would be carried out as part of the audit process. Furthermore, performance indicators highlighted any issues.

F8 – Does the Administrating Authority carry out a data review at least annually? Members agreed that the requirement was fully compliant.

F9 – Is a data improvement plan in place which is being monitored with a defined end date? There was currently no improvement plan in place, and this was a priority for Caroline Berry.

F10 – Are processes and policies in place to reconcile scheme data with employer data? Addresses were not currently checked. Work on LPP data processes would be undertaken next year and address reconciliation would be done.

F11 – Do the Administrating Authority's member data processes meet the requirements of the Data Protection Act 1998 and the data protection

principles? Members agreed that the requirement was fully compliant. LPP use Mimecast as their secure email facility.

Section H – Providing information to members and others

H1 – Has an annual benefit statement been provided to all active members within the required timescales? Caroline Berry was requested to investigate the process followed for providing the annual benefit statement to active members.

H2 – Do these meet the legal requirements in relation to format? Members agreed that the requirement was fully compliant.

H3 – Has a benefit statement been provided to all active, deferred and pension credit members who have required one within the required timescales? Members agreed that the requirement was fully compliant.

H4 – Does this meet the legal requirements in relation to format? Caroline Berry advised that she would check to ascertain whether the legal requirements applied to deferred statements.

H5 – Has an annual benefit statement been provided to all members with AVCs within the required timescales? Officers did not have authority to check with AVC providers as to whether AVC members receive an annual benefit statement. However, written confirmation was sought from the AVC providers that they sent an annual benefits statement to all members with AVCs within the required timescale. Prudential had confirmed that they adhere to the requirements and no response had been received from Standard Life. Caroline Berry advised that she would chase Standard Life for a response.

H6 – Do these meet the legal requirements in relation to format? Minute H5 above refers.

H7 – Is basic scheme information provided to all new and prospective members within the required timescales? The target had been set and contained in the service level agreement with LPP.

H8 – Does this meet the legal requirements in relation to format? Members agreed that the requirement was fully compliant.

H9 – Is all other information provided in accordance with the legal timescales? Members agreed that the requirement was partially compliant.

H10 – Where any information is only provided electronically (i.e. instead of any hard copy) does it comply with the legal requirements? Members agreed that the requirement was 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? Members were advised that the standard letters had been reviewed when the operating system had been migrated to LPP.

H12 – Does the Administering Authority use a tracing service? Members agreed that the requirement was fully compliant.

**Actions:**

- i) **F3 - To discuss the process of recording those overpayments that were written off with Sarah Bryant and would report back to members - Caroline Berry**
- ii) **H1 – To investigate the process followed for providing the annual benefit statement to active members - Caroline Berry.**
- iii) **H4 – To check to ascertain whether the legal requirements applied to deferred statements - Caroline Berry**
- iv) **H5 – To chase Standard Life for confirmation that they send an annual benefit statement to all members within the required timescales - Caroline Berry**
- v) **Sections ‘D’ and ‘I’ to be considered at the next meeting – Victoria Freeman**

**56 LOCAL PENSION BOARD - END OF YEAR FINANCE REPORT 2017-18**

Members received a report which notified of the budget set for the 2018-19 financial year.

In 2017/18 costs totalled 14.5% of the budget allocated and for 2016/17 costs totalled 22% of the budget allocated, averaging out at 18.25% over the 2 year period. The costs for 2017/18 did not incur recruitment costs, however there may be a need to recruit two new employer representatives to the Board.

**57 REVIEW OF SCHEME RISKS**

Member's views were sought on the updated draft Pension Fund Risk Register document which was circulated at the meeting. The final document would be presented to the Pension Committee at their meeting on the 13 November 2018.

**Action: To provide views on the format of the Pension Fund Risk Register document to officers by the 11 September 2018 – All members**

58 **INTERNAL AUDIT**

A review to ensure that procedures were sufficiently robust was on the Internal Audit work plan for September 2018. LPP had recently been audited by Deloitte and a client version of their report would be circulated to members.

**Action: To circulate a client version of Deloitte audit of LPP to members – Caroline Berry**

59 **BOARD RECRUITMENT**

Members discussed future changes to the membership of the Board and the potential vacancy for one employer representative from September 2018 and another from April 2019. It was agreed that an advertisement be placed for the recruitment of an employer representative as soon as possible.

**Action: To place an advertisement for the recruitment of an employer representative - Caroline Berry / Debbie Ford**

---

**Chairman**

This page is intentionally left blank

**NOTES OF THE MEETING OF THE  
LOCAL PENSION BOARD  
Town Hall, Main Road, Romford  
2 October 2018 (4.00 - 5.25 pm)**

**Present:**

Mark Holder, Scheme Member Representative  
David Holmes, Scheme Member Representative

**Officer Attendance:**

Caroline Berry, Pensions Projects and Contracts Manager, OneSource, LBH  
Debbie Ford, Pensions Manager, Pensions and Treasury  
Lillian Thomas, Pensions Accountant, Pensions and Treasury  
James Curtis, LPP (part of the meeting)

**1 CHAIR'S ANNOUNCEMENTS**

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

**2 APOLOGIES FOR ABSENCE**

An apology for absence was received from Anne Giles, Scheme Member Representative.

**3 DISCLOSURE OF INTEREST**

There were no disclosures of interest.

**4 MINUTES OF THE MEETING**

The meeting of the Local Pension Board held on the 21 August 2018 could not be approved, as the meeting was not quorate.

The following matters arose from the minutes of the previous meeting, which were not covered elsewhere on the agenda:

- i) Minute No. 52(i): There was a written process in place to identify late payments, however the process would require amendment to bring in line with the Charging Policy.
- ii) Minute No. 52(ii): Members had suggested that when the Charging Policy was next reviewed, that reference be included to charging a fee for administration for processing late payments and interest charges.  
Action to be carried forward – Caroline Berry

- iii) Minute No. 52(iii): The Work Plan to be included on the agenda as a standing item – Victoria Freeman.
- iv) Minute No. 54: Note No. 5 below refers.
- v) Minute No. 55(i): To discuss the process of recording those overpayments that were written off with Sarah Bryant and would report back to members. Action to be carried forward – Caroline Berry.
- vi) Minute No. 55(ii): It was reported that all active members would receive email notifications if their email addresses were held by LPP. Furthermore, details were made available on the website.
- vii) Minute No. 55(iii): Members were advised that the legal requirements did not apply to deferred statements. The regulations applied only to annual benefit statements.
- viii) Minute No. 55(iv): It was confirmed that Standard Life had sent an annual benefit statement to all members within the required timescales.
- ix) Minute No. 55(v): Note No. 6 below refers.
- x) Minute No. 57: Note No. 7 below refers.
- xi) Minute No. 58: Note No. 8 below refers.

**Actions:**

- i) **Note No. 4(i): Members had suggested that when the Charging Policy was next reviewed, that reference be included to charging a fee for administration for processing late payments and interest charges. Action to be carried forward – Caroline Berry.**
- ii) **Note No. 4(ii): The Work Plan to be included on the agenda as a standing item – Victoria Freeman.**
- iii) **Note No. 4(v): To discuss the process of recording those overpayments that were written off with Sarah Bryant and would report back to members. Action to be carried forward – Caroline Berry.**

## 5 KEY PERFORMANCE INDICATOR REPORT

The monthly report for September 2018 was circulated to members. The majority of cases had been completed on time, and this was largely due to the section being fully staffed and an improvement in management. It was requested that it be highlighted on the Pension Board monthly report the main indicators that are reported in the Annual report to the Pensions Committee. Furthermore, it was requested that accumulative data for the year be presented to the next meeting. Members questioned the validity of data for cases completed on time and were provided assurance that the data was not misleading. Members requested that the following data be provided in future reports:

- Additional work
- 'Top' cases not on time
- Complaints and IDRPs cases
- Life Certificates
- Axis online take up numbers

Concern was raised that the issues with the event report from HMRC had not been resolved, as this was a breach and needed to be urgently addressed.

### **Actions:**

- i) That it be highlighted on the Pension Board monthly report the main indicators that are reported in the Annual report to the Pensions Committee – James Curtis / Caroline Berry.**
- ii) To discuss the format to present accumulative data for the year - James Curtis / Caroline Berry.**
- iii) To check who was responsible for running previous reports for HMRC as a priority to ensure that statutory obligations are met – James Curtis / Debbie Ford.**

## 6 COMPLIANCE CHECKLIST

The following sections were discussed and points noted:

### Section D – Publishing Information about schemes

D1 – Does the Administering Authority publish information about the Pension Board? Members considered the requirement to be fully compliant.

D2 – Does the Administering Authority publish other useful related information about the Pension Board? Members agreed that the website be updated to include a profile of the Local Pension Board members.

D3 – Is the information about the Pension Board kept up to date? Members considered the requirement to be fully compliant.

D4 – Does the Administering Authority publish information about Pension Board business? Members considered the requirement to be fully compliant.

#### Section I – Internal Dispute Resolution

I1 – Has the Administering Authority put in place an internal dispute resolution procedure? Members considered the requirement to be fully compliant. The IDRP was being reviewed with LPP to ensure that it was up to date and included all required and additional helpful information as the current version was based on an old DCLG sample.

I2 – Does the Administering Authority's process highlight or consider whether a dispute is exempt? The process would be included in the IDRP factsheet when the document was reviewed.

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 specific 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? Members considered the requirement to be fully compliant.

I4 – Has the Administering Authority ensured that employers who make first stage decisions also have IDRP in place? Some of the scheme employers had published their stage 1 IDRP adjudicator details along with their scheme discretions, however all employers needed to be encouraged to do so although it was optional for employers to nominate stage 1.

I5 – Are the timescales in the procedure adhered to including sending an acknowledgement on receipt of an application? As yet, the London Borough of Havering had not had a formal IDRP complaint to process, however there was a policy and process in place and this would be reviewed.

I6 – Does the Administering Authority notify and advertise the procedure appropriately? Members considered the requirement to be fully compliant.

I7 – Are the notification requirements in relation to TPAS and the Pensions Ombudsman being adhered to? Members considered the requirement to be fully compliant.

18 – Does the Administering Authority regularly assess the effectiveness of its arrangements? Members considered the requirement to be fully compliant.

19 – Does the Administering Authority regularly assess the effectiveness where employers carry out a stage one process? Members considered the requirement to be fully compliant.

**Actions:**

- i) D2 - To provide a short profile for inclusion on the website - All members.**
- ii) I1 – To review the IDRPs with LPP to ensure that it was up to date and included all required and additional helpful information as the current version was based on an old DCLG sample – Caroline Berry.**
- iii) I2 – Details of the process highlighting or considering whether a dispute is exempt to be included in the IDRPs factsheet when it is reviewed – Caroline Berry.**
- iv) I5 – The policy and process for IDRPs complaints to be reviewed – Caroline Berry.**

**7 RISK REGISTER REVIEW**

Members received the Pension Fund Risk Register, which incorporated risks relating to Havering, Newham and Bexley.

The following points were discussed:

- Risk No. 1, Risk of Inaccurate three yearly actuarial valuation: It was proposed that the wording be amended to 'inappropriate' rather than 'inaccurate'.
- Risk No. 4, Risk of failure to comply with legislative requirements: It was felt that the consequence of not adding on legislation in a timely manner and contributions being delayed was a risk.

Members were requested to provide their views on the format of the Pension Fund Risk Register document to officers before the document was presented to the Pensions Committee on the 13 November 2018.

**Action:**

**To provide views on the format of the Pension Fund Risk Register document to officers by the 12 October 2018 – All members.**

**8 LPP INTERNAL AUDIT**

LPP had an internal audit around benefits administration in January 2018. Unfortunately, due to risk, LPP were unable to share the internal audit report externally.

The scope of the internal audit included:

- Benefit processing – Controls were in place surrounding the accurate calculation and payment of pension benefits, payment authorisations, documentation and record keeping procedures;
- Accuracy of benefit calculations;
- Workflow management process from receipt of task to delivery; and
- Management of the administration system in respect of calculations and factor changes, to enable the administration system to process calculations in line with the Rules of each scheme.

LPP had received an 'effective' rating which could be defined as:

'Compliant (adequate in the circumstances) – low risk of failure in risk mitigation and control and some scope or justification to improve risk mitigation and control activities for audited functions, processes and activities'.

Concern was raised that the key performance data may not provide an accurate picture as the data did not account for time received and when the case was logged onto the system. It was suggested that any questions that officers and members may have, be presented to Lancashire Council who procure LPP, in order for LPP to be challenged.

**Action: Statistics and questions to be presented to Lancashire Council – Caroline Berry.**

**9 BOARD MEMBERSHIP AND RECRUITMENT**

The advertisement and application form for an employee representative for the Local Pension Board and Pensions Committee had been sent to all employers and trusts. The closing date for applications was the 31 October 2018.

**10 TO RECEIVE FEEDBACK FROM RECENT MEETINGS OF THE PENSIONS COMMITTEE**

Members received the minutes of the Pensions Committee held on the 18 September 2018.

---

**Chairman**

This page is intentionally left blank

## The Pension Regulator's and Scheme Advisory Board Compliance Checklist

Date of Completion: 30/11/2017

### Contents

Introduction

Summary Results Dashboard

A - Reporting Duties

B - Knowledge and Understanding

C - Conflicts of interest

D - Publishing information about schemes

E - Managing risk and internal controls

F - Maintaining accurate member data

G - Maintaining contributions

H - Providing information to members and others

I - Internal Dispute Resolution

J - Reporting breaches of the law

Page 17

### 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)*.

to be reviewed

### 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 |
|------------------------------------|-------|-----------|
| <b>Reporting Duties</b>            |       |           |
| A1                                 |       |           |
| A2                                 |       |           |
| A3                                 |       |           |
| <b>Knowledge and Understanding</b> |       |           |
| B1                                 |       |           |
| B2                                 |       |           |
| B3                                 |       |           |
| B4                                 |       |           |
| B5                                 |       |           |
| B6                                 |       |           |
| B7                                 |       |           |
| B8                                 |       |           |
| B9                                 |       |           |
| B10                                |       |           |
| B11                                |       |           |
| B12                                |       |           |
| <b>Conflicts of Interest</b>       |       |           |
| C1                                 |       |           |
| C2                                 |       |           |
| C3                                 |       |           |
| C4                                 |       |           |
| C5                                 |       |           |
| C6                                 |       |           |
| C7                                 |       |           |
| C8                                 |       |           |
| C9                                 |       |           |
| C10                                |       |           |
| C11                                |       |           |
| <b>Publishing Information</b>      |       |           |
| D1                                 |       |           |
| D2                                 |       |           |
| D3                                 |       |           |
| D4                                 |       |           |
| <b>Risk and Internal Controls</b>  |       |           |
| E1                                 |       |           |
| E2                                 |       |           |
| E3                                 |       |           |
| E4                                 |       |           |
| E5                                 |       |           |

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

|                           |  |  |
|---------------------------|--|--|
| I5                        |  |  |
| I6                        |  |  |
| I7                        |  |  |
| I8                        |  |  |
| I9                        |  |  |
| <b>Reporting Breaches</b> |  |  |
| J1                        |  |  |
| J2                        |  |  |
| J3                        |  |  |

This page is intentionally left blank

## 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: <a href="http://yourpension.org.uk/Havering-Publications/Local-Pension-Board">yourpension.org.uk/Havering-Publications/Local-Pension-Board</a> . 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 <a href="http://yourpension.org.uk">yourpension.org.uk</a> . 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              |            | In progress     | Partially 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: <a href="http://yourpension.org.uk">yourpension.org.uk</a> 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:

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 | 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 <a href="http://yourpension.org.uk">yourpension.org.uk</a> 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) |  | 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                |  | 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 biographies for 2 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 public, 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          | 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             |                  | 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. 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. Using processes such as *internal audit walk through process | 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 |

|    |  |     |   |              |            |                 |                     |   |   |
|----|--|-----|---|--------------|------------|-----------------|---------------------|---|---|
| E1 | Is there an agreed process for identifying and recording scheme risks? (continued)   | 105 |   | Ongoing      |            | In Progress     | Partially compliant | *LPP admin provider performance indicators are processed monthly and reported to LPB<br>*admin error rates are monitored<br>*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<br>*the risk register is a living document and is reviewed annually.  |   |
| E2 | Does the Fund have an adequate process to evaluate risks and establish internal controls?                                  | 107 | As above  | Ongoing      |            | In Progress     | 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. 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 | 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.<br><br>Internal audit to carry out process of review of internal controls in 18/19.<br>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. | 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:<br>Restricted access to the building<br>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.<br>Calculations are independently checked when payments made. National Fraud Initiative checks Annual benefit statements request members check their details.<br>Payments made via BACS wherever possible. Filters for spam email etc. Triennial valuation identifies data issues which are resolved.<br>Quarterly reconciliation of payments in and out and pension fund strain costs. Bank reconciliation with the paperwork notifying of the payments.<br>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.<br>There are many controls in place and LBH may consider these to be sufficient to feel comfortable that these address all material fund risks.<br>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.).<br>Formal documentation of internal controls in place as part of risk management policy/register.<br>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             |                  | In Progress     | 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 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.<br>Other points identified of note are:<br>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.<br>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.<br>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:<br>- Annual posting of contributions, where checks are made with data versus member records to pick up any anomalies<br>- 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.<br>- Triennial valuation exercise - amend records on 3 yearly basis if any issues identified by the actuaries automated data portal.<br>- 2 yearly National Fraud Initiative exercise is carried out to identify deceased members.<br>- 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.<br>- Any payments, retirements, transfers etc., checked by a second team member.<br>- 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     | Non-compliant   |   | Data scores have now been received and are very good. However a formal data improvement plan needs to be written |
| 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 dilligence 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:<br>- The statement regarding whether a charge may be made - although no charges are applied to LGPS benefits<br>- There are other guides and factsheets, including the IDRPs 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 Regulations. To be written into monitoring checklists |
| 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:

- 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. | 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. |
| 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   | Annual check        | 30/11/2018       | Fully completed | Fully compliant | There is now a section to cover exempt disputes                        |  |
| 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:<br>- who it applies to<br>- who the specified person (stage 1) is<br>- the timescales for making applications<br>- who to contact with a dispute<br>- the information that an applicant must include<br>- 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 |  |  |

|    |  |     |  |                      |            |                 |                     |  |   |
|----|--|-----|--|----------------------|------------|-----------------|---------------------|--|---|
| 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              |            | In Progress     | 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  | As and when required |            | Fully completed | Fully compliant     |  | 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              |            | 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   | Annual check         | 30/11/2018 | 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.  | 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 |
| 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.  | 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 |       |        |

This page is intentionally left blank

## Contribution recording for employers with an external payroll

- Cashiers will supply a weekly bank statement to confirm monies received. These should be saved in W:\data01\PENSIONS\ADMITTED AND SCHEDULED BODIES - Original spreadsheets sent via email
- External payrolls will send a monthly excel spreadsheet, providing a breakdown of employee and employer contributions along with pensionable pay. These should be saved in W:\data01\PENSIONS\ADMITTED AND SCHEDULED BODIES - Original spreadsheets sent via email
- Once both of these are received, the data should be recorded on the monthly monitoring sheet found in W:\data01\PENSIONS\ADMITTED AND SCHEDULED BODIES - CONTRIBUTIONS 2010-ONWARDS
- Each employer has its own tab to record employee and employer contributions from the monthly spreadsheet which should then be used to reconcile the payment made into the bank account.
- The pensionable pay from the spreadsheet is also recorded to ensure the correct employer contribution rate is being paid.
- Ensure that the overview page is completed with the date the money is received into the bank account for each employer.
- If any payments are received after 22<sup>nd</sup> of the month following the deduction, this must be recorded as a late payment and this must be highlighted to the employer via email. All emails regarding late payments should be saved in W:\data01\PENSIONS\ADMITTED AND SCHEDULED BODIES - CONTRIBUTIONS 2010-ONWARDS\Late Payment Monitoring
- If an employer is consistently late with the payments, the charging policy should be implemented (currently under review). Payments which are paid within 2-5 days of their due date are not considered material.

September 2018

This page is intentionally left blank

**The London Borough of Havering  
Pension Fund**

**Local Government Pension Scheme**

**Charging Policy**

**November 2018**

DRAFT V0.2

## Contents

|  |    |
|--|----|
| Introduction   | 3  |
| Policy   | 4  |
| Glossary of terms  | 4  |
| Cost chargeable to the Fund  | 5  |
| Cost chargeable to employers   | 5  |
| Costs associated with new employers joining the Fund                           | 5  |
| Costs associated with changes to continuing employers                          | 6  |
| Costs associated with ceasing employers leaving the Fund                       | 6  |
| Additional tangible costs  | 7  |
| • Bespoke costs  | 7  |
| • Excessive costs in relation to new, ceasing or changing employers            | 7  |
| • Accounting Reports   | 7  |
| • Poor performance recharges   | 7  |
| Circumstances where costs might be recovered as the result of poor performance | 7  |
| Calculation of costs incurred  | 8  |
| Interest payments on retirement benefits                                       | 8  |
| Late payment of contributions  | 8  |
| Pension Strain Costs   | 10 |
| • Redundancy   | 10 |
| • Ill-Health Retirements   | 10 |
| Applicability  | 11 |
| Ownership and authorisation  | 11 |
| Further Information  | 11 |

## **Introduction**

### **Purpose**

In recent years there has been a significant increase in the amount of fees the Pension Fund spends on legal and actuarial work, largely as a result of an increased number of employers joining, leaving and changing their status within the Fund.

These fees can be spread across all employers, proportionately to their size, although the activity tends to be the result of decisions made by a small number of employers. Alternatively, these fees can be charged to the relevant scheme employer directly.

This policy aims to set out what charges should be met by the relevant scheme employer directly rather than cost being met by all scheme employers.

Pension Fund charges are set out within the Local Government Pension Scheme Regulations 2013 and The Pension Regulator (TPR) Code of Practice 14 - Governance and Administration of Public Service Pension Schemes. .

### **Aims, objectives and outcomes**

The aim of the policy is to deliver value for the members of the Havering Pension Fund, which will help to deliver customer satisfaction with the Council by helping to deliver spend within budget.

### **Policy summary**

A clear and concise guide to what charges may arise for Scheme Employers and which Scheme Employers will be responsible for which charges.

### **Scope**

The policy covers all costs outside of the standard costs, for services provided to support Scheme Employers in delivering their legislative responsibilities.

### **Timescales**

The policy is applicable until updated or reviewed due to legislative, regulatory or audit requirement change.

## Policy

A charging policy has been approved by the Havering Pension Fund Committee that clearly sets out the charging policy to cover fees for legal and actuarial work carried out in relation to the Local Government Pension Scheme (the Scheme).

From 1 November 2017, the London Borough of Havering (the Administering Authority) delegated the pension administration service to Lancashire County Council (LCC) who engaged the Local Pensions Partnership (LPP) to undertake their pensions portfolio. LPP was formed in 2016 through a collaboration between LCC and the London Pensions Fund Authority (LPFA) and provides pension services to the Local Government Pension Scheme, police, firefighters and other public sector funds.

## Glossary of terms

**Administering authority:** the local authority which manages the pension fund

**Scheme employer:** an employer participating in the Local Government Pension Scheme

**Letting authority:** the local authority or other scheme employer which is outsourcing a public service or function

**Contractor:** the company or organisation providing the service outsourced by the letting authority or other scheme employer

**Scheduled Body:** All 1st and 2nd tier Local Authorities and Academy Schools

**Resolution (Designating) Body:** Town and Parish Councils

**Admission Body (including Transfree Admission Body and Community Association Admission body):**

- a body which provides a public service in the United Kingdom which operates otherwise than for the purposes of gain and has sufficient links with a Scheme employer for the body and the Scheme employer to be regarded as having a community of interest (whether because the operations of the body are dependent on the operations of the Scheme employer or otherwise);
- a body, to the funds of which a Scheme employer contributes;
- a body representative of any Scheme employers, or local authorities or officers of local authorities;
- a body that is providing or will provide a service or assets in connection with the exercise of a function of a Scheme employer as a result of:
  - the transfer of the service or assets by means of a contract or other arrangement (i.e. outsourcing),
  - a direction made under section 15 of the Local Government Act 1999,
  - directions made under section 497A of the Education Act 1996;
- a body which provides a public service in the United Kingdom and is approved in writing by the Secretary of State for the purpose of admission to the scheme

## Costs chargeable to the Fund

### Standard Costs

Most costs to the Fund will continue to be charged by the Actuary proportioning them to all employers, based on size, as part of the Triennial Actuarial Valuation exercise. These are then picked up by employers through their employer contributions. We already consider these costs to be spread across by employers in a fair manner and therefore this method will remain unchanged.

Examples of costs included in this category:

- Governance costs
- Benefits administration
- Payroll processing for pensioners
- Actuarial fees associated with completing the triennial valuation
- Investment management costs
- Audit Fees
- Most other administrative work and officer's time

However, some costs are more specific and are incurred as a result of the decision and actions of a particular employer. Therefore it is fair that these should be paid by the employer who generates them, rather than being shared across all employers.

A quotation of the fees and charges will be provided on request, and Scheme Employers are encouraged to contact the Pensions Projects and Contracts Manager at the earliest opportunity before taking any action that would give rise to the situations that would give rise to charges, as set out in this document.

## Cost chargeable to the employers

### Costs associated with new employers joining the Fund

Costs will be notified at the start of the process but may increase with the length or complexity of the query or report, and also due to delays in providing data, incomplete data, incorrect data or recalculations arising from amendments.

| <b>Employer Type</b>          | <b>Standard Actuarial Costs (Contribution rate, bond value report and sub-fund set-up report as relevant)</b> | <b>Standard Legal Fees (drafting and producing admission agreement and other legal queries)</b> |
|-------------------------------|---|---|
| Scheduled and Resolution Body | New scheme employer   | Not applicable  |
| Admission Body                | Letting authority   | Letting Authority   |

### Costs associated with changes to continuing employers

| Employer Type                      | Bond Value re-assessment (Actuarial Costs)   | Bulk Transfers in and out of Havering Pension Fund (Actuarial Costs)   | Bulk Transfers between two employers in Havering Pension Fund (Actuarial Costs) | Merger and Demergers within existing employers (Actuarial and Legal Costs) |
|------------------------------------|--|--|---|--|
| Scheduled Body and Resolution Body | Not Applicable   | The letting authority for transfers out of Havering Pension Fund.<br>The new scheme employer for transfers in. | Please refer to Havering Pension Fund   | Please refer to Havering Pension Fund                                      |
| Admission Body                     | Letting authority (subject to the Administering Authority Policy regarding bond revaluation) | Please refer to Havering Pension Fund  | Please refer to Havering Pension Fund   | Please refer to Havering Pension Fund                                      |

### Costs associated with ceasing employers leaving the Fund

The Pension Fund will carry out a full cessation valuation for Scheme Employers leaving the Scheme to calculate the current surplus or deficit in relation to the Scheme Employer's employees. Costs associated with cessation will be recharged to the departing Scheme Employer as set out below.

Indicative reports to aid decision making by the Scheme Employer may also be provided and will be recharged to the Scheme Employer.

Contact the Pensions Project and Contracts Manager to request an estimate of costs. Costs may increase if there are delays in providing data, for incomplete data or incorrect data. Recalculations and amendments will also result in higher costs.

| Employer Type                      | Cessation valuation (actuarial costs)  |
|------------------------------------|--|
| Scheduled Body and Resolution Body | The scheduled body or resolution body  |
| Admission Body                     | Contractor but may be subject to the admission agreement, bond, guarantor or indemnity |

## **Additional tangible costs**

### **Bespoke Costs**

Bespoke work directly related to a Scheme Employer will be recharged to the Scheme Employer on a case by case basis. Where such work is commissioned by a Scheme Employer a quotation will be provided in advance of any agreement to carry out the work. Bespoke work may be carried out if staffing resources are available to carry out the work required.

### **Excessive costs in relation to new, ceasing or changing employers**

Where administrative time by the Fund relates to one of these situations exceeds what we deem "reasonable", these costs will be recharged to the relevant employer in addition to the standard costs.

### **Accounting Reports**

The FRS102/IAS19 reports are accounting reporting standards, the purpose of which is for employers to disclose/account for the total value of pension payments that have accumulated at an accounting year end. The disclosure is an employer's duty to publish and is not a cost for the Pension Fund to bear. Any officer time spent completing the data returns, to the fund's actuary, on behalf of the employers will be reimbursed. The rate is set at the start of the FRS102/IAS19 cycle and will be communicated to employers at that time and is in addition to the fees charged by the actuary.

### **Poor performance recharges**

Where we consider that we have incurred additional costs (including officer's time) as a result of an employer's poor level of performance, regulation 70 of the Local Government Pension Scheme Regulations 2013 allows us to recover these costs. Details of the regulation is set out below or you can view the full Local Government Pension Regulations [here](#).

#### Circumstances where costs might be recovered as the result of poor performance

The circumstances where costs may be recovered from employers:

- 1) Persistent and on-going failure to provide relevant information (as determined by the Employer Information provided to all new scheme employers) to the Havering Pension Fund, scheme member or other interested parties in accordance within specified performance targets, either as a result of timeliness of delivery or quality of information.
- 2) Persistent and on-going failure to pass relevant information to a scheme member or potential members, either due to poor quality or not meeting the agreed timescales outlined in the performance targets.

- 3) Persistent and on-going failure to deduct and pay over correct employee and employer contributions or any other payments due to the Havering Pension Fund within the stated timescales.
- 4) Instances where the performance of the Scheme employer results in fines or additional costs being levied against the Havering Pension Fund by the Pension Regulator, Pensions Ombudsman or other regulatory body.
- 5) For a persistent failure to resolve an isolated case(s) satisfactorily.

#### Calculation of costs incurred

For a persistent failure to resolve isolated case(s) satisfactorily the Fund will recharge the cost of officer time from the point in time at which we write a formal letter to the scheme employer until the case is resolved. The rate applicable will be dependent upon the level of officer(s) involved in resolving the case and the time spent on resolution.

For persistent and on-going failure to meet targets, following intervention to assist the employer concerned, the Fund will recharge the additional costs due to the employer's poor performance at the relevant officer(s) cost and the time spent on resolution from the point of time that a formal letter has been issued to the scheme employer until performance improves.

Where the performance of the scheme employer results in fines or additional costs being levied against the Fund, the Fund will recharge the full costs it has incurred to the relevant employer(s).

#### Interest payments on retirement benefits

Where the Fund pays out the lump sum payment or first pension payment late because we have not received the forms in sufficient time for them to be processed (i.e. one month and one year late respectively), we are required to pay an interest payment to the member (Reg. 81). This interest cost will be passed to employers.

Interest payable under Reg. 81 must be calculated at one per cent above base rate on a day to day basis from the due date to the date of payment and compounded with three-monthly rests.

#### Late payment of contributions

On 1 April 2015 The Pensions Regulator (TPR) published their code of practice no. 14 concerning '**Governance and Administration of Public Service Pension Schemes**'. Of course, with the exception of the Local Government Pension Scheme Regulations 2013 that came into force from 1 April 2014, the statutory legislation governing all public service pension schemes will come into force from 1 April 2015 in accordance with the Public Service Pensions Act 2013.

With regard to the collection and payment over of pension contributions it should be noted that TPR has a number of statutory objectives including:

- To protect the benefits of pension scheme members;
- To promote and improve understanding of the good administration of work-based pensions
- To maximise compliance with the duties and safeguards of the Pensions Act 2008.

The Pension Regulator's Code of Practice No.14 "Governance and Administration of Public Service Pension Schemes" sets out the legal requirements for maintaining contributions, with regard to what constitutes late payment, the following extract applies:

147. Employer contributions must be paid to the scheme in accordance with any requirements in the scheme regulations. Where employer contributions are not paid on or before the date they are due under the scheme and the scheme manager has reasonable cause to believe that the failure is likely to be of material significance to the regulator in the exercise of any of its functions, the scheme manager must give a written report of the matter to the regulator as soon as reasonably practicable

148. Where employee contributions are deducted from a member's pay, the amount deducted must be paid to the managers of the scheme at the latest by the 19th day of the month following the deduction, or by the 22nd day if paid electronically (the 'prescribed period') or earlier if required by scheme regulations. References to 'days' means all days. References to 'working days' do not include Saturdays, Sundays or Bank Holidays.

149. Where employee contributions are not paid within the prescribed period, if the scheme manager has reasonable cause to believe that the failure is likely to be of material significance to the regulator in the exercise of any of its functions, they must give notice of the failure to the regulator and the member within a reasonable period after the end of the prescribed period. Where there is a failure to pay employee contributions on an earlier date in accordance with scheme regulations, schemes should also consider their statutory duty under section 70 of the Pensions Act 2004 to assess and if necessary report breaches of the law. For more information about reporting breaches of the law, see this section of the code.

Noting these regulatory requirements, together with the Local Government Pension Scheme Regulations 2013 (Reg. 71), the London Borough of Havering will issue Scheme Employers with a written notice of unsatisfactory performance and notify them that they may be charged interest where that performance does not improve.

An employer who continues to fail to meet the statutory requirement to pay employer contributions, employee contributions and employee additional contributions over to the Pension Fund by the 19<sup>th</sup> day of the following month (22<sup>nd</sup> of the following month if paid electronically) will also be at risk of being reported to the Pensions Regulator who has the power to issue fines.

The Fund will recharge the additional costs due to the employer's poor performance at the relevant officer(s) cost and the time spent on resolution from the point of time that a formal letter has been issued to the scheme employer until the payment of contributions has been received.

Interest payable under Reg. 71 must be calculated at one per cent above base rate on a day to day basis from the due date to the date of payment and compounded with three-monthly rests.

## **Pension Strain Costs**

### Redundancy

A pension strain cost may be incurred and will be payable by the Scheme Employer where a member retires early, but having reached at least age 55, on the grounds of redundancy or business efficiency; or where the employer exercises their discretions in such a way as to give rise to pension strain costs. Employer discretions include:

- Award of additional pension,
- Waiver of actuarial reductions,
- Allowing unreduced benefits for early retirement over the age of 55 where the member satisfies the rule of 85.

The above issues should all be covered in the Employer Discretion Policy, as required by the 2013 regulations.

Where an employer makes certain decisions which result in additional benefits being paid out to a member, this results in a strain on the Fund. The cost of providing these additional benefits are calculated and recharged in full to the employer who made the decision.

### Ill-Health Retirements

A pension strain cost may also arise due to ill-health retirements, regardless of the age of the member. Each Scheme Employer is allocated an ill-health allowance at the triennial valuation, or at the time they become a new scheme employer. The costs of ill-health retirements for each Scheme Employer are monitored and employers who exceed their allowance will be invoiced for the excess cost. Information on ill-health insurance is provided to all Scheme Employers but it is currently their decision whether they take out the insurance. Employers should be aware that the pension strain cost of a tier 1 ill-health retirement can be significant, in some cases in excess of £100,000. Scheme Employers should carefully consider the level of their ill-health allowance, the cost of the insurance (which does reduce their employer rate), and the risk of a tier 1 ill-health occurring.

Pension strain costs are based on actuarial factors relating to a number of aspects such as the members age, sex and scheme membership.

## **Applicability**

The policy applies to all current and any future employers within the London Borough of Havering Pension Fund, which includes the Council as an employer, all the Academies within the Borough and Admission bodies carrying out work under contract where there has been a transfer of staff who have retained continued access to the Local Government Pension Scheme.

The consequences of non-compliance include being reported to The Pension Regulator and the possibility of fines.

Scheme Employers will be consulted as part of the policy development process, and a Scheme Employer representative may sit as a Member on the Havering Pension Fund Committee. Revisions to the policy in the future will also be consulted upon with the Scheme Employers. There are currently 49 Scheme Employers of the Havering Pension Fund.

## **Ownership and authorisation**

The Policy Lead is the Pension Projects and Contracts Manager, who will be responsible for review of the policy as and when there are regulatory, audit or legislative changes. The Pension Committee will approve the Policy and any future revisions, subject to delegation to the Section 151 Chief Operating Officer.

## **Further information**

If you have any questions or comments regarding this charging policy, please contact Caroline Berry our Pensions Projects and Contracts Manager.

Telephone: 01708 432185

Email: [caroline.berry@oneSource.co.uk](mailto:caroline.berry@oneSource.co.uk)

If your enquiry is regarding the FRS102/IAS19 - Full details and estimated costs can be obtained by contacting Debbie Ford:

Telephone: 01708 432569

Email: [Debbie.Ford@oneSource.co.uk](mailto:Debbie.Ford@oneSource.co.uk)

This page is intentionally left blank

**Local Pension Board - Performance Indicators - October Monthly Report**

| No | Case Type   | Performance Standard Schedule 1  |            | Minimum Target | Brought Forward | Received | Completed | Completed On Time | % On Time | Carried Forward | Average Elapsed Time | Average Completed Time | Comments  |
|----|---|--|------------|----------------|-----------------|----------|-----------|-------------------|-----------|-----------------|----------------------|------------------------|---|
| 1  | HV01  | Provide welcome letter to new members within 3 working days of notification of joining.  |            | 95%            | 62              | 85       | 82        | 82                | 100       | 65              | 16                   | 4                      | Annual Report standard is 10 working days   |
|    | HV01W   |  | online     |                | 0               | 93       | 2         | 2                 | 100       | 91              | 8                    | 8                      |   |
| 2  | HV02A   | Calculate transfer in calculations within 4 working days of receiving required documentation   | IFA        | 95%            | 5               | 1        | 1         | 0                 | 0         | 5               | 30                   | 8                      | Annual Report standard is 15 working days   |
|    | HV03A   |  | TVI        |                | 5               | 0        | 2         | 2                 | 100       | 3               | 101                  | 57                     |   |
| 3  | HV09A   | Calculate and pay transfer out calculations within 5 working days of receiving required documentation  | IFA        | 90%            | 1               | 3        | 2         | 2                 | 100       | 2               | 5                    | 5                      | Annual Report standard is 15 working days   |
|    | HV010A  |  | TVO        |                | 1               | 2        | 1         | 1                 | 100       | 2               | 5                    | 5                      |   |
| 4  | HV04A   | Act upon request for payment of additional contributions within 10 working days  |            | 90%            | 1               | 1        | 1         | 0                 | 0         | 1               | 17                   | 9                      |   |
| 5  | HV24<br>HV24A<br>HV24G<br>HV24K<br>HV25M<br>HV24V | 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%            | 34              | 123      | 103       | 103               | 100       | 54              | 8                    | 5                      | Split into 6 different case types on CMS - Totals/averages used   |
| 6  | HV11  | Calculate deferred benefit entitlement on leaving within 4 working days of receiving necessary notification of leaving or date of leaving, whichever is later  |            | 90%            | 193             | 64       | 42        | 38                | 90.47     | 216             | 33                   | 17                     | Annual Report standard is 15 working days   |
|    | HV11W   |  | online     |                | 0               | 25       | 7         | 7                 | 100       | 18              | 6                    | 6                      |   |
| 7  | HV12<br>HV12P<br>HV12Z                            | 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.                                    | DB in pay  | 95%            | 39              | 46       | 28        | 27                | 96.4      | 57              | 30                   | 16                     |   |
|    | HV14  |  | Ret        |                | 48              | 15       | 12        | 12                | 100       | 51              | 72                   | 20                     |   |
|    | HV14W   |  | Ret Online |                | 0               | 3        | 0         | 0                 | 0         | 0               | 3                    | 0                      |   |
| 8  | HV16  | Respond to applications for payment of refunds of contributions within 4 working days of receipt of required documentation   |            | 90%            | 43              | 43       | 36        | 36                | 100       | 50              | 13                   | 6                      |   |
|    | HV16W   |  | online     |                | 0               | 19       | 6         | 6                 | 100       | 13              | 5                    | 5                      |   |
| 9  | HV20  | Calculate and pay widow/widower pension benefits within 10 working days of receiving all required documentation and once any overpayments have been settled  | PEN        | 90%            | 90              | 14       | 8         | 8                 | 100       | 96              | 74                   | 19                     | These figures are for all deaths and will include any cases that have no dependant bens to pay. Annual Report looks at death notifications written to within 5 days |
|    | HV20D   |  | DEF        |                | 0               | 1        | 0         | 0                 | 0         | 1               | 0                    | 0                      |   |
|    | HV13  |  | DIS        |                | 4               | 2        | 1         | 1                 | 100       | 5               | 5                    | 5                      |   |
|    | HV13W   |  | DIS online |                | 0               | 0        | 0         | 0                 | 0         | 0               | 0                    | 0                      |   |

|    |       |  |        |      |    |    |    |    |      |    |    |    |   |
|----|-------|--|--------|------|----|----|----|----|------|----|----|----|---|
| 10 | HV08  | Respond to member requests for estimates of benefits within 5 working days following receipt of request  |        | 90%  | 15 | 33 | 25 | 25 | 100  | 23 | 9  | 7  |   |
| 11 | HV22  | Respond to employer requests for estimates of benefits within 5 working days following receipt of request  |        | 90%  | 6  | 10 | 13 | 12 | 92.3 | 3  | 11 | 6  | Annual Report standard is 10 working days   |
|    | HV22W |  | online |      | 0  | 0  | 0  | 0  |      | 0  | 0  | 0  |   |
| 12 | HV34E | 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% | 1  | 5  | 2  | 2  | 100  | 4  | 30 | 11 |   |
| 13 | HV34A | Implement pension sharing orders within legislative timescales (within 5 days of receipt of all relevant information)  |        | 100% | 0  | 0  | 0  | 0  |      | 0  | 0  | 0  |   |
| 14 |       | Provide annual benefit statements to active and deferred members within legislative timescales   |        | 100% |    |    |    |    |      |    |    |    | 100% achieved prior to 31/08/18 deadline  |
| 15 |       | Act upon and implement pension increase orders by next available payment date  |        | 100% |    |    |    |    |      |    |    |    | pensions increase implemented in April for pensions and August for additional PI on lump sums |
| 16 | HV15  | Implement changes to pensioner circumstances by next available payment date  |        | 100% | 10 | 2  | 1  | 1  | 100  | 11 | 21 | 21 |   |
| 17 |       | Respond to requests for information for reports from DWP, HMRC, DCLG, GAD within legislative timeframes  |        | 100% |    |    |    |    |      |    |    |    | All reports/information received in time to meet deadlines                                    |
| 18 |       | 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 |        | 100% |    |    |    |    |      |    |    |    | Need to monitor   |
| 19 |       | Number of cases in backlog   |        |      |    |    |    |    |      |    |    |    | To be provided for end of November  |
| 20 |       | Complaints   |        |      |    |    |    |    |      |    |    |    | 1 case detailed in the October LPP report   |

Havering Council

**Monthly Report**  
**October 2018**

Page 59

## Workflow and Performance - 01/10/2018 to 31/10/2018

### 1. 'Top' Case Types Report

These are the main day to day member related cases measured under the Service Level Agreement.

| Case Type | Description                                      | Brought Forward | Received | Complete | On Time | On Time % | Carried Forward | Average Completed Time | Average Elapsed Time |
|-----------|--|-----------------|----------|----------|---------|-----------|-----------------|------------------------|----------------------|
| HV00      | Post Item  | 0               | 83       | 75       | 64      | 85.33     | 8               | 0                      | 0                    |
| HV01      | Admission  | 62              | 85       | 82       | 82      | 100.00    | 65              | 4                      | 16                   |
| HV01b     | Admissions (Automatic Enrolment)                 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV01O     | Opt-In   | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV01R     | Admissions (Monthly return)                      | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV01w     | Online joiner form                               | 0               | 93       | 2        | 2       | 100.00    | 91              | 8                      | 8                    |
| HV02A     | IFA IN (Actual)                                  | 5               | 1        | 1        | 0       | 0.00      | 5               | 8                      | 30                   |
| HV02E     | IFA in (estimate)                                | 117             | 7        | 4        | 4       | 100.00    | 120             | 50                     | 98                   |
| HV03A     | Other TV in (actual)                             | 5               | 0        | 2        | 2       | 100.00    | 3               | 57                     | 101                  |
| HV03E     | Other TV in (estimate)                           | 63              | 10       | 6        | 6       | 100.00    | 67              | 42                     | 83                   |
| HV04      | Additional Contributions                         | 1               | 0        | 0        | 0       | 100.00    | 1               | 0                      | 0                    |
| HV04a     | Additional Pension Contributions (APCS) actual   | 1               | 1        | 1        | 0       | 0.00      | 1               | 9                      | 17                   |
| HV04e     | Additional Pension Contributions (APCS) estimate | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV05      | Maternity leave/LWOP                             | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV05w     | Maternity leave/LWOP (Online Forms)              | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV06      | AVCs/FSAVCs                                      | 0               | 5        | 3        | 3       | 100.00    | 2               | 4                      | 4                    |
| HV06A     | Retirement AVC                                   | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV07      | Change of hours                                  | 9               | 47       | 27       | 27      | 100.00    | 29              | 15                     | 30                   |
| HV07R     | Change of Hours (Monthly Return)                 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV07w     | Change of hours (Online Forms)                   | 0               | 1        | 0        | 0       | 100.00    | 1               | 0                      | 0                    |
| HV08      | Estimates - individual                           | 15              | 33       | 25       | 25      | 100.00    | 23              | 7                      | 9                    |
| HV09A     | IFA Out (Actual)                                 | 1               | 3        | 2        | 2       | 100.00    | 2               | 5                      | 5                    |
| HV09E     | IFA Out (estimate)                               | 13              | 13       | 10       | 10      | 100.00    | 16              | 15                     | 24                   |
| HV09p     | IFA Payment                                      | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV10A     | Other TV out (actual)                            | 1               | 2        | 1        | 1       | 100.00    | 2               | 5                      | 5                    |
| HV10E     | Other TV out (estimate)                          | 5               | 6        | 4        | 4       | 100.00    | 7               | 5                      | 5                    |
| HV11      | Deferred Benefits                                | 193             | 64       | 42       | 38      | 90.47     | 216             | 17                     | 33                   |
| HV11w     | Deferred Benefits (online Leaver)                | 0               | 25       | 7        | 7       | 100.00    | 18              | 6                      | 6                    |
| HV12      | DBs into payment                                 | 30              | 42       | 25       | 24      | 96.00     | 47              | 9                      | 24                   |

| Case Type | Description                         | Brought Forward | Received | Complete | On Time | On Time % | Carried Forward | Average Completed Time | Average Elapsed Time |
|-----------|-------------------------------------|-----------------|----------|----------|---------|-----------|-----------------|------------------------|----------------------|
| HV12p     | Deferred Payment                    | 3               | 3        | 2        | 2       | 100.00    | 4               | 13                     | 17                   |
| HV12z     | DB into Payment (Disclosure)        | 6               | 1        | 1        | 1       | 100.00    | 6               | 26                     | 49                   |
| HV13      | Death in service                    | 4               | 2        | 1        | 1       | 100.00    | 5               | 5                      | 5                    |
| HV13p     | Death in Service Payment            | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV13w     | Death in service (Online Forms)     | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV14      | Retirements (immediate)             | 48              | 15       | 12       | 12      | 100.00    | 51              | 20                     | 72                   |
| HV14p     | Retirement Payment                  | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV14q     | Third tier ill health review        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV14v     | P45                                 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV14w     | Retirements (immediate online)      | 0               | 3        | 0        | 0       | 100.00    | 3               | 0                      | 0                    |
| HV15      | Benefit Revision                    | 10              | 2        | 1        | 1       | 100.00    | 11              | 21                     | 21                   |
| HV15p     | Revision Payment                    | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV16      | Refunds                             | 42              | 42       | 34       | 34      | 100.00    | 50              | 7                      | 12                   |
| HV16p     | Refund Payment                      | 1               | 1        | 2        | 2       | 100.00    | 0               | 5                      | 14                   |
| HV16w     | Refunds (Online Forms)              | 0               | 19       | 6        | 6       | 100.00    | 13              | 5                      | 5                    |
| HV17      | Opt outs                            | 5               | 30       | 25       | 25      | 100.00    | 10              | 4                      | 6                    |
| HV17d     | Opt Out (3mths or more)             | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV17r     | Opt Out (less than 3 mths)          | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV17w     | Opt outs (Online Forms)             | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV18      | GMP (NI MOD)                        | 13              | 28       | 33       | 32      | 96.96     | 8               | 9                      | 9                    |
| HV19      | Re-employments                      | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV20      | Death on Pension                    | 90              | 14       | 8        | 8       | 100.00    | 96              | 19                     | 74                   |
| HV20d     | Death on Deferred                   | 0               | 1        | 0        | 0       | 100.00    | 1               | 0                      | 0                    |
| HV20p     | Death on Pension Payment            | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV21s     | S/term to L/term spouses            | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV22      | Estimates - employer                | 6               | 10       | 13       | 12      | 92.30     | 3               | 6                      | 11                   |
| HV22w     | Estimates (Online Forms)            | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV23      | Redundancy and Severance            | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV23p     | Redundancy Severance Payment        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV24      | Correspondence (customer) - level 3 | 14              | 11       | 16       | 16      | 100.00    | 9               | 11                     | 18                   |
| HV24A     | Change of address                   | 13              | 34       | 25       | 25      | 100.00    | 22              | 3                      | 5                    |
| HV24B     | Bank change                         | 0               | 1        | 1        | 1       | 100.00    | 0               | 5                      | 5                    |
| HV24C     | Annual Covenant                     | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |

| Case Type | Description                         | Brought Forward | Received | Complete | On Time | On Time % | Carried Forward | Average Completed Time | Average Elapsed Time |
|-----------|-------------------------------------|-----------------|----------|----------|---------|-----------|-----------------|------------------------|----------------------|
| HV24E     | Correspondence (Employer)           | 14              | 2        | 4        | 3       | 75.00     | 12              | 14                     | 23                   |
| HV24g     | Correspondence (customer) - data    | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV24H     | EOY queries                         | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV24I     | Employer Invoice                    | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV24k     | General Cor - Level 1               | 1               | 1        | 1        | 1       | 100.00    | 1               | 8                      | 8                    |
| HV24M     | MSS Registration                    | 3               | 2        | 5        | 5       | 100.00    | 0               | 4                      | 15                   |
| HV24O     | Opt out of e-comms                  | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV24S     | Employer Security                   | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV24t     | P60/Payslip                         | 1               | 1        | 0        | 0       | 100.00    | 2               | 0                      | 0                    |
| HV24v     | General Cor - Level 2               | 3               | 75       | 56       | 56      | 100.00    | 22              | 4                      | 4                    |
| HV24w     | Correspondence (Web)                | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV24x     | Correspondence (Employer Risk)      | 3               | 0        | 0        | 0       | 100.00    | 3               | 0                      | 0                    |
| HV24y     | Invoice (Employer Risk)             | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV24z     | Chargable Case (Employer Risk)      | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV25      | Active GMP                          | 1               | 0        | 0        | 0       | 100.00    | 1               | 0                      | 0                    |
| HV25p     | Pensioner GMP                       | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV26      | Recovery of overpayment             | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV27      | Scheme Pays - Finance               | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV28      | Annual Allowance query              | 0               | 4        | 2        | 1       | 50.00     | 2               | 3                      | 3                    |
| HV28l     | LTA query                           | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV28p     | tax to pay to HMRC                  | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV28y     | Yearly AA Checks                    | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV29      | Correspondence (DWP & tax)          | 0               | 1        | 1        | 1       | 100.00    | 0               | 8                      | 8                    |
| HV30      | Diary                               | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV30c     | Cease pay - level 3                 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV30d     | Cease pay - Level 2                 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV30e     | Cease pay - Level 1                 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV30H     | End of Year Query - Havering        | 630             | 0        | 2        | 2       | 100.00    | 628             | 1                      | 88                   |
| HV30L     | Diary - Leaver with admin           | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV30r     | Diary (Employer Risk)               | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV33      | Childrens' pension review           | 1               | 3        | 2        | 2       | 100.00    | 2               | 3                      | 3                    |
| HV34A     | Divorce TVs and earmarking (actual) | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV34E     | Divorce TVs (estimate)              | 1               | 5        | 2        | 2       | 100.00    | 4               | 11                     | 30                   |

| Case Type | Description                        | Brought Forward | Received | Complete | On Time | On Time % | Carried Forward | Average Completed Time | Average Elapsed Time |
|-----------|------------------------------------|-----------------|----------|----------|---------|-----------|-----------------|------------------------|----------------------|
| HV35      | Financial advisor estimate request | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV37      | Valuation Clearance Cases          | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV38      | Crombie and injury allowance       | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV38p     | Crombie/Injury Payment             | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV40      | Bulk TVs                           | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV40t     | TUPE                               | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV42      | LG99 request                       | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV43w     | Contribution Return Validation     | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV44      | Contribution posting               | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV45      | PR update                          | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV45a     | Queries to Employer                | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV46      | ABS production                     | 0               | 8        | 5        | 5       | 100.00    | 3               | 7                      | 7                    |
| HV47      | Contribution reconciliation        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV48      | End of year member queries         | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV48H     | Havering EOY queries               | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV49      | Monthly conts income LG221         | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV49a     | Contribution Receipt Case          | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV50      | Complaints                         | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV51      | IDRP and Ombudsman                 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV52      | ABS requests                       | 1               | 4        | 3        | 3       | 100.00    | 2               | 4                      | 4                    |
| HV53      | DWP letter traces                  | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV56      | Record Maintenance Query           | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV56e     | Record query End of Year           | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV57      | LG221 - late payers                | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV57a     | LG221 Late payers (Monies)         | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV57b     | LG221 Late payers (Missing)        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV57c     | LG221 Late payers (Admin)          | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV57d     | Monthly Contributions Overpaid     | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV57p     | Late Payers PRUDENTIAL             | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV58      | AVC reconciliation                 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV59      | Life Certificate                   | 3               | 8        | 0        | 0       | 100.00    | 11              | 0                      | 0                    |
| HV59p     | Police certificates                | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV60      | LPFA to Agency Payments            | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |

| Case Type | Description                                 | Brought Forward | Received | Complete | On Time | On Time % | Carried Forward | Average Completed Time | Average Elapsed Time |
|-----------|---|-----------------|----------|----------|---------|-----------|-----------------|------------------------|----------------------|
| HV60p     | CEP Payment                                 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV60r     | Reclaim CEP                                 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV61p     | AVC Payment                                 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV62p     | Misc Payment                                | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV63p     | Request Copy Certificates                   | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV64      | DMT - combining care pay and contributions  | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV64u     | CARE recalculation URGENT                   | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV65      | DMT - Annual AVC statements/lists           | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV68A     | Movement to 50/50 option                    | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV68B     | Movement to full scheme                     | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV68R     | Scheme Movement (Monthly Return)            | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV70a     | Scheme Pays election                        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV70e     | Scheme Pays Estimate                        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV70p     | Scheme Pays payment                         | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV71c     | Death Nomination Form - Cohabiting Partners | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV71D     | Death Nomination Form                       | 5               | 13       | 11       | 11      | 100.00    | 7               | 5                      | 6                    |
| HV75      | Aggregation needed                          | 110             | 7        | 10       | 10      | 100.00    | 107             | 21                     | 32                   |
| HV76      | Valuations                                  | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV76b     | Bond Renewals                               | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV76c     | Cessation Valuations                        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV76D     | Admissions (Employer Risk)                  | 2               | 0        | 0        | 0       | 100.00    | 2               | 0                      | 0                    |
| HV76e     | Cessation Estimate (Employer Risk)          | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV76f     | FRS17 / IAS19 Process                       | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV76v     | Triennial Valuations                        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV77      | Concurrent Employments                      | 0               | 2        | 0        | 0       | 100.00    | 2               | 0                      | 0                    |
| HV78      | AXIS Record Deletion                        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV80      | VTS Transfer                                | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV81d     | Final Pay death                             | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV81l     | Final pay leaver                            | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV81r     | Final Pay retirement                        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV81u     | Underpin                                    | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV82      | Combining                                   | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV83      | EOY Process                                 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |

| Case Type | Description                        | Brought Forward | Received | Complete | On Time | On Time % | Carried Forward | Average Completed Time | Average Elapsed Time |
|-----------|------------------------------------|-----------------|----------|----------|---------|-----------|-----------------|------------------------|----------------------|
| HV84      | 2015 transition member             | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV84w     | Western Union                      | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV85      | Invoices Chargeable/payable        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV86      | Project Work GMP Pensions Revision | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV86r     | Refund List                        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV87      | Project Work                       | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV89a     | Technical AVC queries              | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV89e     | Technical Employer query           | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV89r     | Technical regulation queries       | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV90      | Compliments                        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV92c     | Court Order                        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV92d     | payroll change deduction           | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV93      | Pension Trace                      | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV94      | Contact Centre call back - level 3 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV94a     | Contact Centre call back - level 2 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV94b     | Contact Centre call back - level 1 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV94c     | Contact Centre call back - Data    | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV95      | Technical Member query             | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV95a     | Technical Newsletter articles      | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV95b     | Technical Staff updates            | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV95c     | Technical LPB tech reports         | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV98      | Post Number Change                 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV98p     | Post number change                 | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV98w     | Post number change - web           | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |
| HV99      | Ad-Hoc Work (Employer Risk)        | 0               | 0        | 0        | 0       | 100.00    | 0               | 0                      | 0                    |

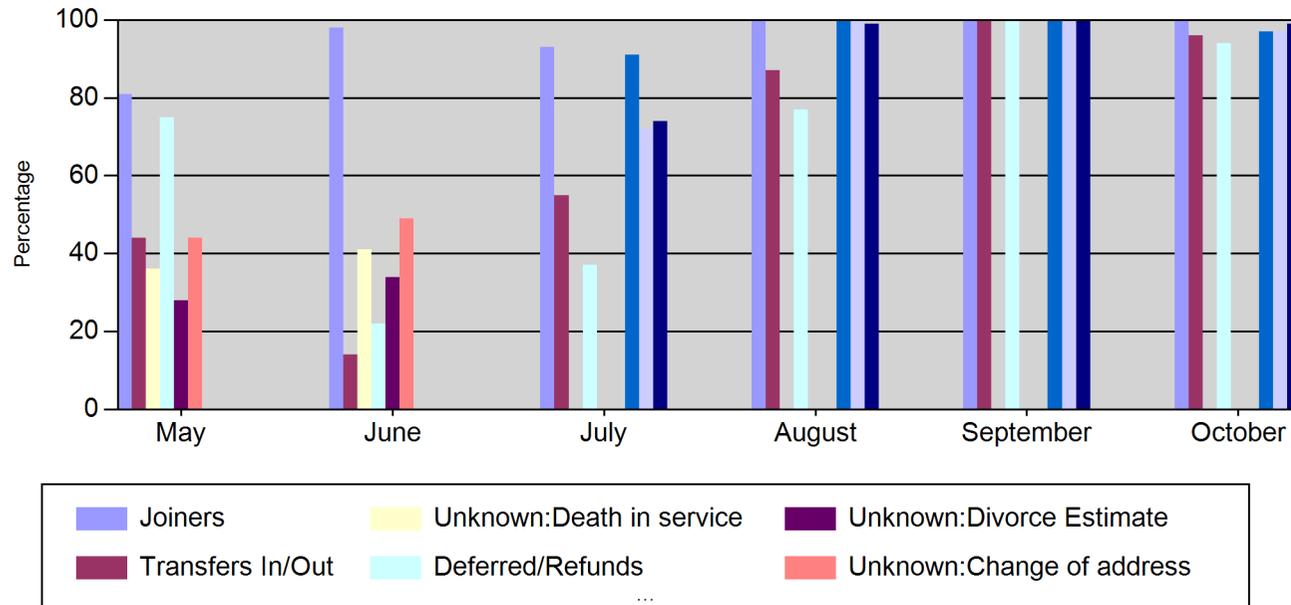
## 2. Cases completed summary

This is a grouped summary of all cases processed this month.

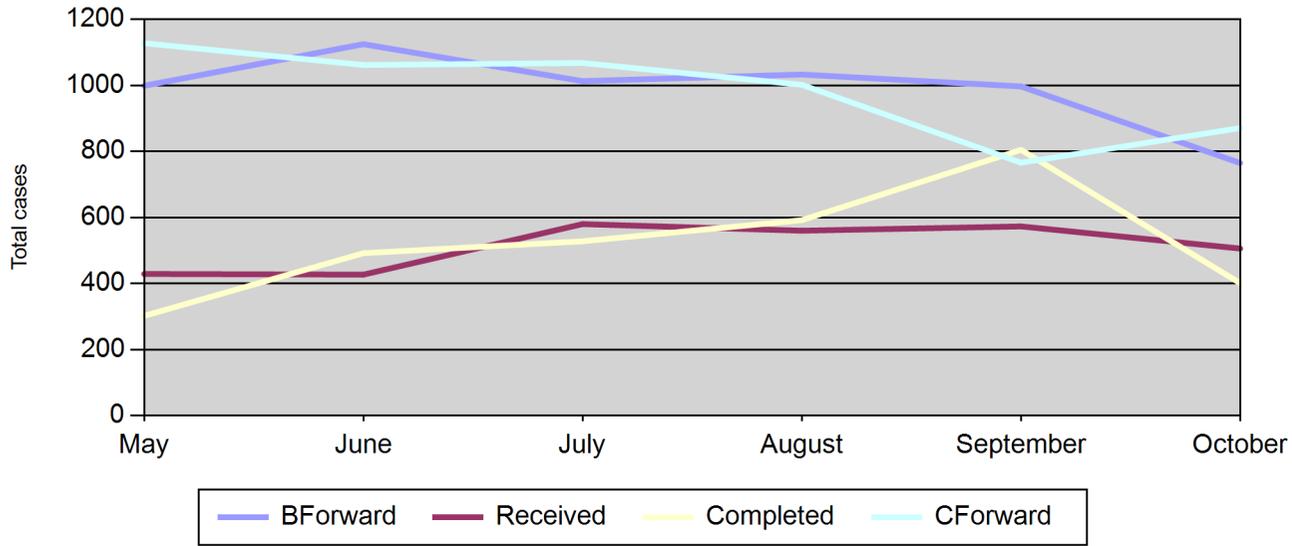
These figures include other lower profile cases included in the Service Level Agreement such as changes of hours, benefit revisions, GMP or DSS correspondence for example. These figures can be broken down or expanded upon request.

| Description         | B/fwd      | Rec'd      | Complete   | On Time    | % OT         | C/fwd      | Average Completed Time | Average Elapsed Time |
|---------------------|------------|------------|------------|------------|--------------|------------|------------------------|----------------------|
| Joiners             | 62         | 85         | 82         | 82         | 100.00       | 65         | 2                      | 8                    |
| Transfers In/Out    | 210        | 42         | 30         | 29         | 96.67        | 222        | 23                     | 43                   |
| Retirement/Deaths   | 172        | 73         | 46         | 45         | 97.83        | 199        | 13                     | 43                   |
| Deferred/Refunds    | 235        | 106        | 76         | 72         | 94.74        | 266        | 12                     | 22                   |
| Estimates           | 22         | 48         | 40         | 39         | 97.50        | 30         | 8                      | 16                   |
| Other - contractual | 64         | 152        | 127        | 126        | 99.21        | 89         | 8                      | 11                   |
| <b>Total</b>        | <b>765</b> | <b>506</b> | <b>401</b> | <b>393</b> | <b>98.00</b> | <b>871</b> |                        |                      |

### Percentage of cases on time



### Workload History

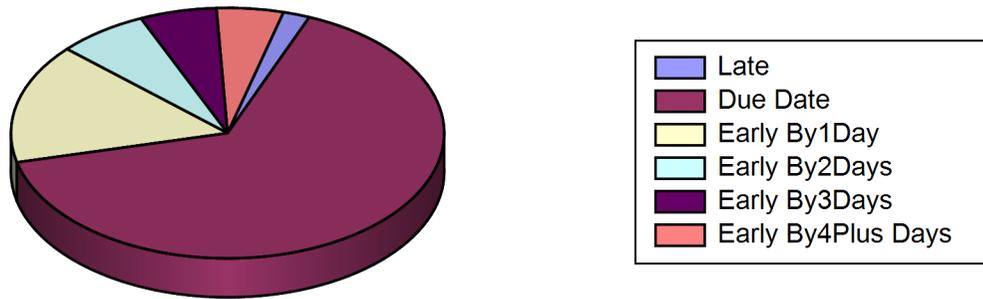


### 3. Cases completed Early

Of the 393 cases completed on time, 132 were completed early as detailed in the table below.

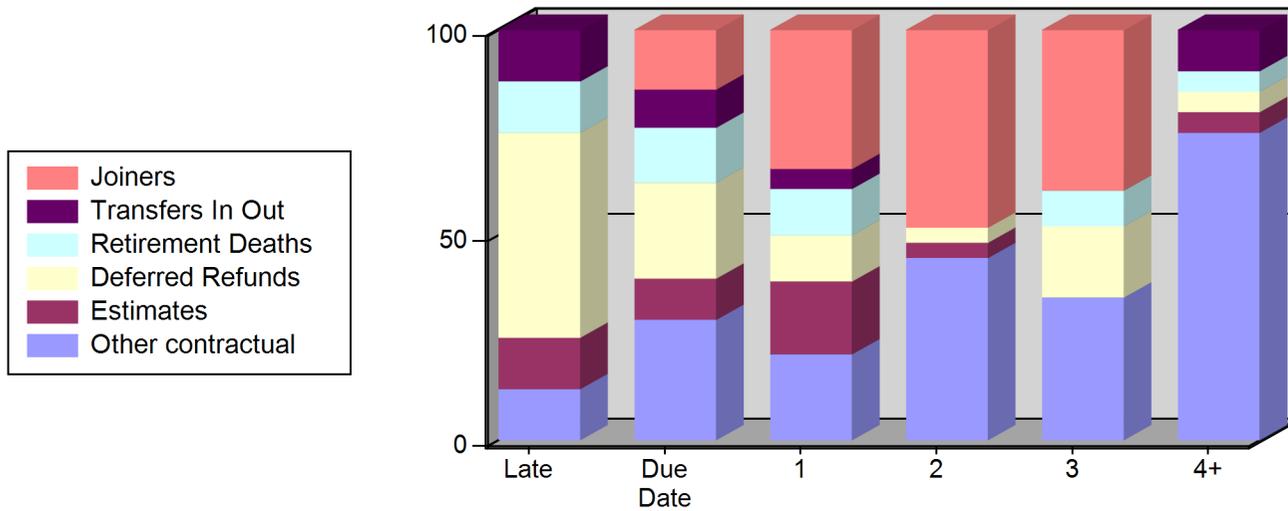
| Description         | 1 Day Early | 2 Days Early | 3 Days Early | 4+ Days Early |
|---------------------|-------------|--------------|--------------|---------------|
| Joiners             | 21          | 13           | 9            | 0             |
| Transfers In/Out    | 3           | 0            | 0            | 2             |
| Retirement/Deaths   | 7           | 0            | 2            | 1             |
| Deferred/Refunds    | 7           | 1            | 4            | 1             |
| Estimates           | 11          | 1            | 0            | 1             |
| Other - contractual | 13          | 12           | 8            | 15            |
|                     | <b>62</b>   | <b>27</b>    | <b>23</b>    | <b>20</b>     |

**Cases completed**



**Cases completed**

Page 68



**4. Additional Work**

The table below shows the total of other 'additional' cases processed this month. These are a combination of year end member queries or backlog work undertaken to improve data and record quality, and 'internal' cases used specifically by LPFA to aid our own administrative procedure.

None

### 5. 'Top' Cases not on time

| Client - All Case Types not on Time | Case Type | Case Description     | Date Due   | Date Completed |
|-------------------------------------|-----------|----------------------|------------|----------------|
| [REDACTED]                          | HV02A     | IFA IN (Actual)      | 05/10/2018 | 08/10/2018     |
| [REDACTED]                          | HV11      | Deferred Benefits    | 30/08/2018 | 17/10/2018     |
| [REDACTED]                          | HV11      | Deferred Benefits    | 05/10/2018 | 08/10/2018     |
| [REDACTED]                          | HV11      | Deferred Benefits    | 09/10/2018 | 10/10/2018     |
| [REDACTED]                          | HV11      | Deferred Benefits    | 16/10/2018 | 17/10/2018     |
| [REDACTED]                          | HV12      | DBs into payment     | 11/10/2018 | 12/10/2018     |
| [REDACTED]                          | HV22      | Estimates - employer | 11/10/2018 | 18/10/2018     |

### 6. Complaints and IDRPs Cases

| Client     | Date Received | Case Type | Status   |                              |
|------------|---------------|-----------|----------|------------------------------|
| [REDACTED] | 31/10/2018    | HV50      | Progress | Details available on request |

### 7. Life Certificates

### 8. Axis online take up numbers

### 9. Service Credits

### 10. Third tier ill-health 18 month and 3 year review dates

### 11. Annual Benefit Statements

Annual Benefits Statement to be sent at the end of August

### 12. Event report from HMRC

LTA increasing to 1.03 Million for 2018/2019

**13. Cases on hold where date received is over 6 months**

| Case Type | Description             | Cases |
|-----------|-------------------------|-------|
| HV01      | Admissions              | 2     |
| HV03E     | Other TV in (estimate)  | 1     |
| HV09E     | IFA Out (estimate)      | 2     |
| HV11      | Deferred Benefits       | 1     |
| HV14      | Retirements (immediate) | 3     |
| HV20      | Death on Pension        | 20    |

#### 14. Web site Statistics

| Month          | Successful Page Requests | Average Page Requests per day |
|----------------|--------------------------|-------------------------------|
| January 2018   | 0                        | 0                             |
| February 2018  | 0                        | 0                             |
| March 2018     | 0                        | 0                             |
| April 2018     | 0                        | 0                             |
| May 2018       | 0                        | 0                             |
| June 2018      | 0                        | 0                             |
| July 2018      | 0                        | 0                             |
| August 2018    | 0                        | 0                             |
| September 2018 | 0                        | 0                             |
| October 2018   | 0                        | 0                             |
| November 2018  | 0                        | 0                             |
| December 2018  | 0                        | 0                             |

## 15. Membership Statistics

These are the total status types for each employer updated on Altair on the last day of the relevant month and are not to be used for actuarial purposes.

| Employer Code | Employer Name              | Status 1 Active | Status 2 Undecided Leaver | Status 4 Deferred Benefit | Status 5 Pensioner | Status 6 Dependant | Status 9 Frozen Refund |
|---------------|----------------------------|-----------------|---------------------------|---------------------------|--------------------|--------------------|------------------------|
| HV10500       | L.b.of Havering            | 4641            | 553                       | 4551                      | 4853               | 856                | 387                    |
| HV10501       | Acit Services Ltd          |                 |                           |                           |                    |                    |                        |
| HV10502       | Abbs Cross School          | 39              | 8                         | 23                        | 26                 | 6                  | 4                      |
| HV10503       | Frances Bardsley Academy   | 65              | 10                        | 37                        | 30                 | 2                  | 5                      |
| HV10504       | Sixth Form College         | 92              | 6                         | 74                        | 32                 | 2                  | 8                      |
| HV10505       | Havering College Fhe       | 258             | 11                        | 389                       | 172                | 18                 | 41                     |
| HV10506       | Coopers Coborn             | 44              | 11                        | 37                        | 21                 | 3                  | 4                      |
| HV10507       | Sacred Heart Of Mary       | 53              | 3                         | 30                        | 22                 |                    | 4                      |
| HV10508       | Citizens Advice Bureaux    |                 |                           |                           | 5                  |                    |                        |
| HV10509       | Hav Mags Court Cttee       |                 |                           | 5                         | 14                 | 6                  | 1                      |
| HV10510       | Morrisons                  |                 |                           | 7                         | 35                 | 2                  |                        |
| HV10511       | Ppies                      |                 |                           |                           |                    |                    |                        |
| HV10512       | May Gurney                 |                 |                           |                           | 2                  | 1                  |                        |
| HV10513       | Almo                       |                 | 1                         | 57                        | 30                 | 6                  | 5                      |
| HV10514       | Slm Food And Beverage Ltd  |                 |                           | 1                         |                    |                    |                        |
| HV10515       | Slm Fitness And Health Ltd | 4               | 10                        | 3                         | 2                  | 2                  |                        |
| HV10516       | Slm Community Leisure C T  | 42              | 16                        | 12                        | 11                 | 1                  | 1                      |
| HV10518       | Catering For Education     |                 |                           | 1                         |                    |                    |                        |
| HV10519       | The Chafford School        | 33              | 13                        | 12                        | 13                 |                    | 1                      |
| HV10520       | Drapers Academy            | 53              | 6                         | 28                        | 4                  |                    | 1                      |
| HV10521       | The Brittons Academy       | 61              | 7                         | 42                        | 21                 | 2                  | 2                      |
| HV10522       | Campion School             | 70              | 12                        | 44                        | 11                 |                    | 3                      |
| HV10523       | Hall Mead School           | 86              | 18                        | 50                        | 17                 | 2                  | 6                      |
| HV10524       | St Edwards Snr Academy     | 49              | 8                         | 50                        | 15                 | 1                  | 1                      |
| HV10525       | Emerson Park School        | 62              | 7                         | 11                        | 10                 |                    | 4                      |
| HV10526       | Redden Court School        | 59              | 6                         | 23                        | 11                 |                    | 6                      |
| HV10527       | The Royal Liberty School   |                 | 12                        | 11                        | 4                  | 3                  | 2                      |
| HV10528       | Volker                     |                 |                           |                           | 1                  |                    |                        |
| HV10529       | The Albany School          | 58              | 11                        | 19                        | 8                  | 2                  | 3                      |
| HV10530       | Family Mosaic              |                 |                           | 37                        | 38                 |                    |                        |
| HV10531       | Upminster Infant Academy   | 25              |                           | 8                         | 4                  |                    | 1                      |
| HV10532       | Upminster Junior Academy   | 21              | 5                         | 6                         | 7                  |                    |                        |

| Employer Code | Employer Name                | Status 1 Active | Status 2 Undecided Leaver | Status 4 Deferred Benefit | Status 5 Pensioner | Status 6 Dependant | Status 9 Frozen Refund |
|---------------|------------------------------|-----------------|---------------------------|---------------------------|--------------------|--------------------|------------------------|
| HV10533       | Bower Park Academy           | 49              |                           | 20                        | 6                  |                    | 5                      |
| HV10534       | Drapers Brookside Jnr School | 28              | 2                         | 4                         | 2                  |                    | 1                      |
| HV10535       | Langtons Junior Academy      | 31              | 1                         | 2                         | 1                  | 1                  |                        |
| HV10536       | Oasis Academy Pinewood       | 37              | 12                        | 10                        | 1                  |                    | 6                      |
| HV10537       | Breyer Group Repairs         | 7               |                           | 3                         | 3                  |                    |                        |
| HV10538       | Breyer Group Voids           | 2               |                           |                           |                    |                    |                        |
| HV10539       | Rise Park Infant Academy     | 32              | 5                         | 6                         | 1                  |                    |                        |
| HV10540       | Rise Park Junior Academy     | 43              | 3                         | 8                         |                    |                    | 4                      |
| HV10541       | Elutec                       |                 |                           |                           |                    |                    |                        |
| HV10542       | Pyrgo Priory Primary School  | 79              | 6                         | 2                         | 1                  |                    | 3                      |
| HV10543       | Dycorts School               | 39              | 10                        | 9                         | 5                  |                    | 1                      |
| HV10544       | Caterlink                    |                 |                           | 4                         |                    |                    |                        |
| HV10545       | Drapers Maylands             | 7               |                           |                           |                    |                    | 3                      |
| HV10546       | Ravensbourne Academy         | 67              | 11                        | 6                         | 3                  |                    | 2                      |
| HV10547       | Drapers Brookside Infants    | 30              |                           | 1                         | 1                  |                    |                        |
| HV10548       | Sodexo                       | 1               |                           | 1                         |                    |                    |                        |
| HV10549       | Benhurst Primary School      | 28              |                           | 3                         |                    |                    |                        |
| HV10550       | Concordia Academy            | 2               |                           |                           |                    |                    |                        |
| HV10551       | Olive Academy Trust          | 3               |                           | 4                         | 2                  |                    | 1                      |
| HV10552       | Marshalls Park Academy       | 53              |                           | 10                        | 3                  |                    | 1                      |
| HV10553       | Royal Liberty Academy        | 37              |                           | 6                         | 3                  |                    |                        |
| HV10554       | Accent Catering              | 6               |                           |                           |                    |                    |                        |
| HV10555       | Scargill Infant Academy      | 29              |                           | 1                         |                    |                    | 1                      |
| HV10556       | Scargill Junior Academy      | 25              |                           |                           | 1                  |                    | 1                      |
| HV10557       | Whybridge Junior Academy     | 18              |                           |                           | 1                  |                    | 1                      |
| HV10558       | Parklands Junior School      | 28              |                           |                           | 2                  |                    |                        |
| HV10559       | Harrow Lodge Primary School  | 50              |                           |                           |                    |                    |                        |
| HV10560       | Harrison Catering            | 4               |                           |                           |                    |                    |                        |
| HV10561       | Gaynes Academy               | 23              |                           |                           | 2                  |                    | 1                      |
| HV10562       | Hacton Academy               | 52              |                           |                           |                    |                    |                        |
| HV10563       | Sanders Academy              | 30              |                           |                           |                    |                    |                        |
| HV10564       | Dame Tipping Academy         | 13              |                           |                           |                    |                    |                        |
|               | <b>Total</b>                 | 6668            | 784                       | 5668                      | 5457               | 916                | 521                    |

## 16. Membership Movements 2018- 2019

These are the year to date number of new statuses since 1 April 2018

| Employer Code | Employer Name              | Status 1<br>Active | Status 2<br>Undecided<br>Leaver | Status 4<br>Deferred<br>Benefit | Status 5<br>Pensioner | Status 6<br>Dependant | Status 9<br>Frozen<br>Refund |
|---------------|----------------------------|--------------------|---------------------------------|---------------------------------|-----------------------|-----------------------|------------------------------|
| HV10500       | L.b.of Havering            | 319                | 1                               | 99                              | 123                   | 22                    | 49                           |
| HV10501       | Acit Services Ltd          |                    |                                 |                                 |                       |                       |                              |
| HV10502       | Abbs Cross School          | 1                  |                                 | 1                               |                       |                       | 2                            |
| HV10503       | Frances Bardsley Academy   | 1                  |                                 | 4                               | 2                     |                       | 1                            |
| HV10504       | Sixth Form College         | 1                  |                                 |                                 | 2                     |                       |                              |
| HV10505       | Havering College Fhe       | 24                 |                                 | 15                              | 2                     | 5                     | 10                           |
| HV10506       | Coopers Coborn             | 2                  |                                 | 2                               |                       |                       |                              |
| HV10507       | Sacred Heart Of Mary       | 3                  |                                 |                                 | 1                     |                       | 1                            |
| HV10508       | Citizens Advice Bureaux    |                    |                                 |                                 |                       |                       |                              |
| HV10509       | Hav Mags Court Cttee       |                    |                                 |                                 |                       |                       |                              |
| HV10510       | Morrisons                  |                    |                                 |                                 | 1                     | 1                     |                              |
| HV10511       | Ppies                      |                    |                                 |                                 |                       |                       |                              |
| HV10512       | May Gurney                 |                    |                                 |                                 |                       |                       |                              |
| HV10513       | Almo                       |                    |                                 |                                 |                       |                       |                              |
| HV10514       | Slm Food And Beverage Ltd  |                    |                                 |                                 |                       |                       |                              |
| HV10515       | Slm Fitness And Health Ltd |                    |                                 |                                 |                       | 2                     |                              |
| HV10516       | Slm Community Leisure C T  |                    |                                 |                                 |                       |                       |                              |
| HV10518       | Catering For Education     |                    |                                 |                                 |                       |                       |                              |
| HV10519       | The Chafford School        |                    |                                 |                                 | 2                     |                       |                              |
| HV10520       | Drapers Academy            | 1                  |                                 |                                 |                       |                       |                              |
| HV10521       | The Brittons Academy       | 3                  |                                 | 6                               | 2                     |                       |                              |
| HV10522       | Campion School             | 5                  |                                 | 4                               |                       |                       |                              |
| HV10523       | Hall Mead School           | 10                 |                                 | 2                               | 5                     |                       | 5                            |
| HV10524       | St Edwards Snr Academy     | 3                  |                                 | 4                               | 1                     |                       |                              |
| HV10525       | Emerson Park School        |                    |                                 |                                 | 1                     |                       |                              |
| HV10526       | Redden Court School        | 3                  |                                 | 6                               |                       |                       | 2                            |
| HV10527       | The Royal Liberty School   |                    |                                 |                                 |                       |                       |                              |
| HV10528       | Volker                     |                    |                                 |                                 |                       |                       |                              |
| HV10529       | The Albany School          | 5                  |                                 |                                 |                       |                       |                              |
| HV10530       | Family Mosaic              |                    |                                 |                                 | 2                     |                       |                              |
| HV10531       | Upminster Infant Academy   | 4                  |                                 | 1                               |                       |                       | 1                            |
| HV10532       | Upminster Junior Academy   | 3                  |                                 | 1                               |                       |                       | 1                            |

| Employer Code | Employer Name                | Status 1 Active | Status 2 Undecided Leaver | Status 4 Deferred Benefit | Status 5 Pensioner | Status 6 Dependant | Status 9 Frozen Refund |
|---------------|------------------------------|-----------------|---------------------------|---------------------------|--------------------|--------------------|------------------------|
| HV10533       | Bower Park Academy           | 7               |                           | 2                         |                    |                    | 4                      |
| HV10534       | Drapers Brookside Jnr School |                 |                           |                           |                    |                    |                        |
| HV10535       | Langtons Junior Academy      |                 |                           |                           | 1                  |                    |                        |
| HV10536       | Oasis Academy Pinewood       | 1               |                           | 1                         |                    |                    |                        |
| HV10537       | Breyer Group Repairs         |                 |                           |                           |                    |                    |                        |
| HV10538       | Breyer Group Voids           |                 |                           |                           |                    |                    |                        |
| HV10539       | Rise Park Infant Academy     |                 |                           |                           |                    |                    | 1                      |
| HV10540       | Rise Park Junior Academy     |                 |                           |                           |                    |                    |                        |
| HV10541       | Elutec                       |                 |                           |                           |                    |                    |                        |
| HV10542       | Pyrgo Priory Primary School  | 2               |                           |                           |                    |                    |                        |
| HV10543       | Dycorts School               | 4               |                           | 3                         |                    |                    |                        |
| HV10544       | Caterlink                    |                 |                           | 3                         |                    |                    |                        |
| HV10545       | Drapers Maylands             | 1               |                           |                           |                    |                    |                        |
| HV10546       | Ravensbourne Academy         | 7               |                           | 4                         |                    |                    |                        |
| HV10547       | Drapers Brookside Infants    |                 |                           | 1                         |                    |                    |                        |
| HV10548       | Sodexo                       |                 |                           |                           |                    |                    |                        |
| HV10549       | Benhurst Primary School      |                 |                           |                           |                    |                    |                        |
| HV10550       | Concordia Academy            |                 |                           |                           |                    |                    |                        |
| HV10551       | Olive Academy Trust          | 1               |                           |                           |                    |                    | 1                      |
| HV10552       | Marshalls Park Academy       | 4               |                           | 3                         |                    |                    | 1                      |
| HV10553       | Royal Liberty Academy        | 5               |                           | 1                         |                    |                    |                        |
| HV10554       | Accent Catering              |                 |                           |                           |                    |                    |                        |
| HV10555       | Scargill Infant Academy      | 2               |                           | 1                         |                    |                    | 1                      |
| HV10556       | Scargill Junior Academy      | 1               |                           |                           | 1                  |                    | 1                      |
| HV10557       | Whybridge Junior Academy     | 1               |                           |                           |                    |                    |                        |
| HV10558       | Parklands Junior School      | 2               |                           |                           | 2                  |                    |                        |
| HV10559       | Harrow Lodge Primary School  |                 |                           |                           |                    |                    |                        |
| HV10560       | Harrison Catering            |                 |                           |                           |                    |                    |                        |
| HV10561       | Gaynes Academy               | 26              |                           |                           | 2                  |                    | 1                      |
| HV10562       | Hacton Academy               | 52              |                           |                           |                    |                    |                        |
| HV10563       | Sanders Academy              | 30              |                           |                           |                    |                    |                        |
| HV10564       | Dame Tipping Academy         | 13              |                           |                           |                    |                    |                        |
|               | <b>Total</b>                 | 547             | 1                         | 164                       | 150                | 30                 | 82                     |

**17. Year end Processing for period 2018- 2019**

| Employer | Employer Name | Return received | New Confs Return Received | Confs Posted | PR Posted | Queries uploaded to website |
|----------|---------------|-----------------|---------------------------|--------------|-----------|-----------------------------|
|----------|---------------|-----------------|---------------------------|--------------|-----------|-----------------------------|