



Haverling

LONDON BOROUGH

LOCAL PENSION BOARD AGENDA

4.00 pm

**Tuesday
22 September 2020**

VIRTUAL MEETING

Members 4: Quorum 2

Denise Broom
Mark Holder
Andrew Frater
Anne Giles

**For information about the meeting please contact:
Luke Phimister - 01708 434619
luke.phimister@onesource.co.uk**

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 - 4)

To approve as correct the minutes of the meeting held on 1st October 2019 and authorise the Chair to sign them.

5 ACTION POINTS FROM THE PREVIOUS MEETING

The Board to review the action points from the last meeting including notes of training on Code of Transparency. Report to follow

6 TO RECEIVE FEEDBACK FROM RECENT MEETINGS OF THE PENSIONS COMMITTEE (Pages 5 - 8)

7 LPP QUARTERLY PERFORMANCE REPORT (Pages 9 - 42)

Reports attached

8 RISKS REGISTER (Pages 43 - 46)

Report attached

9 COMPLIANCE CHECKLIST (Pages 47 - 72)

Attached.

10 TPR REVIEW ACTION PLAN (Pages 73 - 76)

Attached.

11 COMMUNICATIONS CAMPAIGN (Pages 77 - 90)

Reports attached

12 POSITION OF CHAIR

Discussion on the possible move to a permanent chairman

13 LOCAL PENSIONS BOARD ANNUAL REPORT

The Board is to discuss an annual report to go to Pensions Committee

14 SUGGESTED FUTURES MEETING DATES

To be discussed by Board.

**Andrew Beesley
Committee Administration Manager**

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Public Document Pack Agenda Item 4

MINUTES OF THE MEETING OF THE LOCAL PENSION BOARD Town Hall, Main Road, Romford 1 October 2019 (4.10 - 5.50 pm)

Present:

Members: Anne Giles (Scheme Member Representative)
Denise Broom (Employer Representative) (Chair)
Mark Holder (Scheme Member Representative)

Officers: Caroline Berry
Debbie Ford
Lillian Thomas
Luke Phimister

There were no apologies for absence.

All decisions were taken with no votes against.

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

3 DISCLOSURE OF INTEREST

There were no declarations of interest.

4 MINUTES OF THE MEETING

The Board members questioned whether the Terms of Reference had been updated.

Action: Luke Phimister to check Terms of Reference and circulate amended version to Caroline Berry for uploading to the website.

The minutes of the meetings held on the 20 August 2019 were agreed as a correct record and signed by the Chairman.

5 MONTHLY LPP PERFORMANCE REPORT

The members noted that there had not been enough time since the previous LPP Performance Report for any meaningful changes to have occurred however most case types were at 100% on time. The Board noted 2 complaints received by Pensions however these were the first complaints for some time and the number of complaints should reduce as cases on hold are completed. The Board agreed to discuss the quarterly LPP report with a case by case of those at the next Board meeting.

Members were advised that the increase of on hold cases may be due to being on hold in the wrong category, there may be duplicate cases where an employee has transferred from another service and has left before their case is complete or Pensions are waiting on an action from the previous employer. The Board was advised that data may differ due to the monthly reports and the quarterly reports being compiled by different teams within LPP so in turn on different days of the month however, Caroline will endeavour to have these run as close as possible for the best comparison at the next Board meeting.

Board members expressed the view that for the LPP monthly performance report, they would prefer to have only Cases Completed Summary included in the forthcoming meeting agendas with the full report still available should they wish to review it. The Board also expressed that they would like LPP to be invited to attend every other meeting/ every 6 months with LPP being invited to the next meeting to be questioned over the quarterly report.

Action: Caroline Berry to reduce the LPP monthly report to the singular page stated above and to invite LPP to the next Board meeting.

6 COMPLIANCE CHECKLIST

The Board noted that there are no longer any red sections in the compliance checklist. The members noted that B12 is ongoing and the deadline has been pushed back to 31/12/19. The members also noted that C7 and D2 are complete and F9 has a draft data improvement plan in place but it still needs to be formalised. It was advised to the Board that I4 had not changed as they are still to liaise with employers and an update will be provided at the next meeting as it is to be presented Pensions Committee in December.

7 PENSION REGULATOR REVIEW

The Board noted the high level of transparency offered by Havering when assisting with the Pensions Regulator Review. The Pensions Regulator Review stated havering could easily evidence their data improvement plan even though it isn't in place yet. Members noted that the Pensions Committee is keen for the Local Pensions Board to set up a data log or similar to follow up on the review. The members were advised that there were still areas Havering could improve however overall the Pensions Regulator Review was impressed with Havering. Members were also advised that Pensions Regulator may come back to Havering in the future to see if havering has adopted best practise in line with this review.

Action: Caroline Berry to bring action plan to next Local Pension Board meeting

8 COMMUNICATION CAMPAIGN

The Board was advised that Pensions need advice on how to communicate effectively with external staff, for example, School Business Managers. The members put forward ideas for posters, leaflets for teacher's annual budget packs, flyers in pigeon holes, email to the generic office email for schools to be distributed, and posts on the resources section in the HES portal. Other suggestions were roadshows on inset days in schools, face to face sessions, for example, "Lunch and natter" events where staff can discuss at lunchtime.. The Board noted that more guidance needs to be given to managers whose team members are taking a flexible retirement.

Action: Caroline Berry to give update and the next Board meeting

9 RISK REGISTER (STANDING ITEM)

The Summary of Further Actions for discussion and a hand out of details of 2 amendments to the Risk Register were circulated.

- The first item outlines the risk of LCIV staff turnover, how this undermines investor confidence and how the MTFS prediction may fail to reach the target, meaning that annual development charges may not decrease as expected. The Board noted that to mitigate this risk, development costs are reported by the LCIV at the General Shareholder meetings and monitoring meetings that are held quarterly between Havering officer and the LCIV client relations team. The Board agreed to add this risk to the register and for the LCIV development costs to be monitored as an action.
- The second risk details the non-compliance of Fund managers to the Code of Transparency. The consequence is that Havering may not be able to disclose full costs in the Pensions Fund Annual report, so to mitigate this, Fund managers are encouraged to complete the compliance template annually at the end of the financial year and the Board agreed to include this on the risk register with the scrutiny of compliance to be an action.

10 CODE OF TRANSPARENCY

The report presented to the Board details which Fund managers have voluntarily opted to be compliant with the Code of Transparency. The table on page 107 shows which fund managers are or are not yet compliant with the Code.. Members asked for basic training to be delivered at the next Board meeting to aid their understanding of the pooled accounts, the returns for each fund manager and the fees Havering pays for each fund manager.

Action: Debbie Ford to create a spreadsheet breaking down the returns and fees for each Fund manager for the next Board meeting.

11 WORKPLAN

The Board noted that point 3 was in relation to Item 7 and that point 6 was to be discussed if there were any changes or amendments made to the rules. The Board also noted that the future LPB meeting dates had not been circulated to the members so they asked the clerk to circulate them.

Action: Luke Phimister to circulate dates of next meetings.

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

There was no update of the previous Pensions Committee presented to the Board. The minutes of the previous Pensions Committee held on the 17th September 2019 and the minutes for the Special Pensions Committee meeting due to be held on 12th November 2019 will be included on the agenda for the next meeting.

Chairman

**MINUTES OF A MEETING OF THE
PENSIONS COMMITTEE
Town Hall, Main Road, Romford
29 July 2020 (7.00 - 8.45 pm)**

Present:

COUNCILLORS

Conservative Group John Crowder (Chairman), Osman Dervish and Jason Frost

Residents' Group Stephanie Nunn

Labour Group Keith Darvill

North Havering Residents Group Martin Goode

All decisions were taken with no votes against.

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

150 APOLOGIES FOR ABSENCE AND ANNOUNCEMENT OF SUBSTITUTE MEMBERS

There were no apologies for absence.

151 DISCLOSURE OF INTERESTS

There were no disclosures of interests.

152 MINUTES OF THE MEETING

The minutes of the meeting of the Committee held on 10 December 2020 were agreed as a correct record and, due to COVID-19, will be signed by the Chairman at a later date.

153 ADMISSION OF CATERLINK (LIFE EDUCATION TRUST)

The report presented to the committee asked for permissions for Caterlink Limited to be admitted into the Havering Pension Fund.

It was proposed that 6 members of staff would be admitted for a minimum of 3 years on a closed admission arrangement. Hymans provided liability of 40.8% with an indemnity of £55k by way of a bond secured by Caterlink to protect the fund.

The Committee **agreed** the admission of Caterlink Limited into the Havering Pensions Fund subject to:

- Havering and Caterlink signing up to an admission agreement, and;
- An indemnity of £55k by way of Caterlink securing a bond.

154 **INVESTMENT STRATEGY STATEMENT**

The report presented to the committee, which had been postponed from the cancelled March 2020 meeting, proposed the revised investment strategy statement.

Members were reminded that they agreed a change of policy wording at the December 2019 meeting in relation to ESG matters and members noted that the closing date for consultation was 16 March 2020. No comments to the consultation were received.

An officer from Hymans explained to the Committee that since the original draft was put forward to the March meeting a proposal to change to the benchmark allocations was appropriate to reflect the finalisation of the bulk transfer settlement for the colleges. Proposed an increase to the global equities benchmark to 40% (from 35%) and a reduction to the multi asset benchmark to 22.5% (from 27.5%). Members also considered the change of the maximum allocation for multi-assets reduced to 40% from 50% and the maximum allocation to infrastructure was increased from 10% to 15%.

The Committee **considered** the report and **agreed** the proposed changes to the maximum multi-asset and infrastructure allocations and to the change in the benchmark allocations proposed. The Committee **noted** the compliance report set out in Appendix B.

155 **PENSION FUND ACCOUNTS**

The report put before the Committee provided an extract of the unaudited statement of accounts covering the Pension Fund. Members noted that changes had been made to the publication deadlines due to COVID-19 and publication was not necessary until the end of August 2020 as the audit date has been postponed until 30 November 2020.

The statement had been completed in May 2020 and there had been no key changes by CIPFA that had not been covered in the 2018/19 accounts. Members noted a decrease in net asset of the fund by £4million over the year which was a minimal change given the potential effects of COVID-19. The outcome of the audit will be submitted to Audit Committee when published. Officers explained that there had been an increase of audit fees to £52k.

Officers presented the accounts and highlighted key movements from the prior year. Members noted the net decrease of £4m is compiled of a change

in the market value of assets of (£20m), investment income of £10m, net additions of cash of £10m and offset by management expenses of (£4m).

The Committee **noted** the accounts as at 31st March 2020.

156 **PENSION FUND BUSINESS PLAN**

The report presented to the Committee gave details on the work done by the Committee in the previous year and set out the work to be done in the upcoming year.

The Committee **agreed** the business plan for the year 2019/20.

157 **COVID-19 AND FUNDING RISKS**

The report put before the Committee updated members on the impact and risks associated with the COVID-19 pandemic produced by the Funds Actuary Hymans.

Members noted that the situation would be kept under review.

The Committee **noted** Hymans report and recommendations set out in the report and noted the risks identified and mitigations in place. The Committee **agreed** to adopt the Pensions Regulator guidance when considering suspension of contribution rates.

158 **EXCLUSION OF THE PUBLIC**

159 **PENSION FUND PERFORMANCE MONITORING FOR THE QUARTER ENDED MARCH 20**

The report presented to the members of the Committee provided an overview of the performance of the Fund Investment, Manager Monitoring and any Local Government Pension Scheme (LGPS) updates for the quarter ending 31 March 2020.

The Committee **considered** the Hymans reports, the quarterly reports from investments managers and **noted** the analysis of the cash balance

160 **FUND MANAGER REVIEW - VOTING AND ENGAGEMENT**

The report received by the Committee gave a summary on the responsible investment activities of the Fund's managers for the year to 30 June 2019.

Members noted the report had been postponed from the cancelled March 2020 meeting.

The Committee **noted** Hymans summary review of fund manager and engagement activity and **considered and agreed** the potential next steps as outlined in Hymans report.

Chairman



LPP

Local Pensions Partnership

Havering Pension Fund

Quarterly Administration Report

Agenda Item 7

1 April to 30 June 2020

Our Core Values

This administration report is produced in accordance with the Service Level Agreement (SLA) for the provision of pension administration services to Havering Pension Fund.

The report describes the performance of Local Pensions Partnership Administration (LPPA) against the standards set out in the SLA during the period 1 April to 30 June 2020.

Within LPPA, our values play a fundamental role in guiding our behaviour as we grow our pensions services business and share the benefits with our clients.












Annual Plan - 2020/21



Activity

Due  Completed 

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	Apr 20	May 20	Jun 20	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21
Annual Benefit Statement and Newsletter to Deferred Members												
Pension Increases												
Annual Benefit Statement and Newsletter to Active Members												
Pension Saving Statements												
HMRC Scheme Returns												
IAS19 data												

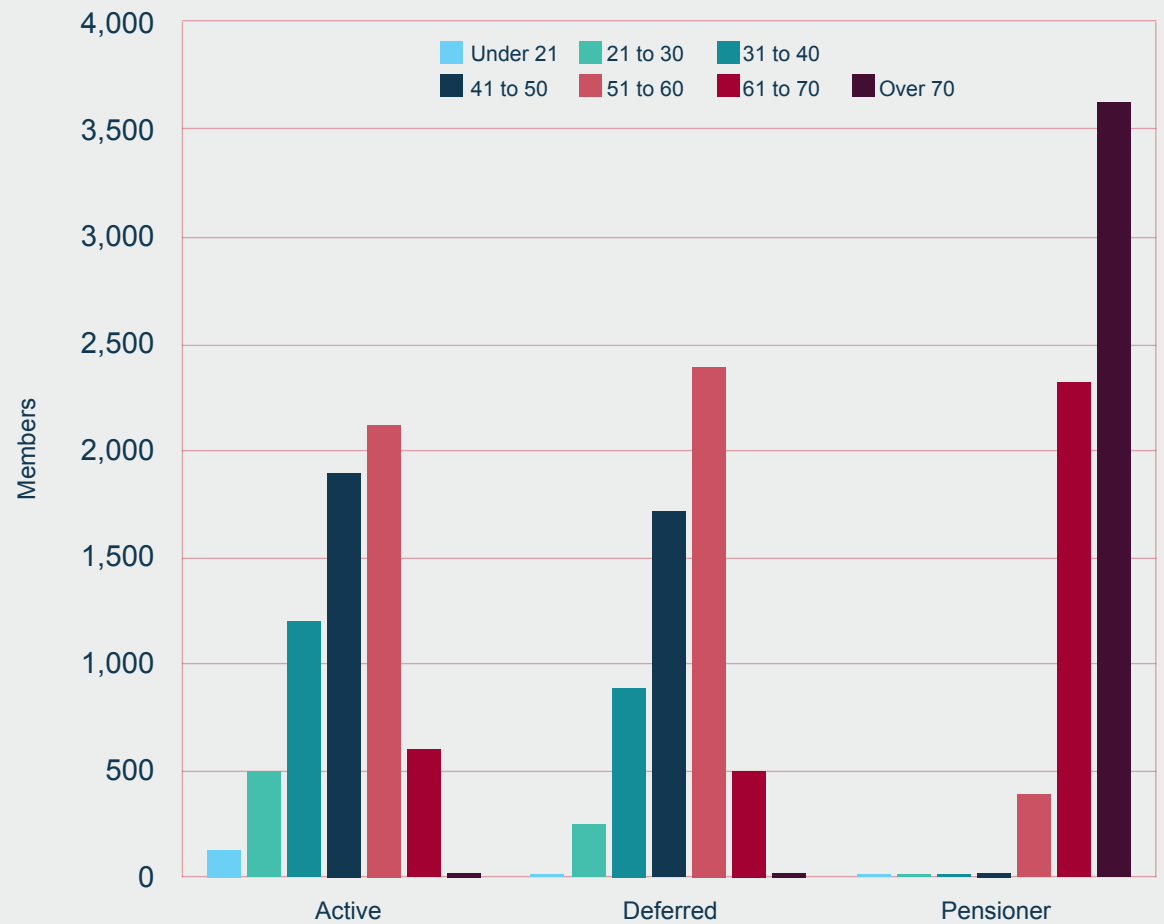
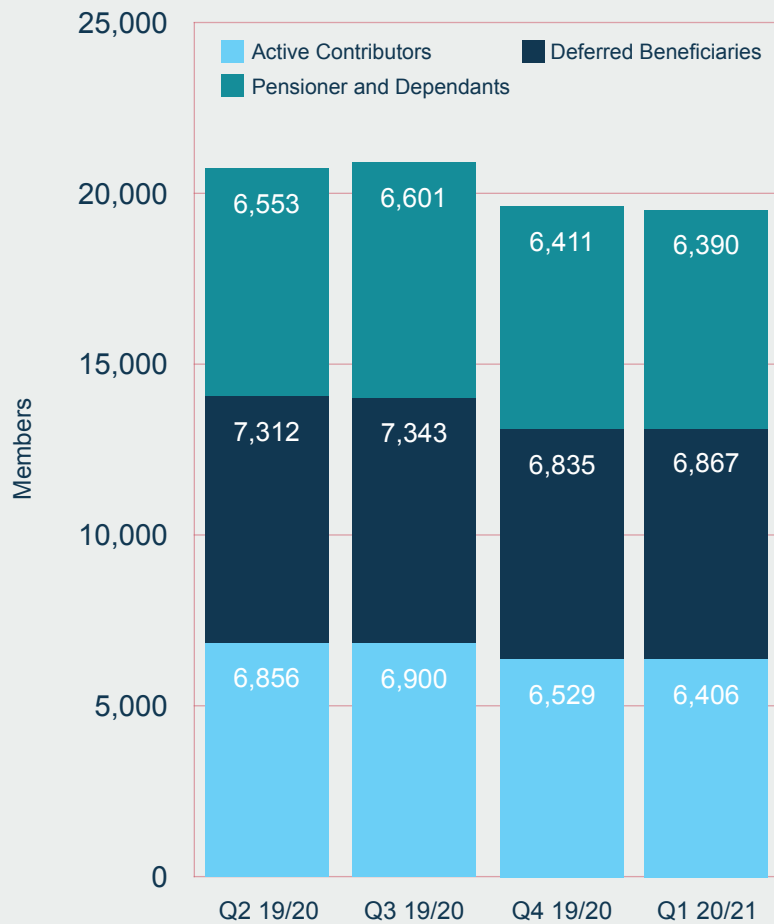
Fund Membership



Total Fund Membership

Current Age Demographic

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Fund Membership



Leavers

	Total current leavers	Received*	Pending**
Havering Pension Fund	391	180	211

* Received from employer and due to be worked by LPPA in line with SLA

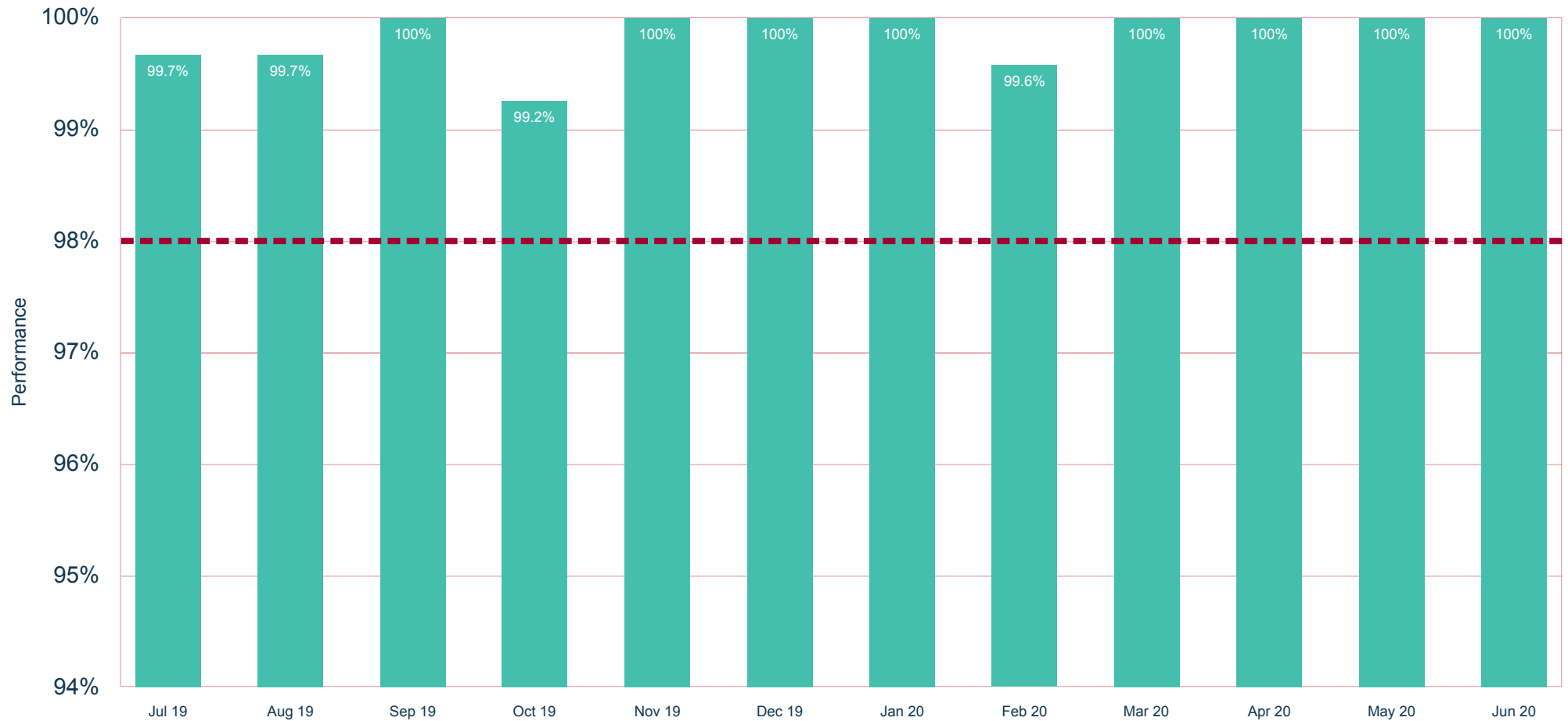
** Awaiting information from employer

Casework Performance Against SLA



Havering Pension Fund performance - all cases

----- Target The quarterly SLA performance was 100%



Casework Performance Against SLA



Quarterly performance standard - Q1

■ Q1 ■ Target (98%)

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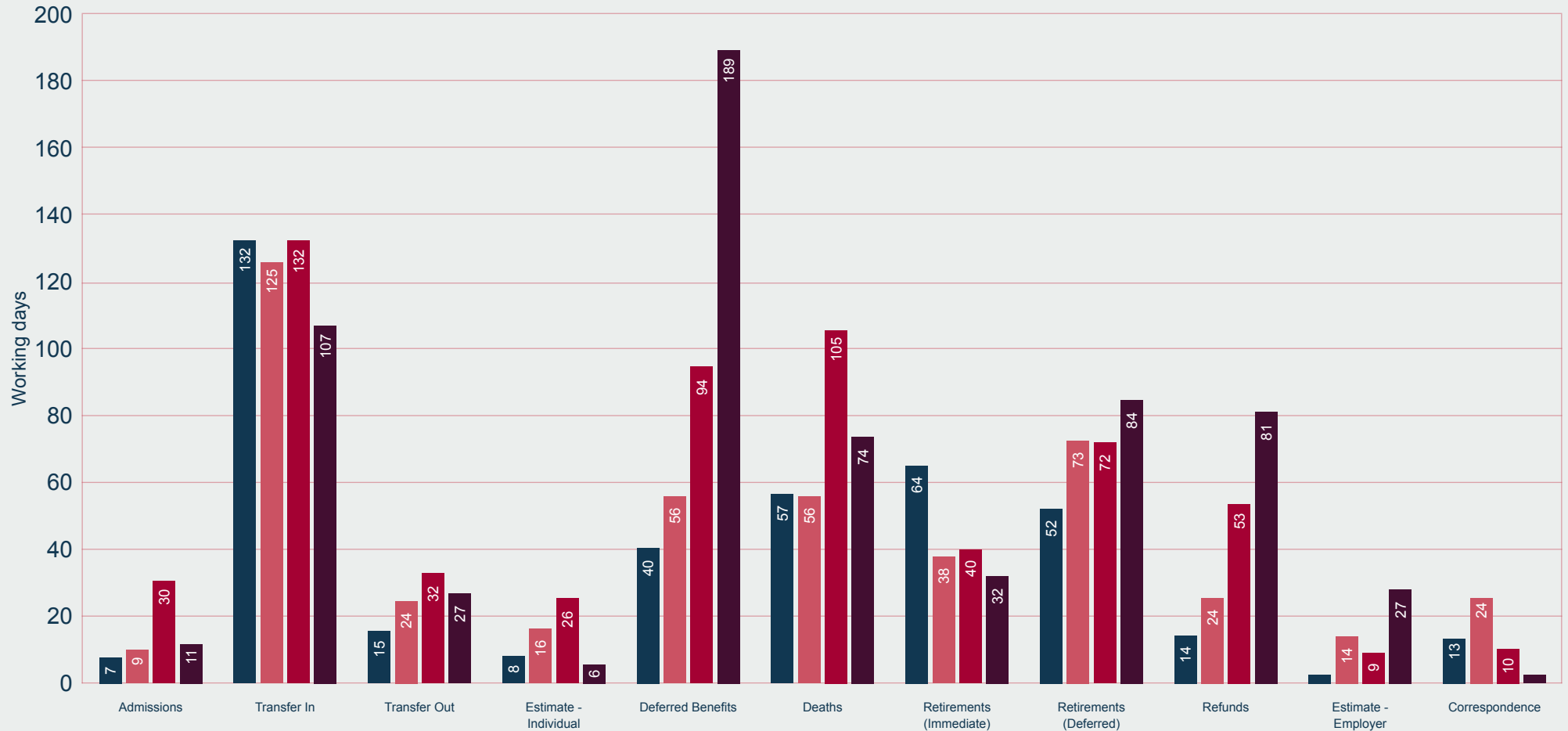
	Q1 Total Processed	92%	93%	94%	95%	96%	97%	98%	99%	100%
Admissions	305									100%
Transfer in	111									100%
Transfer out	83									100%
Estimate - Individual	86									100%
Deferred benefits	270									100%
Deaths	129									100%
Retirements (immediate)	42									100%
Retirements (deferred)	55									100%
Refunds	191									100%
Estimates - Employer	43									100%
Correspondance	84									100%
Aggregation	182									100%
Other	703									100%

Elapsed Times (member experience)



Elapsed Days by Quarter

■ Q2 19/20 ■ Q3 19/20 ■ Q4 19/20 ■ Q1 20/21



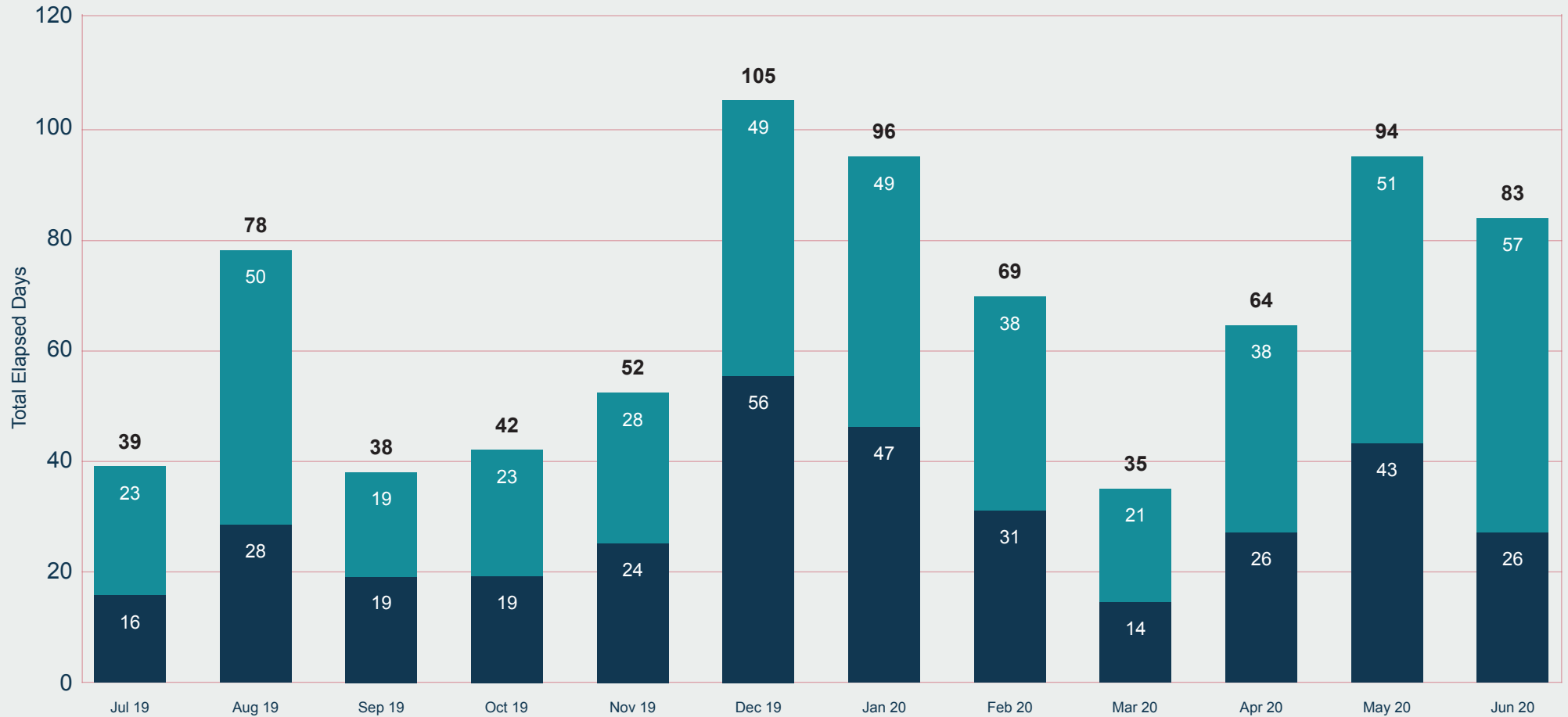
Elapsed Times (Retirements)



Deferred into payment

■ Average days in progress ■ Average days on hold

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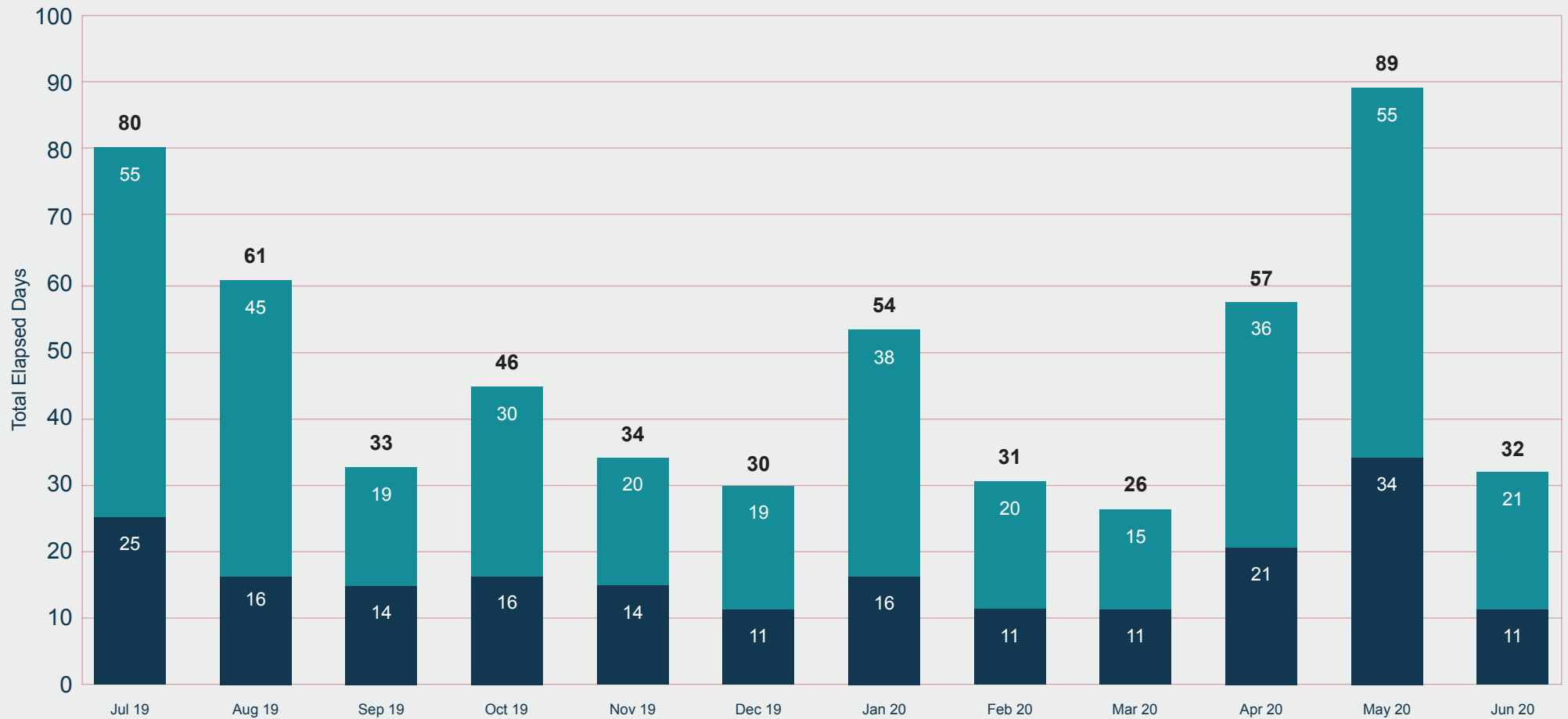
Elapsed Times (Retirements)



Active into payment

■ Average days in progress ■ Average days on hold

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Helpdesk Performance



The Helpdesk deals with all of the updates/queries from the members for all funds within the group thus the figures supplied are at a LPPA level. The call data could not be collected between April and June due to the change in the way LPPA had to work during lockdown. LPPA implemented remote working and maintained an operational contact team but lost the management information temporarily.

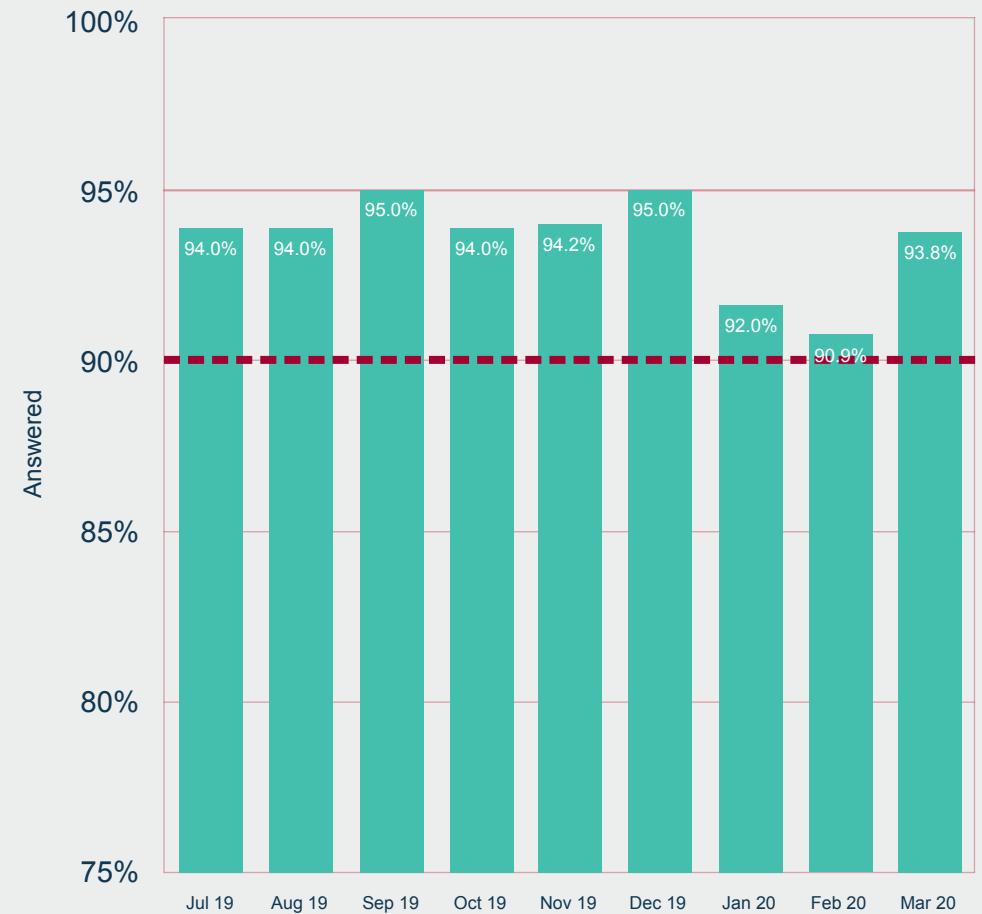
Average wait time

■ Target hit
 ■ Target not hit
 - - - - Target

Calls answered

■ Target hit
 ■ Target not hit
 - - - - Target

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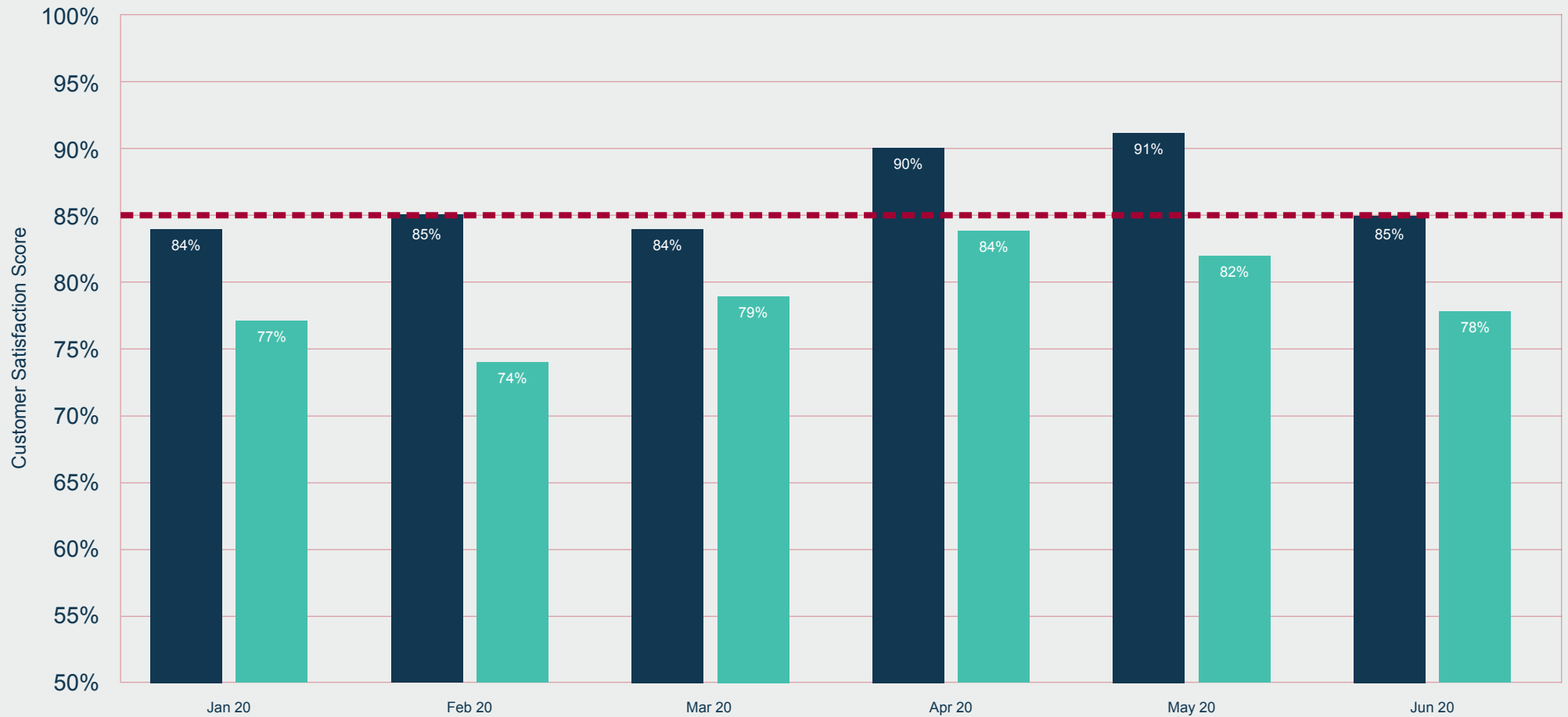
Customer Satisfaction Scores



Customer Satisfaction Scores

■ Telephone ■ E-mail - - - - Target

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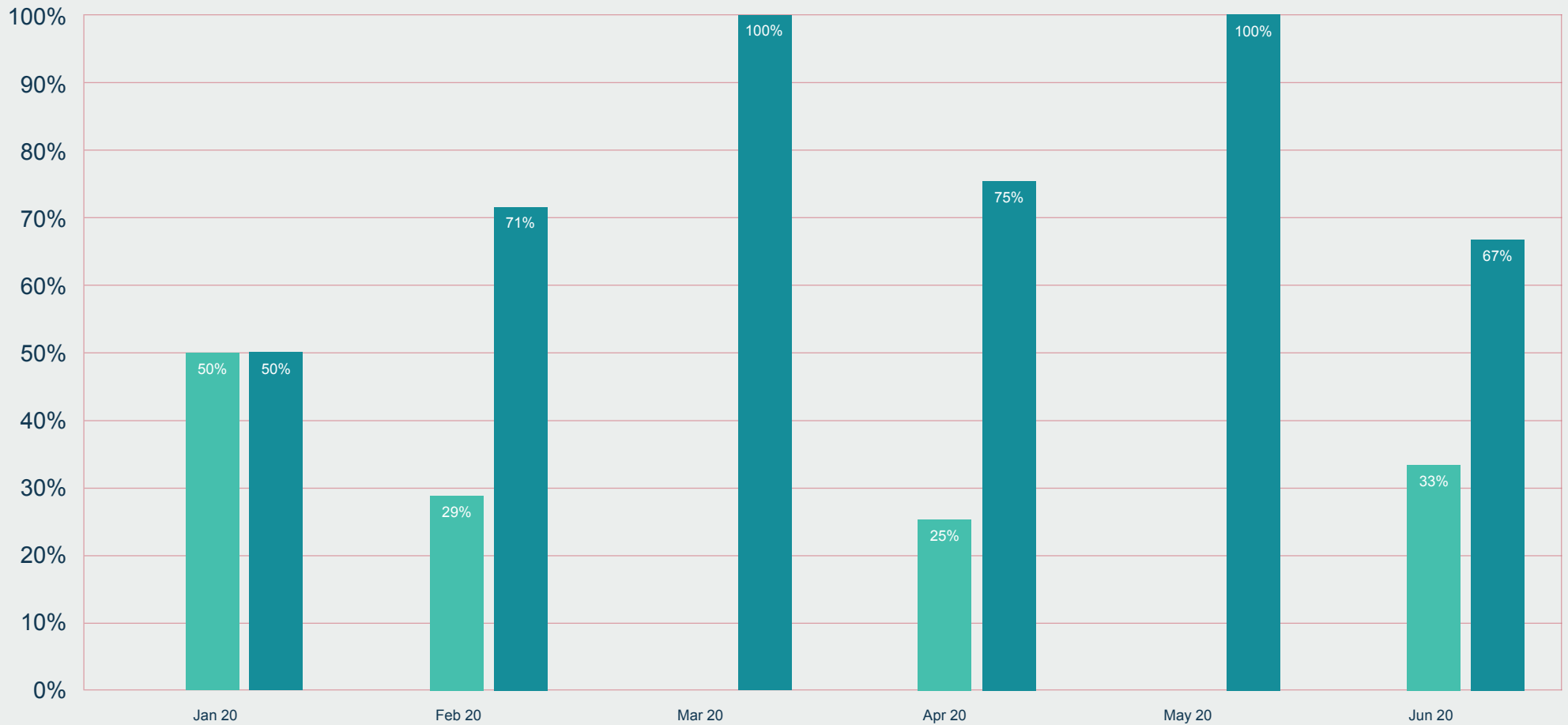


Customer Satisfaction Scores



Customer Satisfaction - Retirements

■ Dissatisfied ■ Neutral ■ Satisfied

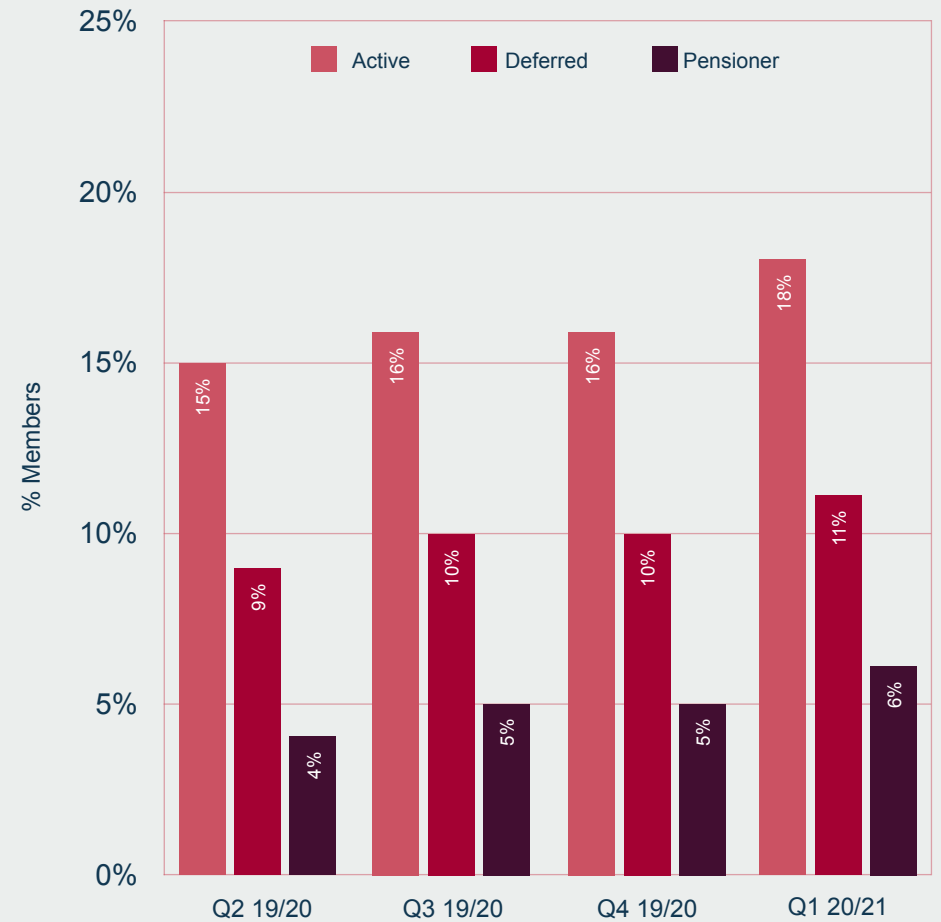
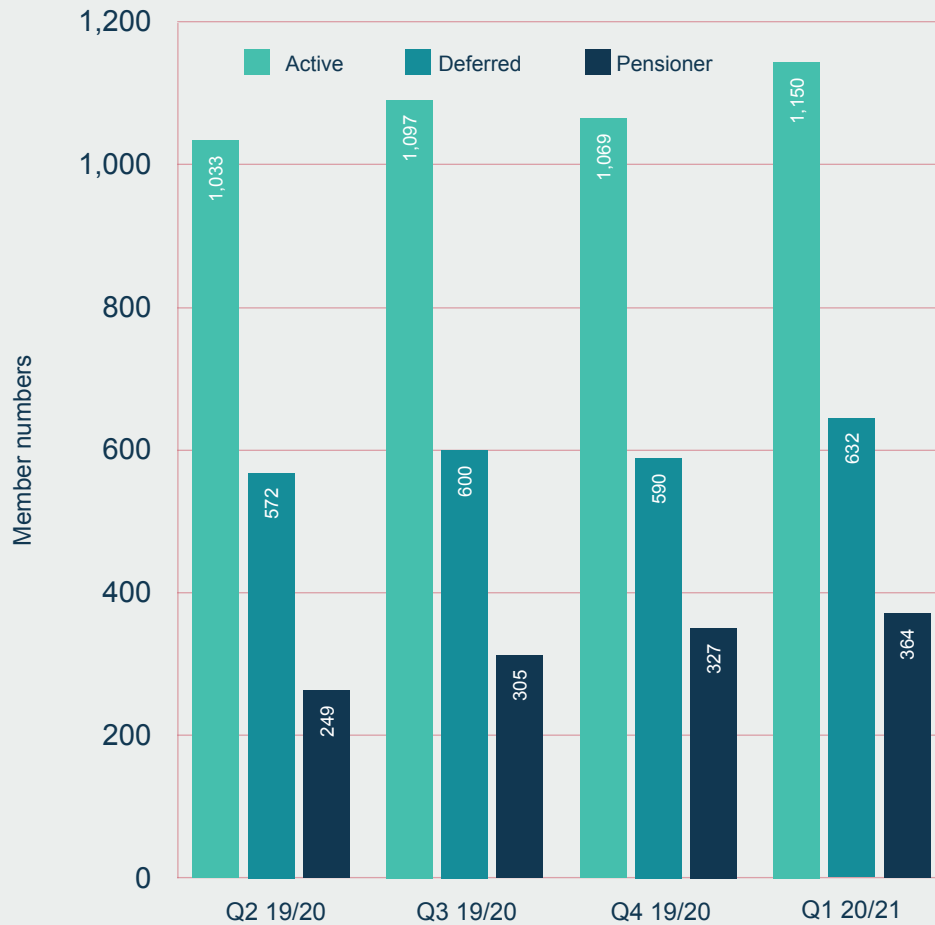


My Pension Online



My Pension Online - Members Registered

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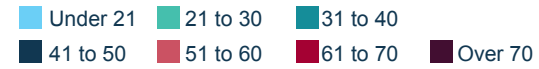


My Pension Online

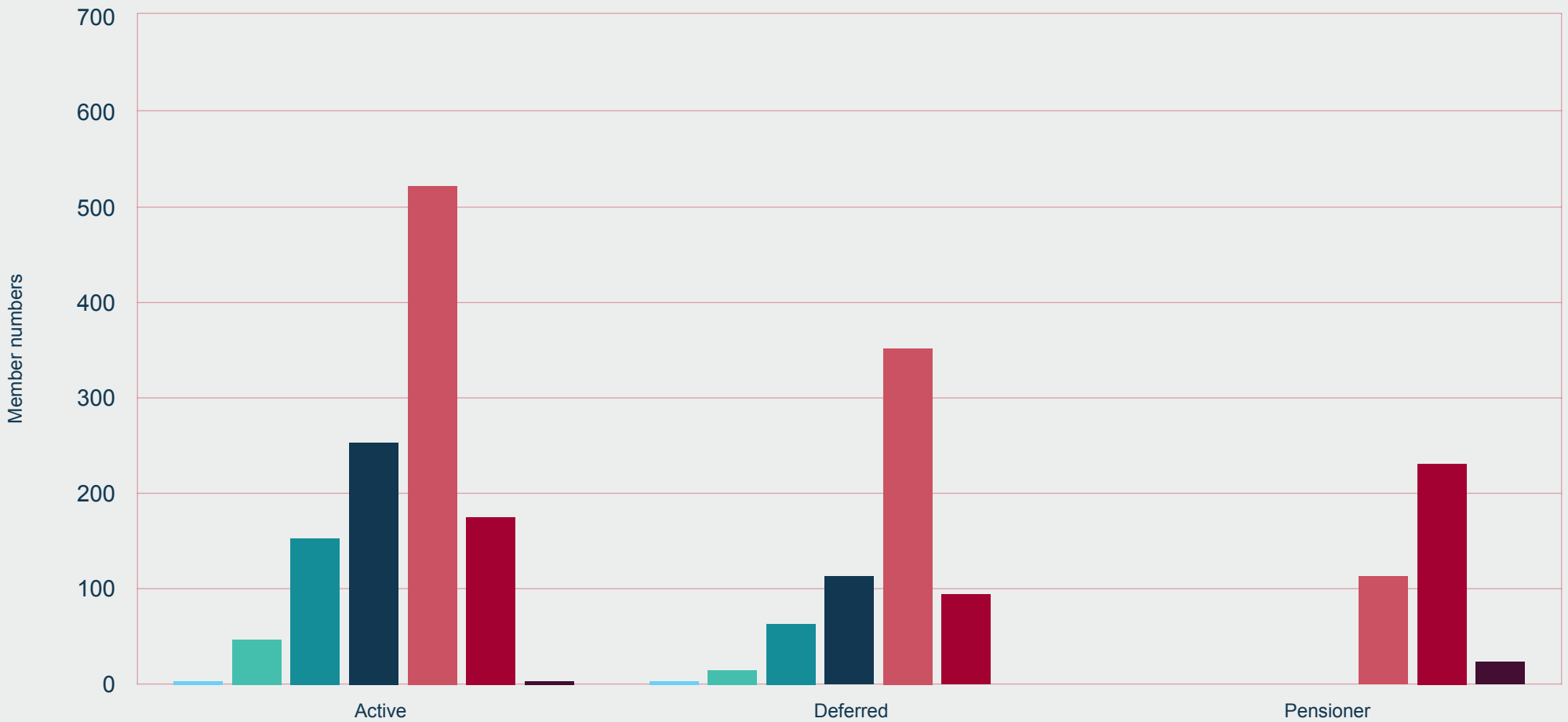


Forward thinking

My Pension Online - Age Demographic



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Service Improvements



Delivered

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Continuity of all services during Covid-19
New helpdesk telephony system 8x8 <ul style="list-style-type: none">- Members now know their position in the queue when waiting - new feature - members requested this as part of their feedback- New automated satisfaction survey at the end of calls for members- Streamlined IVR options to route the call to the right person quicker- Speech analytics
Enhanced KPIs to improve member data and elapsed times
Head of Engagement & Communications and Member Experience Manager (New Roles)

Scheduled

New member websites
Bereavement satisfaction survey
Improved address tracing
Improved mortality screening
Improved email handling with associated SLA's

Member Contact Data



E-mail Addresses

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	Q2 - 2019-20	Q3 - 2019-20	Q4 - 2019-20	Q1 - Jun '20
Active Contributors	46%	47%	45%	45%
Deferred Beneficiaries*	28%	28%	33%	29%
Pensioner and Dependants	16%	17%	18%	18%

*Deferred Beneficiaries also include Frozen Refund members

E-Communications Opt-outs

	Q2 - 2019-20	Q3 - 2019-20	Q4 - 2019-20	Q1 - Jun '20
Active Contributors	-	104 (1.51%)	100 (1.53%)	93 (1.45%)
Deferred Beneficiaries*	-	94 (1.28%)	101 (1.48%)	104 (1.51%)
Pensioner and Dependants	-	44 (5.26%)	47 (5.42%)	51 (5.76%)

*Deferred Beneficiaries also include Frozen Refund members

Member Contact Data



Telephone Numbers

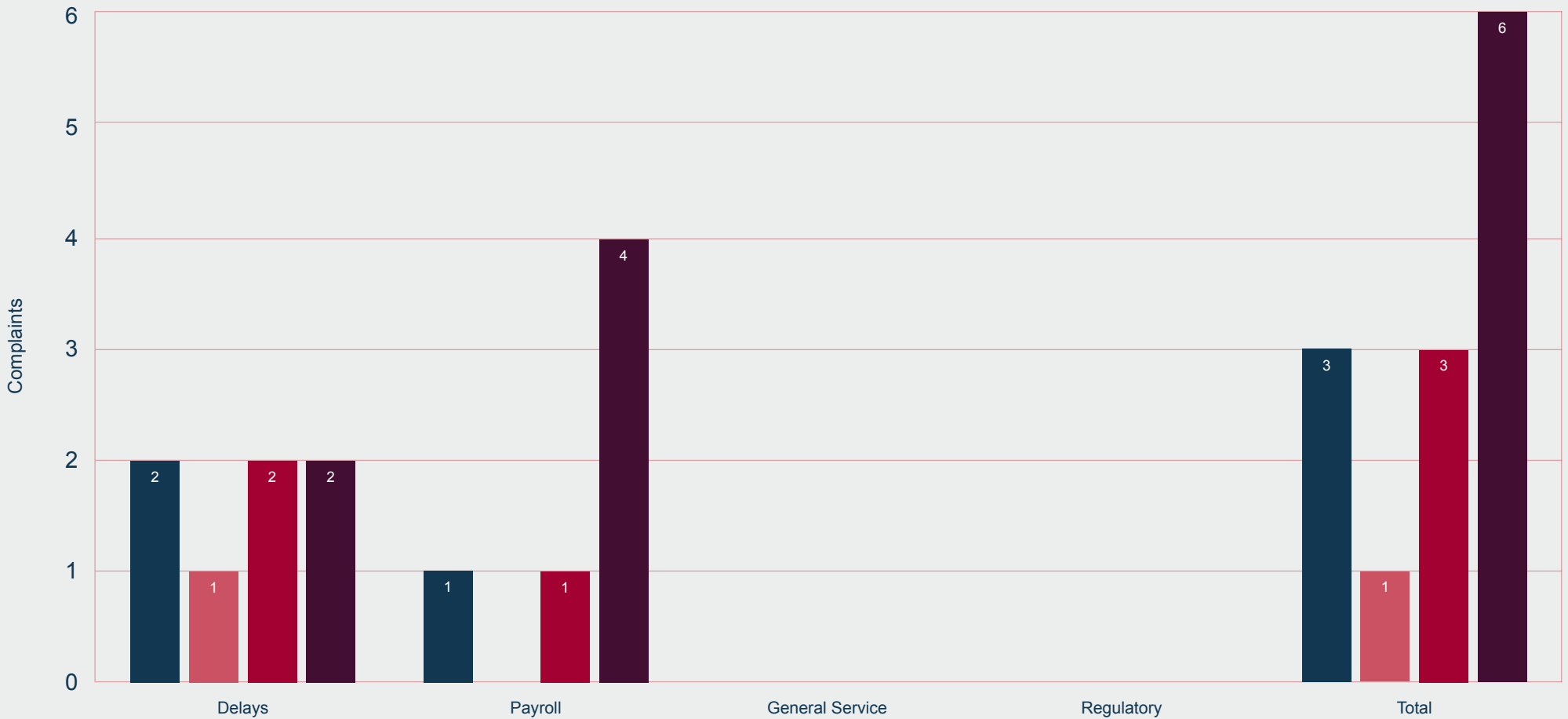
	Q2 - 2019-20	Q3 - 2019-20	Q4 - 2019-20	Q1 - Jun '20
Active	-	-	1,227 (18.79%)	1,201 (18.75%)
Deferred	-	-	1,117 (16.34%)	930 (13.54%)
Pensioner	-	-	1,007 (16.15%)	1,017 (14.79%)

Complaints



Complaints Analysis

■ Q2 19/20 ■ Q3 19/20 ■ Q4 19/20 ■ Q1 20/21



Data Quality (TPR scores)



Common Data Fails

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Data Item	Active	Deferred	Pensioner / Dependant
NI Number	1	6	46
Surname	0	0	0
Forename / Initials	0	0	0
Sex	0	0	0
DOB	0	0	0
Date started pensionable service / Policy / Contributions	0	0	1
Membership status	0	0	0
Last event status	0	0	0
Address	2	164	15
Postcode	17	460	160
Total fails	20	630	222
Individual fails	17	460	160
Total members	6,529	6,835	867
Accuracy rate	99.7%	93.3%	81.5%

Total accuracy rate	96.5%
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Data Quality (TPR scores)

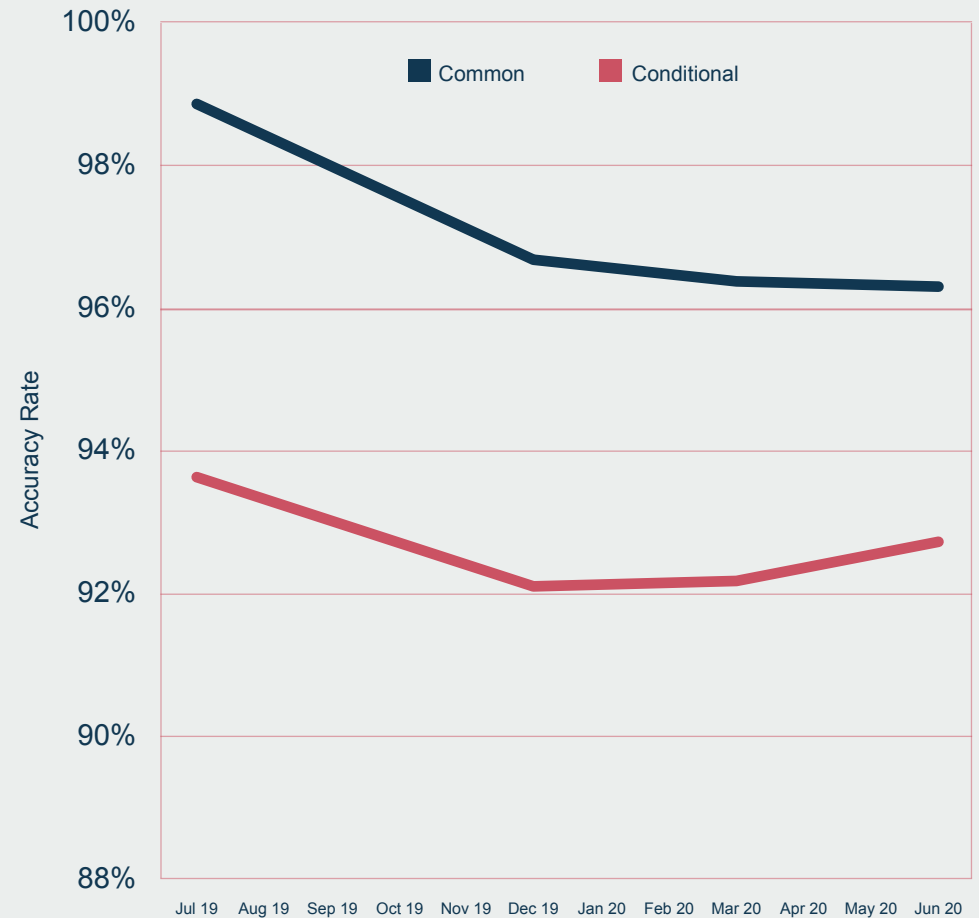


Conditional Data Fails

Data Item	Fails
Divorce Records	0
Transfer In	12
AVC's/Additional Contributions	0
Deferred Benefits	0
Trances (DB)	490
Gross Pension (Pensioners)	0
Trances (Pensioners)	34
Gross Pension (Dependants)	2
Trances (Dependants)	0
Date of Leaving	5
Date Joined Scheme	1
Employer Details	2
Salary	204
Crystallisation	40
Annual Allowance	13
LTA Factors	0
Date Contracted Out	52
Pre-88 GMP	172
Post-88 GMP	477
Total Fails	1,504
Individual Fails	1,055
Total Members	14,159

Total Accuracy Rate 92.6%

Common Vs Conditional Accuracy Rate



Glossary of Terms



Definitions

Page 4

Total Fund Membership

The total fund membership is the number of records held on the pensions administration system with a liability to the pension fund.

Current age demographic

The age demographic of the membership is split across three status's:

Active members – the age demographic of the members currently contributing.

Deferred members – the age demographic of the members who hold a deferred benefit record in the fund.

Pensioner members – the age demographic of pensioner and dependents who are currently in receipt of a pension.

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Casework Performance Against SLA

The SLA is measured from the point at which all information is made available to LPPA to complete the process. Each work type has a defined time allocation and the SLA performance is measured as a % of cases (for which all information is available) have been completed within that timescale.

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Elapsed Times

Elapsed days represent the total number of working days between the time that the case was set up to when it was completed in our case management system.

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Helpdesk Performance

Average wait time is the time taken from connection to speaking to a member of the Helpdesk. This includes time taken listening to any messages.

The percentage of calls answered does not include any calls that hang up prior to speaking to a member of the team,

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Customer Satisfaction Scores

The Helpdesk/E-mail satisfaction score is the percentage of people who completed the survey with a satisfied response.

The Retirement satisfaction score illustrates the total surveys taken, split by response Dissatisfied, Neutral or Satisfied

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My Pension Online (MPO)

The number of members who have signed up to the LPPA's "My Pension Online" member portal split by status including a total quarterly trend and a percentage of membership quarterly trend.

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My Pension Online (MPO)

This section breaks down the members registered for MPO into age demographics

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Existing e-mail addresses

The % of emails held which is important as LPPA utilise email as a method of communication where possible.

E-Communications Opt-outs

The % of members who have chosen not to receive e-communications.

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Telephone

The % of telephone numbers held which is important as LPPA utilise the telephone as a method of communication where possible to reduce elapsed times.

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Complaints

The total number of complaints received by LPPA for the previous four quarters categorised as Delays, Payroll, General Service and Regulatory (whether upheld or not).

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Common/Conditional Data Fails

The Pension Regulator requires administrators to keep members data up to date to ensure benefits are accurately paid. Data is split into common (about the individual) and conditional (about the pension). Both aspects are measured as number of members with 1 or more error / membership).

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LPP

Local Pensions Partnership

Havering Pension Fund

Employer Performance

1 April to 30 June 2020

Appendix



The following data is as at 30 June 2020.

Missing Leavers Forms

Rank	Employer No	Employer Name	Missing forms	# of Actives
1	HV10500	L.B.OF HAVERING	43	4,676
2	HV10529	THE ALBANY SCHOOL	37	59
3	HV10559	HARROW LODGE PRIMARY SCHOOL	20	58
4	HV10543	DYCORTS SCHOOL	10	52
5	HV10550	CONCORDIA ACADEMY	10	12
6	HV10502	ABBS CROSS SCHOOL	9	32
7	HV10542	PYRGO PRIORY PRIMARY SCHOOL	9	74
8	HV10545	DRAPERS MAYLANDS	9	22
9	HV10547	DRAPERS BROOKSIDE INFANTS	8	38
10	HV10503	FRANCES BARDSLEY ACADEMY	6	77

Rank	Employer No	Employer Name	% of actives	# of Actives
1	HV10505	HAVERING COLLEGE FHE	200%	1
2	HV10550	CONCORDIA ACADEMY	83%	12
3	HV10529	THE ALBANY SCHOOL	63%	59
4	HV10545	DRAPERS MAYLANDS	41%	22
5	HV10559	HARROW LODGE PRIMARY SCHOOL	34%	58
6	HV10565	LEWIS AND GRAVES PARTNR LTD	33%	6
7	HV10502	ABBS CROSS SCHOOL	28%	32
8	HV10515	SLM FITNESS AND HEALTH LTD	25%	4
9	HV10547	DRAPERS BROOKSIDE INFANTS	21%	38
10	HV10561	GAYNES ACADEMY	21%	19

Member Record Keeping – Active Members Only

Rank	Employer No	Employer Name	Missing E-mails	# of Actives
1	HV10500	L.B.OF HAVERING	2,447	4,676
2	HV10542	PYRGO PRIORY PRIMARY SCHOOL	62	74
3	HV10522	CAMPION SCHOOL	56	77
4	HV10523	HALL MEAD SCHOOL	48	79
5	HV10562	HACTON ACADEMY	44	61
6	HV10521	THE BRITTONS ACADEMY	43	67
7	HV10529	THE ALBANY SCHOOL	42	59
8	HV10525	EMERSON PARK SCHOOL	41	54
9	HV10526	REDDEN COURT SCHOOL	39	56
10	HV10533	BOWER PARK ACADEMY	35	45

Rank	Employer No	Employer Name	Missing Nom Form	# of Actives
1	HV10500	L.B.OF HAVERING	1,838	4,676
2	HV10503	FRANCES BARDSLEY ACADEMY	40	77
3	HV10523	HALL MEAD SCHOOL	40	79
4	HV10521	THE BRITTONS ACADEMY	34	67
5	HV10522	CAMPION SCHOOL	29	77
6	HV10506	COOPERS COBORN	27	47
7	HV10526	REDDEN COURT SCHOOL	27	56
8	HV10507	SACRED HEART OF MARY	26	49
9	HV10542	PYRGO PRIORY PRIMARY SCHOOL	26	74
10	HV10525	EMERSON PARK SCHOOL	22	54

Rank	Employer No	Employer Name	Missing Address	# of Actives
1	HV10500	L.B.OF HAVERING	9	4,676
2	HV10522	CAMPION SCHOOL	2	77
3	HV10523	HALL MEAD SCHOOL	1	79
4	HV10502	ABBS CROSS SCHOOL	0	32
5	HV10503	FRANCES BARDSLEY ACADEMY	0	77
6	HV10505	HAVERING COLLEGE FHE	0	1
7	HV10506	COOPERS COBORN	0	47
8	HV10507	SACRED HEART OF MARY	0	49
9	HV10508	CITIZENS ADVICE BUREAUX	0	0
10	HV10509	HAV MAGS COURT CTTEE	0	0

Rank	Employer No	Employer Name	Missing Tel No.	# of Actives
1	HV10500	L.B.OF HAVERING	3,726	4,676
2	HV10503	FRANCES BARDSLEY ACADEMY	66	77
3	HV10523	HALL MEAD SCHOOL	66	79
4	HV10522	CAMPION SCHOOL	63	77
5	HV10542	PYRGO PRIORY PRIMARY SCHOOL	60	74
6	HV10562	HACTON ACADEMY	55	61
7	HV10521	THE BRITTONS ACADEMY	50	67
8	HV10529	THE ALBANY SCHOOL	50	59
9	HV10526	REDDEN COURT SCHOOL	48	56
10	HV10546	RAVENSBORNE ACADEMY	48	54

Case Management System – Cases On Hold

Rank	Employer No	Employer Name	Awaiting Employer	# of Actives
1	HV10500	L.B.OF HAVERING	176	4,676
2	HV10542	PYRGO PRIORY PRIMARY SCHOOL	4	74
3	HV10521	THE BRITTONS ACADEMY	3	67
4	HV10522	CAMPION SCHOOL	3	77
5	HV10546	RAVENSBORNE ACADEMY	3	54
6	HV10507	SACRED HEART OF MARY	2	49
7	HV10516	SLM COMMUNITY LEISURE C T	2	42
8	HV10524	ST EDWARDS SNR ACADEMY	2	39
9	HV10526	REDDEN COURT SCHOOL	2	56
10	HV10534	DRAPERS BROOKSIDE JNR SCHOOL	2	33

Appendix



Working together

Average Number Of Days To Complete The Active To Deferred And Active To Pensioner Processes

Rank	Employer No	Employer Name	Act to Def	# of Actives
1	HV10521	THE BRITTONS ACADEMY	147	67
2	HV10546	RAVENSBOURNE ACADEMY	111	54
3	HV10526	REDDEN COURT SCHOOL	110	56
4	HV10534	DRAPERS BROOKSIDE JNR SCHOOL	103	33
5	HV10547	DRAPERS BROOKSIDE INFANTS	103	38
6	HV10516	SLM COMMUNITY LEISURE C T	94	42
7	HV10545	DRAPERS MAYLANDS	82	22
8	HV10500	L.B.OF HAVERING	82	4,676
9	HV10524	ST EDWARDS SNR ACADEMY	49	39
10	HV10522	CAMPION SCHOOL	8	77

Rank	Employer No	Employer Name	Act to Pen	# of Actives
1	HV10542	PYRGO PRIORY PRIMARY SCHOOL	142	74
2	HV10500	L.B.OF HAVERING	47	4,676
3				0
4				0
5				0
6				0
7				0
8				0
9				0
10				0

Retirement Survey Scores (out of 3)

Rank	Employer No	Employer Name	Ave Score	Surveys Taken	# of Actives
1	HV10524	ST EDWARDS SNR ACADEMY	1.0	1	39
2	HV10500	L.B.OF HAVERING	2.5	42	4,676
3	HV10504		0	2	0
4	HV10502	ABBS CROSS SCHOOL	3.0	1	32
5	HV10516	SLM COMMUNITY LEISURE C T	3.0	3	42
6	HV10530	FAMILY MOSAIC	3.0	1	0
7	HV10535	LANGTONS JUNIOR ACADEMY	3.0	1	35
8	HV10539	RISE PARK INFANT ACADEMY	3.0	1	39
9	HV10552	MARSHALLS PARK ACADEMY	3.0	1	45
10					0

Rank	Employer No	Employer Name	Surveys Taken	Ave Score	# of Actives
1	HV10500	L.B.OF HAVERING	42	2.5	4,676
2	HV10516	SLM COMMUNITY LEISURE C T	3	3.0	42
3	HV10504		0	2.5	0
4	HV10502	ABBS CROSS SCHOOL	1	3.0	32
5	HV10524	ST EDWARDS SNR ACADEMY	1	1.0	39
6	HV10530	FAMILY MOSAIC	1	3.0	0
7	HV10535	LANGTONS JUNIOR ACADEMY	1	3.0	35
8	HV10539	RISE PARK INFANT ACADEMY	1	3.0	39
9	HV10552	MARSHALLS PARK ACADEMY	1	3.0	45
10	HV10503	FRANCES BARDSLEY ACADEMY	0	N/A	77

Missing Leaver Forms

Missing Forms – the total number of missing leaver forms for members we are aware who have ceased paying contributions

% of Actives – the percentage of missing leaver forms against active membership

Member Record Keeping – Active Members Only

Missing E-mails – total number of missing email addresses for active members

Missing Nomination Forms – total number of missing email addresses for active members

Missing Addresses – total number of missing home addresses for active members

Missing Tel No. – total number of missing telephone numbers for active members

Case Management System – Case On Hold

Awaiting Employer – total number of cases awaiting a response from the employer with information

Average Number of Days to Complete the Active to Deferred and Active to Pensioner Processes

Active to Deferred – number of days a case has been on hold currently awaiting employer information

Active to Pensioner – number of days a case has been on hold currently awaiting employer information

Survey Scores

Following completion of the retirement process, a retirement survey is sent out to members who we hold email addresses for, to obtain feedback on the retirement process. The first table is a breakdown of retirees who have given us negative feedback following retirement, split by employer. The second table is a breakdown of the most survey responses and results, split by employer.

LOCAL PENSIONS PARTNERSHIP

RISK & COMPLIANCE REPORT

Havering LG

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JANET MORVILLE-SMITH
3rd September 2020

LPP
Local Pensions Partnership

CONTENT

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Complaints

Relevant to the Client during the reporting month.



Breaches

Relevant to the Client during the reporting month.



Incidents

Relevant to the Client during the reporting month.



Risks & Issues

Any relevant risks or issued not covered in the previous sections.

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EXECUTIVE SUMMARY

Havering LG pension administration is being carried out in compliance with the Pensions Regulator Code of Practice 14.



In August 2020 2 complaints have been received, compared to Nil complaints in July, and 1 in June.



Nil breaches occurred in August 2020.



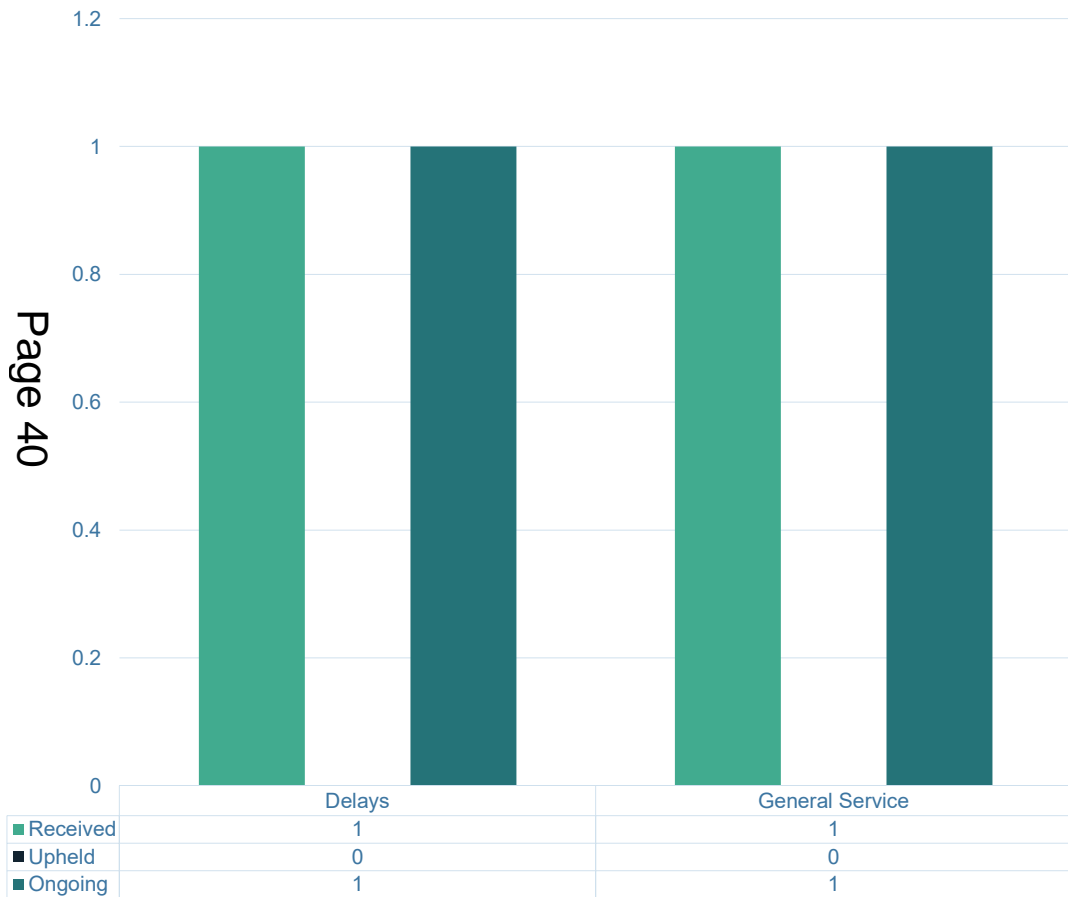
There are no incidents to report this month.



There are no risks or issues to report this month.



COMPLAINTS



Upheld includes Partially Upheld cases

Commentary:

2 complaints received in August. The core categories are shown in the chart to the left.

The reasons for the complaints was:

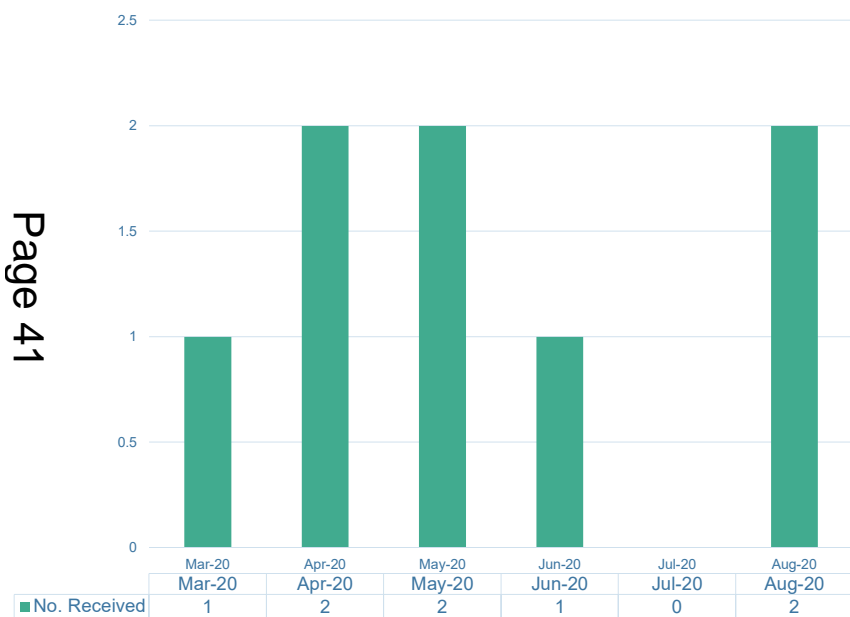
Payments:	General Service:	Delays:
	Member unhappy that incorrect information was provided	Member unhappy with time taken to process retirement

Of the complaints received this month, the key trend would appear to be customer service.

TRENDS



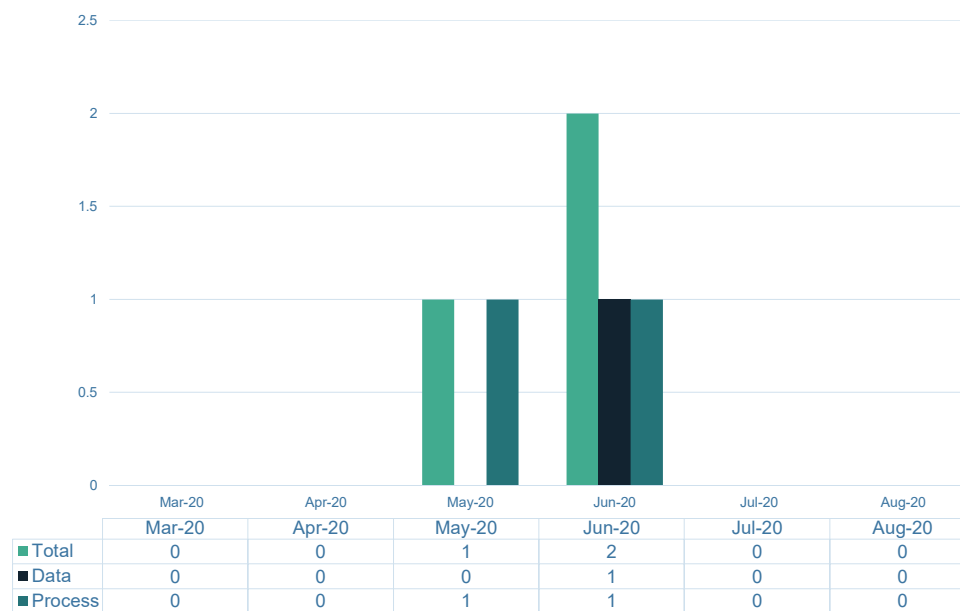
Complaints – No. Received



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Breaches – No. Received



New reporting of Data v Process Breaches only commenced in April 2020

IMPORTANT INFORMATION

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Havering Pension Fund – Risk Register – Summary of Further Actions for discussion

Summary of Amendments to the Risk Register since October 2019 - for Discussion

Risk No	Risk Title (Objective)	Consequence of not achieving the objective	Controls/Mitigations	Amendment
3 Risk of Failure to perform in line with growth expectations	Climate Risk Considerations	<p>There is a growing regularity for long-term investors to consider the extent to which climate change could impact on financial outcomes.</p> <p>The Pensions Regulator has set up a working party to consider guidance for pension schemes which will be published in early 2020. The Scheme Advisory Board is also expected to incorporate climate change considerations into its guidance for LGPS funds during 2020.</p>	<p>In its investment beliefs the Committee recorded a belief that climate change and the expected transition to a low carbon economy represents a long –term financial risk to Fund outcomes. We expect that the guidance will broadly follow the framework proposed by the Taskforce for Climate-related Financial Disclosures (TCFD)</p> <p>Following this framework, the Committee could consider actions including:</p> <ul style="list-style-type: none"> • Further training • Measuring exposure to and reporting. • Escalating engagement with investee companies on climate-related topics. 	To monitor on – going discussions between the TPR and Government regarding regarding Climate Change and the strategies

Risk No	Risk Title (Objective)	Consequence of not achieving the objective	Controls/Mitigations	Amendment
	Risk of a Financial downturn & service delivery due to the effects of the global virus - Covid-19.	<p>There are a whole range of issues that pension trustees, employers and their advisers are facing as a result of COVID-19.</p> <ul style="list-style-type: none"> ▪ Economy impact could result in fall in investment values and impact Funding Levels ▪ Employers not able to pay contributions – requests for suspension or reduction of contributions ▪ Cash flow impacts ▪ Service delivery impacts ▪ Administrative breaches 	<p>Next steps would be taking the Committees investment beliefs and building on developing market practice.</p> <p>The Pensions Regulator (tPR) has provided guidance.</p> <p>COVID-19 news page on LGPS site. FAQ for scheme Administrators and employer updates issued as new information becomes available.</p> <p>The Fund continues to monitor the funding level and outlook and returns on the Funds asset as this is covered within the quarterly monitoring reports and advice from the Funds investment advisors.</p> <p>Cash Flow and employer contributions continue to be monitored monthly</p>	<p>To monitor impact on pensions and investments and to keep abreast of on – going discussions and guidance as issued by tPR and Government regarding COVID -19. In line with tPR guidance priority is given to ensure that:</p> <ul style="list-style-type: none"> • Existing pension benefits are made • New pension benefit cases processed • Bereavement cases processed • Employer contributions • employers need to continue

Risk No	Risk Title (Objective)	Consequence of not achieving the objective	Controls/Mitigations	Amendment
			<p>Havering pension fund staff are working from home to ensure safe working and service continuity.</p> <p>Custodian working from home to ensure service continuity.</p> <p>Investment Managers working from home to provide service continuity</p> <p>Pension Administrators working from home to provide service continuity</p>	

If the board agrees to add the above risks to the register they will be added to the register which will be presented at the next Local Pension Board meeting.

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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

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Introduction

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

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

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

Key

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

to be reviewed

Completed:

Fully Completed
In Progress
Not Started
Not Yet Relevant

Compliant

Fully Compliant
Partially Compliant
Non Compliant
Not Yet Relevant

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Definitions

PSPA134	Public Service Pensions Act 2013
LGPS	Local Government Pension Scheme
TPR	The Pensions Regulator
TPR CODE	The Pensions Regulator's Code of Practice No 14 Governance and administration of public service pension schemes
Scheme Manager	This is the London Borough of Havering
Administering Authority	The LGPS specific term for Scheme Manager
LBH	The London Borough of Havering
IDRP	Internal Disputes Resolution Procedure
SAB	The National LGPS Scheme Advisory Board
PC	Pensions Committee
LPB	Local Pensions Board
LPP	Local Pensions Partnership
MSS	Member Self Service
CMS	Case Management System

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	30/11/2019	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 05/11/2019 prior to the deadline of 06/11/2019	Annual check	30/11/2019	Fully completed	Fully compliant		

B - Knowledge and Understanding

Legal Requirements

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

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

TPR Code Ref 34

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

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

TPR Code Ref 35

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

TPR Code Ref 36

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
B1	Are there policies and arrangements in place to support pension board members in acquiring and retaining knowledge and understanding?	38	A joint training strategy has been developed and was agreed by the Pensions Committee on the 24 November 2015 and presented to the Local Pension Board (LPB) at its meeting on the 6 January 2016. The Training Strategy covers both committee and board members. To assist in achieving the training strategy objectives the fund will aim for full compliance with the CIPFA Knowledge and Skills Framework. Training policy is available on website (under the committee meeting date) and training undertaken is detailed in the annual report.	Annual check	24/11/2015	Fully completed	Fully compliant	The training register is maintained through out the year and published annually in the annual report.	The CIPFA Knowledge and Skills self assessment form becomes a personalised training plan for each member and will be used to document areas of learning and continued development. These need to be reviewed and updated to reflect member changes in the Committee and the LPB. Training policy needs review.
B2	Has a person been designated to take responsibility for ensuring the framework is developed and implemented?	38	On a day to day basis the Pension Fund Manager (Onesource Pensions and Treasury) maintains compliance with the policy and annual reporting. Training is also arranged by Pensions Administration as applicable.	As and when required		Fully completed	Fully compliant		
B3	Is the Fund providing assistance to pension board members to determine the degree of knowledge and understanding required?	48	The CIPFA Knowledge and Skills self assessment was undertaken when the LPB was first set up. The LPB also undertook induction training held by Hymans (generic to the LGPS) and followed up by officers (Havering Pension Fund focus). Ongoing training is provided and attendance published in the Pension fund Annual report.	Ongoing		Fully completed	Fully compliant	Induction training has been carried out for all existing board members.	
B4	Are the roles and responsibilities of pension boards and members of pension board clearly set out in scheme documentation?	47	The roles and responsibilities are set out in the Board Members Terms of Reference. They are also published on the Havering website: yourpension.org.uk/Havering-Publications/Local-Pension-Board . There is a dedicated section covering LPB that includes Board members, Guidance, Government consultation, legislation and board roles	Annual check	31/08/2020	Fully completed	Fully compliant		
B5	Are pension board members aware of their legal responsibility in terms of Knowledge and Understanding?	50	This is detailed in Terms of Reference which were provided and discussed at the first LPB meeting (12/8/15). The Training Strategy also outlines the legal requirements relating to their knowledge and skills.	Ongoing		Fully completed	Fully compliant		

B6	Have all pension board members got access to copies of the scheme rules and relevant Fund documentation?	40	Annual report is presented to the LPB each year and also available to view online on the Havering website yourpension.org.uk . Key documents are published this website.	Ongoing		Fully completed	Fully compliant		
B7	Is there an up-to-date list of the Fund specific documents with which pension board members need to be conversant in?	46	LBH Has created and will maintain a list of documents that the Board members will need to be conversant with.	Annual check	31/08/2020	Fully completed	Fully compliant	To be updated as and when required	Revised list to be circulated
B8	Are all pension board members investing sufficient time in their learning and development?	55	A number of training sessions have been arranged and attendance to date is good. A log is maintained of who has attended training and this is published in the annual report. The CIPFA Knowledge and Skills Framework self-assessment form will also become a personalised training plan for each member and will be used to document areas of learning and continued development.	Ongoing		Fully completed	Fully compliant		This needs to be reviewed to ensure all members training needs have been identified and addressed
B9	Does the Fund offer pre-appointment training for new pension board members or mentoring by existing members?	56	Pre-appointment training has not been offered (nor is mentoring), but potential members were invited to discuss the roles and referred to the Havering website: yourpension.org.uk where the roles and responsibilities are set out.	As and when required		Fully completed	Fully compliant	Induction courses designed to meet needs of new members	
B10	Is there a process in place for regularly assessing the pension board members' level of knowledge and understanding is sufficient for their role, responsibilities and duties?	57	See comments in B3 - the knowledge and skills analysis will be carried out annually, albeit to date not all LPB members have completed it.	Annual check	30/11/2017	Fully completed	Fully compliant		To be reviewed
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	31/03/2020	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	31/01/2020	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		To check whether all members have completed this training
C3	Have all Pension Board members provided appropriate information for the Administering Authority to determine whether a conflict exists (on appointment and from time to time)?	79	The Council maintain appropriate records of declared conflicts of interest and manage any potential conflicts to ensure they do not become actual or perceived conflicts of interest. Records will be lodged in advance of the Board Member's appointment and will be maintained by the Council's Monitoring Officer.	Ongoing		Fully completed	fully compliant	Prior to application, in the advertisement, applicants are referred to the website yourpension.org.uk where the Board Roles holds the Conflicts of Interest Policy and Code of Conduct. These explain the required processes for declaring conflicts. On appointment members are required to declare any conflicts. The Declaration of Interests is a standing item on the agenda at each board meeting.	
C4	Does the appointment process for pension board members require disclosure of interests and responsibilities which could become conflicts of interest?	80	There is a duty on all prospective Local Pension Board members to declare interests prior to their appointment to the Board. No declarations to date in the appointment process under any pension Fund requirement (this is looked at once appointed by way of the Council Code of Conduct declaration).	Ongoing		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)		Fully completed	fully compliant		
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		
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.	
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.	
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		Fully completed	Fully compliant	Website now includes boigraphies for all of the current board 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		
D4	Does the Administering Authority publish information about pension board business?	97	All meetings and papers are pubic, however some items may be restricted.	As and when required		Fully completed	Fully compliant		

E - Managing risk and internal controls

Legal Requirements

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

TPR Code Ref 101

Internal controls are defined in the legislation as:

- 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

TPR Code Ref 102

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

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

E1	Is there an agreed process for identifying and recording scheme risks? (continued)	105		Ongoing		In Progress	Partially compliant	*LPP admin provide performance indicators are processed monthly and reported to LPB *admin error rates are monitored *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 *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	30/11/2019	Fully completed	Fully compliant	Risk register reviewed and agreed by Pensions Committee November 2019	
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. Internal audit to carry out process of review of internal controls in 18/19. 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	30/11/2019	Fully completed	Fully compliant	Risk register reviewed and agreed by Pensions Committee November 2019	
E6	Is there a standing item on the Pension Board agenda to review scheme risks?		The review of the risk register is a standing item on the Local Pension Board agenda	Ongoing		Fully completed	Fully compliant		
E7	Does the Administering Authority have adequate systems, arrangements and procedures (internal controls) in place for the administration and management of the Fund and are they documented ?	116	There are a large range of internal controls in place. Some examples are: Restricted access to the building Altair (pension admin system) is tested at a national level. Has a 2 tier login. Former Staff logins disabled. System backed up regularly, hosted externally and retained offsite. Calculations are independently checked when payments made. National Fraud Initiative checks Annual benefit statements request members check their details. Payments made via BACS wherever possible. Filters for spam email etc. Triennial valuation identifies data issues which are resolved. Quarterly reconciliation of payments in and out and pension fund strain costs. Bank reconciliation with the paperwork notifying of the payments. The LPP will develop a covenant assessment programme for relevant Fund employers, analysing their financial position, prospects and ability to pay necessary employer contributions. LPP will also document existing processes and procedures for Admission, Cessation, Bond Renewal and covenant checks with a clear outline of responsibility, allowing these processes to be regularly reviewed.	Annual check	30/11/2017	In Progress	Partially compliant	LPP will work with the LBH to review agreed Policies, and provide advice to ensure they are kept fully up to date in line with LGPS Regulations and other key legislation. LPP will provide support as necessary, including the provision of training where required. There are many controls in place and LBH may consider these to be sufficient to feel comfortable that these address all material fund risks. However, until a formal risk register is in place, it is unclear whether the controls in place are adequate.	Add a page at beginning of admin procedure manual to set out which staff is authorised to do which tasks (i.e. checking etc.). Formal documentation of internal controls in place as part of risk management policy/register. To be assessed as part of the internal audit
E8	Do these procedures apply equally to outsourced services, are internal controls reflected in contracts with third party providers and is there adequate reporting in relation to those controls?	119	LBH and LPP are working together to ensure that all internal controls are reflected in the work that LPP are doing although it is recognised that there are good controls in place	Annual check)	30/11/2017	In Progress	Partially compliant		Establish whether our AVC arrangements with Prudential and Standard Life need to be included in this section - no as not an outsourced service. Internal audit will provide confirmation that controls are in place

F - Administration and Scheme Record Keeping

Legal Requirements

Scheme managers must keep records of information relating to:

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

TPR Code Ref 122

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

TPR Code Ref 123

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

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

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

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

F9	Is a data improvement plan in place which is being monitored with a defined end date?	141	There is currently no plan in place as no significant data issues have been identified. It is noted that should any future issues arise, a plan would be set out with a formal process in place and a defined end date.	Annual check		In Progress	Partially compliant	Data scores have now been received and are very good. However a formal data improvement plan needs to be written.	A draft Data Improvement Plan has been written for approval
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.	

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 22 nd 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	30/11/2019	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 2020. There were a few that were not issued due to having queries on the record.	Annual check	31/08/2020	Fully completed	Fully compliant	LPP confirmed that 100% of active and deferred benefit statements were sent by the statutory deadline of 31/08/20	
H2	Do these meet the legal requirements in relation to format?	188	The statements used when read with the covering letter do provide all the required information.	Annual check	31/08/2020	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	31/08/2020	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	31/08/2020	Fully completed	Fully compliant	Statements are now 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.		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.		30/11/2018	Fully completed	Fully compliant	Providers have confirmed that they are compliant with this point.	

H7	Is basic scheme information provided to all new and prospective members within the required timescales?	200	The admin team write to all new scheme members once the new record has been created on the pensions system. The letter gives the address for the pensions website that has full details of the scheme. There are some instances where the timescales have not been met. The team are not always aware of new members from externally paid employers if a new starter form is not supplied. The appointment letter sent to LBH employees references the pension scheme and website but it is not known whether other employers provide any information.	Ongoing		Fully completed	Fully compliant	Schedule 1 of the LPP contract states that admissions must be completed within 3 working days. This is monitored via the monthly KPI reports	
H8	Does this meet the legal requirements in relation to format?	200	All scheme information is available on the Havering pensions website. There is a guide to the scheme which provides the required information other than: - The statement regarding whether a charge may be made - although no charges are applied to LGPS benefits - There are other guides and factsheets, including the 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	Disclosure timescales are monitored as part of monthly checks	
H10	Where any information is only provided electronically (i.e. instead of any hard copy) does it comply with the legal requirements?	203	Annual Benefit Statements are provided online. Disclosure requirements were met and members have the opportunity to elect to receive a paper copy. Initial contact with new members is via mail and recommends signing up to the Member Self Service (MSS) facility to be able to access future statements. Hard copies of documents can be provided of intranet material if required. Correspondence with members via email is carried out at member request.	Annual check	31/08/2018	Fully completed	Fully compliant		To check with LPP what information new starters are given
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		
H12	Does the Administering Authority use a tracing service?	208	LBH use the DWP tracing service	Ongoing		Fully completed	Fully compliant	LPP have recently started to use Target Professional Services for address tracing and mortality screening	

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	31/08/2020	Fully completed	Fully compliant	IDRP process is up to date and compliant	
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	31/08/2020	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: - who it applies to - who the specified person (stage 1) is - the timescales for making applications - who to contact with a dispute - the information that an applicant must include - the process by which decisions are reached?	224	The IDRP Factsheet includes all specified information along with a form for the person with an interest in the scheme to complete.	Annual check	31/08/2020	Fully completed	Fully compliant		

14	Has the Administering Authority ensured that employers who make first stage decisions also have IDRP in place?		Some of our scheme employers have published their stage 1 IDRP 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 IDRP 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 IDRP 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	31/08/2020	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 IDRP 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 IDRP 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 IDRP 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 IDRP 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	In Progress	Partially Compliant		Breaches are currently recorded by LPP an reported on a monthly basis. A log needs to be created by LBH to capture these internally
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		

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Summary Dashboard

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

No.	Check	Compliant	Deadline
Reporting Duties			
A1			
A2			
A3			
Knowledge and Understanding			
B1			
B2			
B3			
B4			
B5			
B6			
B7			
B8			
B9			
B10			
B11			
B12			31/12/2019
Conflicts of Interest			
C1			
C2			
C3			
C4			
C5			
C6			
C7			
C8			
C9			
C10			
C11			
Publishing Information			
D1			
D2			
D3			
D4			
Risk and Internal Controls			
E1			31/03/2020
E2			31/03/2020
E3			
E4			31/03/2020
E5			

E6			
E7			31/03/2020
E8			31/03/2020
Maintaining Accurate Member Data			
F1			
F2			
F3			31/03/2021
F4			
F5			
F6			
F7			31/03/2020
F8			
F9			31/12/2019
F10			
F11			
Maintaining Contributions			
G1			
G2			
G3			
G4			
G5			
G6			
G7			
G8			
G9			
Providing Information to Members and Others			
H1			
H2			
H3			
H4			
H5			
H6			
H7			
H8			
H9			
H10			
H11			
H12			
Internal Dispute Resolution			
I1			
I2			
I3			
I4			31/03/2020

I5			
I6			
I7			
I8			
I9			
Reporting Breaches			
J1			
J2			31/12/2020
J3			

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Area of Focus - Record Keeping	tPR Comment	What's already in place	Action required
Data Scores	Considering how high these figures are, we recommend that you sense-check these figures with LPP and where appropriate, challenge them in order to establish your full confidence in its accuracy and what is being measured	LPP have established their own method of calculating the data score, which is run annually.	Hymans Robertson have provided guidance on scoring the accuracy of our data. This is to be reviewed and discussed with LPP as part of the data improvement plan.
Monthly Data Collection	Many scheme managers have moved from annual to monthly data collection and found this enabled them to verify data at an earlier stage		Discussions with LPP to be progressed to ensure monthly data collection is implemented as soon as possible for LB Havering paid staff. Engagement with externally paid employees will then be required.
Data Improvement Plan	A robust data improvement plan should be implemented as appropriate	Draft plan recommended by Hymans Robertson following workshop with contract manager	Update the plan and work with LPP to implement
Pensions Administration Strategy	Although not a legal requirement, a PAS could be implemented clearly setting out responsibilities and consequences of not complying with duties to the fund. The pension board should review the PAS and ensure it will stand up to challenges from employers.	Charging Policy	PAS to be written and implemented

Area of Focus - Internal Controls			
Risk Register	A comprehensive risk register which captures operational activities to mitigate risks with deadlines and owners - delegated individuals by senior managers - is an effective tool to monitor progress addressing risks and their impact on scheme manager's objectives. It also forms a solid base at the pensions board meetings which may help its members to have useful debates. We recommend that the scheme manager aligns the various risk registers and will include all risks related to pensions (directly or indirectly) within the pension risk register.	Risk register is reviewed annually and is now a standing agenda item at pension board meetings.	revisit COP14 para 100-120 Ensure that everything is captured and aligned
Breaches	We recommend that the scheme manager keeps a breach log with details such as actions taken to assess materiality, individuals involved in the assessment,		Ensure that a log is created and a procedure is in place
Decision Making and escalations	Set out decision making authority and escalation points and develop a decision log or similar. We would view it as good practice for the decision making authority of more junior staff members and escalation points are also recorded.	Scheme of Delegation in place for senior members of staff.	To be considered keeping in mind the small number of staff that this will apply to

Area of Focus - Communication			
Member communications	It is often helpful for scheme managers to measure the effectiveness of their communication with savers, eg measuring website traffic and running surveys	Since the move to the LPP contact centre, members are asked to complete a survey following telephone or email communication.	To review results of Havering specific surveys
Annual Benefit Statements	We encourage the scheme manager to look into ways of further promoting the take up rate of the online portal.	Member self service is promoted by LPP through various standard letters, including all new starters.	To be included as part of the communications strategy

IDRP	Complaints and compliments could be analysed to identify changes that can be made to improve the operation of the fund. You may wish to consider capturing all complaints in one single complaints log to assist with monitoring.	Log to be established
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Area of Focus - Cyber Security		
Cyber Security - Third Party	Scheme managers should be aware of the cyber security processes used by third party providers, such as the administrator or custodian, that handle fund assets or data	LPP to supply client facing documents to provide details of all policies and controls in place for data security.
	Scheme manager to monitor spam and quarantine reports from LPP as a minimum and ensure that any tests or accreditations cover all relevant aspects of pension administration	LPP has provided accreditation and assurance that policies are in place Cyber Security is now a standing agenda item for client review meetings To discuss with LPP how this can be implemented and monitored.

Area of Focus - Scams		
Due Dilligence	Please discuss due dilligence activities LPP carries out in relation to receiving schemes; ask for their procedures and feedback after reviewing them to ensure all appropriate steps are covered and they are followed in practice.	To be raised at a future client review meeting.

Data Improvement Plan - London Borough of Havering Pension Fund

Activity	Action	Owner	Priority	Timescale	Outcome/Objectives	Progress	Comments
Data Improvement Plan implementation	Agree LPP input into Data Improvement plan	Havering Contract Manager			Data improvement plan updated and passed for final sign off		
Year end							
Activities associated with annual "year-end" processing, to ensure the Fund is "data ready" for the formal valuation exercise, annual benefit production and issue of pension savings statements	Liaise with participating employers to confirm year-end data requirements	LPPA			All employers receive bespoke EOY template and have access to Your Fund		
	Identify any specific employer training that may be required	LPPA and Havering PF			Training given where required		
	Provide training to participating employers where necessary	LPPA and Havering PF			responsibilities and the data requirements of the		
	Ensure all year-end posting is carried out in administration system	LPPA			Year end posting is complete and update provided to Havering PF		
	Run year-end validations through administration system	LPPA			Validation work completed and update provided to Havering PF		
	Clear errors - liaising directly with participating employers where necessary	LPPA			Errors cleared and update provided to Havering PF		
	Space for additional items identified following discussion with LPP Report progress to Pension Board	Havering Contract Manager			Progress to be reported at each relevant meeting		
Education							
Areas of improvement that would be beneficial	Continually develop administration staff, to include awareness of the importance of data quality	LPPA			Receive assurances from LPPA that appropriate training plans are in place		Can be added to client meeting agendas
	Identify training issues required by participating employers	LPPA			Employer training plan put in place		
	Ensure delivery of training, where required	LPPA and Havering PF			Complete work as noted in 'action' comments		
	Space for additional items identified following discussion with LPP Report progress to Pension Board	Havering Contract Manager			Progress to be reported at each relevant meeting		
Annual Data Audit							
Regular activities available to ensure quality and timeliness of data received in relation to scheme members from external agencies and sources	Procure an address tracing service to undertake regular searches for missing or new addresses	LPPA			Complete work as noted in 'action' comments		
	Undertake regular checks to ensure all contact details are present and correct: address, email and telephone number and update as required	LPPA			Work completed and update provided to Havering PF as part of quarterly reporting		
	Ensure appropriate use of the LGPS "NI Database" to ensure correct payment of death grants	LPPA			Assurances provided by LPPA		
	Routinely check the NI Database as part of day-to-day administration and action as appropriate	LPPA			Assurances provided by LPPA		
	Ensure appropriate use of the DWP "Tell us Once" service, to ensure timely notification of scheme member deaths, where appropriate	LPPA			Assurances provided by LPPA		
	Undertake regular data mortality screening against the national death register as administered by the General Register Office + take action where unreported deaths are identified	LPPA and Havering PF			Complete work as noted in 'action' comments		
	Space for additional items identified following discussion with LPP Report progress to Pension Board	Havering Contract Manager			Progress to be reported at each relevant meeting		
Data Accuracy							
Regular run of data through Fund Actuary's "Data Portal" as a means of checking accuracy of member data - part of regular inter-valuation data monitoring	Arrange for running of valuation extracts from administration system	LPPA			Complete work as noted in 'action' comments		
	Upload on to Data Portal	LPPA and Havering PF			Complete work as noted in 'action' comments		
	Analyse critical errors and warnings + undertake data correction activities in administration system where required	LPPA and Havering PF			Complete work as noted in 'action' comments		
	Re-run reports and upload to Data Portal to confirm corrections	LPPA and Havering PF			Complete work as noted in 'action' comments		
	Space for additional items identified following discussion with LPP Report progress to Pension Board	Havering Contract Manager			Progress to be reported at each relevant meeting		
Employer engagement							
Actions to link data held by Fund with that of participating scheme employers	No less than annual data reconciliation exercise - providing copy of common data items for active members held on administration system	LPPA			To identify discrepancies within the member common data items, missing joiners/leavers, etc.		
	Ensuring monthly employee and employer contribution returns are received within required timescales	Havering PF			Monthly monitoring task		
	Issuing reminders to those employers who miss deadlines	Havering PF			Monthly monitoring task		
	Escalating persistent offenders to the Administering Authority and seeking to resolve persistent failure, utilising legal services where required	Havering PF			Escalated cases are progressed and actively monitored. Outcome is high engagement with Scheme employer		
	Undertake monthly reconciliation of employee and employer contributions and the supporting member summaries provided by each employer	Havering PF			Monthly monitoring task		
	Space for additional items identified following discussion with LPP Report progress to Pension Board	Havering Contract Manager			Progress to be reported at each relevant meeting		
Continual development of technology							
	Continue to seek opportunities to develop appropriate technology to improve member data quality standards	LPPA and Havering PF			Technology is used to advance, improve and better member data quality		

Objectives to ensure where technology is used it assists in the delivery of consistent and accurate member data	Streamline operational processing participating employer and administration activities	LPPA and Havering PF			Complete work as noted in 'action' comments	
	Implement monthly reporting, initially to identify any missing starters and leavers but with a view to a full upload of all data in the future	LPPA and Havering PF			Complete work as noted in 'action' comments	
	Space for additional items identified following discussion with LPP					
	Report progress to Pension Board	Havering Contract Manager			Progress to be reported at each relevant meeting	
TPR data scoring						
Undertaking regular data scoring exercise as part of TPR annual reporting exercise	Review scores provided within the LPPA quarterly performance report	Havering PF			Complete work as noted in 'action' comments	Updates to process will need to be considered once SAB scheme specific data specification agreed
	Agree plan for tackling any gaps/errors/inconsistencies uncovered	LPPA and Havering PF			Complete work as noted in 'action' comments	
	Undertake data correction and report progress	LPPA			Receive assurances from LPPA that action has been taken	
	Space for additional items identified following discussion with LPP					
	Report progress to Pension Board	Havering Contract Manager			Progress to be reported at each relevant meeting	
Website						
Undertake a review of Fund website - to ensure content is appropriate for needs of members and their beneficiaries	Review site content	Havering PF			Complete work as noted in 'action' comments	LPPA are due to re-launch the website in November so checks should be carried out following this
	Update website content where required	LPPA and Havering PF			Complete work as noted in 'action' comments	
	Ensure all relevant documents are published to the website	LPPA and Havering PF			Complete work as noted in 'action' comments	
	Space for additional items identified following discussion with LPP					
	Report progress to Pension Board	Havering Contract Manager			Progress to be reported at each relevant meeting	

Pensions Communications Campaign

Background

Following a review by the Pensions Regulator, outsourcing of the pensions administration function and feedback from stakeholders, it has become apparent that we need to raise awareness of pensions and the tools available to members.

Aims

- To encourage all pension scheme members to sign up for My Pension Online - Member Self-Service
- To ensure staff are aware of the pension website and the information that is available
- To ensure staff are aware of the correct contact details for pension related queries
- To manage the expectations of scheme members and their managers for pension matters
- To encourage engagement with scheme employers

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Item	Medium	Audience	Frequency	When
MPO - Member Self Service	LBH Pop Ups	LBH Corporate Staff		
	Core Brief			
	Intranet Page			
	Global News			
	Leaflet	Satelite Offices		
	Leaflet	School Staff		
Expression of Wish forms	LBH Pop Ups	LBH Corporate Staff		
	Core Brief			
	Intranet Page			
	Global News			
	Leaflet	Satelite Offices		
	Leaflet	School Staff		
	LBH Pop Ups			

Pensions Website	Core Brief	LBH Corporate Staff		
	Intranet Page			
	Global News			
	Leaflet	Satelite Offices		
	Leaflet	School Staff		
LPP Contact Details	LBH Pop Ups	LBH Corporate Staff		
	Core Brief			
	Intranet Page			
	Global News			
	Leaflet	Satelite Offices		
	Leaflet	School Staff		
Retirement Process	Core Brief	LBH Corporate Staff		
	Pensions Website (Factsheet)	All Staff		
	Intranet (link to Factsheet)	LBH Corporate Staff		
	Email (Factsheet)	External employees		
	Email (Factsheet)	School Staff		
	Factsheet	Satelite Offices		
Ad Hoc Pension Sessions				
Pension Roadshows				
School Business Managers Network				

LOCAL PENSIONS PARTNERSHIP ADMINISTRATION

Member Communications Update

August 2020

Member Communication Plan

Introduction

Working closely with our Clients and their Employers, LPPA are continuously looking at ways to improve the service we provide to your Members. Our aim is to deliver the best possible pension experience for Members and in doing so achieve our KPI's.

The following slides outline the approach we are taking over the next 12 months working towards this goal.

Contents:

- **LPPA Engagement KPI's** – page 3
- **Improving Member Insight** – page 4/5
- **Increase Member Self Service** – page. 6
- **Enhance the Member Experience** – page 7
- **General Activity** – page 8
- **Targeted Campaign** – page 9
- **Member Communications 12 Month Schedule** – page 10/11

Member Communication Plan

LPPA Engagement KPI's

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Increase MPO registrations

Reduce elapsed times
(for retirement & death cases to be worked)

Review all Member letters

Increase nominated beneficiaries for Active Members

Increase email addresses & phone no's held for Members

Reduce number of Member letters

Member Communication Plan

Improving Member Insight

- New Helpdesk telephony system (installed in July'20) provides scheme and status information about the Members contacting us and the reasons why
- It also enables us to use speech analytics to digitally monitor call trends into the Helpdesk
- Collating and acting upon Member feedback from inbound calls and Satisfaction Surveys – we're amending the pension estimate disclaimer on My Pension Online to provide greater clarity as a result of Member comments
- Measure engagement and response rates to specific campaigns by monitoring monthly MPO login rates – this will be invaluable for the planning of future campaigns
- In addition to Member forums and the feedback we currently receive, we exploring if there are other ways to better understand what Members think of the service we provide and how it can be improved for them

Member Communication Plan

Improving Member Insight

We'll be using management information to better understand Member behaviour. For example the figures below show when MPO registered Members* last logged on to the service.

When last logged on to MPO		
In the last 12 months	>12 months ago	Not since first registering
51.43%	46.44%	2.13%

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From this we know that our communications strategy needs to encourage Members to login more frequently so they are better informed about their pension and their future options.

* covers all scheme Members registered to use MPO and the figures represent the period 01/08/2019 to 31/07/2020

Member Communication Plan

Increase Member Self Service

- Ongoing improvements to MPO will be promoted to encourage Members to use the service, such as the new slider tool (due Oct'20) that enables Members to vary the estimated lump sum and pension amounts
- Working closely with Employers to increase volume of Member email addresses – who can then be sent a link to register for MPO
- Simplifying the MPO registration process to make it easier and quicker for Members
- New release of Altair (in Oct'20) will allow MPO activation keys to be bulk emailed to drive up member self service
- MPO to be more prominent on the new website (go live in Nov'20)

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Member Communication Plan

Enhance the Member Experience

- Launch of the new and improved website will be communicated to all Members in November 2020 and will provide a live 'Webchat' facility for the first time
- Greater use of video content to make pensions easier to understand. We'll also upload recordings of pension presentations and tutorials to make them available to a wider Member audience.
- Introduce SMS (text message) service to provide "*case in progress*" updates to Members – *this is still in the development stage*
- Increase in targeted activity to make campaigns more relevant to the Members' pension status and age – now working with a new email provider to make e-comms more agile
- Review of all letters – to improve consistency, clarity and Member understanding. We're prioritising the most used letters (top 10 most frequently sent out letters account for c40% of all letters by volume).
- Encouraging Members to update their work email to personal email addresses – very important for those approaching retirement age

Member Communication Plan

General Activity

- Ongoing delivery of regulatory communications
- Launch of new website (online & offline campaign) in Nov'20
- Email campaigns to highlight the various benefits of registering on MPO
- Inform Members about the new slider calculator tool on MPO – an added value feature to encourage Member to use MPO more often
- Advising Members of the importance of keeping their personal details up to date – easiest way is through MPO
- SMS text messages – “case in progress” updates to reduce chaser calls to the helpdesk
- Use email footers, auto-reply emails & SMS messages to promote MPO and communicate important information or seasonal messages
- Introduction of a new ‘Dealing with Bereavement’ leaflet for people who have recently lost someone who was a scheme Member

Member Communication Plan

Targeted Campaigns – these are tailored campaigns to communicate a specific message and/or call to action which are sent to Members that match certain criteria.

- Email campaign directed at 50+ Members with work email addresses – *need to change before they retire*
- Targeted campaign for those Members who have not nominated a death beneficiary
- Testing different direct mail campaigns to encourage members with no email address to register for MPO
- Making recorded video presentations available to new Members to explain the features and benefits
- Bespoke Client email campaigns – in line with the needs of our Clients we can email information to Members of specific schemes
- Test and learn email campaigns with content which is relevant to certain Member age groups

From the beginning of September LPPA will have a new in-house bulk email facility which gives us much more flexibility. Over the coming weeks and months, we'll be trialling a number of different targeted campaigns. The response rates to these campaigns will help us to refine and optimise future activity.

Member Communication Plan

Member Communications 12 Month Schedule (slide 1 of 2)

This is an outline schedule of the planned communications which can be flexible and adaptable in line with the needs of our Clients', any pension industry updates (re. McCloud) and external factors (such as Covid 19).

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September 2020		October 2020					December 2020		January 2021		February 2021	
September 2020		October 2020			November 2020		December 2020		January 2021		February 2021	
Test & learn targeted email campaigns	SMS go live: text message updates for pending enquiries "Your case is still being progressed"	Provide Pensions Savings Statement (by 6th Oct)	Dealing with Bereavement - leaflet for people who have lost someone who was a Member	Website pre-launch comms: new website coming soon	Education campaign to inform Members what to do & decisions to make before drawing their pension	Marketing campaign to launch new website	Awareness campaign (online & offline) re Death Grant Nomination	Information campaign re options at retirement	Targeted campaign to Members with work emails to provide personal email	DM letter campaign to promote MPO & obtain email & phone numbers for the 50+ Members we don't have contact details for	Email campaign to promote MPO registrations <i>(refresh message)</i>	

Member Communication Plan

Member Communications 12 Month Schedule (slide 2 of 2)

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March 2021		April 2021			May 2021		June 2021		July 2021		August 2020	
Communicate pay dates & annual pension increase to pensioners	Targeted email campaigns for specific member groups (eg. 50+, no nominated beneficiary, work emails).	Pensioner Newsletter	Issue P60's	Deferred Newsletter	Active Newsletter	Information campaign re options at retirement	Email campaign to promote MPO registrations (<i>refresh message</i>)	Send out Annual Benefit Statements	Email campaign to promote MPO registrations			

In addition to the activities outlined on this and the previous slide, the following will be delivered throughout the year as required: Scheme Essentials presentation, Employee Pension Surgeries, Pension Roadshows & Member Focus Groups.

Since March 2020, these have been delivered online due to the Government guidance re Covid 19.

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