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LOCAL PENSION BOARD AGENDA

4.00 pm Thursday Virtual Meeting

Members 4: Quorum 2

Mark Holder Denise Broom 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 22nd September 2020 and authorise the Chair to sign them.

5 TO RECEIVE FEEDBACK FROM RECENT MEETINGS OF THE PENSIONS COMMITTEE

6 ANNUAL INTERNAL CONTROL ASSURANCE 2020 (Pages 5 - 16)

Report attached

7 RISK AND COMPLIANCE (Pages 17 - 24)

Report attached

8 POSITION OF CHAIRMAN

For discussion

9 RISK REGISTER

For discussion

10 LGPS LEGISLATIVE UPDATE 2021 (Pages 25 - 26)

Report attached

11 HAVERING PENSION FUND ADMINISTRATION REPORT Q2 (Pages 27 - 54)

Report attached

12 DATA IMPROVEMENT & LPB ACTION PLAN 2020-21 (Pages 55 - 58)

Report attached

13 LBH TPR CODE 14 COMPLIANCE (Pages 59 - 76)

Reports attached

14 HAVERING EMPLOYER PERFORMANCE Q2 (Pages 77 - 84)

Report attached

15 COMMUNICATIONS CAMPAIGN (Pages 85 - 86)

Report attached

16 LPB ANNUAL REPORT 2019-20 (Pages 87 - 108)

Report attached

Andrew Beesley Committee Administration Manager



Public Document Pack Agenda Item 4

MINUTES OF THE MEETING OF THE LOCAL PENSION BOARD VIRTUAL MEETING 22 September 2020 (4.00 - 5.45 pm)

Present:

Members: Anne Giles (Scheme Member Representative)

Mark Holder (Scheme Member Representative)
Denise Broom (Employer Representative) (Chair)

Andrew Frater (Employer Representative)

Officer: Caroline Berry

Debbie Ford Lillian Thomas

Luke Phimister (Clerk)

24 CHAIR'S ANNOUNCEMENTS

25 APOLOGIES FOR ABSENCE

There were no apologies for absence.

26 **DISCLOSURE OF INTEREST**

There were no disclosures of interest.

27 MINUTES OF THE MEETING

The minutes of the previous meeting held on 1st October 2019 were agreed as a correct record and, due to COVID-19, will be signed by the Chairman at a later date.

28 ACTION POINTS FROM THE PREVIOUS MEETING

The action points were addressed at later items in the agenda.

29 TO RECEIVE FEEDBACK FROM RECENT MEETINGS OF THE PENSIONS COMMITTEE

The Board were notified that the Pensions Committee had admitted Caterlink into the Pension Fund, had agreed a new investment strategy and had agreed a business plan which was backwards looking. The Board noted that the Pensions Committee had commissioned Hymans to evaluate risks due to COVID-19 and it was suggested that mitigations were already in place and there were no issues arising for the Pension Fund.

The Board requested that future Pensions Committee agendas are circulated to Board members.

30 LPP QUARTERLY PERFORMANCE REPORT

The report presented to the committee updated the Board on the LPP Quarterly performance.

The Board noted that the data given was LLP-wide rather than Havering specific. The Board noted that they only had the figures for cases completed and agreed that the visuals for elapsed time was helpful. The Board noted an increase in registrations, 107 in 1 month with another 109 new sign ups after 4 global news articles. The Board noted that there had been a backlog of paperwork due to home working and 211 leavers still required information from the employers. Members of the Board discussed breaches and agreed that the Board should be made aware of any breaches and the outcomes of any breaches and complaints alongside the risk and compliance report.

Action point: Caroline Berry to include employer performance document alongside the next quarterly performance report.

31 **RISKS REGISTER**

The risk register was presented to the Board and members noted there had been 2 new risks identified since October 2019.

The risk presented to the Board was 'Risk of failure to perform in line with growth expectations' with the first objective being Climate risk. It was noted that the Pensions Committee would have a duty to consider climate risk when making investments and was therefore added to the risk register. The second objective presented to the Board was for financial downturn risks due to COVID-19. Members noted that investment levels, cash flows and employer contributions could be affected.

The Board agreed for the risks to be added to the register.

32 **COMPLIANCE CHECKLIST**

Officers talked the Board through the compliance checklist and members noted that some evidence of training needs updating and longer serving members will need to revisit the Pension regulator toolkit as it had been updated since their completion.

The Board agreed for the checklist to be updated and put in priority order for the next meeting.

33 TPR REVIEW ACTION PLAN

The report presented to the Board followed a Pensions regulator review in summer 2019 of the Council's processes, producers and governance in place.

The Board noted that although the review was positive, there were still areas of improvement. Members notes the draft data improvement plan and, following comments from the Board, would be presented to Pensions Committee for noting. The Board noted the data improvement plan had to be in place to meet the Pensions Regulator recommendations..

Action Point: Comments back from members by 31st October 2020.

34 COMMUNICATIONS CAMPAIGN

The Board noted that Pensions does not have a high enough profile to communicate effectively to staff. It was agreed to work with LPP to help boost Pensions communications.

35 **POSITION OF CHAIR**

The Board agreed to continue to rotate the chairmanship until Andrew Frater has chaired a meeting, with a review following that meeting. Mark Holder will be the Chair for the next meeting.

36 LOCAL PENSIONS BOARD ANNUAL REPORT

The Board noted that the report would be presented to the Pensions Committee at the November 2020 meeting.

37 SUGGESTED FUTURES MEETING DATES

The Board noted that no draft dates had been set and asked the clerk to circulate these after the meeting.

Action Point: Luke Phimister to circulate draft meeting dates.

Chairman

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INTERNAL CONTROL ASSURANCE REPORT



Local Pensions Partnership Administration Limited (LPPA)

ANNUAL INTERNAL CONTROL ASSURANCE REPORT

August 2020



INTERNAL CONTROL ASSURANCE REPORT

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INTRODUCTION

LPPA, part of the LPP Group, provides pension administration services to over 600,000 members across 1,900 employers for its 17 LGPS and blue light clients.

We deliver high-quality pensions administration services to Local Government, Police and Firefighters Pension Schemes.

LPPA has three sites; the majority of our c.220 employees are based in Preston, and we have satellite offices in Havering and Hertford. We administer pensions for 17 public sector clients. We look after more than 600,000 members across over 1,900 employers.

This is the first Internal Control Assurance Report published by LPPA which outlines the specific control objectives that we have designed to support our business objectives. It underpins the work LPPA has undertaken and demonstrates the strength of our control environment which supports our organisation as we move forward into the future.

We use our scale and expertise to simplify pensions administration, providing value for money pension services that help our clients overcome the challenges of pension complexity.

We provide first-class end-to-end pensions administration services including payroll, and member and employer engagement. Our service consistently exceeds Service Level Agreements and we take a proactive approach to improving administration services across the sector, striving to become a pensions administration Centre of Excellence.

We place a strong emphasis on building effective and collaborative working relationships with our clients. Our approach is based on all participants sharing constructive dialogue and timely feedback to enable us to drive continuous improvement in the services we offer.

Key components of our approach include:

- ✓ A clear understanding of clients' requirements and expectations translated into well-defined Service Level Agreements (SLAs) and Key Performance Indicators (KPIs).
- ✓ Timely, transparent and comprehensive client reporting.
- ✓ Strong governance processes to ensure services are compliant with Code of Practice 14 and public sector pensions legislation.

3 Offices	17 Clients	1,900 Employers	600,000 Members
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REPORT BY THE HEAD OF RISK & COMPLIANCE

This Report relates to the pensions administration services provided by Local Pensions Partnership Administration Limited (LPPA).

As Head of Risk & Compliance for LPPA, I joined the Company in April 2020, tasked with the identification of control objectives relating to the provision of pensions administration services by LPPA and the design, implementation and operation of controls to provide reasonable assurance that the control objectives are achieved.

In taking on those responsibilities I have taken account of, not only the interests of the members, but also the clients and those of the stakeholders as well as the wider LPP Group to drive the general effectiveness and efficiency of the administration services for all concerned.

In future years, this report will be prepared for clients who have used the pensions administration services to provide assurance that those services are being delivered by LPPA in compliance with Code of Practice 14 and public sector pensions legislation.

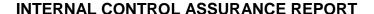
The criteria used in making this assertion will be that:

- (i) the risks that threaten achievement of the Control Objectives stated in this report have been identified;
- (ii) the identified controls would, if operated as described, provide reasonable assurance that those risks did not prevent the stated Control Objectives from being achieved; and
- (iii) the controls were consistently applied as designed, including manual controls which were applied by individuals who have the appropriate competence and authority.

This year, given that I have only been in post for 4 months, I cannot provide the assurance at this time as I am still getting to know the business and identifying and assessing the controls in place. This first report therefore provides an overview of the Internal Audit activity undertaken during 2019/20 and sets out the assurance framework I have recently implemented in LPPA to provide the assurances that our clients require going forward.

This report will not omit or distort information relevant to the scope of the services being described in the Control Objectives, whilst acknowledging that it has been prepared to meet the common needs of a broad range of clients and may not therefore include every aspect of the services that each individual client may consider important in its own particular environment.

Janet Morville-Smith Head of Risk & Compliance LPPA





OVERVIEW OF INTERNAL AUDIT ACTIVITY 2019/20

This section contains details of the audit activity for the financial year ended 31 March 2020 in regard to pension administration processes

Note: Prior to June 2020, pensions administration services were provided by LPP Limited. On 1st June 2020 all pensions administration staff were TUPE transferred to LPPA Limited. Thus, audits performed in FY2019/20 were performed on, and delivered to, LPP.

Audits Conducted by Deloitte:

Several distinct internal audits took place across the LPP Group. Three of those audits related to our investment business, LPPI; two were specific to benefits administration, and other audit areas span the LPP Group (e.g. Cyber security).

Of the audits that are relevant to the pension administration service:

Date Report Issued	Title	Scope	Rating
June 2019	Benefit Administration	Focus on the calculation and payment process for Transfer Values and Retirement Benefits	Ineffective
January 2020	Contingency – Further Review following the Benefit Administration findings	Focus on the administration and financial processes and controls specifically in relation to any process where a payment is made to a member	Effective with Scope for Improvement

The benefits administration audit was conducted in March 2019 and looked at a small sample of benefit calculations across our Police and Fire client schemes and transfers from our Local Government client scheme. No errors were identified in the benefit calculations. Two issues were identified in the transfer calculations.

The cases sampled were cases dating back to the period shortly after the implementation of the transformation project in April 2018 that resulted in large backlogs and poor service levels.

Since this audit, some exceptional work has been undertaken over the course of 2019/20 in readiness for the new LPPA structure. The operational teams have developed, and the structure and management of pension administration has improved immensely under the direction of Jo Darbyshire the new LPPA MD. It was recognised that Compliance and Risk within LPPA was not as robust as it should be and therefore steps were





taken to address this with the commencement of the recruitment process to appoint an administration focused Head of Risk and Compliance. Janet Morville-Smith took up the position in April 2020.

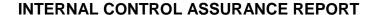
In January 2020, Deloitte were asked to re-assess the benefit administration processes, which showed a marked improvement being demonstrated in the second audit.

Of the wider LPP Group audits:

- GDPR was rated effective with room for improvement
- Cyber security was rated ineffective; and
- Core financial controls was rated ineffective

The cyber security and core financial controls audits covered general operations of the LPP Group and are indirectly relevant to the services LPP provides to clients. In the case of both audits, LPP management had self-identified and put in place management actions to address the main findings before the audit reports were concluded and plans are in progress and on track to address all outstanding findings.

Since those audits took place, LPPA has established a focused and dedicated Risk and Compliance function to strengthen controls within pension administration.





CONTROL ASSURANCE FRAMEWORK

This section contains details of the assurance framework that LPPA will follow for 2020/21, commencing 1st June 2020 regarding pension administration processes

Organisational Structure

LPPA is a subsidiary of Local Pensions Partnership Limited, and operates over 3 sites in Preston, Havering and Hertford.

LPPA

LPPA provides pension administration services for Local Government Pension Schemes and other public sector pension funds. We look after the needs of over 600,000 pension scheme members across a variety of schemes and industries.

As a leading third party pensions administrator, we are responsible for the pension administration services, including calculation and payment of pension benefits, data quality and member and employer engagement.

Internal Controls

The system of internal controls is based upon an ongoing process designed to identify the risks to the achievement of policies, aims and objectives; to evaluate the nature and extent of those risks; and to manage them efficiently, effectively and economically.

A key element of this structure includes formally agreed, clear definitions of the responsibilities and authority delegated to individual managers across all major activities, supported by LPPA Senior Leadership Team and the LPPA Board.

The LPPA Risk Management Framework includes the Risk Register, which maps and monitors the risks that threaten achievement of the Control Objectives and regularly reviews and tests the Controls to ensure they remain effective in managing those risks.

Governance Structure

The LPPA Board is chaired by Sir Peter Rogers and includes 4 Non-Executive Directors.

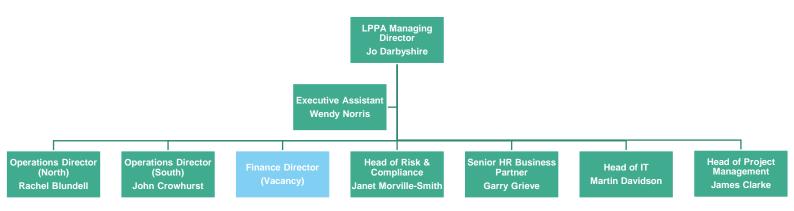
The LPPA Senior Leadership Team is led by Jo Darbyshire, LPPA Managing Director, and includes Senior Managers with the appropriate skills, knowledge and expertise to achieve the strategic objectives of LPPA.

INTERNAL CONTROL ASSURANCE REPORT



ORGANISATION OVERVIEW

LPPA Senior Leadership Team



INTERNAL CONTROL ASSURANCE REPORT



CONTROL OBJECTIVES

CODE OF PRACTICE 14

1. Accepting clients

- Accounts are set up and administered in accordance with client agreements and applicable regulations.
- Complete and authorised client agreements are operative prior to initiating administration activity.
- Pension schemes taken on are properly established in the system in accordance with the scheme rules and individual elections.

2. Authorising and processing transactions

■ Benefits payable and transfer values are calculated in accordance with scheme rules and relevant legislation and are paid on a timely basis.

3. Maintaining financial and other records

- Member records consist of up-to-date and accurate information and are updated and reconciled regularly.
- Contributions and benefit payments are completely and accurately recorded in the proper period.
- Scheme documents (deeds, policies, contracts, booklets) are complete, up to date and securely held.

4. Monitoring compliance

- Services provided to pension schemes are in line with service level agreements.
- Transaction errors are rectified promptly and Members treated fairly.

5. Reporting to clients

- Periodic reports to participants and scheme sponsors are accurate and complete and provided within required timescales.
- Annual reports and accounts are prepared in accordance with applicable law and regulations.
- Regulatory reports are made if necessary.

INFORMATION TECHNOLOGY

6. Restricting access to systems and data

- Physical access to computer networks, equipment, storage media and program documentation is restricted to authorised individuals.
- Logical access to computer systems, programs, master data, transaction data and parameters, including access by administrators to applications, databases, systems and networks, is restricted to authorised individuals via information security tools and techniques.
- Segregation of duties is defined, implemented and enforced by logical security controls in accordance with job roles.

DATA PROTECTION / GDPR

7. Data Security

■ Processing, storing and transmission of personal data is defined, implemented and enforced by security controls in accordance with job roles.

INTERNAL CONTROL ASSURANCE REPORT



METHOD OF ASSURANCE

This section details how LPPA will achieve the control objectives to provide the future assurances that pension administration processes comply with CoP14

Historically, Internal Audit for LPP has been provided by Deloitte LLP. Deloitte were engaged to focus on assessing the design adequacy, implementation and operating effectiveness of key controls mitigating certain risks. Part of the engagement with LPP was to review certain aspects of the operational pension administration business.

The main focus of the Audits of operational pension administration have been around the calculations and payments to members, in particular, Transfer Values and Retirement Benefits. Deloitte's reviewed the administration processes and controls for the processes that result in payments being made.

The contract with Deloitte LLP ends in March 2021 and LPPA will take a decision at that point whether to continue to engage with a third party for their Internal Audit requirements.

With effect from 1st June 2020, LPPA has established its own Governance which utilises the Three Lines of Defence model, in addition to the engagement with Deloitte. Key components of this Governance include:

Risk & Compliance

In April 2020 LPPA established a dedicated Risk & Compliance function within the pension administration business. This function remains independent of operational management, with the Head of Risk & Compliance reporting directly to the LPPA MD with a dotted line into the LPPA Board.

The Risk & Compliance Team has been established to ensure LPPA, its policies and procedures fulfil the requirements for Local Government and Public Service Pension Schemes, adhering to the relevant legislation and the Code of Practice as laid down by the Pensions Regulator. Risk & Compliance have a wide remit across LPP and has unrestricted access to any and all records, physical properties and personnel relevant to the administration of the pension schemes.

The LPPA Risk Management Framework has been established to manage all risks associated with the LPPA business, including strategic, operational, financial and reputational risks.

The Risk & Compliance Team has been set up to incorporate the various assurance functions, as well as other functions which it is deemed should be independent of the operational business functions.

Risk & Compliance - Quality Assurance & Compliance Monitoring

LPPA has established a Quality Assurance and Compliance Monitoring Team within the Risk & Compliance function and a compliance monitoring plan has been prepared which is designed to deliver a series of audit engagements based on an appropriate risk assessment and priorities that are consistent with the objectives of LPPA and its clients.



INTERNAL CONTROL ASSURANCE REPORT

This involved:

- ✓ identification of the 'monitoring universe' a comprehensive list of potential administration areas by service, function and / or major systems that could be monitored;
- ✓ understanding the strategy and business objectives of LPPA and its clients;
- ✓ identifying key risks and controls associated with each administration area; and
- taking account of the results of previous audit work, discussions with key employees and consideration of current risks identified through the risk management framework.

The compliance monitoring activities are in addition to the Internal Audit work carried out by Deloitte.

A monthly process of 'Check the Checker' has been implemented to strengthen the quality of administration activities to help to drive a 'right first time' culture.

Risk & Compliance - Technical

LPPA has established a Technical Team within the Risk & Compliance function with appropriate subject matter expertise to ensure all administration activities comply with Code of Practice 14 and public sector pensions legislation. This team also comprise of the subject matter experts for taxation and all other legislative and regulatory requirements impacting pension administration.

The Technical Team will support the operational business functions, providing guidance and resolving complex queries. They are also tasked with driving awareness and education within the operational business areas where requirements change or where knowledge gaps are identified.

Risk & Compliance – Complaints

LPPA has established a dedicated Complaint Handling Team within the Risk & Compliance function to ensure that any complaints and the Internal Dispute Resolution Process (IDRP) are managed independently of the operational functions.

Effective complaint management will drive business improvements and embed a 'Treating Customers Fairly' culture.





INTERNAL CONTROL 2020/21

Moving forward into the next Financial Year LPPA Risk & Compliance will be producing more reporting for Clients and Stakeholders to provide ongoing assurance that the pension administration services provided by LPPA are robust and compliant with all relevant Rules, Regulation, Legislation, and Industry Codes of Practice that apply to a pension administration business.

Reporting has already commenced from June 2020 on the following aspects for each Client individually:

- Complaints
- ✓ IDRP
- ✓ Breaches Data Breaches; CoP14 Breaches and LPPA Process Breaches
- ✓ Incidents
- ✓ Risks & Issues

Internal Audit continues to be provided by Deloitte as per their current audit plan and the following reviews have been scheduled for LPPA in 2020:

Review Title	Commencement Date	Rating
Data Quality	April 2020	Effective
Benefit Administration	April 2020	On-going
Benefit Administration	September 2020	N/A

In addition, LPPA Risk & Compliance will undertake a program of compliance monitoring throughout the year.

Accreditations

LPPA will continue to maintain the following accreditations in support of its control assurance framework.

Title	Expiry
ISO 27001	LPPA re-certification due in December 2020
Cyber Essentials	Re-certification underway in July 2020

This Internal Control Assurance Report will be issued annually covering the previous financial year.

LOCAL PENSIONS PARTNERSHIP

RISK & COMPLIANCE REPORT

Havering LG



CONTENT



Compliance Updates

Relevant to the Client during the reporting month.



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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COMPLIANCE UPDATES



LPPA submitted it's response to HM Treasury's consultation on GMP Indexation.



EXECUTIVE SUMMARY

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



In December 2020 2 complaints have been received, compared to 1 complaint in November, and 1 in October.



Nil breaches occurred in December 2020.



There are no incidents to report this month.

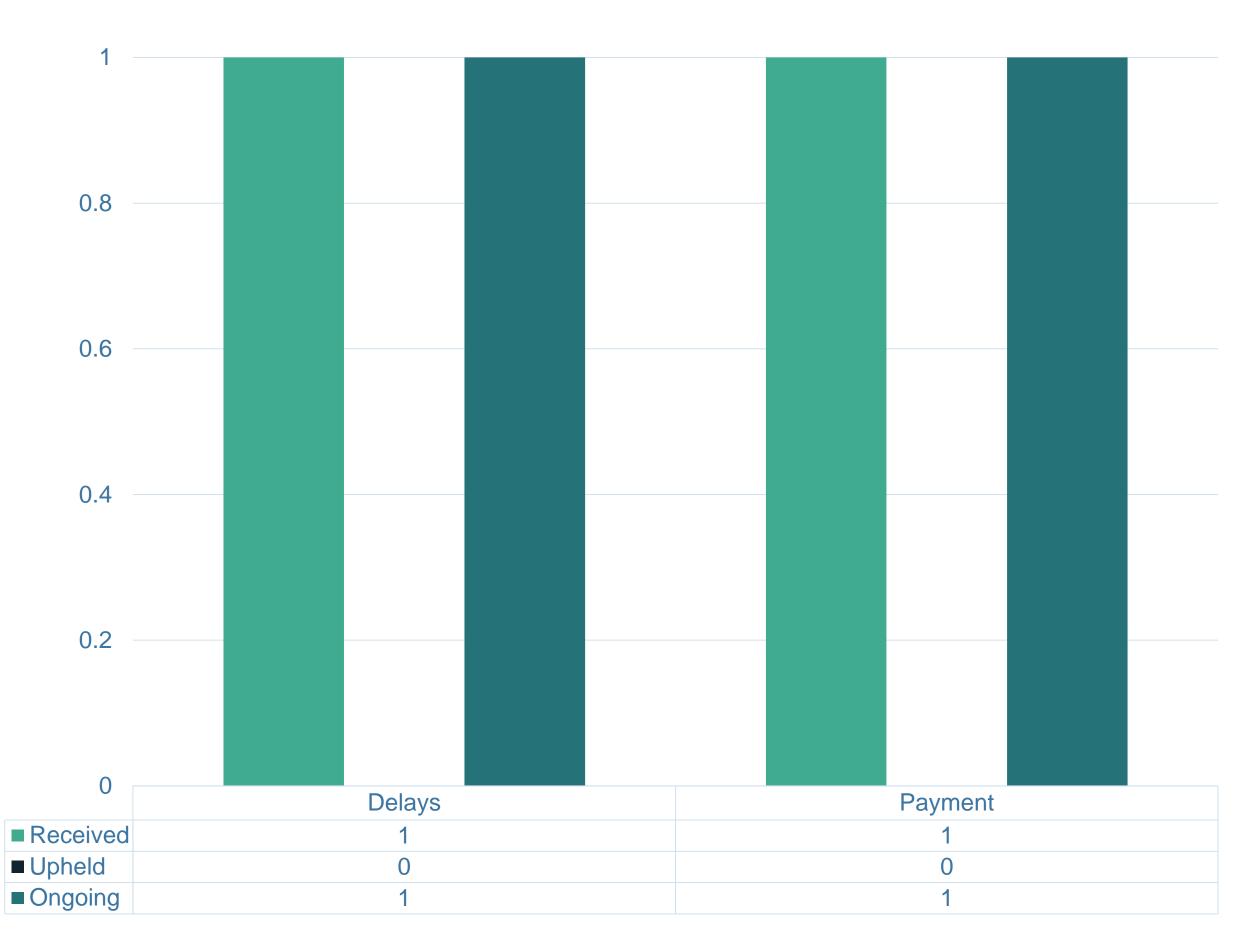


There are risks or issues to report this month.



COMPLAINTS

1.2



Upheld includes Partially Upheld cases

Commentary:

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

The reasons for the complaints was:

Payments:	General Service:	Delays:
1 member unhappy pension not paid in December		1 member unhappy with delay on retirement as leavers documents were not provided

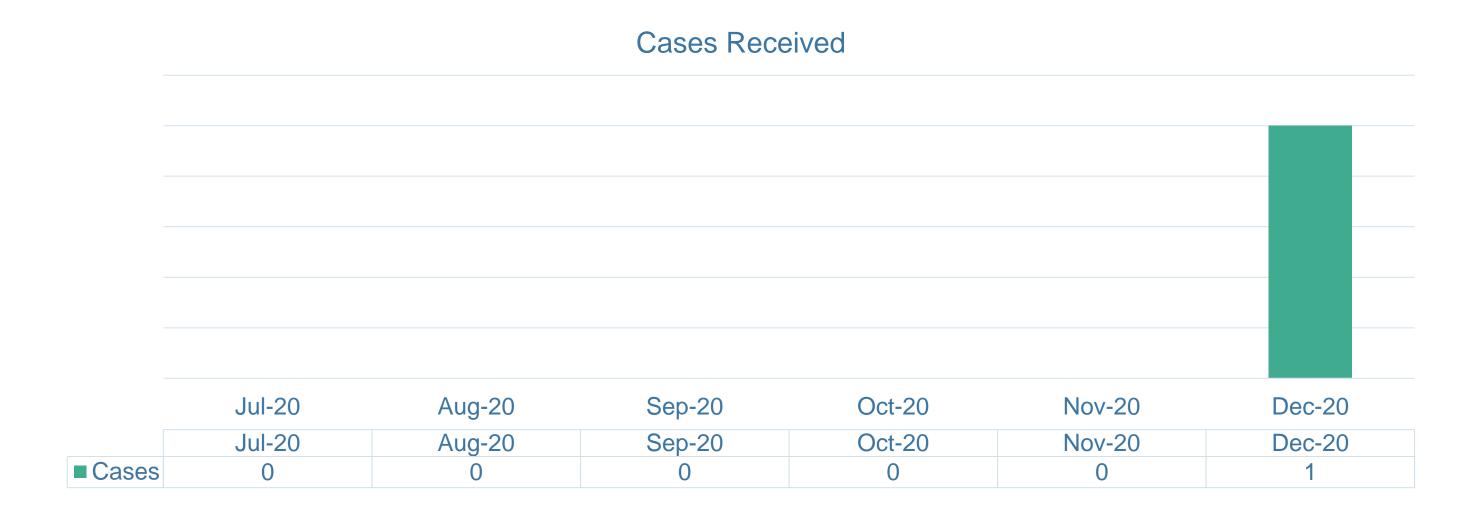


RISKS/ISSUES

Commentary:

Pension Transfer mis-selling has become the next target for Claims Management Companies. They are trying to pursue companies who processed pension transfers, going back to 2012 (and possibly earlier), where the transfer money was paid out to, what now transpires to be, an unauthorised Scheme.

Pension Scams and Pension Liberation were rife in the early 2000's and as those who followed the advice of the scammers now approach retirement, they are finding that they have no pension fund.

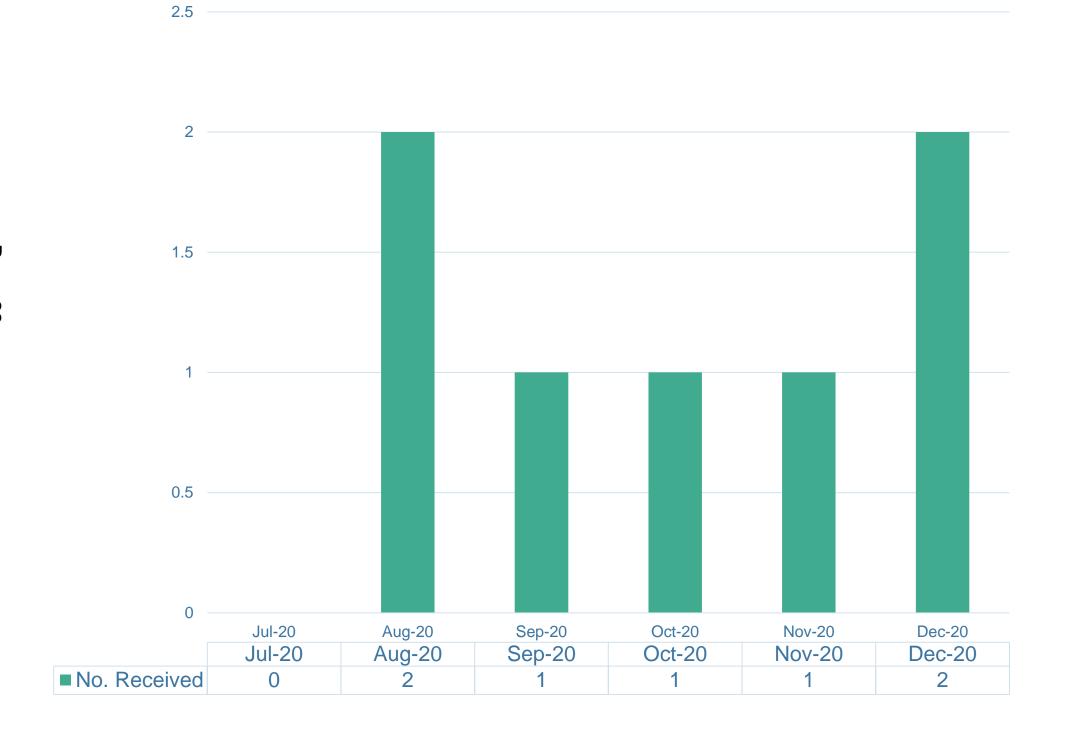




TRENDS



Complaints – No. Received





Breaches – No. Received





IMPORTANT INFORMATION

This presentation has been prepared to inform the intended recipient of information regarding LPPA Ltd only. It does not provide advice on legal, taxation or investment matters and should not be relied upon for any other purpose without seeking independent advice. No investment decisions should be based upon its statements without such advice.

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LGPS Legislative Updates:

Public sector exit payments

On 4th November 2020 The Restriction of Public Sector Exit Payments Regulations 2020 came into force enforcing a cap of £95k to an exit payment for an employee leaving a public sector employer.

The amount in severance payments, pension strain cost and notice payments in excess of three months are included in the calculation.

There is now a conflict between the exit cap regulations and the LGPS regulations. The LGPS regulations require a member who is made redundant over the age of 66 to take immediate unreduced pension, but the exit cap regulations prevent the employer from paying strain cost if the exit package exceeds £95k.

MHCLG have issued a consultation on the draft amendments to the LGPS regulations, which closed on 18th December 2020. Once in place the Regulations will address the conflict but these are not expected before March 2021

It has therefore been necessary to implement an interim solution to the conflict. Based on advice from our One Source legal team and guidance from LGA and the LGPS SAB, LB Havering, as an administering authority have decided that any members made redundant after 3rd November 2020, where their exit package exceeds the £95k cap, will be offered the choice of taking immediate fully reduced pension or a deferred pension to take at a later date.

By doing this, we comply with The Restriction of Public Sector Exit Payments Regulations 2020 in that a strain cost will not be payable to the Pension Fund and the exit package will be below the cap. We do however, open ourselves to challenge as we are not adhering to the LGPS Regulations. It was felt that this options leaves us with the least risk as it is easier to pay a member more benefit if order to by the courts or Pensions Ombudsman, then to try an reclaim anything that it is decided has been overpaid.

In addition to the above and as part of amendment to the Local Government Pension Scheme Regulations, new universal GAD factors will be introduced for all LGPS funds to use in the calculation of strain costs. This is to ensure equal treatment of all scheme members regardless of the individual fund that they pay into.

The existing factors used to calculate pension strain costs are intended to fill any funding gap created by paying a member's pension early. They were not calculated with the intention of impacting a member's benefits and as a result, the factors are specific to each individual fund and are not unisex.

Following advice from our Actuary, Havering, as an administering authority, have made the decision to start using the draft GAD factors and calculation methodology ahead of the implementation of the amendment regulations.

LGPS Amendments to Statutory Underpin (McCloud)

When the Government reformed public service pension schemes in 2014 and 2015 they introduced protections for older scheme members. Following the findings in the McCloud legal judgement, certain elements of public sector pension schemes brought in at the time of the reforms have been deemed age discriminatory. The Government has confirmed that there will be changes to all public sector pension schemes to remove the age discrimination. In the case of the Local Government Pension Scheme, it is the "underpin" provision which gives special protection to the rights of older members that has been classed as age discriminatory.

We await further clarification on the implementation of the remedy but LPPA have already started looking at the additional administration requirements both in terms of identifying any missing data and the resources and cost of the project.

Management of employer risk regulations

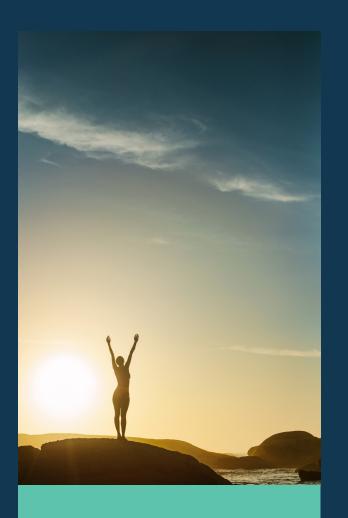
On 26 August MHCLG published its latest partial response to the May 2019 consultation called "Changes to the local valuation cycle and management of employer risk". The accompanying amendment regulations have also been made and came into force from 23 September 2020.

The new regulations focus on three key areas:

- Review of employer contributions (inter-valuation)
- Spreading exit debts
- Deferred Debt Agreements

The Funding Strategy Statement has been updated to reflect the new Regulations and the discretions we have in these areas.

LPP Local Pensions Partnership



Havering Pension Fund

Quarterly Administration Report

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Definitions



Page 6

Total Fund Membership

Total Fund Membership is the number of Member records held on the LPPA pensions administration system that are contributing to, awaiting benefits, or receiving benefits from the pension fund.

Current age demographic

The age profile of the Membership is split across three types of status:

Active Members – Members who are currently contributing toward their pension benefits.

Deferred Members – Members who hold a deferred benefit in the fund.

Pensioner Members – Pensioners and Dependants who are currently receiving a pension.

Page 8

age

29

Casework Performance Against SLA

Performance is measured once all information is made available to LPPA, to enable them to complete the process. All casework has a target timescale in which to complete the process, and performance is measured as the % of cases that have been completed within that timescale.

Page 9 & 10

Casework Performance Against SLA

The category of 'Other' on this page covers cases including, but not exclusive to:

- Benefit revisions
- Maternity/paternity cases
- Ill Health cases
- Scheme Opt-Out cases
- Cases raised to cover 'My Pension Online' registration queries
- P60 queries
- 50/50 scheme changes
- APC / AVC queries

Page 11, 12 & 13

Elapsed Times

Elapsed days represent the total number of working days between the case being set up, and when it was completed by LPPA.

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Helpdesk Performance

Average wait time measures the time taken from the caller being placed into the queue, to them speaking with a Helpdesk adviser.

The percentage of calls answered does not include calls that are abandoned by the caller where the wait time is less than 2 minutes. From July 2020, the average wait time is Client specific (prior to this, it was measured for All Clients).

Page 17 & 18

Customer Satisfaction Scores

The Helpdesk satisfaction scores (telephone, email and retirement) are the percentage of people who completed the survey with a satisfied (green) or neutral (amber) response. The Retirement satisfaction score illustrates the total surveys taken, split by response of Dissatisfied or Satisfied.

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My Pension Online (MPO)

The number and % of Members who have signed up to "My Pension Online" (online Member portal), including a quarterly view and a comparison with the overall LPPA sign up rate (all Members).

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My Pension Online (MPO)

The number of Members that are registered for My Pension Online, split by Member status and age profile.

Page 22 & 23

Telephone Numbers

The number and % of telephone numbers held by Member status (this is important as LPPA use telephone contact details where possible to reduce elapsed times).

Existing e-mail addresses

The number and % of emails held by Member status (this is important as LPPA utilise email as the preferred method of written communication).

E-Communications Opt-outs

The number and % of Members who have chosen not to receive email communications.

Page 25 & 26

Common/Conditional Data Fails

The Pension Regulator requires Administrators to keep Member data up to date to ensure benefits are accurately paid. This is split by Common Data (details that are specific to the Member) and Conditional Data (data that is related to the pension).

Individual Fails shows the total number of unique Members that have a single or multiple number of Common Data or Conditional Data fails. On both charts, the Accuracy Rate (%) then compares the number of Individual Fails to the total number of Scheme Members.

The TPR (The Pension Regulator) data scores were originally collected on a quarterly basis, but from June 2020 both have been collected monthly.

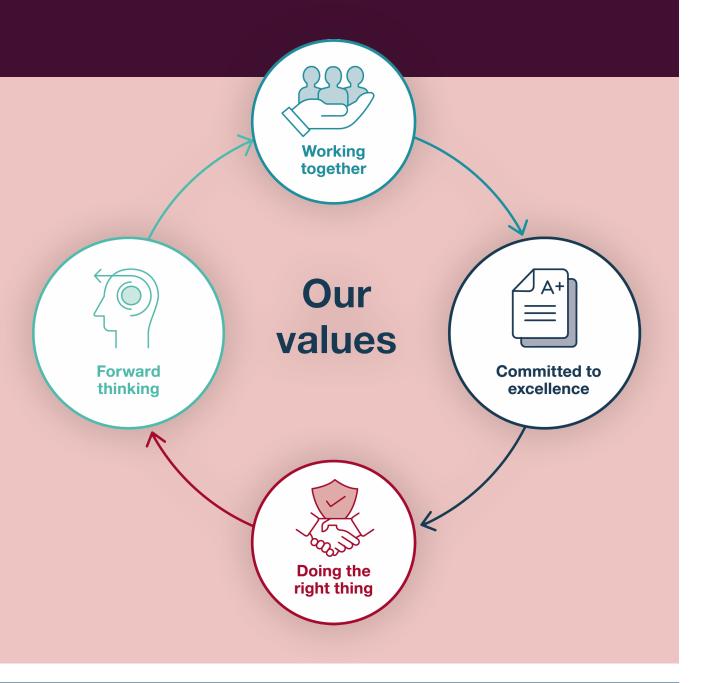
For more detail on the Data Items / Error types presented in these charts, please visit either the <u>TPR</u> or <u>PASA</u> (The Pension Administration Standards Association) websites.

Our Core Values

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

The report describes the performance of Local Pensions Partnership Administration (LPPA) against the standards set out in the SLA.

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

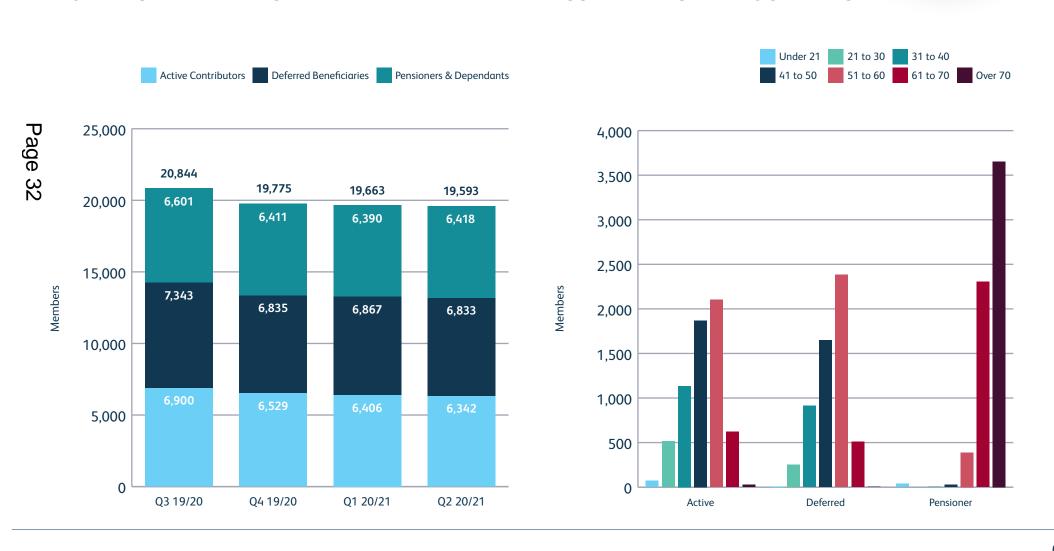
		Apr 20	Μαy 20	Jun 20	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21
J	Annual Benefit Statement and Newsletter to Deferred Members			✓									
)))	Pension Increases		✓										
	Annual Benefit Statement and Newsletter to Active Members					~							
	Pension Saving Statements								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

Fund Membership



TOTAL FUND MEMBERSHIP

CURRENT AGE DEMOGRAPHIC



Fund Membership



LEAVERS

These leavers are currently included in the active membership figures in the previous page.

	Total Current Leavers	Received*	Pending**
)	253	82	171

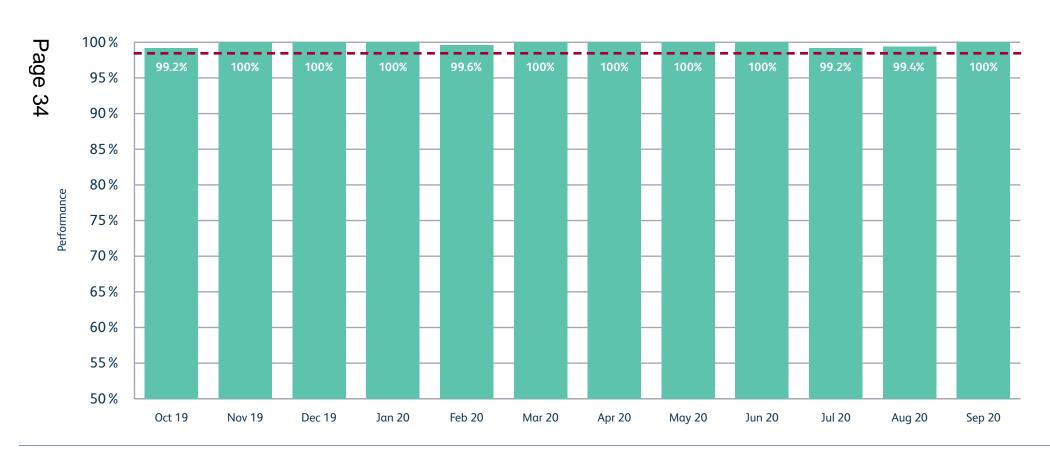
^{*} Received from employer and due to be worked by LPPA in line with SLA ** Awaiting information from employer

Casework Performance Against SLA



PERFORMANCE - ALL CASES

Target (98%) The quarterly SLA performance was 99.56%



Casework Performance Against SLA



QUARTERLY PERFORMANCE STANDARD

Page

Target Total SLA target 92% 93% 94% 95% 96% 97% 98% 99% 100% (working days) Processed New starters 3 210 100% Transfer In 100% 84 4 98.9% Transfer Out 92 5 Estimate – Individual 113 99.1% 5 **Deferred Benefits** 227 100% 4 117 98.3% Deaths 10 Retirements (immediate) 51 100% 5 Retirements (deferred) 73 100% 5 Refunds 99% 4 102 Estimates – Employer 5 22 100% 98.7% Correspondence 5 77 Aggregation 145 100% 30 Other (see Definitions – page 3) 265 99.6%

Casework Performance Against SLA



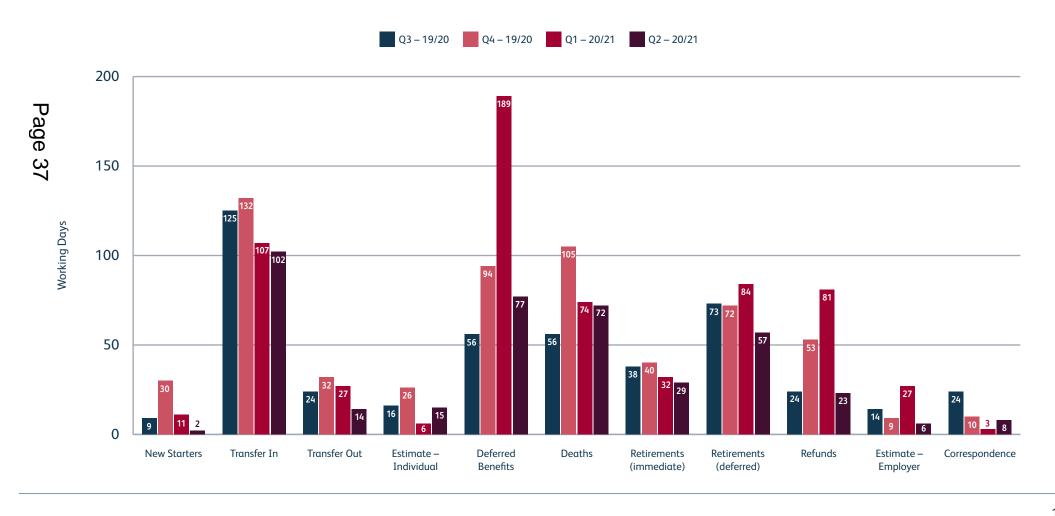
ONGOING CASEWORK AT THE END OF THE REPORTING QUARTER

	Brought Forward	Completed	Received	Outstanding
New Starters	2	210	258	50
Transfer In	112	84	74	102
Transfer Out	24	92	84	16
Estimate - Individual	19	113	107	13
Deferred Benefits	102	227	193	68
Deaths	113	117	170	166
Retirements (Immediate)	24	51	59	32
Retirements (Deferred)	87	73	97	111
Refunds	25	102	98	21
Estimates - Employer	5	22	20	3
Correspondence	14	77	74	11
Aggregation	169	145	103	127
Other (see Definitions – page 3)	39	265	352	126

Elapsed Times



ELAPSED DAYS BY QUARTER



Elapsed Times (Retirements)



DEFERRED INTO PAYMENT

Page 38

REASONS ON HOLD





	Employer	Member	Other	Total
Oct 19	6.4	16.3	0.3	23.0
Nov 19	6.2	20.4	1.4	28.0
Dec 19	9.0	40.0	0.0	49.0
Jan 20	8.6	35.9	4.6	49.1
Feb 20	2.7	34.8	0.5	38.0
Mar 20	3.8	17.2	0.0	21.0
Apr 20	2.9	35.1	0.0	38.0
May 20	1.5	49.5	0.0	51.0
Jun 20	1.4	53.7	1.9	57.0
Jul 20	0.7	30.2	1.1	32.0
Aug 20	2.4	44.3	0.3	47.0
Sep 20	3.4	27.8	4.8	36.0

Elapsed Times (Retirements)



ACTIVE INTO PAYMENT

Total Elapsed Working Days

REASONS ON HOLD





	Employer	Member	Other	Total
Oct 19	7.9	22.1	0.0	30.0
Nov 19	5.8	12.2	2.0	20.0
Dec 19	9.3	8.7	1.0	19.0
Jan 20	8.0	30.0	0.0	38.0
Feb 20	5.2	12.7	2.1	20.0
Mar 20	1.8	13.2	0.0	15.0
Apr 20	12.0	24.0	0.0	36.0
May 20	25.5	24.7	4.8	55.0
Jun 20	11.0	10.0	0.0	21.0
Jul 20	1.9	26.1	0.0	28.0
Aug 20	10.8	7.2	0.0	18.0
Sep 20	7.6	7.6	3.8	19.0

Helpdesk Performance - Calls



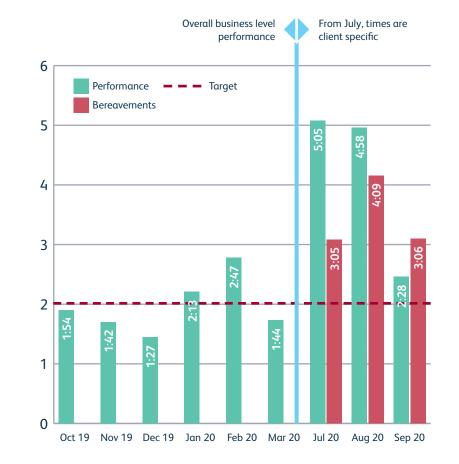
AVERAGE WAIT TIME

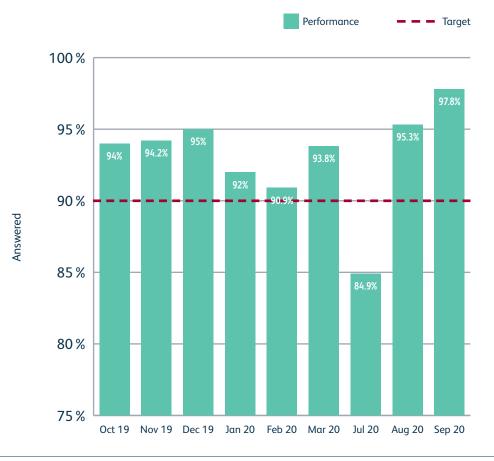
CALLS ANSWERED

The Helpdesk deals with all call and e-mail enquiries from both members and employers for all funds that LPPA provide administration services for. 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.

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Minutes





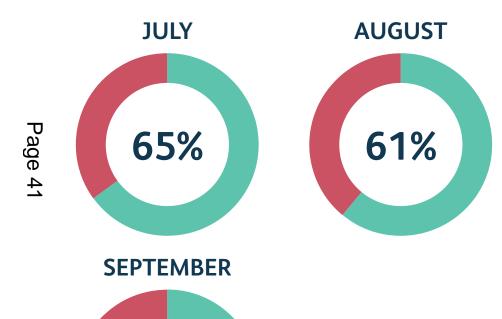
Helpdesk Performance - Calls



RESOLUTION RATE

59%

(TARGET 75%)



WHAT DO MEMBERS & EMPLOYERS CALL ABOUT?

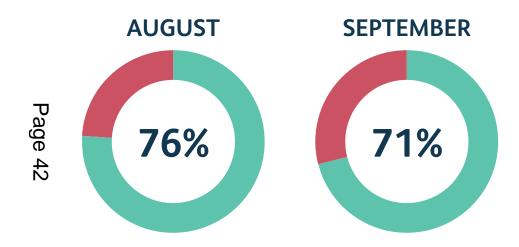
	JUL 20	AUG 20	SEP 20
ABS	2	5	6
Annual Allowance	0	0	0
AVC / APC	0	2	1
Bereavement	21	19	16
Deferred	5	7	2
Divorce	14	21	13
Estimate	37	39	46
Life Certificates	0	0	0
McCloud	0	0	0
Online	20	14	10
P60	3	5	4
Payslip	11	12	14
PI	0	5	0
Refund	13	22	13
Retirement	138	88	134
Transfer	40	53	52
Update Details	0	5	7

Helpdesk Performance - Emails



RESOLUTION RATE

(TARGET 75%)



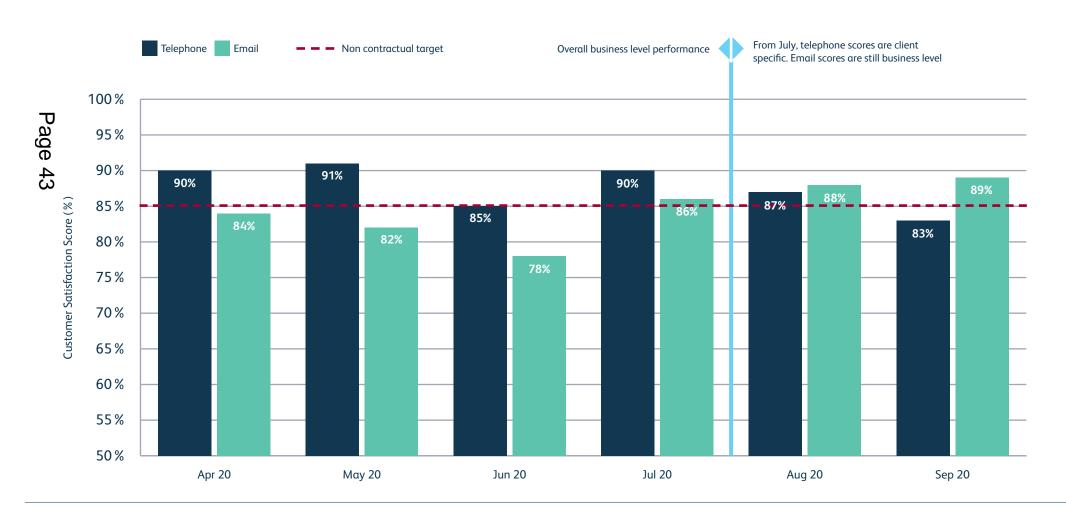
WHAT DO MEMBERS & EMPLOYERS EMAIL ABOUT?

	AUG 20		
ABS	6	6	
Annual Allowance	0	0	
AVC / APC	4	2	
Bereavement	10	21	
Deferred	3	3	
Divorce	1	14	
Estimate	22	33	
Life Certificates	1	0	
McCloud	0	0	
Online	12	16	
P60	1	0	
Payslip	4	8	
PI	0	0	
Refund	5	9	
Retirement	31	43	
Transfer	34	63	
Update Details	20	20	

Customer Satisfaction Scores



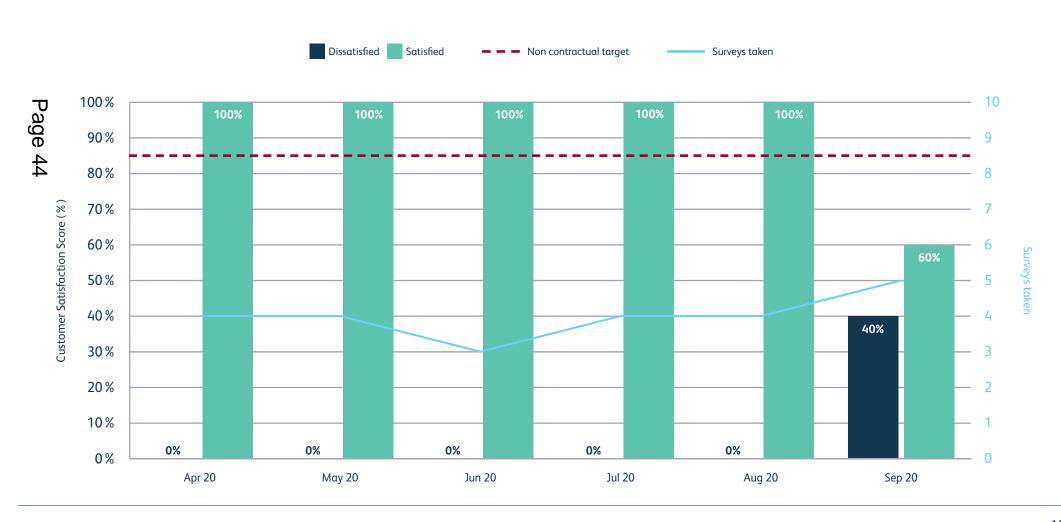
HELPDESK SATISFACTION



Customer Satisfaction Scores



RETIREMENTS



My Pension Online



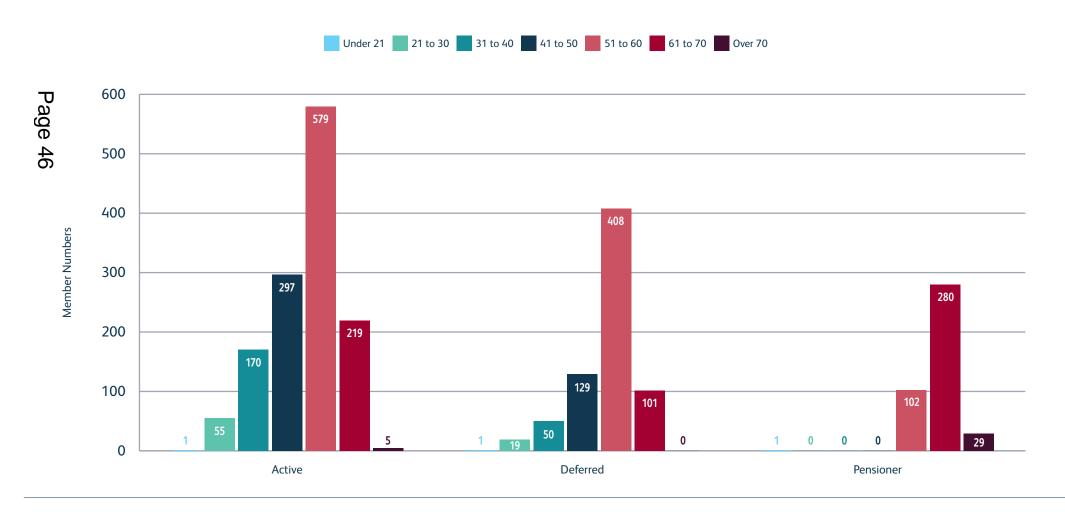
MEMBERS REGISTERED



My Pension Online



AGE DEMOGRAPHIC



Service Improvements



DELIVERED

1	Bereavement survey launched				
2	New Engagement and Communication team in place				
3	In-house bulk email solution procured				
4 Mortality tracing and address screening launched through Targ					
5	Member Communications Plan (updated and issued to Clients)				
6	Covid-19 impact analysis and service measures (Q1 Client pack)				
7	Website content review and rewrite (detailed pension processes)				
8	23% of Member letters reviewed				
9	New format Quarterly Client reports (Q1) rolled out				
10	Online Client Forum delivered to 22 attendees				
11	Voice analytics launched through new telephony system (to improve call quality monitoring)				
12	Employer meetings and training sessions delivered remotely				

SCHEDULED

1	Launch of single website for all Members and Employers		
2	Q2 Covid-19 impact analysis and service measures (update to clients)		
3	Ongoing remote Employer training and workshops (delivered through MS Teams)		
4	Member surveys to launch (estimates and transfers)		
5	'Livechat' launch and available on the new website		
6	DocuSign implementation to improve elapsed times		
7	Bulk email activity to Members and Employers planned: a. New website launch b. MPO registration and ongoing engagement c. Increase Member Death Nominations		

Member Contact Data



EMAIL ADDRESSES

		Q3 – 19/20	Q4 – 19/20	Q1 – 20/21	Q2 – 20/21
כ כ	Active Contributors	3,225 (46.74%)	2,951 (45.2%)	2,894 (45.18%)	2,942 (46.39%)
)	Deferred Beneficiaries	1,722 (28.39%)	1,878 (33.21%)	1,655 (28.95%)	1,699 (29.7%)
2	Pensioner and Dependants	1,131 (17.13%)	1,129 (17.61%)	1,167 (18.26%)	1,229 (19.15%)

TELEPHONE NUMBERS

	Q3 – 19/20	Q4 – 19/20	Q1 – 20/21	Q2 – 20/21
Active Contributors	-	1,227 (18.79%)	1,201 (18.75%)	1,182 (18.64%)
Deferred Beneficiaries	-	1,117 (16.34%)	930 (13.54%)	962 (14.08%)
Pensioner and Dependants	-	1,007 (15.71%)	1,017 (15.92%)	1,039 (16.19%)

Member Contact Data



DEATH NOMINATION

	Q3 – 19/20	Q4 – 19/20	Q1 – 20/21	Q2 – 20/21
Active Contributors	-	-	2,487 (38.82%)	2,481 (39.12%)

E-COMMUNICATIONS OPT-OUT

	Q3 – 19/20	Q4 – 19/20	Q1 – 20/21	Q2 – 20/21
Active Contributors	104 (1.51%)	100 (1.53%)	93 (1.45%)	91 (1.43%)
Deferred Beneficiaries	94 (1.28%)	101 (1.48%)	104 (1.51%)	101 (1.48%)
Pensioner and Dependants	44 (0.67%)	47 (0.73%)	51 (0.80%)	56 (0.87%)

Engagement Activity (Employer & Scheme Member)



EMAILS

	Date	Message / Campaign	Employer / Member	Action
	17 July 2020	MPO Campaign	Employer	Launching the MPO campaign with tools for employers
,	19 August 2020	ABS Employer email	Employer	Advising employers that ABSs were live
ונו	27 August 2020	YourFund User Guide	Employer	Directing employers to the YourFund guide
י ר	1 September 2020	LGA Bitesize training	Employer	Directing employers to the LGA bitesize training
)	15 September 2020	McCloud data collection	Employer	Key information about data collection in association with the McCloud judgement

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Data Quality (TPR scores)



COMMON DATA

Data Item	Active	Deferred	Pensioner / Dependant
NI Number	1	6	31
Surname	0	0	0
Forename / Initials	0	0	0
Sex	0	0	0
Date of Birth	0	0	0
Date started pensionable service / Policy / Contributions	0	0	1
Expected retirement / maturity / target retirement date	0	0	0
Membership status	0	0	0
Last event status	0	0	0
Address	13	442	79
Postcode	16	458	158
Total fails	30	906	269
Individual fails	16	458	158
Total members	6,342	6,833	6,418
Accuracy rate	99.7%	93.3%	97.5%

Total accuracy rate 96.6%

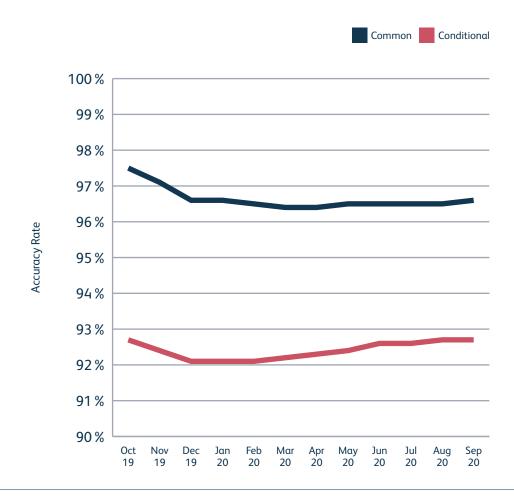
Data Quality (TPR scores)



CONDITIONAL DATA

	Data Item	Fails
	Divorce records	0
	Transfer In	17
	AVC's / Additional Contributions	1
П	Deferred Benefits	0
Page	Tranches (DB)	464
ge	Gross Pension (Pensioners)	0
52	Tranches (Pensioners)	34
N	Gross Pension (Dependants)	2
	Tranches (Dependants)	0
	Date of leaving	4
	Date Joined Scheme	1
	Employer Details	2
	Salary	125
	Crystallisation	40
	Annual Allowance	173
	LTA Factors	0
	Date Contracted Out	51
	Pre-88 GMP	149
	Post-88 GMP	441
	Total fails	1,504
	Individual fails	1,424
	Total members	19,593
	Total accuracy rate	92.7%

COMMON & CONDITIONAL ACCURACY RATE





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Data Improvement Plan - London Borough of Havering Pension Fund

ctivity	Action	Owner	Priority	Timescale	Outcome/Objectives	Progress	Comments
Data Improvement Plan implementation					Data improvement plan updated and passed for		
Data improvement Fian implementation	Agree LPP input into Data Improvement plan	Havering Contract Manager	1	Feb-21	final sign off		
ar end							
	Liaise with participating employers to confirm year-end data				All employers receive bespoke EOY template and		
	requirements	LPPA			have access to Your Fund		
		LPPA and Havering PF	-		Training given where required		
	Provide training to participating employers where necessary	LPPA and Havering PF	-	Mar-22	responsibilities and the data requirements of the		
Activities associated with annual "year-end"	Factors all constraints in annulad action administration at the	LPPA			Year end posting is complete and update provided		
ormal valuation exercise, annual benefit production	Ensure all year-end posting is carried out in administration system	LPPA	-	1	to Havering PF Validation work completed and update provided to		+
and issue of pension savings statements	Run year-end validations through administration system	LPPA			Havering PF		
and issue of pension savings statements	Clear errors - liaising directly with participating employers where	LITA	+	,	Tid Verinig 11		
	necessary	LPPA		3	Errors cleared and update provided to Havering PF		
	Space for additional items identified following discussion with LPP	2177					
		Havering Contract Manager			Progress to be reported at each relevant meeting		
lucation							
deation	Continually develop administration staff, to include awareness of the				Receive assurances from LPPA that appropriate		
	importance of data quality	LPPA		Apr 21	training plans are in place		Can be added to client meeting agendas
			<u> </u>				Can be added to client meeting agendas
Areas of improvement that would be beneficial		LPPA	 		Employer training plan put in place		+
	Ensure delivery of training, where required	LPPA and Havering PF	1	Sep-21	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		
nnual Data Audit							
					Receive assurances from LPPa that the service		
	Report on new Target Tracing and Mortality screening	LPPA		Sen-21	received is effective and value for money		
ŀ					,		
	Undertake regular checks to ensure all contact details are present and				Work completed and update provided to Havering		
	correct: address, email and telephone number and update as required	I PPA		lun-21	PF as part of quarterly reporting		
	Ensure appropriate use of the LGPS "NI Database" to ensure correct						
I,	payment of death grants	LPPA	1	Mar-22	Assurances provided by LPPA		Included in the annual administration repor
Regular activities available to ensure quality and	Routinely check the NI Database as part of day-to-day administration						
timliness of data received in relation to scheme	and action as appropriate	LPPA		Mar-22	Assurances provided by LPPA		Included in the annual administration report
members from external agencies and sources	Ensure appropriate use of the DWP "Tell us Once" service, to ensure				·		
	timely notification of scheme member deaths, where appropriate	LPPA	1 :	Mar-22	Assurances provided by LPPA		Included in the annual administration report
	Undertake regular data mortality screening against the national death						i i
	register as administered by the General Register Office + take action						
	where unreported deaths are identified	LPPA and Havering PF		Mar-22	Complete work as noted in 'action' comments		Included in the annual administration report
	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		
ata Accuracy							
•							
	Arrange for running of valuation extracts from administration system	LPPA		Aug-21	Complete work as noted in 'action' comments		
no de la confederation de finales de la linea.	Upload on to Data Portal	LPPA and Havering PF			Complete work as noted in 'action' comments		
Regular run of data through Fund Actuary's "Data Portal" as a means of checking accuracy of member	Analyse critcal errors and warnings + undertake data correction	-					
lata - part of regular inter-valuation data monitoring	activities in administration system where required	LPPA and Havering PF		Aug-21	Complete work as noted in 'action' comments		
ata - part or regular inter-valuation data monitoring	Re-run reports and upload to Data Portal to confirm corrections	LPPA and Havering PF		Aug-21	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		
ployer engagement							
	No less than annual data reconciliation exercise - providing copy of						
	common data items for active members held on administration				To identify discrepancies within the member		
	system	LPPA		once year end 2021 is finalised	common data items, missing joiners/leavers, etc.		
	Ensuring monthly employee and employer contribution returns are						
	received within required timescales	Havering PF	<u> </u>	ongoing monthly	Monthly monitoring task		<u> </u>
		Havering PF		ongoing monthly	Monthly monitoring task		
Actions to link data held by Fund with that of	Escalting persistent offenders to the Administering Authority and				Escalated cases are progresesed and actively		
participating scheme employers	seeking to resolve persistent failure, utilising legal services where		1		monitored. Outcome is high engagement with		1
		Havering PF	<u> </u>	ongoing monthly	Scheme employer	<u> </u>	<u> </u>
	Undertake monthly reconciliation of employee and employer						
	contributions and the supporting member summaries provided by		1				1
		Havering PF	1 :	ongoing monthly	Monthly monitoring task		1
	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		
ontinual development of technology							
			1	1	L	į	I
	Continue to seek opportunities to develop appropriate technology to		1		Technology is used to advance, improve and better		

i .							
	Streamline operational processing participating employer and						
Objectives to ensure where technology is used it	administration activities	LPPA and Havering PF	1		Complete work as noted in 'action' comments		
assists in the delivery of consistent and accurate							
member data	Implement monthly reporting, initially to identify any missing starters						
		LPPA and Havering PF	1 1		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		
TOO I .	10 pt 10 p	riavering contract ivianager					
TPR data scoring							
						Undates to proces	s will need to be considered once
	Review scores provided within the LPPA quarterly performance report	Havering PF	1 1	lun-21	Complete work as noted in 'action' comments		fic data specification agreed
Undertaking regular data scoring exercise as part of		LPPA and Havering PF	1		Complete work as noted in 'action' comments	SAB Scheme Speen	ne data specification agreed
TPR annual reporting exercise	Agree plant for tacking any gaps/errors/inconsistencies uncovered	LFFA and navering FF	1	Jul-21	Receive assurances from LPPA that action has been		
	Undertake data correction and report progress	LPPA	1	Jul-21	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							
						I BBA are due to re	-launch the website in November
Undertake a review of Fund website - to ensure	Review site content	Lucia de la Re			Consolists		e carried out following this
content is appropriate for needs of members and their		Havering PF	1		Complete work as noted in 'action' comments	SO CHECKS SHOULD D	ie carried out following trits
beneficiaries		LPPA and Havering PF	1		Complete work as noted in 'action' comments		
Denendaries	Ensure all relevant documents are published to the website	LPPA and Havering PF	1	Apr-21	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		·

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

he scheme manager aligns the various risk registers and will include all risks related to	
ndirectly) within the pension risk register.	
he scheme manager keeps a breach log with details such as actions taken to assess	
s involved in the assessment,	Breach log is now in place
	To be considered keeping in mind the small number of staff that this will apply
	ng authority and escalation points and develop a decision log or similar. We would view it he decision making authority of more junior staff members and escalation points are also Scheme of Delegation in place for senior

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.	Survey Results are included in the quarterly performance reports
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.	Included in communications strategy for both Havering and LPPA

	Complaints and compliments could be analysed to identify changes that can be made to improve the operation		
IDRP	of the fund. You may wish to consider capturing all complaints in one single complaints log to assist with monitoring.		Log to be established
Area of Focus - Cyber Security			LPP to supply client facing documents to
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 has provided accreditation and assurance that policies are in place	provide details of all policies and control 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	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.

The Pension Regulator's and Scheme Advisory Board Compliance Checklist

Date of Current Version: 13/01/2021

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

TI - Internal Dispute Resolution

J - Reporting breaches of the law

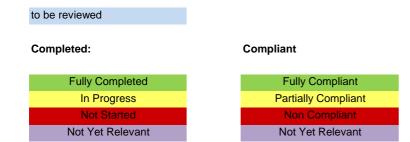
(C) Introduction

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 cot 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.

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 may 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).



Definitions

PSPA134 LGPS

O TPR

TPR CODE Scheme Manager

Scheme Manager

Administering Authority

LBH IDRP SAB PC LPB LPPA MSS

CMS

Public Service Pensions Act 2013 Local Government Pension Scheme

The Pensions Regulator

The Pensions Regulator's Code of Practice No 14 Governance and administration of public service pension schemes

This is the London Borough of Havering
The LGPS specific term for Scheme Manager

The London Borough of Havering Internal Disputes Resolution Procedure The National LGPS Scheme Advisory Board

Pensions Committee Local Pensions Board

Local Pensions Partnership Administration

Member Self Service Case Management System

Summary Dashboard

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

No.	Check	Compliant	Deadline
	•	Reporting Duties	
A1			
A2			
A3			
	K	nowledge and Understanding	
B1			
B2			
B3			
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B6			
B7			
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B12			
		Conflicts of Interest	
C1			
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C11			
		Publishing Information	
D1			
D2			
D3			
D4			
		Risk and Internal Controls	
E1			
E2			
E3			
E4			
E5			
E6			
E7			
E8			
	Mai	ntaining Accurate Member Data	1
F1			
F2			

•			
F3			
F4			
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F6			
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F9			
F10			
F11			
		Maintaining Contributions	
G1			
G2			
G3			
G4			
G5			
G6			
G7			
G8			
G9			
	Providing	Information to Members and C	Others
H1			
H2			
H3			
H4			
H5			
H6			
H7			
H8			
H9			
H10			
H11			
H12			
		Internal Dispute Resolution	
I1			
I2			
13			
14			
15			
16			
17			
18			
19			
		Reporting Breaches	
J1			
J2			
J3			

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	1	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
A1	Is your scheme registered with the Pension Regulator?	1	Yes - the 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?		The scheme return was submitted to TPR with details of all scheme employers.	Annual check	17/11/2020	Fully completed	Fully compliant		
A3	Have you completed this latest Scheme Return in the required timescale?		The scheme return was submitted on 17/11/2020 prior to the deadline of 15/12/2020	Annual check	17/11/2020	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.

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.

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 34

TPR Code Ref 35

TPR Code Ref 36

No.	TPR Requirement	TPR	London Borough of Havering Approach / Evidence	Frequency of	Last Review	Check	Compliant	Notes	Action
		Code Ref		Review	Date	Completed			
B1	Are there policies and arrangements in place to support pension board members in acquiring and retaining knowledge and understanding?		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 register is maintained throughout the year detailed in the annual report.		31/03/2020	Fully completed	Fully compliant		Once the Good Governance Guide has been finalised and formally adopted, the training strategy will be revised to cover all areas within the recommendations. The timetable will depend on the capacity within MHCLG and other LGPS stakeholders to progress to implementation of the proposals and consult on formal guidance given their other current priorities.
B2	Has a person been designated to take responsibility for ensuring the framework is developed and implemented?		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		

B	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.	Do Board Members wish to comment here? Would it be useful to review the self assessment (See B10)?
B	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 and are provided to new members on appointment.	Annual check	31/08/2020	Fully completed	Fully compliant		Documentation to be published to the new havering.gov pensions web pages
B	Are pension board members aware of their legal responsibility in terms of Knowledge and Understanding?	50	This is detailed in Terms of Reference which is provided to each member on appointment to the Board. The Training Strategy also outlines the legal requirements relating to knowledge and skills.	Ongoing		Fully completed	Fully compliant		Do Board Members wish to comment here?
В	Have all pension board members got access to copies of the scheme rules and relevant Fund documentation?	40	Scheme Regulations are available on the Igpsregs.org website. All key fund documentation is also available to view on the havering.gov pensions web pages	Ongoing		Fully completed	Fully compliant		Documentation to be published to the new havering.gov pensions web pages
Page 6	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.	As and when required but at least annually	31/08/2020	Fully completed	Fully compliant		Revised list to be circulated
34 B	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		Do Board Members wish to comment here?
B	Does the Fund offer pre- appointment training for new pension board members or mentoring by existing members?	56	Pre-appointment training and mentoring has not been offered, but potential members are invited to discuss the roles and referred to the website where the roles and responsibilities are set out. Induction courses are designed to meet the needs of new members	As and when required		Fully completed	Fully compliant		
В	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.	Annual check	30/11/2017	Fully completed	Fully compliant		A review of the self assessment should be undertaken. Do Board Members wish to comment here?
В	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		

E	12 Have the p	ension board members 59	9	The modules within the Pensions Regulator online toolkit	Annual check	31/03/2020	In progress	Partially	There is generic training available
	completed	the Pension		are available to Board Members and completed courses				compliant	for trustees plus additional training
	Regulator's	toolkit for training on		have been recorded in the training log. In addition, to					specific to public service schemes
	the Code of	f Practice number 14?		the COP14 training, general online training is also					and the COP14. Links to be
				available via the Pensions Regulator					provided
				·					

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	7,100	TPR Code Ref		Frequency of Review	Date	Completed	Compliant	Action
Pa	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.gov pensions web pages.	Annual	31/12/2020	Fully completed	Fully compliant	Documentation to be published to the new havering gov pensions web pages
Page 65	Do pension board members have a clear understanding of their role the circumstances in which they may have a conflict of interest an how to manage potential conflicts?	,	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.	Ongoing		Fully completed	Fully compliant	Do Board Members wish to comment here? Some training is outstanding (see B12)
C	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	
C2	Does the appointment process fo pension board members require disclosure of interests and responsibilities which could become conflicts of interest?	r 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 have been received 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). Conflicts of interest is a standing item on all Board agends	Ongoing		Fully completed	Fully compliant	
C	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	

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. Declaration of interest is a standing item on the LPB agenda and wheh a conflict arises, this will be disclosed and recorded in a Pension Board conflicts register. There is no requirement for Board Members to publish their declarations of interest on the Council website			Fully completed	Fully compliant		
C7	Is appropriate information included in the register?	84	The Local Pension Board register is based on the Pensions Regulator template and has all required information	Annual	31/12/2020	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		

ປ ຜ ເວ ຫ D - Publishing information about schemes

Conclusion 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.

The information must include:

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	London Borough of Havering Approach / Evidence	Frequency of	Last Review	Check	Compliant	Notes	Action
		Code		Review	Date	Completed			
		Ref							
D1	Does the Administering Authority publish information about the pension board?		The havering.gov website provide information relating the LPB Members	As and when required		In progress	Partially compliant		Following the removal of any fund specific documents from the LPPA pension fund members website, new pages are being built within the main Havering website to accommodate the Local Pension Board information
D2	Does the Administering Authority publish other useful related information about the pension board?		The Havering website provides the names, contact details and biographies of the LPB 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.			In progress	Partially compliant		As D1

TPR Code Ref 92

TPR Code Ref 93

D3	Is all the information about the	98	All the information currently held on the website is up to	As and when	In progress	Partially	As D1
	Pension Board kept up to date?		date.	required		compliant	
D4	Does the Administering Authority	97	All papers are pubic and published on the Havering	As and when	Fully completed	Fully compliant	
	publish information about pension		website, however some items may be restricted.	required			
	board business?						
I				l			

E - Managing risk and internal controls

Legal Requirements

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

TPR Code Ref 101

Internal controls are defined in the legislation as:

TPR Code Ref 102

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

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

No	TPR Requirement	TPR Code Ref	London Borough of Havering Approach/ Evidence		Last Review Date	Check Completed	Compliant	Notes	Action
Page 67	Is there an agreed process for identifying and recording scheme risks?		identify all risks to the Fund and to consider the position both in aggregate and at an individual risk level. The Administering Authority monitors the potential risks to the Fund, and will take appropriate action to mitigate the impact of these on the fund wherever possible. Risks are identified and assessed in line with the Authority's risk management process, with risks being identified within Service Plans. Internal Controls operate in the day to day activities that fall under the administration and management of the scheme. Internal controls of the scheme assets include monitoring these quarterly and presenting formal reports to the Pensions Committee and risk is addressed as part of the quarterly monitoring processes. Risk implications are a standard inclusion in reports to the Pensions Committee and the Local Pension Board. LPPA have recruited a Head of Rish and Comliance and provide a monthly risk and compliance report wich is presented to the Board			In Progress	Partially compliant		To ensure that the LPPA Annual Assurance Report provides the evidence required to have confidence in their approach to risk
E2	Does the Fund have an adequate process to evaluate risks and establish internal controls?	107	The Pension Fund Manager (Onesource Pensions and Treasury) has produced a risk register to include, initially, 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. A traffic light system is used 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. New risks may be detected and the traffic light system be updated where action has been taken to reduce a risk. The Risk Register is a living document and a standing item on the Local Pension Board agenda.	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.

E		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.	Annual check	12/01/2020	Fully completed	Fully compliant	2021	process of compiling an employer level risk register to assess the employers in the LBH Fund Is this in place?
E		Does the Administering Authority review the effectiveness of the risk management and internal control systems of the Fund?	111	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	12/01/2020	In Progress	Partially compliant		To consider having a documented process to meet the requirement of this part of the code
Ē	5	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. Additions to the register are presented to the Board and the Committee are asked to agree the risk register annually	Annual check	12/01/2021	Fully completed	Fully compliant	Risk register reviewed and agreed by Pensions Committee January 2021	
Ē		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 adenda	Ongoing		Fully completed	Fully compliant		
Page 68		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 and has a 2 tier login - Calculations are independently checked - National Fraud Initiative checks - Annual benefit statements request members check their details Payments made via BACS - Triennial valuation identifies data issues which are resolved. Quarterly reconciliation of payments in and out and pension fund strain costs. Not all procedures are documented	Ongoing		In Progress	Partially compliant		To ensure documeted procedures are in place where required and ensure that the LPPA Annual Assurance Report provides the evidence required to satisfy this point
		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 work together to ensure that all internal controls are reflected in the work that LPP undertake although it is recognised that there are good controls in place	Ongoing		In Progress	Partially compliant		To ensure that the LPPA Annual Assurance Report provides the evidence required to have confidence in their approach to this area

F - Administration and Scheme Record Keeping Legal Requirements

Scheme managers must keep records of information relating to:

TPR Code Ref 122

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

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

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:

TPR Code Ref 123

- · 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)

N					Frequency of	Last Review		Compliant	Notes	Action
F	1	Do member records hold the	126	LBH/LPPA use Altair as their administration system. It	Ongoing		Fully completed	Fully compliant		
		information required as defined in		records all member and beneficiary information set out in						
	1	the Record Keeping Regulations		Record Keeping Regulations.						
	į.	and is it accurate?								
ŀ	-	Does the Fund have the	400/	Drive to the hardward work the extreme consequence of the extreme	0		Fully a second stand	Endler and a Const		Danada Adaministration Otrata
		appropriate processes in place so	128/	Prior to the beginning of the scheme year all employers are provided with an updated employee contribution	Ongoing		Fully completed	Fully compliant		Pension Administration Strategy (PAS) to be put in place although
		employers can provide timely and		table and the monthly pay and contribution spreadsheet						not currently mandatory it is
		accurate information?		including guidance for completion.						considered good practice
	ľ	accurate information?		New employers admitted to the pension fund, or anyone						considered good practice
				outsourcing their payroll services, are provided with all						
				relevant information to meet their responsibilities as a						
\mathbf{H}				scheme employer. LPPA have a secure portal for the						
P				submission of all member specific information, new						
g				starter forms, leaver forms, end of year data etc. All						
age 69				employers have an administration responsibility to						
0				ensure the correct users within their organisations have						
9				access to the portal.						
<u> </u>	-		1011					E 11 11 1		5 11 : 11 6:4
			131/	The specific requirements of the record keeping	Ongoing		Fully completed	Fully compliant		Record keeping would benefit from
			132	regulations are adhered to except that employer contributions are not recorded to the member record on						an exercise to reconcile One Oracle payroll to Altair to check for
		required by the Record Keeping Regulations?		Altair as they have no impact on a members benefits.					I .	discrepancies. Initial work has
	ľ	Regulations!		These are recorded at employer level by Pension Fund					I .	started to identify the scope of the
				Accounts and the data can be obtained for all members						project.
				if required.						project.
				A record is kept of all overpayments written off during						
				the financial year and the overpayment write off policy is						
				agreed by Pensions Committee annually						
F		Are records kept of pension board			Ongoing		Fully completed	Fully compliant		
		meetings as required by the		all details are posted on LBH website.						
		Record Keeping Regulations?								
F		•	134		Ongoing		Fully completed	Fully compliant		
		made by the pension board,		meetings						
		outside of meetings as required								
		by the Record Keeping								
L		Regulations?								
F		<u> </u>	135	GDPR allows pension records to be held indefinately	Ongoing		Fully completed	Fully compliant		
	Į:	as they are needed?		and no member records are archived or removed from						
				the systems. There are no remaining paper files, historic						
				files have been scanned onto an electronic system.						
_				•	•					

Г	- 7	Does the Administering Authority	136	There is no formal policy or documented procedure for	Ongoing		In Progress	Partially		To implement a data improvement
l'		have policies and processes to	130	the checks that are carried out, but there is confidence in			iii i iogiess	compliant		plan
		monitor data on an ongoing		the accuracy and completeness of the vast majority of				Compilant		pian
		basis?		data required.						
		basis!		The Common and Conditional data scores are monitored						
				and reported in the quarterly performance reports from LPPA. Other periodic checks include;						
				- Triennial valuation exercise						
				- Biannual National Fraud Initiative exercise carried out						
				to identify deceased members.						
				- Pensioner payslips sent in April/May and October. If a						
				payslip is returned the team then investigates any						
				possible address errors or sends life certificates.						
				- Use of the DWP 'Tell Us Once' system.						
-	-0	Doggatha Administania a Authoritu	400	,	A marrial abasels	24/02/2020	Fully as an lated	Fully seventions		
ľ		, ,	138	,	Annual check	31/03/2020	Fully completed	Fully compliant		
		carry out a data review at least annually?		accurate record keeping.						
		armuany?								
F	- 9	Is a data improvement plan in	141	There is currently no plan in place	Annual check		In Progress	Partially	Data scores have now been	A draft Data Improvement Plan has
		place which is being monitored						compliant	received and are very good.	been written for approval
		with a defined end date?							However a formal data	
									improvement plan needs to be	
									written.	
F	- 10	Are processes and policies in	142	The year end process ensures that scheme data is	Annual check	31/03/2020	Fully completed	Fully compliant		Investigate whether addresses can
		place to reconcile scheme data		reconciled against employer, although this does not						be reconciled with future year end
		with employer data?		currently include postal or email addresses.						data.
F	F11	Do the Administering Authority's	143	The data processes meet the requirements with regard	Ongoing		Fully completed	Fully compliant		
		member data processes meet the	-	to what is held, how it is used and how long it can be						
		requirements of the Data		held for. Information shared securely via encrypted						
		Protection Act		email, password protected documents or secure online						
U		1998 and the data protection		portals.						
Pag		principles?								
\Box				1						

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
Employee	Paid within the prescribed period (19 th day of the month, or 22nd day if	To TPR: Within a reasonable
	paid electronically) or earlier date if required by the scheme regulations	period – 10 working days

Ν	ο.	TPR Requirement	TPR	London Borough of Havering Approach / Evidence	Frequency of	Last Review	Check	Compliant	Notes	Action
G	1	Does the Fund have procedures	150	A comprehensive monitoring spreadsheet is maintained	Ongoing		Fully completed	Fully compliant		
		and processes in place to identify		for each employer with an external payroll to identify late						
		payment failures?		payments. LBH does not currently have any problems						
				with late payments.						

G2		156/ 157	Dates payments are received are recorded based on the information supplied 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.			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 Fusion payroll system on a monthly basis.	Ongoing		Fully completed	Fully compliant	
G4	Are these procedures regularly reviewed to ensure they are effective?		Other than via internal and external audit (which should identify areas for concern), the processes are not regularly reviewed. There are relatively few employers in the Fund and a good relationship exists with them, so the risk of deliberate underpayment or fraudulent behaviour is considered to be minor.	As and when required	31/12/2020	Fully completed	Fully compliant	
Page 71	Do the Administering Authority's processes include managing overdue contributions in line with TPR's suggested approach?	163	A formal procedure is in place and the Charging Policy has been updated to cover this. The Charging Policy was presented to Committee for noting in December 2018 with approval being given by the Section 151 officer.	As and when required		Fully completed	Fully compliant	
G6	Does the Fund maintain a record of any investigations and communications with employers?	170	Although there are currently no identified concerns or investgations a register has been created and is stored with the monthly monitoring spreadsheet	Ongoing		Fully completed	Fully compliant	
G7	Do employers provide sufficient information to monitor contributions and is this in accordance with the LGPS regulations?	164	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. A procedure note is in place and the Chargin Policy has been updated to cover this.	As and when required		Fully completed	Fully compliant	
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.	Annual check	31/03/2020	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 Requirement London Borough of Havering Approach / Evidence Check Frequency of Last Review Compliant Notes Action Code Review Date Completed Ref Has an annual benefit statement 188 Active and deferred benefit statements were issued by Annual check 31/08/2020 Fully completed Fully compliant been provided to all active 31st August 2020. There were a few that were not members within the required issued due to having queries on the record. timescales? H2 Do these meet the legal 188 The statements used, when read in conjunction with the Annual check 31/08/2020 Fully completed Fully compliant requirements in relation to covering letter, do provide all the required information. format? Has a benefit statement been Deferred Benefits Statements and Pension Credit Annual check 31/08/2020 Fully completed Fully compliant provided to all active, deferred Statements are produced annually as part of the year and pension credit members who end process (ie members do not need to request a have requested one within the statement). required timescales? The statements currently include all information required Annual check Does this meet the legal 31/08/2020 In Progress partially To speak to LPP under the Disclosure Regulations, apart from the method requirements in relation to compliant format? of calculation. Has an annual benefit statement 194 The statements are sent directly to the members by the Annual check 31/08/2020 Fully completed Fully compliant Providers have confirmed that AVC providers. been provided to all members they are compliant with this point. with AVCs within the required timescales? Do these meet the legal 30/11/2018 195 Providers have confirmed that they are compliant with Fully completed Fully compliant requirements in relation to this point. All relevant scheme information is available on the LPPA Ongoing Is basic scheme information 200 Fully completed Fully compliant provided to all new and Pension Website for all new and prospective members prospective members within the to view at any time. LPPA write to all new scheme required timescales? members within 3 working days of receiving the joiner information from an employer. There are a few instances when the Disclosure Regulation timeframes are not met due to late notification by an employer. Does this meet the legal 200 All scheme information is available on the Havering Need to be reviewed following the Ongoing n Progress partially pensions website. There is a guide to the scheme which release of the new LPPA website requirements in relation to compliant format? provides the required information other than: The statement regarding whether a charge may be made - although no charges are applied to LGPS benefits There are other guides and factsheets, including the IDRP leaflet. Is all other information provided in 201 It is not possible to confirm whether disclosure A guery has been raised with LPP to Ongoing n Progress partially timescales are being met in all cases as the reporting is accordance with the legal compliant see whether more automated not available. Disclosure timescales are reviewed by the timescales? reporting can be implemented Pensions Projects and Contracts Manager as part of the monthly monitoring of cases.

TPR Code Ref 187

Page 72

F	provided electronically (i.e. instead of any hard copy) does it comply with the legal requirements?	203	Disclosure requirements were met and members have the opportunity to elect to receive a paper copy. Initial contact with new members is via mail and recommends signing up to the Member Self Service (MSS) facility to be able to access future statements. Hard copies of documents can be provided of intranet material if required. Correspondence with members via email is carried out at member request.	Ongoing	Fully completed	Fully compliant	Specific information needs to be given regarding online ABS at joiner/leaver events - to be raised with LPP
F	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	Both Havering as the Administrating Authority and LPPA have robust communication strategies to ensure sound engagement with members and other stakeholders. The use of MSS is actively promoted by both Havering and LPPA. Communications are kept as clear as possible and always include contact details for further clarification.	Ongoing	Fully completed	Fully compliant	
F	Does the Administering Authority use a tracing service?	208	LPPA have engaged Target Professional Services to provide address tracing and mortality screening for all clients	Ongoing	Fully completed	Fully compliant	

I - Internal Dispute Resolution Legal requirements

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

TPR Code Ref 215

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

The Act also states that the procedure must include: TPR Code Ref 218

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

The procedure may require people with an interest in the scheme to first refer matters in dispute to a 'specified person' in order for that person to consider and give their decision on those

matters. This decision may then be confirmed or replaced by the decision taken by the scheme manager after reconsideration of the matters. However, legislation provides flexibility for scheme managers to decide the details of these.

No.	TPR Requirement	TPR	London Borough of Havering Approach / Evidence	Frequency of	Last Review	Check	Compliant	Notes	Action
I 1	Has the Administering Authority put in place an internal dispute resolution procedure?		There is a formal process in place. This is documented in the IDRP factsheet which is available from the pensions team or on the Havering 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		
12	Does the Administering Authority's process highlight or consider whether a dispute is	214	Exempt disputes are covered in the IDRP factsheet	Annual check	31/08/2020	Fully completed	Fully compliant		

TPR Code Ref 213

TPR Code Ref 216

13	2	Does the information made	224	The IDRP Factsheet includes all specified information	Annual check	31/08/2020	Fully completed	Fully compliant	
10		available to applicants about the	224	along with a form for the person with an interest in the	Alliuai check	31/00/2020	i ully completed	i uny compilant	
		procedure clearly state the		scheme to complete.					
		procedure and process to apply		continue to complete.					
		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?							
<u> </u>								D (* 11	111111111111111111111111111111111111111
14		Has the Administering Authority			Ongoing		In Progress	Partially	Liaise with employers to agree a
		ensured that employers who		stage 1 IDRP adjudicator details along with their scheme				compliant	stage 1 process (which could be
		make first stage decisions also		discretions, available on the pension scheme website.					use of the LBH stage 1 appointed
		have IDRP in place?		This has not been followed up with all employers					person).
15		Are the timescales in the	228	LPPA has a dedicated complaints team which assist in	As and when		Fully completed	Fully compliant	Havering would benefit from have a
		procedure adhered to including		the monitoring of IDRP timescales	required				central register of IDRP cases as
		sending an acknowledgment on							and when they arise in the future
		receipt of an application?							
16	3	Does the Administering Authority	235	There is a paragraph in all standard letters for	Ongoing		Fully completed	Fully compliant	
		notify and advertise the procedure		notification of benefits and new starters. The guide is					
		appropriately?		also on the Havering Pensions website					
17		A ve the patification veguine manate	238	The TDAC and Ombudences details are presided at the	Ammunal aharak	31/08/2020	Fully as well at a d	Fully sometimes	
17		Are the notification requirements in relation to TPAS and the	238	· ·	Annual check	31/08/2020	Fully completed	Fully compliant	
ď		Pensions Ombudsman being		required stages					
9		adhered to?							
Page			234	No formal reporting as such is in place I DI I have your	As and when		Fully as well at a d	Fully sometimes	Have sing a vegetelel be a politification become
74		Does the Administering Authority regularly assess the effectiveness	Z3 4	No formal reporting as such is in place. LBH have very few IDRP cases they are almost exclusively Tier 3 III	required		Fully completed	Fully compliant	Havering would benefit from have a central register of IDRP cases as
4		of its arrangements?		health cases.	required				and when they arise in the future
		ioi iis arrangements?		Health Cases.					and when they arise in the luture
IS		Does the Administering Authority	234	No formal reporting as such is in place. Our employers	As and when		Fully completed	Fully compliant	Havering would benefit from have a
		regularly assess the effectiveness		have very few IDRP cases they are almost exclusively	required				central register of IDRP cases as
		where employers carry out a		Tier 3 III health cases.					and when they arise in the future
		stage one							
		process?							

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:

- · 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:

- 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

TPR Code Ref 241

TPR Code Ref 242

No.	TPR Requirement	TPR	London Borough of Havering Approach / Evidence	Frequency of	Last Review	Completed	Compliant	Notes	Action
Page 75		244	The reporting arrangements are published in on the Havering Pension website		21/11/2017	In Progress	Partially Compliant		Staff may benefit from an update/reminder
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. Administration breaches are reported by LPPA on a monthly basis and a register is kept by Havering	Annual check	31/12/2020	In Progress	Partially Compliant		
J3	Are breaches being recorded in accordance with the agreed procedures?	246	As above (J2). The named officer for reporting issues to within Havering is currently the Section 151 Officer. A register is maintained to record breaches even if they are not reported to the Pensions Regulator.	Annual check	31/12/2020	Fully completed	Fully compliant		

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LPP Local Pensions Partnership



Havering Pension Fund

Employer Performance

Missing Leavers Forms

Rank	Employer No	Employer Name	Missing forms	# of Actives
1	HV10500	L.B.OF HAVERING	71	4,588 (1.5%)
2	HV10559	HARROW LODGE PRIMARY SCHOOL	21	58 (36.2%)
3	HV10529	THE ALBANY SCHOOL	20	59 (33.9%)
4	HV10550	CONCORDIA ACADEMY	7	13 (53.8%)
5	HV10545	DRAPERS MAYLANDS	6	22 (27.3%)
6	HV10542	PYRGO PRIORY PRIMARY SCHOOL	5	71 (7%)
7	HV10543	DYCORTS SCHOOL	5	69 (7.2%)
8	HV10547	DRAPERS BROOKSIDE INFANTS	5	36 (13.9%)
9	HV10524	ST EDWARDS SNR ACADEMY	4	38 (10.5%)
10	HV10546	RAVENSBOURNE ACADEMY	4	61 (6.6%)

Rank	Employer No	Employer Name	% of actives	# of Actives
1	HV10505	HAVERING COLLEGE FHE	100%	2
2	HV10550	CONCORDIA ACADEMY	54%	13
3	HV10559	HARROW LODGE PRIMARY SCHOOL	36%	58
4	HV10529	THE ALBANY SCHOOL	34%	59
5	HV10565	LEWIS AND GRAVES PARTNR LTD	33%	6
6	HV10545	DRAPERS MAYLANDS	27%	22
7	HV10515	SLM FITNESS AND HEALTH LTD	25%	4
8	HV10568	DRAPERS MAT	20%	5
9	HV10561	GAYNES ACADEMY	16%	19
10	HV10547	DRAPERS BROOKSIDE INFANTS	14%	36

Active MPO users

Rank	Employer No	Employer Name	MPO User	# of Actives
1	HV10500	L.B.OF HAVERING	1,003	4,588 (21.9%)
2	HV10523	HALL MEAD SCHOOL	28	85 (32.9%)
3	HV10522	CAMPION SCHOOL	20	73 (27.4%)
4	HV10503	FRANCES BARDSLEY ACADEMY	16	72 (22.2%)
5	HV10546	RAVENSBOURNE ACADEMY	16	61 (26.2%)
6	HV10516	SLM COMMUNITY LEISURE C T	15	41 (36.6%)
7	HV10506	COOPERS COBORN	14	47 (29.8%)
80	HV10529	THE ALBANY SCHOOL	13	59 (22%)
இ	HV10535	LANGTONS JUNIOR ACADEMY	12	35 (34.3%)
(Q)	HV10533	BOWER PARK ACADEMY	11	49 (22.4%)
Œ				

Rank	Employer No	Employer Name	% of actives	# of Actives
1	HV10568	DRAPERS MAT	80%	5
2	HV10571	CATERLINK (FRACES BARDSLEY)	60%	5
3	HV10560	HARRISON CATERING	50%	2
4	HV10554	ACCENT CATERING	40%	5
5	HV10516	SLM COMMUNITY LEISURE C T	37%	41
6	HV10535	LANGTONS JUNIOR ACADEMY	34%	35
7	HV10551	OLIVE ACADEMY TRUST	33%	6
8	HV10523	HALL MEAD SCHOOL	33%	85
9	HV10506	COOPERS COBORN	30%	47
10	HV10549	BENHURST PRIMARY SCHOOL	28%	25

Altair Data - Active members only

∞	
Rank	I

Rank	Employer No	Employer Name	Missing E-mails	# of Actives
1	HV10500	L.B.OF HAVERING	2,388	4,588 (52%)
2	HV10542	PYRGO PRIORY PRIMARY SCHOOL	58	71 (81.7%)
3	HV10523	HALL MEAD SCHOOL	52	85 (61.2%)
4	HV10522	CAMPION SCHOOL	50	73 (68.5%)
5	HV10562	HACTON ACADEMY	43	61 (70.5%)
6	HV10521	THE BRITTONS ACADEMY	42	65 (64.6%)
7	HV10525	EMERSON PARK SCHOOL	42	54 (77.8%)
8	HV10526	REDDEN COURT SCHOOL	41	57 (71.9%)
9	HV10529	THE ALBANY SCHOOL	41	59 (69.5%)
10	HV10533	BOWER PARK ACADEMY	37	49 (75.5%)

Rank	Employer No	Employer Name	Missing Nom Form	# of Actives
1	HV10500	L.B.OF HAVERING	1,829	4,588 (39.9%)
2	HV10523	HALL MEAD SCHOOL	42	85 (49.4%)
3	HV10503	FRANCES BARDSLEY ACADEMY	39	72 (54.2%)
4	HV10521	THE BRITTONS ACADEMY	33	65 (50.8%)
5	HV10522	CAMPION SCHOOL	29	73 (39.7%)
6	HV10506	COOPERS COBORN	27	47 (57.4%)
7	HV10542	PYRGO PRIORY PRIMARY SCHOOL	26	71 (36.6%)
8	HV10526	REDDEN COURT SCHOOL	25	57 (43.9%)
9	HV10507	SACRED HEART OF MARY	24	50 (48%)
10	HV10525	EMERSON PARK SCHOOL	22	54 (40.7%)

Rank	Employer No	Employer Name	Missing Address	# of Actives
1	HV10500	L.B.OF HAVERING	10	4,588 (0.2%)
2	HV10522	CAMPION SCHOOL	2	73 (2.7%)
3	HV10523	HALL MEAD SCHOOL	1	85 (1.2%)

Rank	Employer No	Employer Name	Missing Tel No.	# of Actives
1	HV10500	L.B.OF HAVERING	3,658	4,588 (79.7%)
2	HV10523	HALL MEAD SCHOOL	72	85 (84.7%)
3	HV10543	DYCORTS SCHOOL	64	69 (92.8%)
4	HV10503	FRANCES BARDSLEY ACADEMY	60	72 (83.3%)
5	HV10522	CAMPION SCHOOL	60	73 (82.2%)
6	HV10542	PYRGO PRIORY PRIMARY SCHOOL	60	71 (84.5%)
7	HV10562	HACTON ACADEMY	55	61 (90.2%)
8	HV10546	RAVENSBOURNE ACADEMY	54	61 (88.5%)
9	HV10521	THE BRITTONS ACADEMY	49	65 (75.4%)
10	HV10526	REDDEN COURT SCHOOL	49	57 (86%)

CMS - Cases on hold

Rank	Employer No	Employer Name	Awaiting Employer	# of Actives
1	HV10500	L.B.OF HAVERING	126	4,588 (2.7%)
2	HV10523	HALL MEAD SCHOOL	5	85 (5.9%)
3	HV10542	PYRGO PRIORY PRIMARY SCHOOL	3	71 (4.2%)
4	HV10503	FRANCES BARDSLEY ACADEMY	2	72 (2.8%)
5	HV10524	ST EDWARDS SNR ACADEMY	2	38 (5.3%)
6	HV10534	DRAPERS BROOKSIDE JNR SCHOOL	2	33 (6.1%)
7	HV10545	DRAPERS MAYLANDS	2	22 (9.1%)
8	HV10546	RAVENSBOURNE ACADEMY	2	61 (3.3%)
9	HV10502	ABBS CROSS SCHOOL	1	33 (3%)
10	HV10516	SLM COMMUNITY LEISURE C T	1	41 (2.4%)

Elapsed Days

Rank	Employer No	Employer Name	Active to Deferred	# of Actives
1	HV10542	PYRGO PRIORY PRIMARY SCHOOL	161	71
2	HV10534	DRAPERS BROOKSIDE JNR SCHOOL	159	33
3	HV10538	BREYER GROUP VOIDS	151	1
4	HV10545	DRAPERS MAYLANDS	143	22
5	HV10524	ST EDWARDS SNR ACADEMY	111	38
6	HV10500	L.B.OF HAVERING	110	4,588
7	HV10522	CAMPION SCHOOL	66	73
8	HV10503	FRANCES BARDSLEY ACADEMY	21	72
9	HV10539	RISE PARK INFANT ACADEMY	21	40
	HV10519	THE CHAFFORD SCHOOL	9	43

Rank	Employer No	Employer Name	Active to Pensioner	# of Actives
1	HV10500	L.B.OF HAVERING	83	4,588
2	HV10523	HALL MEAD SCHOOL	16	85
3	HV10553	ROYAL LIBERTY ACADEMY	5	44
4				
5				
6				
7				
8				
9				
10				

Retirement Survey Scores (out of 5)

			Ave	Surveys	
Rank	Employer No	Employer Name	Score	Taken	# of Actives
1	HV10507	SACRED HEART OF MARY	2.0	1	50
2	HV10524	ST EDWARDS SNR ACADEMY	2.0	1	38
3	HV10500	L.B.OF HAVERING	4.0	43	4,588
4	HV10504	SIXTH FORM COLLEGE	4.0	2	0
5	HV10502	ABBS CROSS SCHOOL	5.0	1	33
6	HV10516	SLM COMMUNITY LEISURE C T	5.0	3	41
7	HV10539	RISE PARK INFANT ACADEMY	5.0	1	40
8	HV10552	MARSHALLS PARK ACADEMY	5.0	1	47
9					
10					

			Surveys	Ave	
Rank	Employer No	Employer Name	Taken	Score	# of Actives
1	HV10500	L.B.OF HAVERING	43	4	4,588
2	HV10516	SLM COMMUNITY LEISURE C T	3	5	41
3	HV10504	SIXTH FORM COLLEGE	2	4	0
4	HV10502	ABBS CROSS SCHOOL	1	5	33
5	HV10507	SACRED HEART OF MARY	1	2	50
6	HV10524	ST EDWARDS SNR ACADEMY	1	2	38
7	HV10539	RISE PARK INFANT ACADEMY	1	5	40
8	HV10552	MARSHALLS PARK ACADEMY	1	5	47
9					
10					

Missing Leaver Forms

Missing Forms - The total number of members who currently sit as active on our systems and we are aware that this member has since ceased paying into the LGPS. % of actives - The percentage of missing leaver forms against active membership

Altair Data - Active members only

Missing E-mails - Total number of e-mails missing on our systems for members currently paying into the LGPS
Missing Nom Form - Total number of members paying into the LGPS who haven't submitted a death nomination form
Missing Addresses - Total number of members paying into the LGPS who we do not have a home address for
Missing Tel No. - Total number of members paying into the LGPS who we do not have a telephone number for

CMS Cases on hold

Awaiting Employer - Total number of cases LPPA are awaiting a response back from the employer

Elapsed Days

Active to Deferred - The average number of working days between LPPA being informed the member is a leaver to 31st September for those members who LPPA are currently awaiting a reply from the employer

Active to Pensioner - The average number of working days between LPPA being informed the member is retiring to 31st September for those members who LPPA are currently awaiting a reply from the employer/member

Survey Scores

age

Table 1 - Top 10 worst performing employers based on the members retirement survey scores, number of surveys taken and the number of members paying into the LGPS

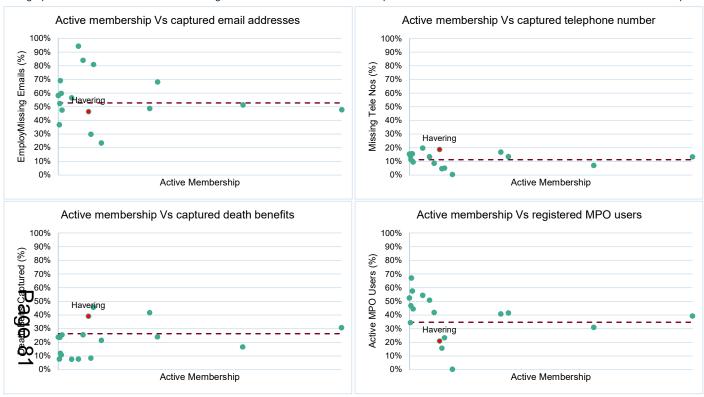
Table 2 - Top 10 employers who have had the most retirement survey scores taken, their average members retirement survey score and the number of members paying into the LGPS

4

How do you compare to others administered by LPPA?

Member data

The graphs below detail the % of members registered for MPO and the amount of personal contact data held for members. This is shows as a comparison against the other funds administered.



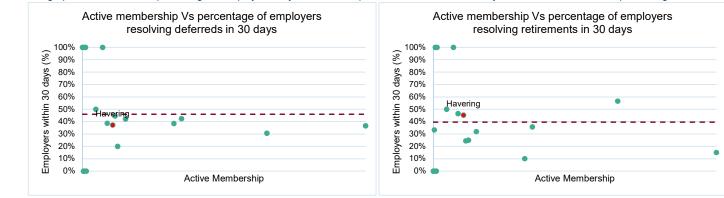
Satisfaction Scores

The graph(s) below detail(s) the satisfaction score of members who have completed the retirement process. This is shows as a comparison against the other funds administered.



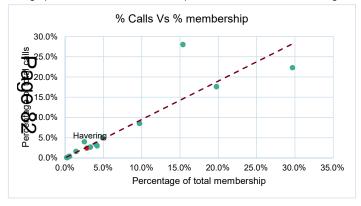
Elapsed Time

The graphs below detail the percentage of employers, of your fund, who process a leaver within 30 days. This is shows as a comparison against the other funds administered.



Call Volumes

The graph below details what % of helpdesk calls relate to the Havering Pension Fund. This is compared against Havering Pension Fund's proportion of total members administered by LPPA.



Notes:

Each scatter chart that appears in this report contain individual points and a dotted red line.

The dotted red line represents the combined client performance and the individual points represents a different client that LPPA administers.

The single red point indicates where you sit when being compared to each of the other clients.



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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.

<u>Aims</u>

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

ည် Item O	Medium	Audience	Frequency	When	
	LBH Pop Ups				
<u></u>	Core Brief				
	Intranet Page	LBH Corporate Staff			
MPO - Member Self Service			13/05/20, 19/06/20, 03/08/20, 19/10/20 Offices taff		
	Leaflet	Satelite Offices		, , , , ,	
	Leaflet	School Staff			
	LBH Pop Ups				
	Core Brief				
	Intranet Page	LBH Corporate Staff			
Expression of Wish forms	Global News			13/05/20, 19/06/20, 19/10/20	
	Leaflet	Satelite Offices			
	Leaflet	School Staff			

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		LBH Pop Ups		
		Core Brief	LBH Corporate Staff	
	Pensions Website	Intranet Page	22.7.00. por aco oca	
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		Leaflet	Satelite Offices	
		Leaflet	School Staff	
		LBH Pop Ups		
		Core Brief	LBH Corporate Staff	
	LPP Contact Details	Intranet Page	LBH Corporate Stair	
		Global News		
		Leaflet	Satelite Offices	
u		Leaflet	School Staff	
Page 86		Global News	LBH Corporate Staff	01/07/2020
е		Pensions Website (Factsheet)	All Staff	
36	Retirement Process	Intranet (link to Factsheet)	LBH Corporate Staff	
	Retirement Process	Email (Factsheet)	External employees	
		Email (Factsheet)	School Staff	
		Factsheet	Satelite Offices	
	Ad Hoc Pension Sessions			
Ī	Pension Roadshows			
	School Business Managers Net	work		



LONDON BOROUGH OF HAVERING LOCAL PENSION BOARD

ANNUAL REPORT 2019/20



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Opening remarks.

It is our pleasure, to introduce the Board's 2019/20 Annual Report. The Board's task is to assist the council by making sure it is administering the Local Government Pension Scheme (LGPS) effectively and efficiently and is compliant with the law.

The Board have two year work plan to tackle the areas deemed as most important to the administration of the fund and has worked hard during the year to deliver the objectives of the work plan. More detail on the work plan and the work completed can be found in the body of this report.

The Board met formally four times from April 2019 to March 2020 to discharge its duties. Board members completed online training and attended training and pension workshops during this period to enhance their knowledge in preparation for specific topics and spent time reviewing documents in preparation for board meetings. Details of the completed training are provided in Appendix 1.

We would like to thank officers for their hard work and support in researching and preparing information for the discussions at pension board meetings and the ongoing support and guidance for the board.

The pension environment is continually changing and the Board endeavours to keep abreast of these changes and is working hard to support and assist the council's pension administration in maintaining the high standards in the administration of the Fund.

The Board continues to develop its knowledge and skills and is actively working through the items on the work plan.

In March 2020 and in response to the COVID-19 pandemic, Havering Council and the Local Pensions Partnership successfully initiated their Business Continuity Plans to ensure that services to LGPS members and employers remained excellent and Scheme governance was maintained. Where possible officers are homeworking and Board meetings are currently held virtually.

Members of the Local Pensions Board

Introduction

- 1. Local Pension Boards are constituted entirely under the Public Service Pensions Act 2013 and are not local authority committees.
- The role of each Board is to help ensure each scheme complies with governance and administration requirements. They may have additional duties, if scheme or other regulations so specify.
- 3. Pension Boards need to have an equal number of employer and member representatives. They may also have other members, such as independent experts. All Pension Board members have a duty to act in accordance with scheme regulations and other governing documents.
- 4. Scheme regulations (or scheme-specific guidance) may provide further detail on the scope of the Pension Board and how it should operate, for example how many Pension Board members need to attend a meeting to be quorate and how often it should meet.
- 5. This Annual Report has been established to ensure Pensions Committee are aware of work undertaken during the year and the future work plans.

Role of the Local Pension Board

- 1. The role of the Local Pension Board, as defined by sections 5 (1) and (2) of the Public Service Pensions Act 2013, is to: -
 - Assist the London Borough of Havering Administering Authority as Scheme Manager:-
 - To secure compliance with the LGPS regulations and any other legislation relating to the governance and administration of the LGPS:
 - To secure compliance with requirements imposed in relation to the LGPS by the Pensions Regulator;
 - In such other matters as the LGPS regulations may specify;
 - Secure the effective and efficient governance and administration of the LGPS for the London Borough of Havering Pension Fund;
 - Provide the Scheme Manager with such information as it requires ensuring that any member of the Pension Board or person to be appointed to the Pension Board does not have a conflict of interest.
- 2. The Pension Board will ensure it effectively and efficiently complies with the code of practice of the governance and administration of public service pension schemes issued by the Pension Regulator;
- 3. The Pension Board will also help ensure that the London Borough of Havering pension Fund is managed and administered effectively and complies with the

- code of practice on governance and administration of public service pensions schemes issued by the Pension Regulator;
- 4. The Pension Board shall meet sufficiently regularly to discharge its duties and responsibilities effectively;
- In support of its core functions the Board may make a request for information to the Pensions Committee with regard to any aspect of the Administering Authority's function. Any such request should be reasonably complied with in both scope and timing;
- 6. In support of its core functions the Board may make recommendations to the Pensions Committee which should be considered and a response made to the Board on the outcome within a reasonable period of time.

Membership of the Board

The Board consists of 4 voting members, two representing employers and two representing scheme members.

Board members were appointed for a fixed term of 4 years, which could be extended for further periods subject to re-nomination.

Substitute members are not permitted.

Each Board member should endeavour to attend all Board meetings during the year and are required to attend at least 4 meetings each year, one of which must be the Annual Meeting.

In the event a Board member failed to attend three consecutive meetings, that individual would automatically be disqualified, unless failure was due to some reason approved by the Board before the date of the third consecutive meeting.

Denise Broom and Andrew Frater are appointed as Employer representatives and Mark Holder and Anne Giles as Scheme Member representatives.

Board Meetings

The Board met on five occasions up to the end of the financial year.

Meetings took place on 2 April 2019, 5 June 2019, 20 August 2019, 1 October 2019 and (informally) 7 January 2020.

Matters discussed by the Board

The following matters have been discussed by the Board:

- Review of work plan
- Support for the Board
- Details of the Board's budget
- Pensions Committee meeting updates
- The Pensions Regulator compliance checklist
- The Pensions Regulator's review of the Havering Fund
- Performance of the Pensions Administration Service
- Communications Campaign
- The Risk Register
- Terms of Reference
- Audit of the Pensions Administration provider
- Data scores
- Code of Transparency

There have been no conflicts of interest involving any of the work undertaken by the board or during any agenda items. Minutes of the meetings can be found at www.havering.gov.uk and by following Council and Democracy \ Councillors, senior staff and decision making \ Committees \ Committee details

Training

The board members are committed to the legal requirement to acquire the appropriate knowledge and skills and to demonstrate and evidence these legal requirements. To do this the Committee and the Board jointly adopted the CIPFA Knowledge and Skills Framework (KSF) in 2015, it has adopted a register that shows that the training and development being undertaken during the year. The register can be found in Appendix 1.

To summarise:

Members have attended a variety of externally provided courses and seminars.

Individuals have completed on-line learning from the Pensions Regulator as well as other self-directed learning which includes reading and e-learning.

All members have undertaken a training needs analysis.

Further training events will be organised once the training requirements of the pension committee have been assessed.

Financial Position

Local Government Pension Scheme Governance Regulations 2015 section 106(9) states that the expenses of a Local Pension Board (LPB) are to be regarded as part of the costs of administration of the fund held by the administering authority.

Guidance issued in January 2015 suggested that it is appropriate for the LPB to be given adequate resources to fulfil its task.

Terms of reference adopted by Governance Committee on the 11 March 2015 and then the Council meeting on the 25 March 2015 also states that the LPB is to be provided with adequate resources to fulfil its role.

The estimated budget agreed by the Administering Authority's Statutory Section 151 officer and costs incurred for 2019/20 are shown in the following table:

Description	2018/19 Actual £	2019/20 Estimate £	2019/20 Actual £	2020/21 Estimate £	2021/22 Estimate £	2022/23 Estimate £
Members Allowance & Travelling	1,673	3,000	946	3,000	3,000	3,000
Support Services – Internal Recharge	1,075	1,000	640	1,000	1,000	1,000
Printing, Stationary & Office Expenses	0	3,400	0	3,400	3,400	3,400
Communication & Computing	0	500	0	500	500	500
Professional Advice	0	10,000	0	10,000	10,000	10,000
*Training & Development	1,430	10,000	295	10,000	10,000	10,000
Total	4,178	27,900	1,881	27,900	27,900	27,900

^{*}Training costs of £10,000 is to be shared with the Pensions Committee to keep officer time and training costs to a minimum. The amounts shown above represent the LPB share of the costs.

Budgets have been set to cover a four year period from 2019/20 to 2022/23 to reflect the period of term that the LPB appointees will serve. 2019/2020 is the fifth operational year of the LPB.

1) The LPB is accountable to the Administering Authority and prior approval was sought from the Section 151 officer to amend budgets. It was agreed by the board that the 4 year budget be reduced by £7,000 from £34,900 to £27,900 as a reduction in support service recharges had resulted in low costs year on year.

The cost for the LPB is met from the Havering Pension Fund and approved by the Administering Authority's Statutory Section 151 Officer.

The Future

A new 18/24 month work plan for 2020/21 and 2021/22 is currently being discussed.

The list below is the draft areas being considered:

- 1. To ensure that the Pensions Regulator compliance checklist has been completed and is reviewed regularly.
- 2. To ensure that a process is in place to make any items that have been identified as being non-compliant or partially compliant from the Pension Regulator compliance checklist are made fully compliant within agreed and acceptable timescales. Any items that cannot be made fully compliant are added to the risk register with a clear explanation as to the reasons why.
- To request that the scheme manager provide evidence that the Administering Authority is meeting the pension regulators requirements in any areas that we require further assurance.
- 4. To regularly review the key performance indicators and statistical information relating to the administration of the scheme and ensure an action plan is in place for indicators that are not meeting the agreed target.
- 5. To ensure that investment managers disclose all their fees and charges and are progressing towards the local government pension scheme cost transparency code.
- 6. To monitor pensions administration provided by Local Pensions Partnership (LPP) and ensure that any changes are well planned and documented.
- 7. To ensure that the scheme manager fully plans for any new legislation and we are compliant with all aspects of any new legislation.
- 8. Report regularly to the pensions committee on the work of the pension board and ensure that there is good communication between the two boards.

The Work Plan will be a live document and subject to change as necessary with a formal review at least every two years

	DATE	TOPIC COVERED	LOCATION	KSF	COST	ATTENDED BY
Fage	29 June 2015 12 Aug 2015	Hymans – Fund Actuary delivered training: Why we are here Roles & Responsibilities Knowledge & Skills Brief overview of LGPS	Hyman's Office – One London Wall	KSF 1	£3,500 (shared equally between LBH and Redbridge)	Justin Barrett – Employer rep Mark Holder - Member rep Marshajane Thompson – Member rep David Holmes – Employer Rep
90	12 Aug 2015	Officers - Local Pension Board Induction covered: Brief overview of the havering Pension fund How the scheme is funded Governance Structure Key parties in the Fund Investment Monitoring Strategy documents Valuation LPB reporting requirements	Town Hall – Prior to Local Pension Board meeting	KSF 1,2,4,5 & 6	Officer Time	Mark Holder - Member rep Justin Barrett – Employer rep (chair)

DATE	TOPIC COVERED	LOCATION	KSF	COST	ATTENDED BY
6 January 2016	 Hymans – Fund's Actuary delivered TUPE Transfer Training, covered: What is TUPE Pension Protection & Regulations Admission bodies documents & securities Cessations 	Town Hall – prior to Local Pension Board meeting	KSF 6	£3,500	Mark Holder - Member rep Justin Barrett – Employer rep (chair)
(C) 25 April 2016 (C) (C) (C) (C) (C) (C) (C) (C) (C) (C)	Pensions & Lifetime Savings Academy (PLSA) covered: Governance Structure of LGPS TPR approach to governance & Admin Purpose & Responsibilities of National & Local Pensions Boards	PLSA Offices, London	KSF 1	£450.00 + VAT	Mark Holder – Member Rep
15 June 2016	Pensions & Lifetime Savings Academy (PLSA) covered: • Governance Structure of LGPS • TPR approach to governance & Admin • Purpose & Responsibilities of National & Local Pensions Boards	PLSA Offices, London	KSF 1	£900.00 + VAT	Marshajane Thompson – Member Rep Justin Barrett – Employer Rep (chair)

DATE	TOPIC COVERED	LOCATION	KSF	COST	ATTENDED BY
7 October 2016	Eversheds – LGPS: New Challenges, covered: • Update on LGPS Pooling • New Fair Deal update • 2016 Valuations • Legal, Investment & Brexit update	Eversheds, one Wood Street, London	KSF 1 & 6	£100?	David Holmes – Employer Rep
28 November 02016 00 0	Pensions & Lifetime Savings Academy (PLSA) covered: Governance Structure of LGPS TPR approach to governance & Admin Purpose & Responsibilities of National & Local Pensions Boards	PLSA Offices, London	KSF 1	£450.00 + VAT	David Holmes – Employer Rep
13 December 2016	Hymans - Joint training with Pensions Board - Valuation 2016 Results covered: • 2016 Valuation framework • Valuing liabilities • Actuarial assumptions • 2016 results • What changed since 2013	Havering Town Hall	KSF 6	£2,000	Mark Holder – Member rep David Holmes – Employer Rep

	DATE	TOPIC COVERED	LOCATION	KSF	COST	ATTENDED BY
Page 98	23 January 2017	Hymans - Joint Training with Pensions Board - Investment Strategy Training covered; • New investment Regulation 2016 • Overview of ISS/DCLG Guidance • What changed between SIP/ISS • Asset allocation rebalancing • Investment strategy evolution • Investment objectives • Overview of UK Stewardship code • Credit Strategies	Havering Town Hall	KSF 5	£2,100	Justin Barrett – Employer Rep (chair) Mark Holder – Member Rep David Holmes – Employer Rep Anne Giles – Member Rep
	1 February 2017 1 March 2017	London CIV Stewardship Seminar LCIV Annual conference including fund manager sessions	Guildhall, City of London	KSF1 KSF4/5	Free	Mark Holder – Member Rep Mark Holder – Member Rep
	28 June 2017	CIPFA & Barnett Waddingham – Local Pension Boards Two years on	Cheapside House, 138 Cheapside, London EC2V		£175	David Holmes - Employer Rep Mark Holder – Member Rep Anne Giles – Member Rep

D	ATE	TOPIC COVERED	LOCATION	KSF	COST	ATTENDED BY
3 Nov	vember 2017	Association of Colleges	Webinar		FREE	David Holmes – Employer Rep
6 Nov	vember 2017	CIPFA & Barnett Waddingham – LPB Autumn Seminar covers: Latest LGPS updates Reporting Breaches of Law Investment Regulations & related key policies	Cheapside House, 138 Cheapside, London EC2V		£125	Ann Giles – Member Rep Virpi Raivio- Employer Rep
21 No 2017	ovember	Hymans – Actuary- Admissions and TUPE policies	Havering Town Hall	KSF 6	Part of Actuarial contract	Mark Holder – Member Rep Anne Giles – Member Rep Virpi Raivio – Employer Rep
12 De 2017	ecember	Officers - Local Pension Board Induction covered: Brief overview of the havering Pension fund How the scheme is funded Governance Structure Key parties in the Fund	Central Library	KSF 1,2,4,5 & 6	Officer Time	Ann Giles (TBC) Virpi Raivio (TBC)

	DATE	TOPIC COVERED	LOCATION	KSF	COST	ATTENDED BY
		 Investment Monitoring Strategy documents Valuation LPB reporting requirements 				
rage 100	26 February 2018	CIPFA and Barnett Waddingham LGPS Local Pension Board Members Spring Seminar	Cheapside House, 138 Cheapside, London EC2V 6BW	KSF 1,2a	£125	Mark Holder – Member Rep and Chair Anne Giles – Member Rep Virpi Raivio – Employer Rep
	27 June 2018	CIPFA and Barnett Waddingham – Local Pension Boards three years on	Cheapside House, 138 Cheapside, London EC2V 6BW		£175 x3	Mark Holder – Member Rep and Chair Anne Giles – Member Rep Virpi Raivio – Employer Rep
	10 th October 2018	LGPS Governance Training Fundamentals - Day 1	Park Plaza Hotel, 239 Vauxhall Bridge Road, London, SW1V 1EQ.		£260	Mark Holder

	DATE	TOPIC COVERED	LOCATION	KSF	COST	ATTENDED BY
30 ¹	th October 18	LGPS Governance Training Fundamentals - Day 2	Park Plaza Hotel, 239 Vauxhall Bridge Road, London, SW1V 1EQ.		£260	Mark Holder
4 th 20	December 18	LGPS Governance Training Fundamentals - Day 3	Park Plaza Hotel, 239 Vauxhall Bridge Road, London, SW1V 1EQ.		£260	Mark Holder
20	th December 18	Local Pension Board Induction Training	2 nd Floor, Romford Library		0	Denise Broom
26	th June 2019	CIPFA and Barnet Waddington LGPS Local Pension Board Annual Event	2nd Floor 2 London Wall Place 123 London Wall London EC2Y 5AU		£185 plus VAT	Anne Giles – booked in April 19
11	th July 2019	Currency Management Training	Town Hall		Hymans	No attendance Slides distributed to all 23 July 2019

DATE	TOPIC COVERED	LOCATION	KSF	COST	ATTENDED BY
25 th September 2019	Introduction to the LGPS – Circulated email to Pensions by Committee and LPB Members 230419	Northern Trust Offices, Canary Wharf		£345 plus VAT	Denise Broom – booked in March 19
18 th October 2019 U	Ruffer – Conference 2019	The Grand Hotel, Trafalgar Square, London		None	Mark Holder Anne Giles
October 19	Pensions Regulator Toolkit – All Modules	Home Office		None	Denise Broom
12 th November 2019	A Guide to the LPGS – sent via email	LBH	All	None	Mark Holder Anne Giles Denise Broom
13 November 2019	CIPFA Pensions Network Conference	The London Stock Exchange		None	Anne Giles

DATE	TOPIC COVERED	LOCATION	KSF	COST	ATTENDED BY
10 December 2019	Hymans Valuation 2019 Training	LBH Offices		TBC	None
3 rd February 2020	LPB Induction	LBH Offices		None	Andrew Frater
20 February 2020 0 1	LGPS LPB Members and Officers	Barnett Waddington Offices		£135 plus VAT	Andrew Frater
24 June 2020	LPB Members	Barnett Waddington Seminar - Webinar		£195 plus VAT	Anne Giles
29 July 2020 30 October 2020 26 January 2021 26 April 2021	Provides an overview of the Local Government Pension Scheme. They will cover the structure of the scheme and its key stakeholders, and will provide a summary of its benefits, costs and how it is governed. They will also provide online networking opportunities.	Webinar		£175 plus vat per delegate	Offered to Anne Giles Mark Holder Denise Broom Andrew Frater

	DATE	(TOPIC COVERED	LOCATION	KSF	COST	ATTENDED BY
	Module Completion Date AG – 18/05/20 DB – 25/10/19 AF – 14/05/20 MH – 09/05/18		ensions Regulator Public Service polkit: Conflicts of interest	online	KSF 1		Mark Holder – Member Rep - 09/05/18 Anne Giles - Member Rep 18/05/20
04		•	Managing Risks and internal controls	online	KSF1		Mark Holder – Member Rep - 09/05/18 Ann Giles – Member Rep - 18/05/20
		•	Maintaining accurate member data	online	KSF1		Mark Holder – Member Rep - 09/05/18 Ann Giles – Member Rep – 18/05/20
		•	Maintaining member contributions	online	KSF2		Mark Holder – Member Rep - 09/05/18 Ann Giles – Member Rep – 18/05/20

	DATE	TOPIC COVERED	LOCATION	KSF	COST	ATTENDED BY
Fage 105		Providing information to members and others	online	KSF2		Mark Holder – Member Rep - 09/05/18
		Resolving internal disputes	online	KSF2		Mark Holder – Member Rep - 09/05/18
		Reporting Breaches of Law	online	KSF1		Mark Holder – Member Rep - 09/05/18 Anne Giles – Member Rep -18/05/20
		Pensions regulator Trustee Toolkit Introducing Pension Schemes	online	KSF1		Andrew Frater – Employer Rep – 14/05/20 Denise Broom – Employer Rep – 25/10/19
		The Trustees Role	online	KSF1		Andrew Frater – Employer Rep - 14/05/20 Denise Broom – Employer Rep – 25/10/19

	DATE	TOPIC COVERED	LOCATION	KSF	COST	ATTENDED BY
		Running a Scheme	online			Andrew Frater – Employer Rep – 14/05/20 Denise Broom – Employer Rep – 25/10/19
Fage 106		Pensions Law	online			Andrew Frater – Employer Rep - 14/05/20 Denise Broom – Employer Rep - 25/10/19
		An Introduction to Investment	online			Denise Broom – Employer Rep - 25/10/19
		How a Defined Benefit Scheme Work	online			Denise Broom – Employer Rep - 25/10/19
		Funding your Defined Benefit Scheme	online			Denise Broom – Employer Rep- 25/10/19
		Investment in a Defined Benefit Scheme	online			Denise Broom – Employer Rep - 25/10/19

DATE	TOPIC COVERED	LOCATION	KSF	COST	ATTENDED BY
	Defined Benefit recovery plans, contributions and funding principles	Online			Denise Broom – Employer Rep – 25/10/19

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