



# Haverling

LONDON BOROUGH

## LOCAL PENSION BOARD AGENDA

**4.00 pm**

**Tuesday  
30 March 2021**

**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](mailto: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 - 2)

To approve as correct the minutes of the meeting held on 21<sup>st</sup> January 2021 and authorise the Chair to sign them.

### 5 LPP QUARTERLY PERFORMANCE REPORT (Pages 3 - 44)

Documents attached.

### 6 RISKS REGISTER (Pages 45 - 66)

Document attached

### 7 LGPS LEGISLATION UPDATE

Verbal update to be given

### 8 COP14 COMPLIANCE CHECKLIST (Pages 67 - 84)

Documents attached

### 9 DATA IMPROVEMENT PLAN

Verbal update to be given

### 10 COMMUNICATIONS CAMPAIGN (Pages 85 - 86)

Document attached

### 11 POSITION OF CHAIR

Verbal update to be given

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

**Andrew Beesley  
Committee Administration Manager**

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# Public Document Pack Agenda Item 4

**MINUTES OF THE MEETING OF THE  
LOCAL PENSION BOARD  
Virtual Meeting  
21 January 2021 (4.00 - 5.50 pm)**

**Present:**

Andrew Frater  
Anne Giles  
Mark Holder

Officers Present: Luke Phimister, Caroline Berry and Debbie Ford

**38 CHAIR'S ANNOUNCEMENTS**

The Chairman reminded Members of the action to be taken if they were to be disconnected from the call.

**39 APOLOGIES FOR ABSENCE**

Apologies were received from Denise Broom

**40 DISCLOSURE OF INTEREST**

There were no disclosures of interest.

**41 MINUTES OF THE MEETING**

The minutes of the previous meeting held on 22nd September 2020 were agreed as a correct record and, due to COVID-19, will be signed by the Chairman at a later date.

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

Feedback was provided to cover pension committee meetings on the 1 October 2020, 12 November 2020 and 12 January 2021. It was noted that the Pensions Committee had admitted Harrison catering to the Pension Fund, had considered proposals to continue with the implementation of the Investment Strategy, received a regulation update regarding LGPS amendment to the McCloud underpin.

**43 ANNUAL INTERNAL CONTROL ASSURANCE 2020**

The Board noted that Havering had received a green rating for the pension administration services.

**ACTION POINT: Control objectives to use same headings as TPR Code of Practise**

44 **RISK AND COMPLIANCE**

It was noted by the Board that LPP had received 1 subject access request and that was being processed. It was also noted that no claims had been successful and the letters produced by LPP were to be signed off by Caroline.

45 **DATA IMPROVEMENT & LPB ACTION PLAN 2020-21**

It was noted by the Board that the priority and timescale of the activities had been included, however some timescales had not been included as the completion is due to LPP interaction. It was noted that the year-end data was given a priority 3 due to the timescale with an input from LPP to be given. The Board then discussed the action plan and noted that the actions had either been covered or were included in the data improvement plan.

46 **LBH TPR CODE 14 COMPLIANCE**

The Board were presented with the TPR code 14 compliance checklist and noted that some of the areas had been found to be amber due to no Havering specific documents being on the LPP website therefore they were having to be implemented into the main Havering website.

**ACTION POINT: Board members to look at blue comments and sections D & E on pages 64-67 of the agenda pack**

47 **POSITION OF CHAIRMAN**

The Board discussed the position and role of the Chairman and noted suggestions of an independent chair. It was noted that the budget was sufficient to cover the cost and the Board members agreed that an independent Chair would help the Board run more efficiently.

**ACTION POINT: Caroline to research Newham's process for getting an independent Chair**

Andrew Frater left the meeting at this point so Items 9, 10, 11, 14, 15 and 6 of the agenda pack were discussed when the Board was not quorate and therefore could not be included in the minutes.

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Chairman

# LPP

Local Pensions Partnership  
Administration

Havering Pension Fund

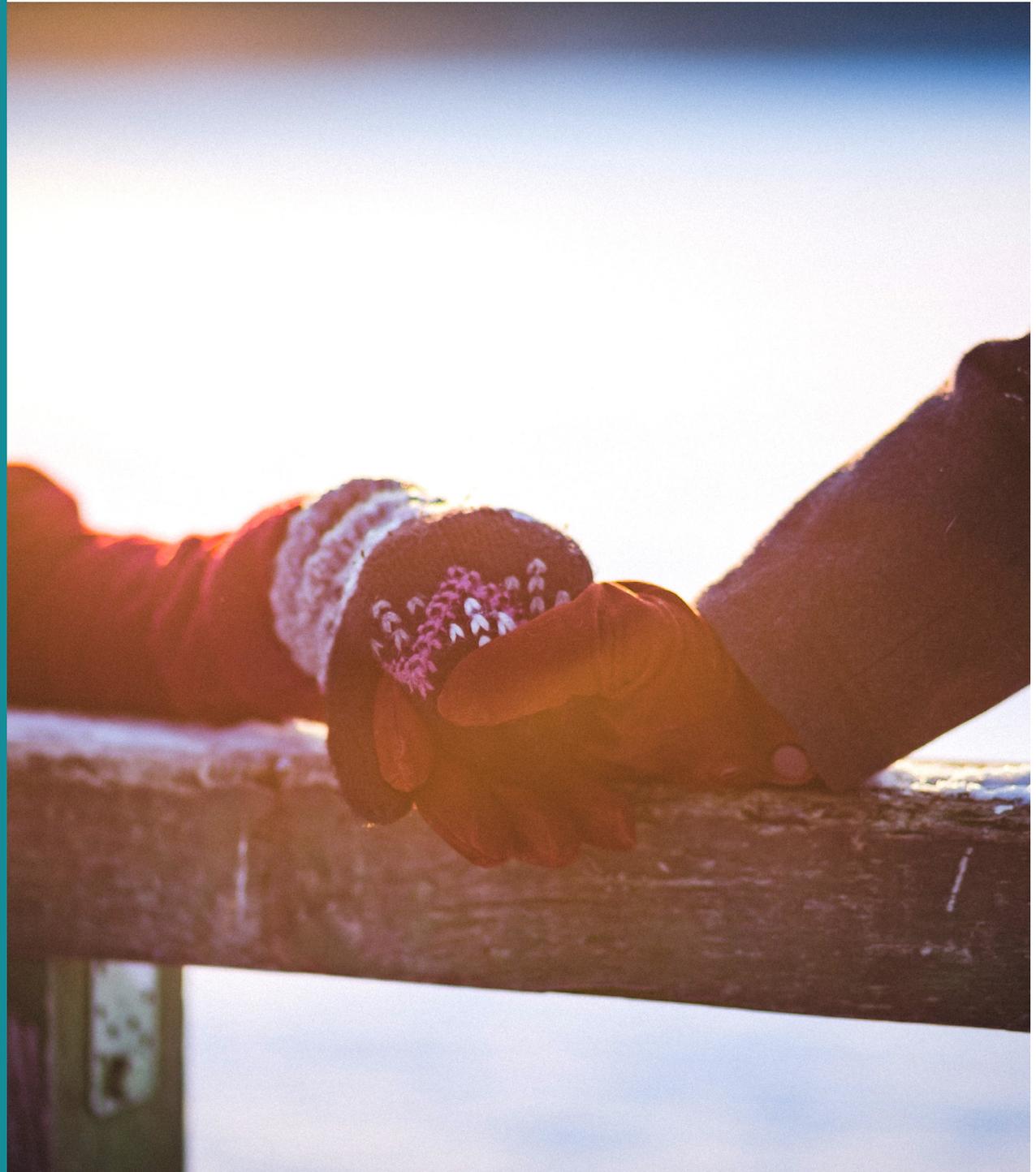
# Quarterly Administration Report

1st October – 31st December 2020



# Contents

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# Definitions



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## **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

## **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

Please note the number of cases brought forward, does not match the corresponding number of outstanding cases reported in the previous quarter (due to reasons including the deletion of cases during the current reporting period).

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).

Page 20

## **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 26 & 27

## **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 [TPR](#) or [PASA](#) (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



Forward Thinking

## ACTIVITY

✓ COMPLETED    📅 DUE

Page 7

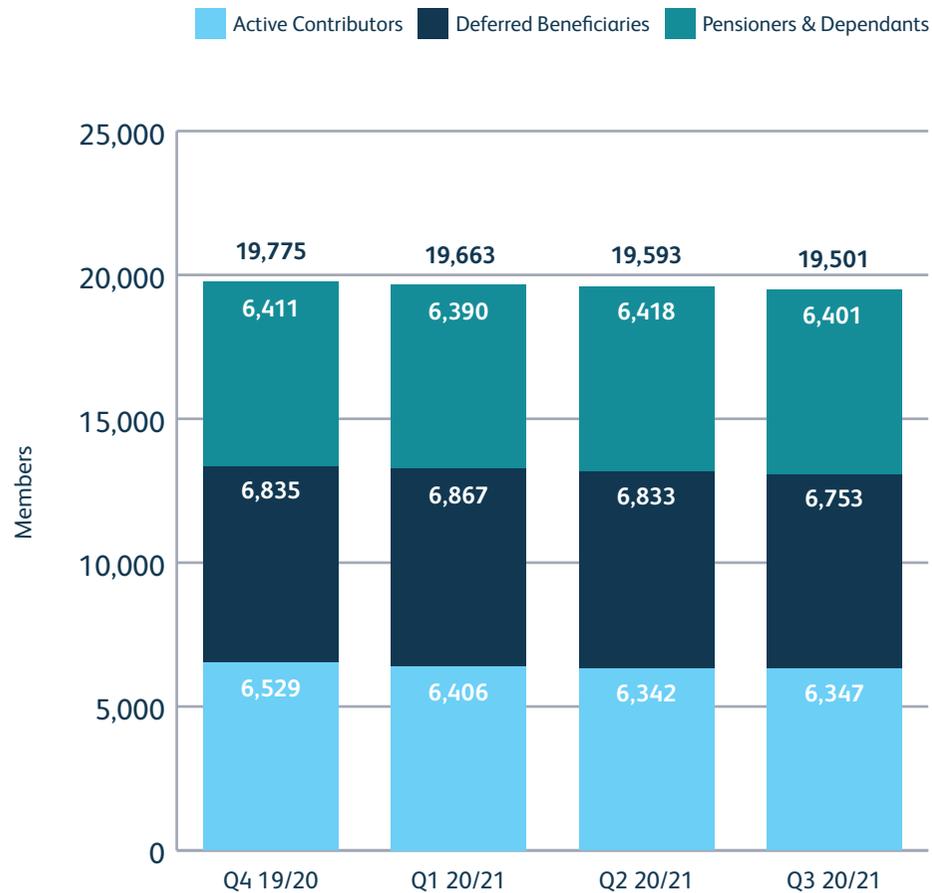
	Apr 20	May 20	Jun 20	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21
Annual Benefit Statement and Newsletter to Deferred Members			✓									
Pension Increases		✓										
Annual Benefit Statement and Newsletter to Active Members					✓							
Pension Saving Statements							✓					
HMRC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

# Fund Membership

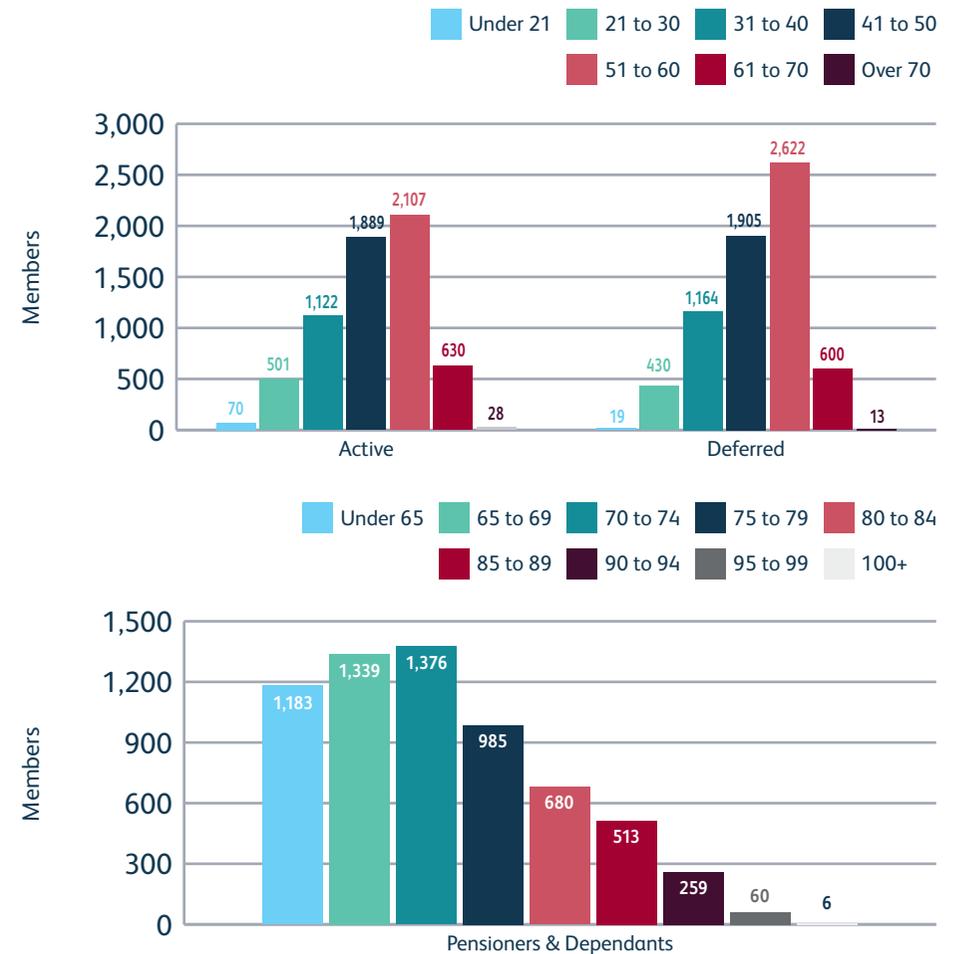


## TOTAL FUND MEMBERSHIP

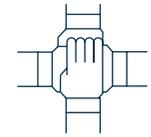
Page 8



## CURRENT AGE DEMOGRAPHIC



# Fund Membership



Working Together

## LEAVERS

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

Total Current Leavers	Received*	Pending**
151	17	134

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

\*\* Awaiting information from employer

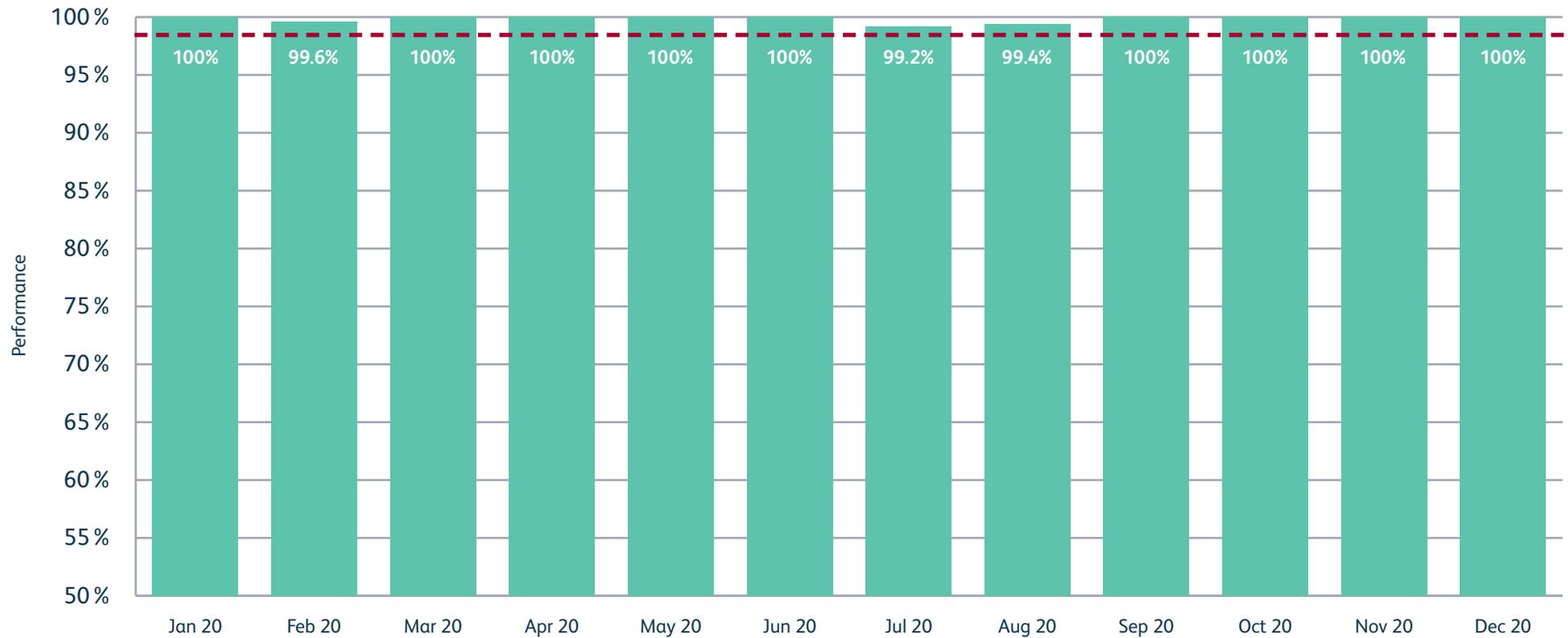
# Casework Performance Against SLA



## PERFORMANCE - ALL CASES

--- Target (98%)    The quarterly SLA performance was 100%

Page 10



# Casework Performance Against SLA



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## QUARTERLY PERFORMANCE STANDARD

■ Target

	SLA target (working days)	Total Processed	92%	93%	94%	95%	96%	97%	98%	99%	100%
New starters	3	244									100%
Transfer In	4	66									100%
Transfer Out	5	84									100%
Estimate – Individual	5	66									100%
Deferred Benefits	4	131									100%
Deaths	10	123									100%
Retirements (immediate)	5	70									100%
Retirements (deferred)	5	112									100%
Refunds	4	89									100%
Estimates – Employer	5	21									100%
Correspondence	5	77									100%
Aggregation	30	107									100%
Other (see Definitions – page 3)		374									100%

# Casework Performance Against SLA



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## ONGOING CASEWORK AT THE END OF THE REPORTING QUARTER

	Brought Forward	Completed	Received	Outstanding
New Starters	50	244	224	30
Transfer In	102	66	54	90
Transfer Out	18	84	87	21
Estimate - Individual	14	66	61	9
Deferred Benefits	69	131	122	60
Deaths	166	123	119	162
Retirements (Immediate)	31	70	72	33
Retirements (Deferred)	115	112	69	72
Refunds	20	89	92	23
Estimates - Employer	3	21	24	6
Correspondence	17	77	63	3
Aggregation	130	107	82	105
Other (see Definitions – page 3)	128	374	326	80

# Elapsed Times



Doing The Right Thing

## ELAPSED DAYS BY QUARTER



# Elapsed Times (Retirements)



Doing The Right Thing

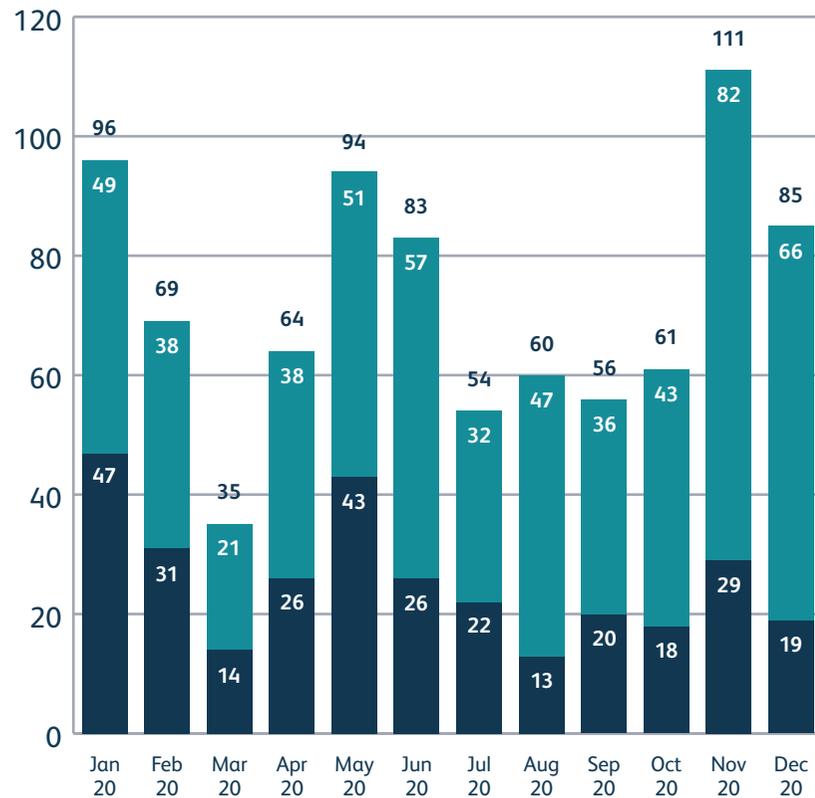
## DEFERRED INTO PAYMENT

## REASONS ON HOLD

Average working days with LPPA  
 Average working days with Employer/Member/Other

Page 14

Total Elapsed Working Days



	Employer	Member	Other	Total
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
Oct 20	1.2	28.5	13.3	43.0
Nov 20	5.2	48.6	28.2	82.0
Dec 20	15.6	50.2	0.1	65.9

# Elapsed Times (Retirements)

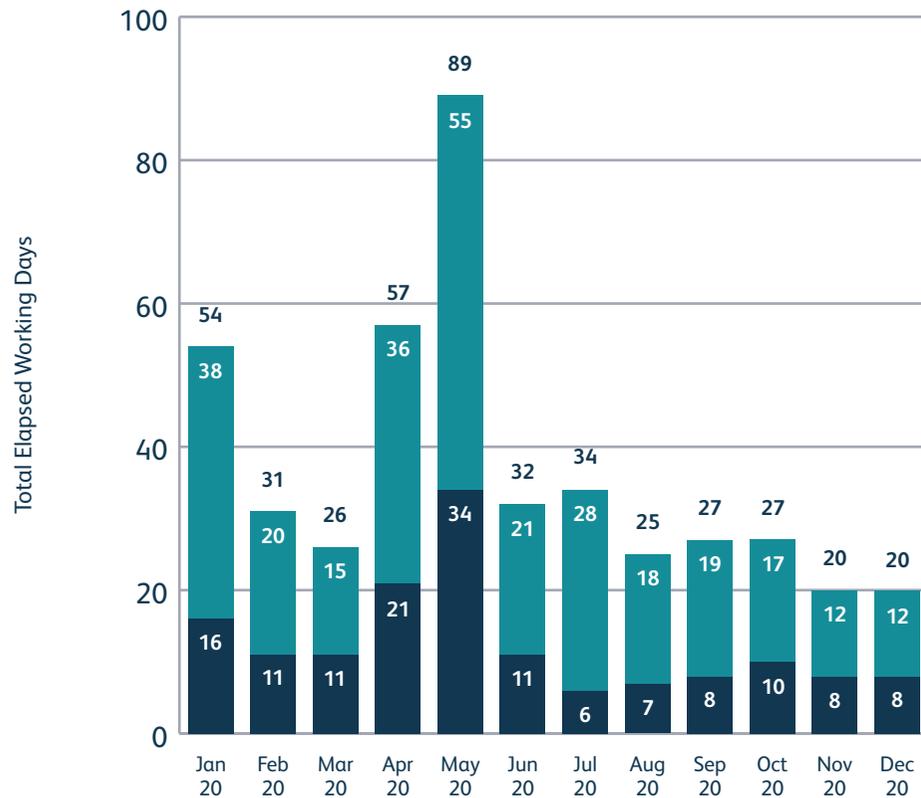


Doing The Right Thing

## ACTIVE INTO PAYMENT

## REASONS ON HOLD

Average working days with LPPA  
 Average working days with Employer/Member/Other



	Employer	Member	Other	Total
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
Oct 20	2.2	14.8	0.0	17.0
Nov 20	2.7	9.3	0.0	12.0
Dec 20	1.0	11.0	0.0	12.0

# Helpdesk Performance - Calls



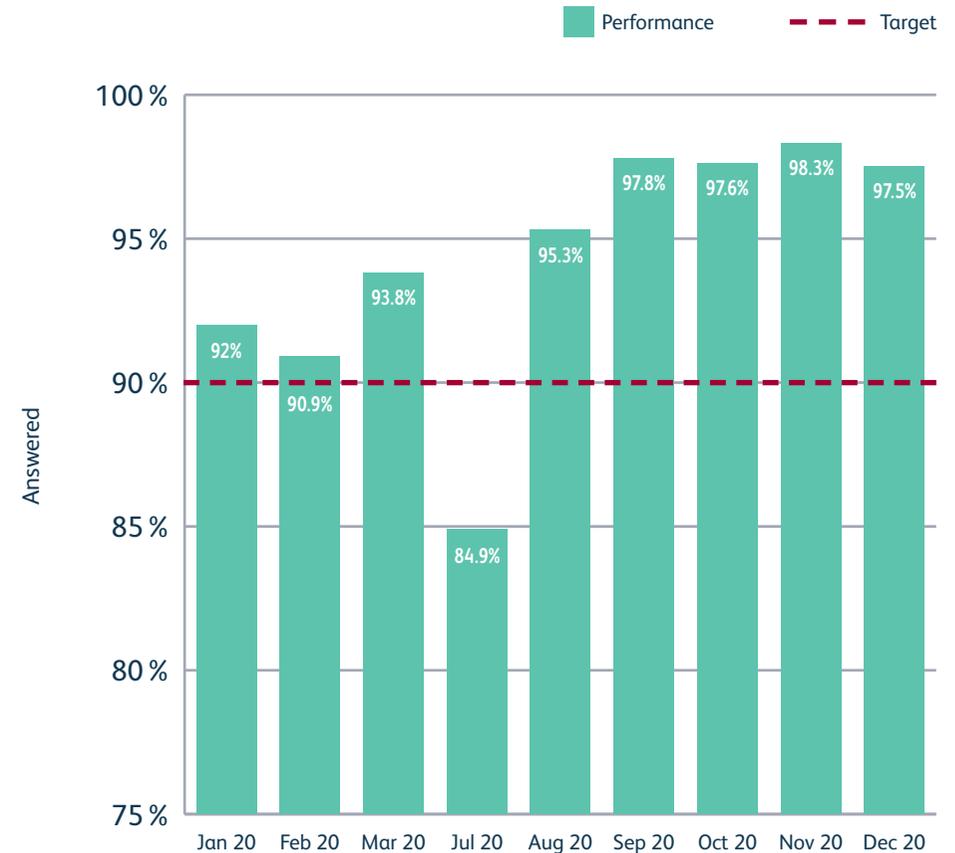
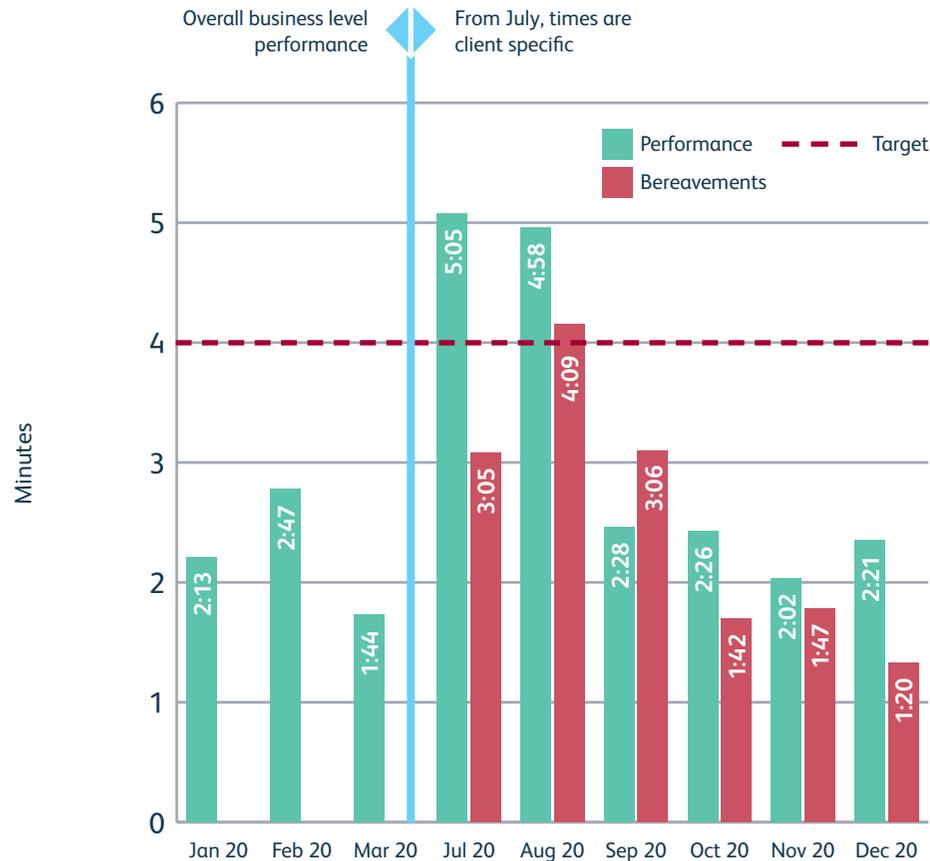
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## AVERAGE WAIT TIME

## 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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# Helpdesk Performance - Calls

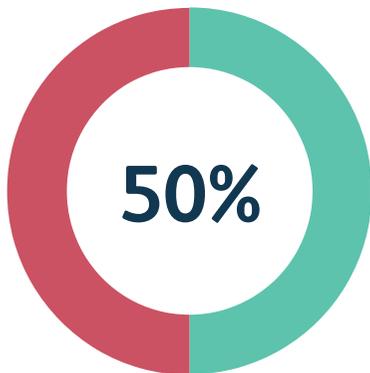


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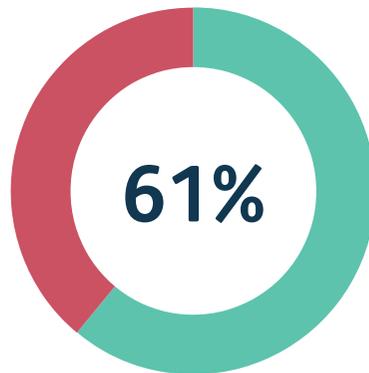
## RESOLUTION RATE

(TARGET 75%)

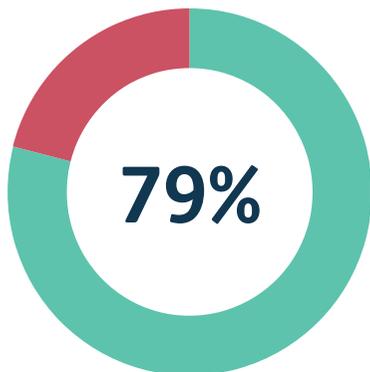
### OCTOBER



### NOVEMBER



### DECEMBER



## WHAT DO MEMBERS & EMPLOYERS CALL ABOUT?

	OCT 20	NOV 20	DEC 20
ABS	2	2	0
Annual Allowance	1	1	0
AVC / APC	2	2	5
Bereavement	25	37	20
Deferred	1	3	2
Divorce	14	12	3
Estimate	54	39	8
Life Certificates	0	0	1
Online	16	14	4
P60	5	3	1
Payslip	14	11	10
PI	0	0	0
Refund	18	16	7
Retirement	134	111	49
Transfer	106	50	6
Update Details	12	8	11

# Helpdesk Performance - Emails

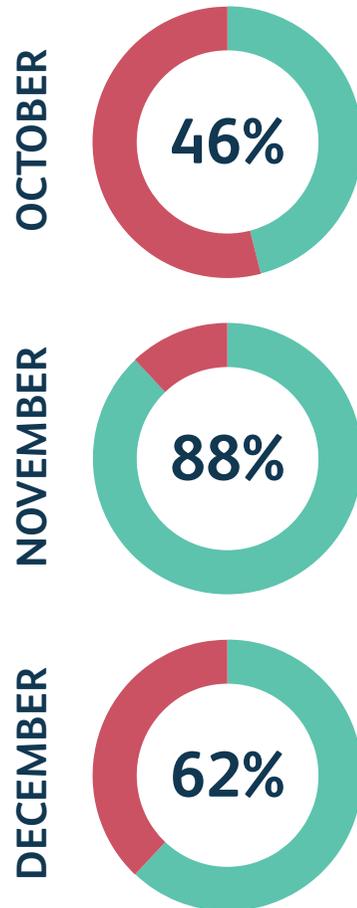


## RESOLUTION RATE (TARGET 75%)

## WITHIN SLA (2 WORKING DAYS)

## WHAT DO MEMBERS & EMPLOYERS EMAIL ABOUT?

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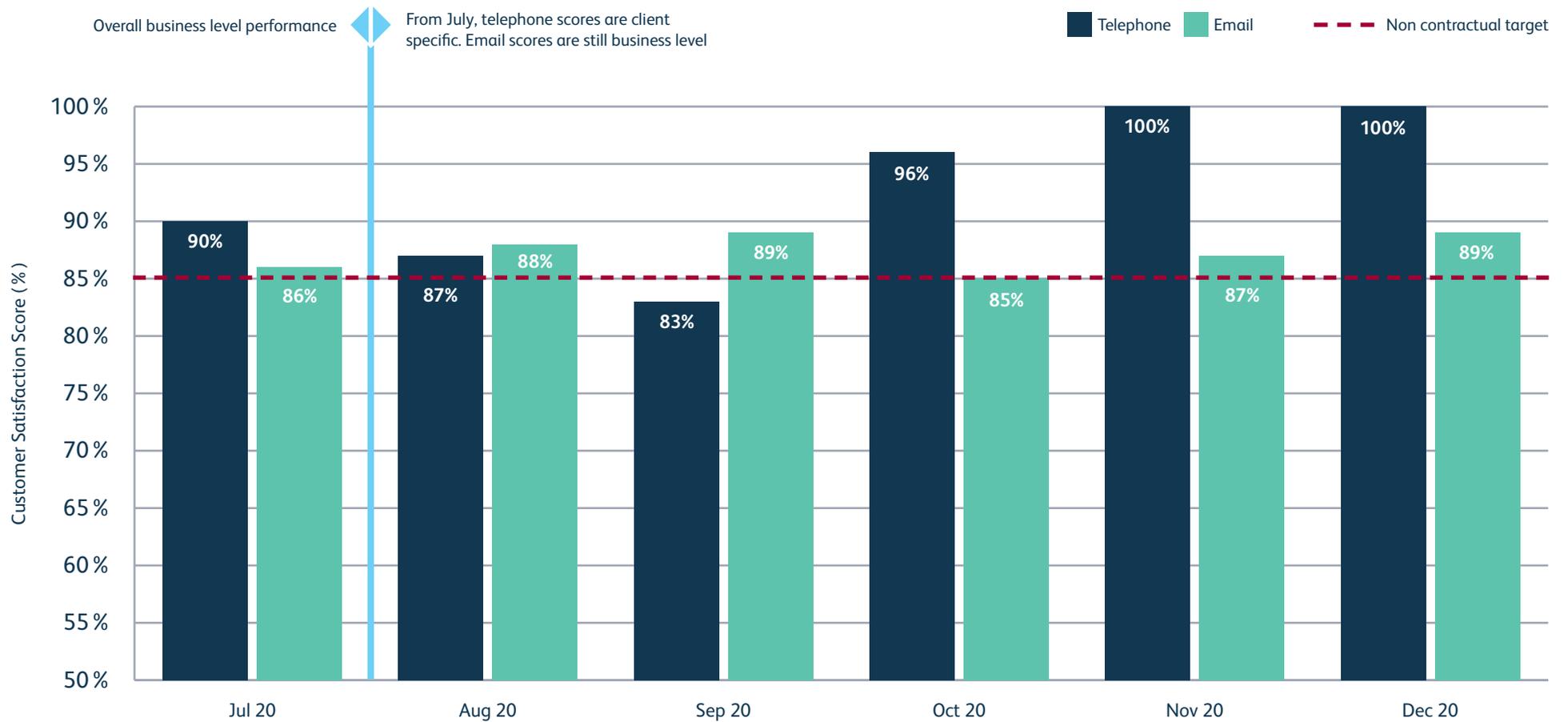
	OCT 20	NOV 20	DEC 20
ABS	4	4	2
Annual Allowance	4	3	2
AVC / APC	3	1	0
Bereavement	20	32	80
Deferred	0	1	1
Divorce	14	46	57
Estimate	19	18	14
Life Certificates	1	1	0
Online	8	3	11
P60	7	0	4
Payslip	6	2	1
PI	0	0	0
Refund	8	5	4
Retirement	48	47	69
Transfer	25	36	32
Update Details	12	14	17

# Customer Satisfaction Scores



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## HELPDESK SATISFACTION



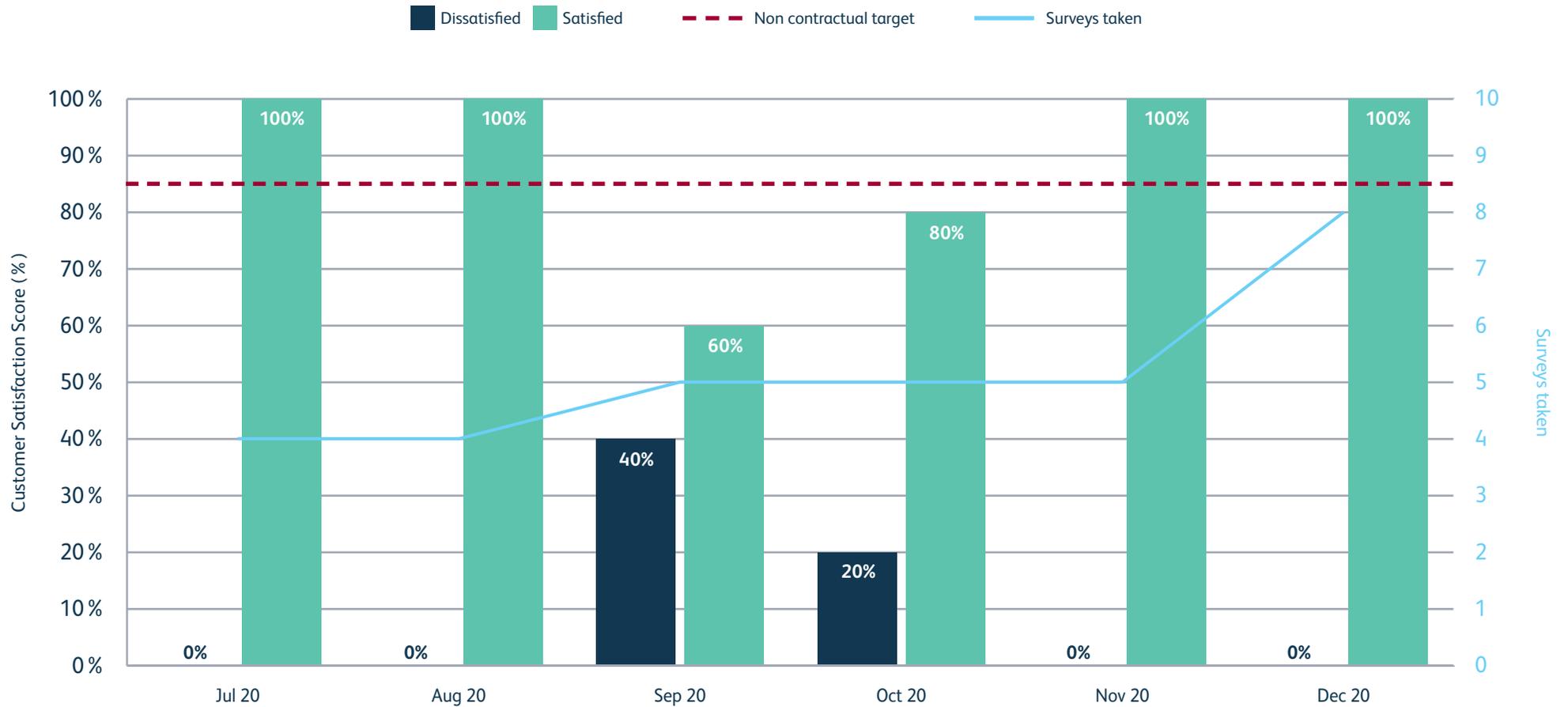
# Customer Satisfaction Scores



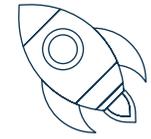
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## RETIREMENTS

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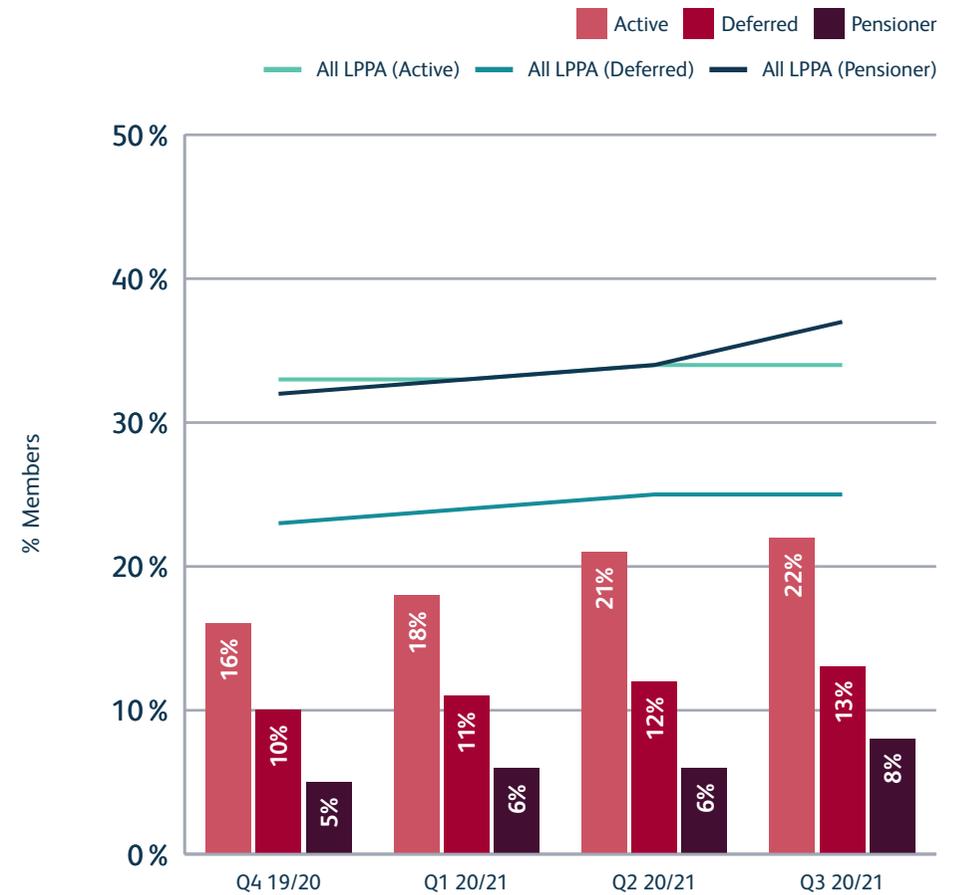
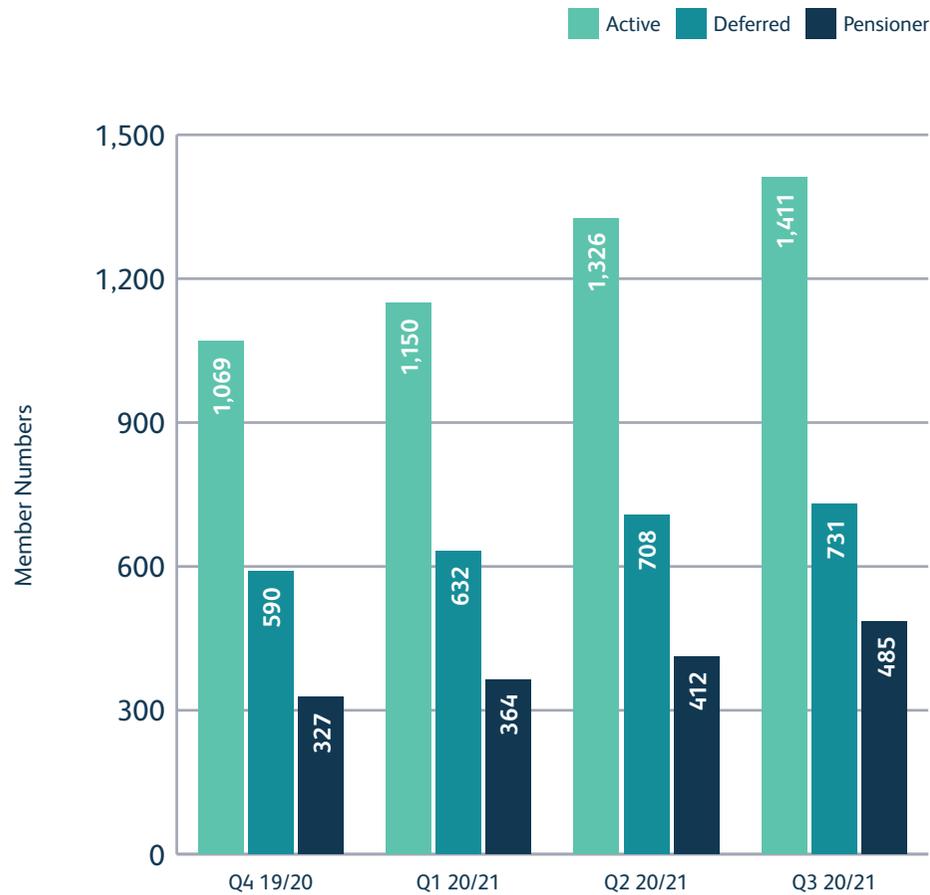
# My Pension Online



Forward Thinking

## MEMBERS REGISTERED

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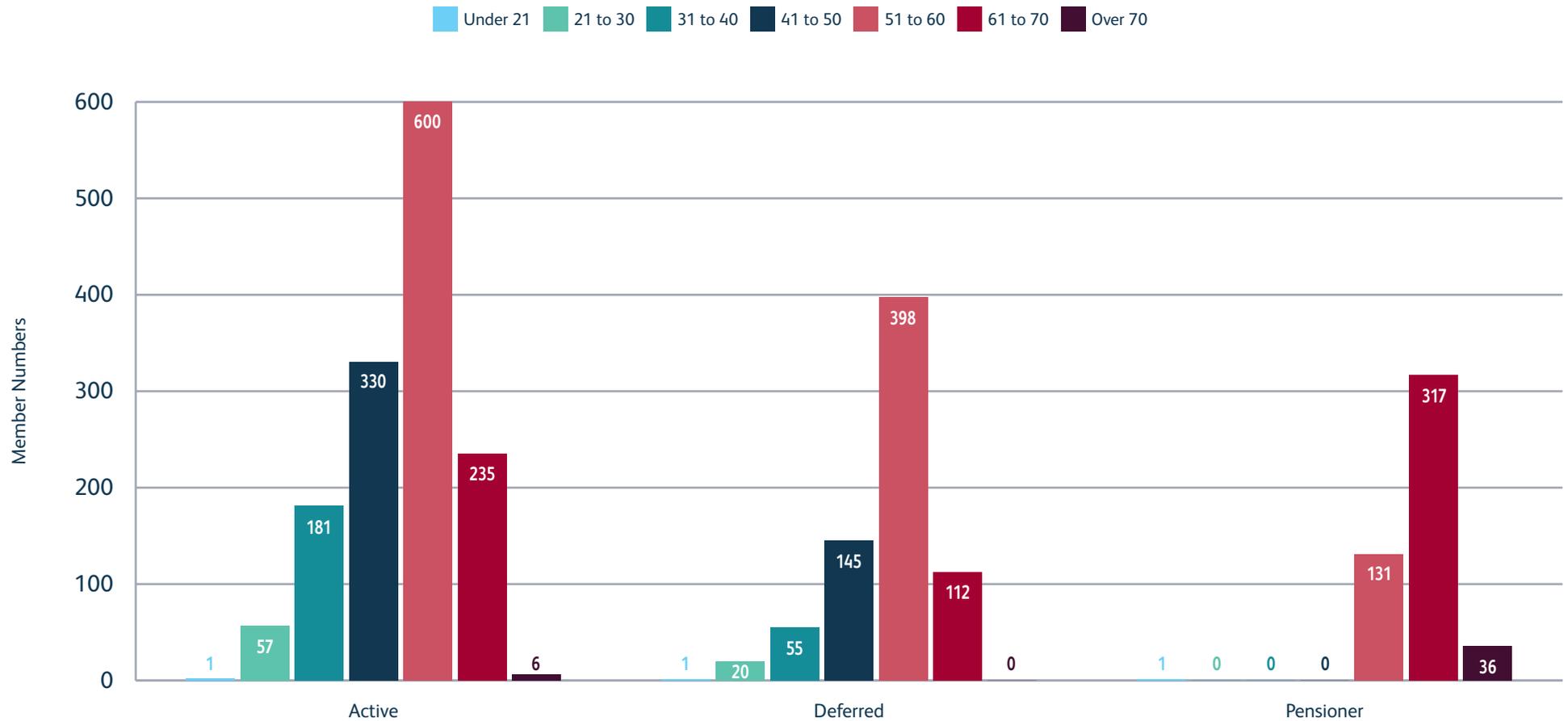
# My Pension Online



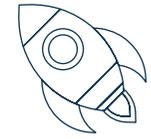
Forward Thinking

## AGE DEMOGRAPHIC

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# Service Improvements



Forward  
Thinking

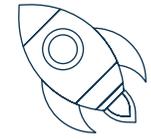
## DELIVERED

1	New LPPA website launched
2	Bulk emails issued to Employers and Members to communicate the site launch
3	LiveChat launched on the website, to offer Members an alternative channel to contact the Helpdesk
4	Online Employer training sessions continue to be delivered remotely
5	Operational teams realigned to improve pension administration processes
6	Exit Cap communications to Clients and Employers
7	Data quality improvements – Member email and telephone details captured by Helpdesk advisers
8	Launched bereavement booklet
9	Introduced dedicated checking team

## SCHEDULED

1	Overseas Members – Life Certificate email activity (January)
2	End of Year data returns (employer training and planning)
3	ABS / P60 campaign planning
4	Pensioner Newsletter (Spring)

# Member Contact Data



Forward  
Thinking

## EMAIL ADDRESSES

	Q4 – 19/20	Q1 – 20/21	Q2 – 20/21	Q3 – 20/21
Active Contributors	2,951 (45.2%)	2,894 (45.18%)	2,942 (46.39%)	2,972 (46.83%)
Deferred Beneficiaries	1,878 (33.21%)	1,655 (28.95%)	1,699 (29.7%)	1,719 (30.33%)
Pensioner and Dependents	1,129 (17.61%)	1,167 (18.26%)	1,229 (19.15%)	1,344 (21%)

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## TELEPHONE NUMBERS

	Q4 – 19/20	Q1 – 20/21	Q2 – 20/21	Q3 – 20/21
Active Contributors	1,227 (18.79%)	1,201 (18.75%)	1,182 (18.64%)	1,199 (18.89%)
Deferred Beneficiaries	1,117 (16.34%)	930 (13.54%)	962 (14.08%)	998 (14.78%)
Pensioner and Dependents	1,007 (15.71%)	1,017 (15.92%)	1,039 (16.19%)	1,101 (17.20%)

# Member Contact Data



Forward  
Thinking

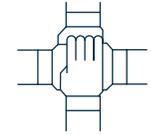
## DEATH NOMINATION

	Q4 – 19/20	Q1 – 20/21	Q2 – 20/21	Q3 – 20/21
Active Contributors	–	2,487 (38.82%)	2,481 (39.12%)	2,467 (38.87%)

## E-COMMUNICATIONS OPT-OUT

	Q4 – 19/20	Q1 – 20/21	Q2 – 20/21	Q3 – 20/21
Active Contributors	100 (1.53%)	93 (1.45%)	91 (1.43%)	87 (1.37%)
Deferred Beneficiaries	101 (1.48%)	104 (1.51%)	101 (1.48%)	95 (1.41%)
Pensioner and Dependents	47 (0.73%)	51 (0.80%)	56 (0.87%)	64 (1.00%)

# Engagement Activity



Working Together

## SUMMARY

This Quarter's biggest event for Engagement was the launch of the new LPPA Website. A presentation of the new site was made to all Clients, launch emails were issued which included the contactable Member database (c. 180k). As a direct result, approximately 1,700 new MPO registrations were recorded in December.

The new LiveChat function was tested and launched alongside the new website, this is now being successfully used by Members to talk directly with Helpdesk advisers to resolve queries.

As part of the continued Member data collection campaign, from October 2020 the Helpdesk now capture email addresses and telephone numbers during calls. This supports the ongoing exercise initiated to collect Member contact data via Employers.

Throughout Q3 the Employer Engagement Team has focused on two main Employer campaigns, 'Assumed Pensionable Pay and Absence' and 'Ill Health Awareness'.

The 'Assumed Pensionable Pay and Absence' campaign email generated over 200 registrations to attend 2 training sessions covering 'Assumed Pensionable Pay and Absence'.

The 'Ill Health Awareness' campaign email attracted almost 100 attendees across two separate online training events.

Overall, the team delivered over 60 online sessions reaching out to almost 400 Employers, and held 15 Member awareness sessions to 185 members.

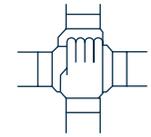
Several emails relating to the 'Exit Cap' have been issued to Employers keeping them up to date on this high-profile topic.

An email was issued to Employers to reinforce the "Importance of sending leaver forms in a timely / accurate manner" and provided signposting for Employers to the relevant sections of the new website.

In addition to the various campaigns and communications detailed in this report, the team continue to engage with Employers and Members through regular virtual visits and support meetings.



# Engagement Activity (Employers & Emails)



Working Together

## EMPLOYERS

Date	Employer	Activity	Number in attendance
09 Oct 2020	Frances Bardsley Academy	Support	1
26 Oct 2020	Harrow Lodge Primary/ Hornchurch High School	Visit	1
09 Nov 2020	Harrow Lodge Primary	Training	1
09 Nov 2020	Hornchurch High School	Training	1
09 Nov 2020	St Edwards Snr Academy	Training	3
15 Dec 2020	Havering Council	Training	5
15 Dec 2020	Drapers' Multi Academy Trust	Training	2
15 Dec 2020	The Coopers Company & Coborn School	Training	1
15 Dec 2020	Unity Schools Partnership	Training	2
17 Dec 2020	Oasis Community Learning	Training	1

## EMAILS – EMPLOYERS

Date	Message / Campaign	Call to Action
07 Oct 2020	Ill health Promo Campaign	Book on training
12 Oct 2020	Exit Cap 1	Information
21 Oct 2020	Ill Health Campaign Reminder	Book on training
02 Nov 2020	Exit Cap 2	Information
05 Nov 2020	Exit Cap 3 Message from LGA	Information

## EMAILS – MEMBERS

Date	Message / Campaign	Number of Emails Sent
22 Oct 2020	My Pension Online Activation Keys	901
26 Oct 2020	My Pension Online Activation Keys (Follow up)	760
13-24 Nov 2020	Pre-Launch Website Update	197,681
08 Dec 2020	Website Now Live	189,821
Weekly Email	Surveys (Bereavement, Transfer Out, Estimate, Retirement)	

# Data Quality (TPR scores)



Doing The Right Thing

## COMMON DATA

Data Item	Active	Deferred	Pensioner / Dependant
NI Number	1	6	25
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	12	434	73
Postcode	14	450	103
<b>Total fails</b>	<b>27</b>	<b>890</b>	<b>202</b>
<b>Individual fails</b>	<b>14</b>	<b>450</b>	<b>103</b>
<b>Total members</b>	<b>6,347</b>	<b>6,753</b>	<b>6,401</b>
<b>Accuracy rate</b>	<b>99.8%</b>	<b>93.3%</b>	<b>98.4%</b>

**Total accuracy rate**

**96.9%**

# Data Quality (TPR scores)



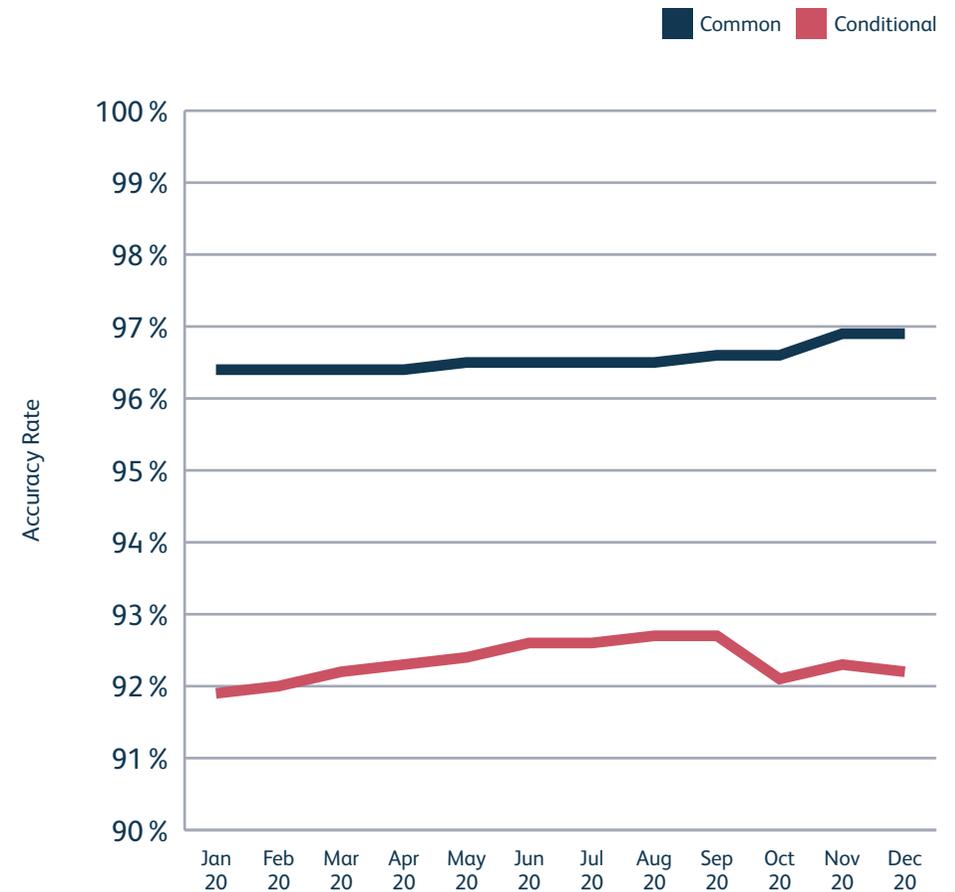
Doing The Right Thing

## CONDITIONAL DATA

Data Item	Fails
Divorce records	0
Transfer In	8
AVC's / Additional Contributions	1
Deferred Benefits	0
Tranches (DB)	444
Gross Pension (Pensioners)	0
Tranches (Pensioners)	34
Gross Pension (Dependants)	3
Tranches (Dependants)	0
Date of leaving	4
Date Joined Scheme	1
Employer Details	2
Salary	267
Crystallisation	40
Annual Allowance	208
LTA Factors	0
Date Contracted Out	55
Pre-88 GMP	137
Post-88 GMP	435
<b>Total fails</b>	<b>1,639</b>
<b>Individual fails</b>	<b>1,517</b>
<b>Total members</b>	<b>19,501</b>

**Total accuracy rate 92.2%**

## COMMON & CONDITIONAL ACCURACY RATE



LPP

Local Pensions Partnership  
Administration

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## **Local Pension Board – Supplementary Performance Information**

**18<sup>th</sup> March 2021**

### **Purpose of paper**

The London Borough of Havering Local Pensions Board (LPB) receive standardised quarterly performance data produced by LPPA. We understand that the Board would like greater transparency around the following areas:

1. The elapsed time of cases which are currently on hold, pending receipt of further information from a third party; and
2. A high-level overview of the 'reason' a case may be on hold.

This report provides an overview of items 1 & 2 for discussion with the Board.

**Elapsed time of current cases on hold (item 1)**

The table below gives an overview of the number of cases currently on hold and the elapsed time of each as at 18<sup>th</sup> March 2021. Please note that a case on hold is one which has had action taken by LPPA, but that is now awaiting further information from a 3<sup>rd</sup> party to finalise processing. In section 4, we look at the breakdown of 'reasons' why a case is currently be on hold.

LPPA will continue to proactively review the oldest cases identified in the table below.

Case Type	< 1 month	1-3 months	3-6 months	7-9 months	10-11 months	> 1 year	Grand Total
New Joiners	2	3	0	0	0	0	5
Aggregation	9	5	9	8	1		32
General Correspondence	1		1	0	0	0	2
Bereavements	14	22	73	2	3	13	127
Deferred benefits	15	12	13	4	1	12	57
Estimates - member	0	1	1	0	0	0	2
Refunds	4	6	1	3	1	5	20
Deferred into payment	19	19	16	0	3	1	58
Retirements	7	5	4	4	2	2	24
Transfers in	17	13	11	12	9	16	78
Transfers out	9	3	11	1	1	1	26
<b>Grand Total</b>	<b>97</b>	<b>89</b>	<b>140</b>	<b>34</b>	<b>21</b>	<b>50</b>	<b>431</b>

**On hold `reasons` (item 2)**

The table below provides a high-level overview of the reasons why cases are currently on hold. These cases are where LPPA has taken action and in order to progress the case we are waiting for further information and/or a response from a 3<sup>rd</sup> party as per the breakdown below.

Case Type	Awaiting a Pending Leaver/Transfer	Awaiting Aggregation	Awaiting AVC provider	Awaiting death certificate	Awaiting employer / client	Awaiting former / new scheme	Awaiting HMRC	Awaiting member / beneficiary	Grand Total
New Joiners	0	0	0	0	5	0	0	0	5
Aggregation	6	11	0	0	4	0	0	11	32
General Correspondence	0	0	0	0	2	0	0	0	2
Bereavements	0	0	0	48	8	0	1	70	127
Deferred benefits	2	7	0	0	44	0	0	4	57
Estimates - member	0	2	0	0	0	0	0	0	2
Refunds	4	3	0	0	13	0	0	0	20
Deferred into payment	0	0	0	0	1	0	1	56	58
Retirements	0	0	1	0	7	0	0	16	24
Transfers in	7	0	0	0	13	38	0	20	78
Transfers out	5	1	0	0	6	10	1	3	26
<b>Grand Total</b>	<b>24</b>	<b>24</b>	<b>1</b>	<b>48</b>	<b>103</b>	<b>48</b>	<b>3</b>	<b>180</b>	<b>431</b>

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# LPP

Local Pensions Partnership  
Administration

## Havering Pension Fund

# Employer Performance

1st October – 31st December 2020



# Contents

## Risk Dashboard

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## Risk Metrics

Page 4

## Service Dashboard

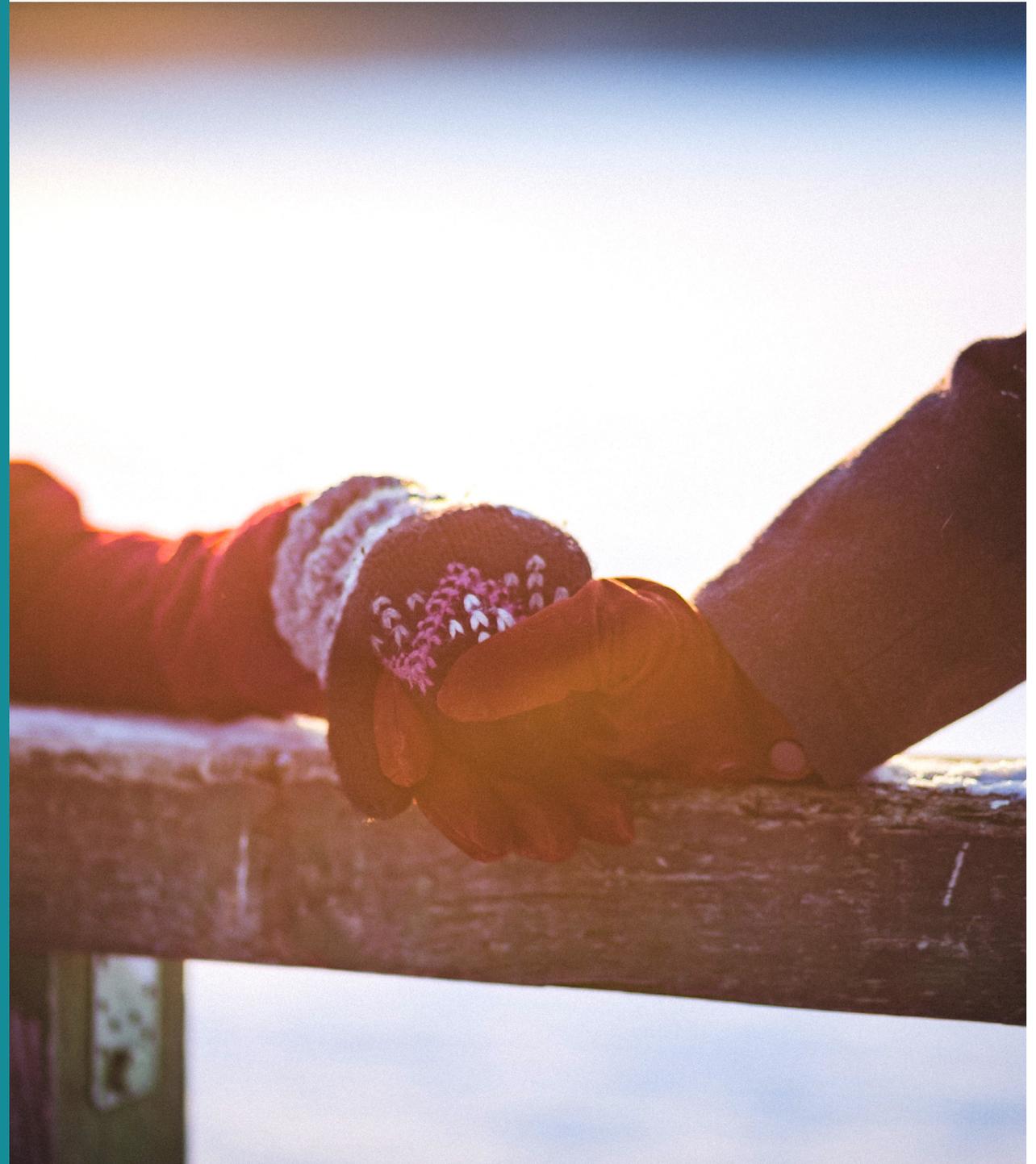
Pages 5

## Service Metrics

Pages 6 & 7

## Notes

Page 8



## Overall Risk - Employer ranking

Top 20 lowest performing Employers in Fund						
Rank	Employer No	Employer Name	Nov	Dec	Months in List	# of Actives
1	HV10534	DRAPERS BROOKSIDE JNR SCHOOL	12.0	21.4	2	32
2	HV10516	SLM COMMUNITY LEISURE C T	11.0	19.1	2	40
3	HV10524	ST EDWARDS SNR ACADEMY	9.4	18.6	2	38
4	HV10500	L.B.OF HAVERING	19.4	18.3	2	4,586
5	HV10523	HALL MEAD SCHOOL	17.9	17.9	2	82
6	HV10542	PYRGO PRIORY PRIMARY SCHOOL	18.3	17.9	2	70
7	HV10546	RAVENSBOURNE ACADEMY	17.9	17.1	2	61
8	HV10533	BOWER PARK ACADEMY	6.6	16.1	1	47
9	HV10519	THE CHAFFORD SCHOOL	15.3	15.9	2	42
10	HV10527	THE ROYAL LIBERTY SCHOOL	3.9	15.6	1	2
11	HV10539	RISE PARK INFANT ACADEMY	14.9	14.6	2	40
12	HV10502	ABBS CROSS SCHOOL	13.6	13.7	2	33
13	HV10545	DRAPERS MAYLANDS	14.7	13.1	2	21
14	HV10572	CATERLINK (DAME TIPPING)	1.0	12.0	1	1
15	HV10571	CATERLINK (FRACES BARDSLEY)	1.0	11.7	1	5
16	HV10570	HARRISON CATERING (GAYNESS)	1.0	11.6	1	1
17	HV10522	CAMPION SCHOOL	17.9	10.6	2	72
18	HV10565	LEWIS AND GRAVES PARTNR LTD	1.0	10.6	1	6
19	HV10529	THE ALBANY SCHOOL	1.9	10.4	1	56
20	HV10550	CONCORDIA ACADEMY	1.0	10.1	1	17

## Overall Risk - Employer Ranking

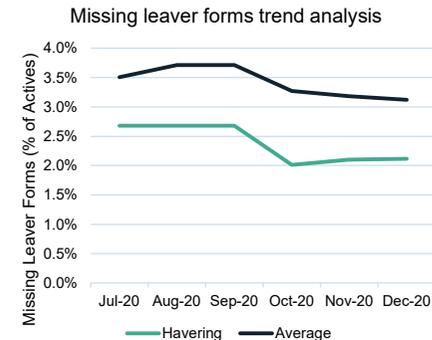
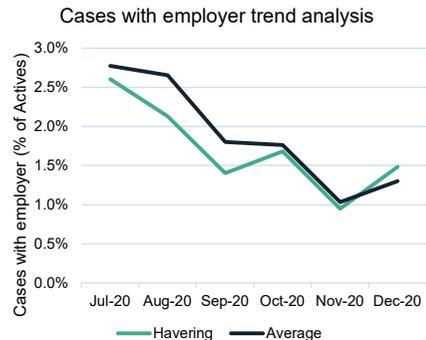
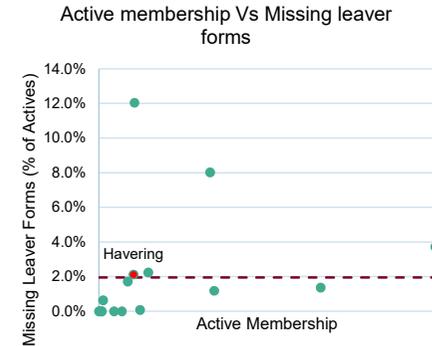
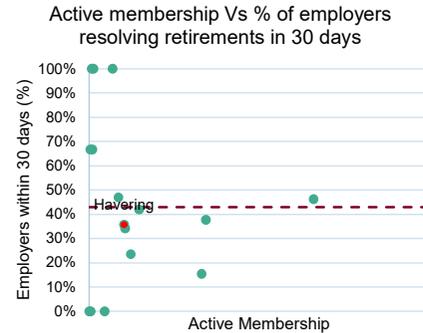
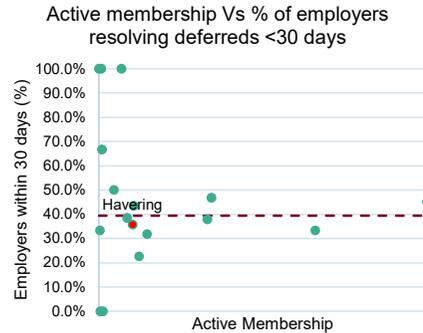
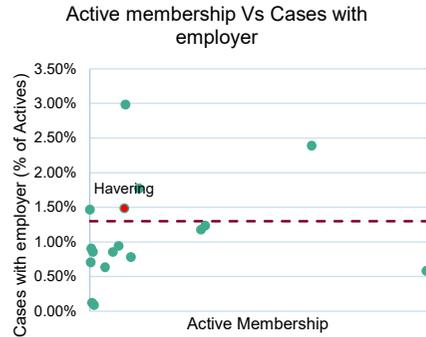
Each employer is ranked against all employers in the fund for the following metrics:

- Cases with the employer
- Total number of days cases have been with the employer
- Elapsed days active to deferred
- Elapsed days active to pensioner
- Elapsed days active to death
- Oldest case ongoing
- Number of cases over 1 year

These individual ranks are then averaged to produce an overall ranking figure and the top 20 lowest performing employers are listed.

The previous monthly score is also presented to show any significant movers within the current top 20 tables.

Please refer to the quarterly administration report for engagement activity



# Risk Metrics

## Cases with Employer

Rank	Employer No	Employer Name	Nov	Dec	# of Actives
1	HV10500	L.B.OF HAVERING	46	62	4,586 (1.4%)
2	HV10516	SLM COMMUNITY LEISURE C T	0	4	40 (10%)
3	HV10523	HALL MEAD SCHOOL	2	4	82 (4.9%)
4	HV10550	CONCORDIA ACADEMY	0	4	17 (23.5%)
5	HV10502	ABBS CROSS SCHOOL	1	2	33 (6.1%)
6	HV10527	THE ROYAL LIBERTY SCHOOL	0	2	2 (100%)
7	HV10529	THE ALBANY SCHOOL	0	2	56 (3.6%)
8	HV10533	BOWER PARK ACADEMY	0	2	47 (4.3%)
9	HV10539	RISE PARK INFANT ACADEMY	1	2	40 (5%)
10	HV10519	THE CHAFFORD SCHOOL	1	1	42 (2.4%)

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

## Elapsed Days - Active to Pensioner

Rank	Employer No	Employer Name	Nov	Dec	# of Actives
1	HV10560	HARRISON CATERING	416	416	1
2	HV10525	EMERSON PARK SCHOOL	395	395	53
3	HV10542	PYRGO PRIORY PRIMARY SCHOOL	182	182	70
4	HV10546	RAVENSBOURNE ACADEMY	151	151	61
5	HV10534	DRAPERS BROOKSIDE JNR SCHOOL	80	80	32
6	HV10519	THE CHAFFORD SCHOOL	73	73	42
7	HV10524	ST EDWARDS SNR ACADEMY	55	55	38
8	HV10552	MARSHALLS PARK ACADEMY	52	52	47
9	HV10539	RISE PARK INFANT ACADEMY	53	48	40
10	HV10533	BOWER PARK ACADEMY	23	45	47

The average number of working days between LPPA being informed the Member is retiring to 31st December for those Members who LPPA are currently awaiting a reply from the Employer/Member

## Elapsed Days - Active to Deferred

Rank	Employer No	Employer Name	Nov	Dec	# of Actives
1	HV10527	THE ROYAL LIBERTY SCHOOL	0	255	2
2	HV10534	DRAPERS BROOKSIDE JNR SCHOOL	0	210	32
3	HV10524	ST EDWARDS SNR ACADEMY	0	165	38
4	HV10500	L.B.OF HAVERING	107	89	4,586
5	HV10523	HALL MEAD SCHOOL	40	60	82
6	HV10502	ABBS CROSS SCHOOL	35	55	33
7	HV10519	THE CHAFFORD SCHOOL	36	54	42
8	HV10529	THE ALBANY SCHOOL	0	39	56
9	HV10516	SLM COMMUNITY LEISURE C T	0	19	40
10					

The average number of working days between LPPA being informed the Member is a leaver to 31st December for those Members who LPPA are currently awaiting a reply from the Employer

## Missing Leavers Forms

Rank	Employer No	Employer Name	Nov	Dec	# of Actives
1	HV10500	L.B.OF HAVERING	40	40	4,586 (0.9%)
2	HV10559	HARROW LODGE PRIMARY SCHOOL	21	22	58 (37.9%)
3	HV10529	THE ALBANY SCHOOL	18	15	56 (26.8%)
4	HV10552	MARSHALLS PARK ACADEMY	1	8	47 (17%)
5	HV10546	RAVENSBOURNE ACADEMY	3	6	61 (9.8%)
6	HV10550	CONCORDIA ACADEMY	7	6	17 (35.3%)
7	HV10543	DYCORDS SCHOOL	5	5	68 (7.4%)
8	HV10545	DRAPERS MAYLANDS	6	5	21 (23.8%)
9	HV10542	PYRGO PRIORY PRIMARY SCHOOL	5	4	70 (5.7%)
10	HV10547	DRAPERS BROOKSIDE INFANTS	5	4	36 (11.1%)

Rank	Employer No	Employer Name	Nov	Dec	# of Actives
1	HV10559	HARROW LODGE PRIMARY SCHOOL	36%	38%	58
2	HV10550	CONCORDIA ACADEMY	54%	35%	17
3	HV10565	LEWIS AND GRAVES PARTNR LTD	33%	33%	6
4	HV10529	THE ALBANY SCHOOL	32%	27%	56
5	HV10515	SLM FITNESS AND HEALTH LTD	25%	25%	4
6	HV10545	DRAPERS MAYLANDS	29%	24%	21
7	HV10568	DRAPERS MAT	20%	20%	5
8	HV10552	MARSHALLS PARK ACADEMY	2%	17%	47
9	HV10561	GAYNES ACADEMY	16%	16%	19
10	HV10547	DRAPERS BROOKSIDE INFANTS	14%	11%	36

The total number of Members who currently sit as active on our systems and we are aware that these Members have since ceased paying into the LGPS.

Please note: Those Employers with a high percentage of missing leavers (regardless of size of Employer) will have significant actuarial implications. This table was incorporated as to identify any potential cessation valuations as well as significant Employer contribution rate increases at the next triennial valuation.

FRS17/IAS19 reports would also be impacted if there were a large number of missing leavers identified.

## Overall service - Employer ranking

Top 20 lowest performing Employers in Fund						
Rank	Employer No	Employer Name	Nov	Dec	Months in List	# of Actives
1	HV10572	CATERLINK (DAME TIPPING)	25.2	24.8	2	1
2	HV10550	CONCORDIA ACADEMY	23.0	23.0	2	17
3	HV10500	L.B.OF HAVERING	22.0	21.3	2	4,586
4	HV10543	DYCORTS SCHOOL	22.2	21.2	2	68
5	HV10515	SLM FITNESS AND HEALTH LTD	21.0	20.5	2	4
6	HV10522	CAMPION SCHOOL	20.2	19.7	2	72
7	HV10546	RAVENSBOURNE ACADEMY	19.3	18.7	2	61
8	HV10540	RISE PARK JUNIOR ACADEMY	18.8	18.5	2	42
9	HV10519	THE CHAFFORD SCHOOL	18.8	18.3	2	42
10	HV10523	HALL MEAD SCHOOL	18.2	18.0	2	82
11	HV10535	LANGTONS JUNIOR ACADEMY	18.7	18.0	2	35
12	HV10524	ST EDWARDS SNR ACADEMY	18.7	17.8	2	38
13	HV10563	SANDERS ACADEMY	15.2	17.5	1	36
14	HV10545	DRAPERS MAYLANDS	17.3	17.0	2	21
15	HV10555	SCARGILL INFANT ACADEMY	16.8	16.8	2	25
16	HV10562	HACTON ACADEMY	16.8	16.8	2	59
17	HV10534	DRAPERS BROOKSIDE JNR SCHOOL	17.2	16.7	2	32
18	HV10536	OASIS ACADEMY PINWOOD	16.7	16.5	2	42
19	HV10561	GAYNES ACADEMY	16.5	16.2	2	19
20	HV10554	ACCENT CATERING	16.2	15.8	2	5

## Overall Service - Employer Ranking

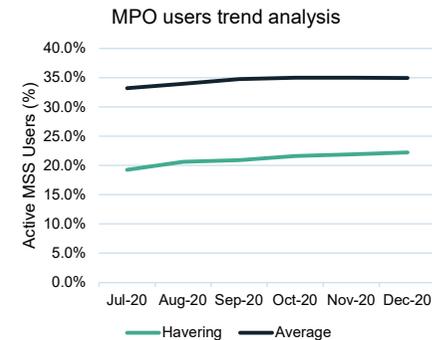
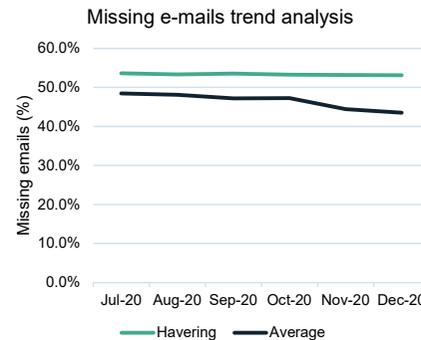
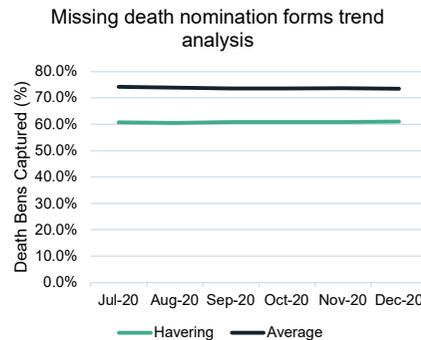
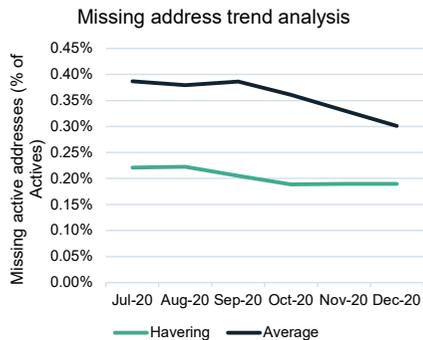
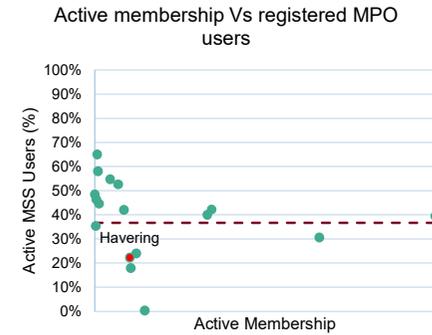
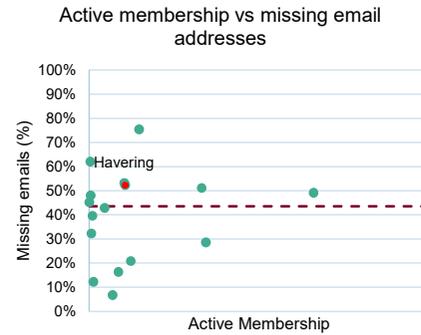
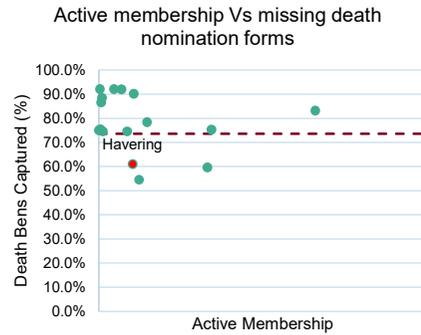
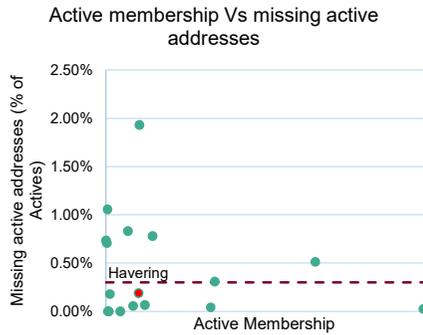
Each employer is ranked against all employers in the fund for the following metrics:

- Missing email addresses
- Missing addresses
- Missing death nomination forms
- Missing telephone numbers
- Average retirement survey score
- Average estimate survey score

These individual ranks are then averaged to produce an overall ranking figure and the top 20 lowest performing employers are listed.

The previous monthly score is also presented to show any significant movers within the current top 20 tables.

Please refer to the quarterly administration report for engagement activity.



## Missing addresses

Rank	Employer No	Employer Name	Nov	Dec	# of Actives
1	HV10500	L.B.OF HAVERING	9	9	4,586 (0.2%)
2	HV10522	CAMPION SCHOOL	2	2	72 (2.8%)
3	HV10523	HALL MEAD SCHOOL	1	1	82 (1.2%)

Missing addresses is a key pension regulator common data fail and regular reports are compiled by LPPA and Employers chased to obtain this missing information.

## Missing death nomination forms

Rank	Employer No	Employer Name	Nov	Dec	# of Actives
1	HV10500	L.B.OF HAVERING	2,759	2,761	4,586 (60.2%)
2	HV10543	DYCOROTS SCHOOL	59	58	68 (85.3%)
3	HV10562	HACTON ACADEMY	45	46	59 (78%)
4	HV10546	RAVENSBOURNE ACADEMY	45	45	61 (73.8%)
5	HV10542	PYRGO PRIORY PRIMARY SCHOOL	44	44	70 (62.9%)
6	HV10522	CAMPION SCHOOL	42	42	72 (58.3%)
7	HV10559	HARROW LODGE PRIMARY SCHOOL	42	42	58 (72.4%)
8	HV10529	THE ALBANY SCHOOL	38	38	56 (67.9%)
9	HV10523	HALL MEAD SCHOOL	38	37	82 (45.1%)
10	HV10526	REDDEN COURT SCHOOL	32	33	59 (55.9%)

Recording death nomination forms streamlines the process should the worst happen to a Member. This information can also be used by the actuaries to more accurately calculate the scheme liabilities.

## Missing e-mail addresses

Rank	Employer No	Employer Name	Nov	Dec	# of Actives
1	HV10500	L.B.OF HAVERING	2,378	2,378	4,586 (51.9%)
2	HV10542	PYRGO PRIORY PRIMARY SCHOOL	56	56	70 (80%)
3	HV10523	HALL MEAD SCHOOL	50	49	82 (59.8%)
4	HV10522	CAMPION SCHOOL	48	48	72 (66.7%)
5	HV10526	REDDEN COURT SCHOOL	42	43	59 (72.9%)
6	HV10562	HACTON ACADEMY	40	41	59 (69.5%)
7	HV10521	THE BRITTONS ACADEMY	39	39	62 (62.9%)
8	HV10525	EMERSON PARK SCHOOL	39	38	53 (71.7%)
9	HV10507	SACRED HEART OF MARY	36	37	54 (68.5%)
10	HV10529	THE ALBANY SCHOOL	37	37	56 (66.1%)

Email communication is LPPA's preferred method of Member communication (unless they have opted out of e-communications). All Members are able to register for and get access to My Pension Online, if they have a valid email address

## Registered MPO users

Rank	Employer No	Employer Name	Nov	Dec	# of Actives
1	HV10500	L.B.OF HAVERING	1,038	1,056	4,586 (23%)
2	HV10523	HALL MEAD SCHOOL	29	28	82 (34.1%)
3	HV10522	CAMPION SCHOOL	22	22	72 (30.6%)
4	HV10516	SLM COMMUNITY LEISURE C T	18	19	40 (47.5%)
5	HV10506	COOPERS COBORN	18	18	51 (35.3%)
6	HV10503	FRANCES BARDSLEY ACADEMY	16	17	68 (25%)
7	HV10546	RAVENSBOURNE ACADEMY	16	16	61 (26.2%)
8	HV10529	THE ALBANY SCHOOL	13	13	56 (23.2%)
9	HV10533	BOWER PARK ACADEMY	13	13	47 (27.7%)
10	HV10521	THE BRITTONS ACADEMY	13	12	62 (19.4%)

MPO access is strongly advised as this gives the Members the ability to keep their records up to date, view benefit statements, submit death nominations and calculate estimates.

## Retirement Survey Scores (out of 5)

Rank	Employer No	Employer Name	Ave Score	Surveys Taken	# of Actives
1	HV10524	ST EDWARDS SNR ACADEMY	2.0	1	38
2	HV10503	FRANCES BARDSLEY ACADEMY	4.0	2	68
3	HV10563	SANDERS ACADEMY	4.0	1	36
4	HV10504	SIXTH FORM COLLEGE	4.0	2	0
5	HV10500	L.B.OF HAVERING	4.2	44	4,586
6	HV10502	ABBS CROSS SCHOOL	5.0	1	33
7	HV10516	SLM COMMUNITY LEISURE C T	5.0	3	40
8	HV10529	THE ALBANY SCHOOL	5.0	1	56
9	HV10539	RISE PARK INFANT ACADEMY	5.0	1	40
10	HV10540	RISE PARK JUNIOR ACADEMY	5.0	1	42

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

## Active membership Vs average overall retirement score



# Service Metrics

Estimate Survey Scores (out of 5)

Rank	Employer No	Employer Name	Ave Score	Surveys Taken	# of Actives
1	HV10500	L.B.OF HAVERING	2.5	2	4,586
2	HV10507	SACRED HEART OF MARY	4.0	1	54
3	HV10520	DRAPERS ACADEMY	5.0	1	39
4	HV10563	SANDERS ACADEMY	5.0	1	36
5					
6					
7					
8					
9					
10					

Top 4 worst performing Employers based on the Members estimate survey scores, number of surveys taken and the number of Members paying into the LGPS

## Call Volumes

This chart details what % of helpdesk calls relate to the Havering Fund. This is compared against Havering's proportion of total Members administered by LPPA.

Tables pertaining to individual Employers can not be derived from the source data as callers are only required to identify the Fund they are employed by and not their individual Employer

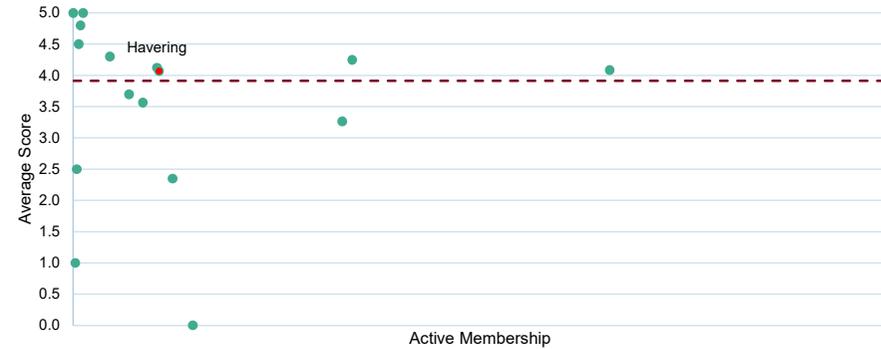
Notes:

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

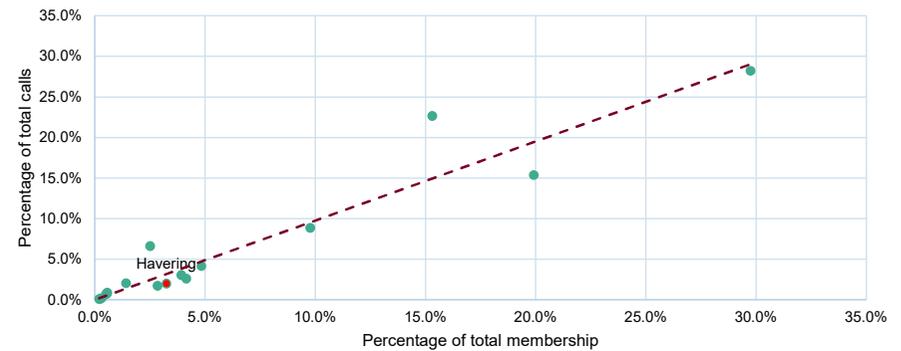
The dotted red line represents the combined Client performance and the individual points represents a different Client that LPPA administers.

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

Active membership Vs average overall estimate score



% Calls Vs % membership



## Risk Dashboard

**Overall Risk - Employer Ranking** - See detailed notes on page 4

**Cases with Employer** - Percentage derived by dividing the total number of cases with the Employer by the number of active Members

**% of Employers resolving deferrals < 30 days** - Average number of days it takes for resolving a deferred case for each employer then the percentage of employers who have an average of under 30 days.

**% of Employers resolving retirements < 30 days** - Average number of days it takes for resolving a retirement case for each employer then the percentage of employers who have an average of under 30 days.

**Missing Leaver Forms** - The percentage of missing leaver forms against active membership

## Risk Metrics

**Cases with Employer** - The top 10 Employers in your Fund based on the number of cases currently with the Employer to respond to LPPA

**Active to Deferred** - The top 10 Employers in your Fund based on the average number of working days between LPPA being informed the member is a leaving employment to the completion of the case.

**Active to Pensioner** - The top 10 Employers in your Fund based on the average number of working days between LPPA being informed the member is retiring to the completion of the case.

**Missing Leaver Forms** - The top 10 Employers in your Fund based on the total number of missing leaver forms and the percentage of active members

## Service Dashboard

**Overall Service - Employer Ranking** - See detailed notes on page 6

**Missing Addresses** - Percentage of members paying into the LGPS who we do not have a home address for

**Missing Nom Form** - Percentage of members paying into the LGPS who haven't submitted a death nomination form

**Missing E-mails** - Percentage of e-mails missing on our systems for members currently paying into the LGPS

**MPO user** - Total number of members paying into the LGPS who has access to My Pension Online

## Service Metrics

**Missing Addresses** - The top 10 Employers in your Fund based on members paying into the LGPS who we do not have a home address for

**Missing Nom Form** - The top 10 Employers in your Fund based on members paying into the LGPS who haven't submitted a death nomination form

**Missing E-mails** - The top 10 Employers in your Fund based on e-mails missing on our systems for members currently paying into the LGPS

**MPO user** - The top 10 Employers in your Fund based on members paying into the LGPS who has access to My Pension Online

**Retirement Survey** - Top 10 Employers in your Fund based on the members retirement survey scores, number of surveys taken and the number of members paying into the LGPS

**Estimate Survey** - Top 10 Employers in your Fund based on the members estimate survey scores, number of surveys taken and the number of members paying into the LGPS

**Call Volumes** - See detailed notes on page 8

# LPP

Local Pensions Partnership  
Administration

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# Pension Fund Risk Register

## Havering

October 2020

Generic Pension Fund Risk Register

The pension fund uses a 4 x 6 matrix to plot risk likelihood and impact and has set its risk appetite. The green shaded area on the matrix shows the risks where there is good control and the Council is comfortable with the risk. Risks in the amber and red zones are those over which closer control is needed.

Page 46

Likelihood	A				
	B				
	C				
	D				
	E				
	F				
		4	3	2	1
	Impact				

**Risk Likelihood**  
 F = Very Unlikely  
 E = Unlikely  
 D = Possible  
 C = Likely  
 B = Very likely  
 A = Certainty

**Risk Impact**  
 4 = Negligible  
 3 = Moderate  
 2 = Serious  
 1 = Major

Pension Fund Risk Register oneSource – Havering – as at October 2020

Appendix A

Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/ Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
1	S151 Officer/ Director of Exchequer and Transactional Services Lower Level: PM/CMO  PFM/CMO  CMO  PFM/CMO	<p><b>Risk of Inaccurate three yearly actuarial valuation</b></p> <p><b>Cause:</b></p> <ul style="list-style-type: none"> <li>▪ Inappropriate assumptions used by actuary in calculations for valuation</li> <li>▪ Poor quality data provided from LB of Havering</li> <li>▪ Personal data not maintained to a high standard (gaps/incorrect)</li> <li>▪ Actuary’s own assumptions are not robust or reflective</li> </ul>	<ul style="list-style-type: none"> <li>▪ Deficit not reduced</li> <li>▪ Employers pay/continue to pay inappropriate contribution percentages</li> <li>▪ Increase in employer contributions</li> <li>▪ Potential for Council Tax increases</li> <li>▪ More investment risk may be taken to bridge a gap that doesn’t actually exist</li> <li>▪ Potential for a more risk adverse Investment Strategy when</li> </ul>	<ul style="list-style-type: none"> <li>▪ Valuation completed by a qualified professional actuary</li> <li>▪ Robust, open procurement process in place for appointment of actuary</li> <li>▪ Assumptions for valuation are in compliance with regulation</li> <li>▪ Actuarial assumptions are open to challenge by officers and GAD</li> <li>▪ Valuation results are checked for consistency across LGPS funds by GAD via the S13 report</li> </ul>	D/3	None identified at this point	

Pension Fund Risk Register oneSource – Havering – as at October 2020

Appendix A

Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/ Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
Page 48			more risk is required.	<ul style="list-style-type: none"> <li>▪ Local Government benchmarking/comparisons of assumptions</li> <li>▪ Annual review of actuary performance undertaken by Pensions Committee</li> <li>▪ Controls in place to ensure accuracy and completeness of data.</li> <li>▪ Monitoring of contributions due and received</li> </ul>			
	2	S151 Officer/ Lower Level as follows:  PFM  PFM PFM  PFM	<b>Risk of Incorrect / Inappropriate Investment Strategy</b> <b>Cause:</b> <ul style="list-style-type: none"> <li>▪ Lack or poor professional investment advice given</li> <li>▪ Poor governance</li> <li>▪ Investment advice is not taken</li> </ul>	<ul style="list-style-type: none"> <li>▪ Pension deficit not reduced</li> <li>▪ Potential for financial loss</li> <li>▪ Growth opportunities are not maximised</li> </ul>	<ul style="list-style-type: none"> <li>▪ Investment Advisor appointed to advise the Fund and is instrumental in setting Investment Strategy</li> <li>▪ Independent advisor was</li> </ul>	D/2	

Pension Fund Risk Register oneSource – Havering – as at October 2020

Appendix A

Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/ Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
PFM PFM PFM	PFM	<ul style="list-style-type: none"> <li>▪ Lack of understanding and awareness (Pension Committee)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Could generate inefficiencies and unintended risks if not fully understood.</li> </ul>	<ul style="list-style-type: none"> <li>▪ appointed for a one off exercise following adoption of investment strategy in January 17 to undertake a health check and add robustness on the investment strategy.</li> </ul>			
	PFM	<ul style="list-style-type: none"> <li>▪ Lack of clear risk appetite</li> </ul>	<ul style="list-style-type: none"> <li>▪ More investment risk may be taken to bridge a gap that doesn't actually exist</li> </ul>	<ul style="list-style-type: none"> <li>▪ Robust, open procurement process in place for appointment of Investment Advisor</li> </ul>			
	PFM	<ul style="list-style-type: none"> <li>▪ Based upon inaccurate actuarial valuation</li> <li>▪ Concentration risk by asset, region and sector</li> </ul>	<ul style="list-style-type: none"> <li>▪ Potential for a more risk adverse Investment Strategy when more risk is required.</li> <li>▪ Potential for Council Tax increases</li> <li>▪ Loss of investment opportunities and adverse performance</li> </ul>	<ul style="list-style-type: none"> <li>▪ Investment Advisor performance is annually reviewed by the Pensions Committee and conforms to Competitive Markets Order.</li> <li>▪ Close working relationship is encouraged between actuaries and investment advisor in the</li> </ul>			

Pension Fund Risk Register oneSource – Havering – as at October 2020

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Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/ Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
Page 50				development of the investment strategy <ul style="list-style-type: none"> <li>▪ Investment strategy continually assessed as part of the quarterly monitoring process by the Pensions Committee</li> <li>▪ Liabilities analysed during inter-valuation period</li> <li>▪ Knowledge and skills training of LPB and Committee Members</li> <li>▪ Inductions carried out for new LPB and Pension Fund Committee member.</li> </ul>		<ul style="list-style-type: none"> <li>▪ Pensions Committee - Training / Awareness - working towards full compliance with CIPFA Knowledge and Skills framework.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Knowledge and Skills Training is on-going for Pension Committee and Local Pension Board members.</li> </ul>
	3	S151 Officer/ Lower Level as follows:	<b>Risk of failure of investments to perform in-line with growth expectations</b>  <b>Cause</b>			D/3	

Pension Fund Risk Register oneSource – Havering – as at October 2020

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Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
Page 51	PFM	<ul style="list-style-type: none"> <li>Poor Fund Manager selection</li> </ul>	<ul style="list-style-type: none"> <li>Deficit reduction targets are not met</li> </ul>	<ul style="list-style-type: none"> <li>Robust, Fund Manager selection process</li> </ul>		<ul style="list-style-type: none"> <li>Pensions Committee Training/Awareness – working towards full compliance with CIPFA Knowledge and Skills framework</li> </ul>	<ul style="list-style-type: none"> <li>CIPFA Knowledge and Skills Training is on-going.</li> </ul>
	PFM	<ul style="list-style-type: none"> <li>Underperformance by fund manager</li> </ul>	<ul style="list-style-type: none"> <li>Potential for losses to be incurred</li> </ul>	<ul style="list-style-type: none"> <li>Diverse portfolio to reduce negative effects from market volatility</li> </ul>			
	PFM	<ul style="list-style-type: none"> <li>Poor investment advice provided to the Fund or not taken</li> </ul>	<ul style="list-style-type: none"> <li>Increased employer contributions</li> </ul>	<ul style="list-style-type: none"> <li>Fund performance and asset class split is reviewed quarterly by investment advisor/Pensions Committee and officers.</li> </ul>			
	PFM	<ul style="list-style-type: none"> <li>Negative financial market impacts</li> </ul>	<ul style="list-style-type: none"> <li>Reputational risk from poor investments</li> </ul>	<ul style="list-style-type: none"> <li>Fund Managers (including LCIV) attend Pension Committee to present quarterly performance reports and challenge by the Committee and Fund Advisor.</li> </ul>			
	PFM	<ul style="list-style-type: none"> <li>External factors / increased market volatility (i.e. 2008), uncertainty of Brexit, COVID-19 Pandemic.</li> </ul>	<ul style="list-style-type: none"> <li>The fund's assets are not sufficient to meet its long term liabilities</li> </ul>	<ul style="list-style-type: none"> <li>Process in place to fund new illiquid mandates.</li> </ul>			
	PFM	<ul style="list-style-type: none"> <li>Delays in the implementation of the strategy will reduce the effectiveness of the strategy and may impact growth</li> </ul>	<ul style="list-style-type: none"> <li>Economy downturn could result in general fall in investment values</li> </ul>				
	PFM	<ul style="list-style-type: none"> <li>Delays in compliance with capital calls on new illiquid mandates could result in penalty payments</li> </ul>					
	PFM						

Pension Fund Risk Register oneSource – Havering – as at October 2020

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Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/ Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
Page 52	PFM	<ul style="list-style-type: none"> <li>▪ Underperformance of fund manager (LCIV new pooled holding) in achieving Asset Under Management Target</li>   <li>▪ Fund Managers – non-compliance to the Code of Transparency.</li> </ul>	<ul style="list-style-type: none"> <li>• MTFS prediction may fail to reach the target – consequence being that annual development charges may not decrease in line with MTFS expectations</li>   <li>▪ Havering not able to disclose full management fees in the Pension Fund Annual Report and accounts, in line with CIPFA guidance.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Development costs are reported by the LCIV at the General Shareholder meetings attended by shareholder reps i.e. Councillors from each borough.</li> <li>▪ Monitoring meetings are held with Officers from Havering and LCIV client relations team quarterly.</li> <li>▪ Fund Managers complete the Code of Transparency compliance template annually.</li> </ul>		<ul style="list-style-type: none"> <li>▪ To continue the monitoring of the LCIV performance.</li> <li>▪ To ensure LCIV development costs are notified to shareholder representative for informed voting decisions.</li>   <li>▪ Ensure annual compliance with receipt of completed templates.</li> </ul>	<ul style="list-style-type: none"> <li>• Regular reviews of the LCIV performance continues and this includes monitoring of the LCIV development costs</li>   <li><b>Further Action taken</b> <ul style="list-style-type: none"> <li>▪ Ongoing action taken as templates are submitted year on year. 2019/20 templates now all completed.</li> </ul> </li> </ul>

Pension Fund Risk Register oneSource – Havering – as at October 2020

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Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/ Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
4	S151 Officer /Director of Exchequer and Transactional Services.  Lower Level as follows: PFM/CMO  PFM/CMO  PFM/CMO  PFM/CMO  PFM/CMO	<b>Risk of failure to comply with legislative requirements</b>  <b>Cause:</b> <ul style="list-style-type: none"> <li>▪ Lack of appropriate skills/knowledge of tPR, MHCLG and CIPFA Guidance, Financial Regulations and accounting standards</li> <li>▪ Unaware of legislative changes</li> <li>▪ key person dependency</li> <li>▪ Poor/inaccurate interpretation of the regulations</li> <li>▪ Failure/inability to administer the pension scheme appropriately</li> </ul>	<ul style="list-style-type: none"> <li>▪ Reputational damage</li> <li>▪ Potential for financial penalties from the tPR</li> <li>▪ Potential for costly legal challenges</li> <li>▪ Impact on employer contributions, delayed due to non-compliance.</li> <li>▪ Adverse external audit report</li> </ul>	<ul style="list-style-type: none"> <li>▪ Financial requirements are subject to external and internal audit with no qualifications.</li> <li>▪ Experienced personnel in place</li> <li>▪ Continual personal development for all Committee/LPB members and Officers</li> <li>▪ Induction carried out for new Pension Fund Committee and Local Pension Board members</li> <li>▪ Legislative changes are reported to the Pensions</li> </ul>	E/3	None identified at this point.	

Pension Fund Risk Register oneSource – Havering – as at October 2020

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Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/ Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
Page 54				Committee where required <ul style="list-style-type: none"> <li>▪ Local Pension Board in place to oversee adherence to the regulations</li> <li>▪ Active participation in Legislative Consultations where appropriate</li> <li>▪ External and in house training provided where required</li> <li>▪ Member of the CIPFA Pensions Network</li> <li>▪ Participate in the CIPFA Pensions Network/ Peer forums to share knowledge &amp; awareness</li> <li>▪ Statutory policy documents reviewed annually to ensure compliance with legislation</li> </ul>			

Pension Fund Risk Register oneSource – Havering – as at October 2020

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Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
				<ul style="list-style-type: none"> <li>▪ Access to specialist pension media sources.</li> <li>▪</li> </ul>			
5	<p>S151 Officer /Director of Exchequer and Transactional Services. Lower level as follows:</p> <p>PFM/CMO</p> <p>PFM/CMO</p> <p>PFM/CMO</p> <p>PFM/CMO</p> <p>PFM/CMO</p> <p>PFM/CMO</p>	<p><b>Risk of inability to manage/govern the Pension Fund and associated services:</b></p> <p><b>Cause:</b></p> <ul style="list-style-type: none"> <li>▪ Ineffective / lack of succession planning</li> <li>▪ Loss of corporate knowledge/expertise</li> <li>▪ Long term sickness absence</li> <li>▪ Increase in staff turnover</li> <li>▪ Lack of resource (Staffing/financial)</li> <li>▪ No knowledge base to store experiences/information</li> </ul>	<ul style="list-style-type: none"> <li>▪ Negative impacts upon service provision</li> <li>▪ Time delays</li> <li>▪ Potential for breach of legislation</li> <li>▪ Financial penalties/ other sanctions</li> <li>▪ Reputational Damage</li> <li>▪ Increased costs due to “buying in” external expertise</li> </ul>	<ul style="list-style-type: none"> <li>• LPP appointed in Havering in November 17 to administer the Pension Fund</li> <li>• Attendance at local forum meetings</li> <li>• Continuous pension training for LPB, Pensions Committee members and staff</li> <li>• Attendance at Annual Pension Managers conference</li> </ul>	D/3	<ul style="list-style-type: none"> <li>• Succession planning required for key personnel</li> <li>• Review / update procedure manuals</li> <li>• Option being assessed for joint administration with Newham to build resilience</li> <li>• Development of Training Matrix</li> <li>• Development of workflow/process management</li> </ul>	<ul style="list-style-type: none"> <li>• Succession planning in progress</li> <li>• CMO working to prepare procedure manuals.</li> <li>• Training matrix in place, however cannot be fully applied until all CIPFA K&amp;S questionnaires are completed by Local Pension Board and</li> </ul>

Pension Fund Risk Register oneSource – Havering – as at October 2020

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Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/ Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
Page 56	PFM	<ul style="list-style-type: none"> <li>▪ LCIV resourcing – LCIV staff turnover</li> </ul>	<ul style="list-style-type: none"> <li>▪ Undermines investor confidence in the LCIV.</li> <li>▪ Asset under management do not increase in line with expected target –leading to increase costs for the fund</li> </ul>	<ul style="list-style-type: none"> <li>• Members of Local Authority Pensions Web</li> <li>• Participates in the CIPFA Pensions Network/ Peer forums to share knowledge &amp; awareness</li> <li>• Guidance from external agencies (some will be at a cost)</li> <li>• Asset under management target not met</li> </ul>		<ul style="list-style-type: none"> <li>• Continued monitoring of LCIV</li> </ul>	<p>Pensions Committee members.</p> <ul style="list-style-type: none"> <li>• LPP works with the CMO to develop/improve workflow processes</li> </ul>
	PFM/CMO	<ul style="list-style-type: none"> <li>▪ ICT failure/Disaster Recovery</li> </ul>	<ul style="list-style-type: none"> <li>▪ Loss of infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• ICT/ Disaster Recovery in place</li> </ul>		<ul style="list-style-type: none"> <li>• Ensure GDPR practice undertaken</li> </ul>	<ul style="list-style-type: none"> <li>• Evidence that working from home to maintain service</li> </ul>
	PFM/CMO	<ul style="list-style-type: none"> <li>▪ Cyber Security Risk</li> </ul>	<ul style="list-style-type: none"> <li>▪ Failure of all ICT services</li> <li>▪ Ransomware risk</li> </ul>				

Pension Fund Risk Register oneSource – Havering – as at October 2020

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Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/ Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
Page 57	PFM/CMO	<ul style="list-style-type: none"> <li>▪ Implementation of Oracle Cloud causes system issues</li> </ul>	<ul style="list-style-type: none"> <li>▪ Data breaches</li> <li>▪ Pension Fund Accounts system failures - operational issues and accounting reconciliations not able to be carried out.</li> </ul>	<ul style="list-style-type: none"> <li>• Constant security upgrades to computer systems. Internal Audit for oneSource Cyber Security carried out in Oct 2018.LPP have gained a certificate of Cyber Essentials from March 19 – March 20.</li> <li>• Oracle expertise aware of Pension fund system requirements. Systems tested at each stage of implementation.</li> </ul>		<ul style="list-style-type: none"> <li>• Use protected portals to send personal information</li> <li>• Internal Firewalls recommended</li> </ul>	<p>continuity successful after implementation of COVID-19 working restrictions</p>
	CMO	<ul style="list-style-type: none"> <li>▪ Poor pension fund administration including outsourced service by LPP</li> </ul>	<ul style="list-style-type: none"> <li>• Admission agreements not completed by the transfer date.</li> </ul>	<ul style="list-style-type: none"> <li>• Formal agreement in place with administrator, including SLA's</li> </ul>		<ul style="list-style-type: none"> <li>• Pension Fund Staff to interact regarding the progress of the Oracle Cloud Implementation</li> </ul>	<p>Further Actions :</p> <ul style="list-style-type: none"> <li>• Fusion live in September 20 – Testing was undertaken by Pension Staff. System monitoring is on-going.</li> </ul>
	CMO	<ul style="list-style-type: none"> <li>▪ Poor administration by the employers, payroll providers in the fund</li> </ul>		<ul style="list-style-type: none"> <li>• Service is subject to external auditor</li> </ul>		<ul style="list-style-type: none"> <li>• That LPP provide Havering with a copy of their external audit once this has been presented to their own audit committee and released</li> </ul>	<ul style="list-style-type: none"> <li>• LPP External audit report was received by the CMO on 1st September 20. CMO to take to LPB for further</li> </ul>
	PFM/CMO						

Pension Fund Risk Register oneSource – Havering – as at October 2020

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Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
Page 58	PFM/CMO	<ul style="list-style-type: none"> <li>▪ Poor monitoring of employer financial status</li> </ul>	<ul style="list-style-type: none"> <li>• Pension costs and payments delayed or incorrect.</li> </ul>	<p>report of LPP processes</p> <ul style="list-style-type: none"> <li>• A statutory Local Pension Board is in place to assist the administering authority in effective and efficient governance of the Havering Pension Fund</li> </ul>		<ul style="list-style-type: none"> <li>• CMO is in place and continues to review the administration work of LPP and report to the LPB</li> </ul>	<p>discussion at a future meeting</p>
	CMO	<ul style="list-style-type: none"> <li>▪ Poor communications with stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>▪ Inaccurate data provided by the pension fund employers and payroll providers give rise to inaccurate data and financial reputational consequences such as actuary to set contribution rates with a high margin of error.</li> </ul>	<ul style="list-style-type: none"> <li>• The Council has in place a complaints system to address complaints via the website</li> </ul>		<ul style="list-style-type: none"> <li>• Strengthen the process for Bond reviews.</li> </ul>	
	CMO	<ul style="list-style-type: none"> <li>▪ Excessive charges by suppliers</li> <li>▪ Employer goes into default, deficit on termination, change of status, financial risk.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Employer defaults</li> <li>▪ Employer failure to pay scheme contributions on time</li> <li>▪ Poor Communication with stakeholders giving rise to disaffection and actions against the Council</li> </ul>	<ul style="list-style-type: none"> <li>• CMO in post to review the administration work of LPP</li> <li>• Employer covenants checks undertaken by LPP</li> <li>• Bond or guarantee reviews in place and reviewed every</li> </ul>			

Pension Fund Risk Register oneSource – Havering – as at October 2020

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Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/ Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
Page 59	PFM	<ul style="list-style-type: none"> <li>▪ Inappropriate investment accounting – including reliance on third party providers.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Qualified opinion on the accounts by external auditor</li> <li>▪ Higher employer contributions due to poor investment performance</li> <li>▪ Insufficient assets to meet short term liabilities</li> </ul>	<p>three years as part of valuation process</p> <ul style="list-style-type: none"> <li>• Monthly reconciliations to monitor cash flow carried out.</li> <li>• Ee’s and Er’s contributions reconciled monthly –late payments chased</li> <li>• Fee Invoices checked prior to payment</li> <li>• Pension Fund accounts subject to external audit.</li> <li>• Attendance at accounting seminars/training</li> <li>• Pension Fund uses the service of an external custodian to verify asset values and performance</li> </ul>			<ul style="list-style-type: none"> <li>• Fund Managers performance is monitored quarterly.</li> </ul>

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Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/ Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
Page 60				<ul style="list-style-type: none"> <li>• Attendance at accounting seminars/training</li> <li>• Monitor audited accounts of third party providers to ensure consistent asset valuation.</li> <li>• Monitor investment managers performance – Fund Managers present at Pension Fund Committee meetings</li> <li>• Union Representative at the Committee</li> </ul>			
6	S151 Officer /Director of Exchequer and Transactional Services Lower Level as follows: PFM/CMO	<b>Risk of failure to on board or exit employers/members effectively</b> <b>Cause:</b> <ul style="list-style-type: none"> <li>▪ Delays in internal processing of documentation</li> </ul>	<ul style="list-style-type: none"> <li>▪ Delays in collection of contributions from the</li> </ul>	<ul style="list-style-type: none"> <li>▪ Escalation to Heads of Service</li> </ul>	D/2	<ul style="list-style-type: none"> <li>▪ Review of internal processes on boarding processes</li> </ul>	

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Appendix A

Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
Page 61	CMO PFM/CMO PFM/CMO CMO	<ul style="list-style-type: none"> <li>▪ Member data incomplete</li> <li>▪ Poor communications with stakeholders</li> <li>▪ Lack of understanding by employers with regard to their responsibilities</li> <li>▪ Lack of signed admission agreements from Employers</li> </ul>	employers/member s <ul style="list-style-type: none"> <li>▪ Impacts cash flow</li> <li>▪ Potential for litigation</li> <li>▪ Employer contribution assessment can become out of date</li> <li>▪ Potential breach of regulations</li> <li>▪ Incorrect records of new members</li> <li>▪ External Audit Opinion on internal controls</li> <li>▪ Employer’s liabilities may fall back onto other employers and ultimately local taxpayers.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Script in place to deliver to new Academy employers, with feedback process in place (minuted)</li> <li>▪ Database maintained on all contact details for LGPS communications.</li> <li>▪ Monthly schedules maintained by the Pensions Administration Team</li> <li>▪ Tracing agencies used to locate pension fund members</li> <li>▪ Electronic file of required documents forwarded to new employers</li> <li>▪ Actuarial assessment completed for all new admission</li> </ul>		<ul style="list-style-type: none"> <li>• Template admission agreement awaiting legal clearance</li> </ul>	<ul style="list-style-type: none"> <li>▪ Still in progress lead by the risk officer in LPP</li> </ul>

Pension Fund Risk Register oneSource – Havering – as at October 2020

Appendix A

Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/ Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
Page 62				<p>requests to assess the level of risk.</p> <ul style="list-style-type: none"> <li>▪ TUPE manual completed in November 2017</li> <li>▪ Admission policy and manual completed in November 2017</li> <li>▪ Bonds and suitable guarantees put into place to protect the Fund in case of default.</li> <li>▪ Funding level of each employer is assessed as part of the triennial valuation and contribution rates set accordingly.</li> <li>▪ CMO works closely with LPP. Carries out spot to checks review the work on a regular basis</li> <li>▪ LPP report their performance to the</li> </ul>			

Pension Fund Risk Register oneSource – Havering – as at October 2020

Appendix A

Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/ Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
				Local Pension Board at every meeting <ul style="list-style-type: none"> <li>▪ Pensions Accounts review and check all oracle entries relating to pensions against the LPP Altair report on a quarterly basis.</li> </ul>		<ul style="list-style-type: none"> <li>▪ Pensions Accounts refer any oracle queries to LPP for investigation.</li> </ul>	
7 Page 63	S151 Officer Director of Exchequer and Transactional Services. Lower Level as follows: CMO  PFM/CMO PFM/CMO  PFM/CMO	<b>Risk of Pension Fund Payment Fraud</b> <b>Cause:</b> <ul style="list-style-type: none"> <li>▪ Pension overpayments arising as a result of non-notification in change of circumstances</li> <li>▪ Internal staff fraud</li> <li>▪ Staff acting outside of their levels of authorisation</li> <li>▪ Conflict of interest</li> </ul>	<ul style="list-style-type: none"> <li>▪ Financial loss</li> <li>▪ Reputational damage of Pension Administration team and Council</li> <li>▪ Litigation / investigation</li> <li>▪ Internal disciplinary</li> <li>▪ Reputational damage</li> </ul>	<ul style="list-style-type: none"> <li>▪ Participate in the National Fraud Initiative (bi-annually)</li> <li>▪ Process is in place to investigate return of payment by banks.</li> <li>▪ All pension calculations are peer checked and signed off by senior officer</li> </ul>	E/1		

Pension Fund Risk Register oneSource – Havering – as at October 2020

Appendix A

Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
Page 64				<ul style="list-style-type: none"> <li>▪ Segregation of duties within the Pensions Administration Team</li> <li>▪ Segregation of duties between Payroll and Pensions Administration Team</li> <li>▪ Address checked for deferred pensions prior to payment</li> <li>▪ Internal audit checks carried out</li> <li>▪ Signed up for DWP database Tell us Once – DWP inform Havering of deaths relating to contributors to the LGPS fund</li> <li>▪ Pension Fund bank account checked monthly</li> <li>▪ Register of interests declarations</li> </ul>			<p><b>Further Actions Taken</b></p> <ul style="list-style-type: none"> <li>• LPP to investigate the cost/use of ATMOS – a mortality screening application. September 20 – Mortality Screening outsourced to external supplier - Target</li> </ul>

Pension Fund Risk Register oneSource – Havering – as at October 2020

Appendix A

Risk No.	Risk Owner	Risk Title (Objectives)	Consequences of not achieving the objective (Effect)	Controls/Mitigations	Likelihood/Impact	Actions/Recommendations	Review of Actions taken to date and further actions identified
				covered at all board/Committee meetings			

CIPFA	Chartered Institute of Public Finance and Accountancy
DWP	Department for Work and Pensions
GAD	Government Actuary's Department
ISG	Information and Communications Technology
LICV	London Collective Investment Vehicle
LGPS	Local Government Pension Scheme
LPB	Local Pension Board
LPP	Local Pensions Partnership
MHCLG	Ministry of Housing, Communities and Local Government
PFM	Pension Fund Manager – Finance – Debbie Ford
CMO	Contract Monitoring Officer - Caroline Berry

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

Date of Current Version: 13/01/2021

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## Introduction

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

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

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

## Key

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

to be reviewed

**Completed:**

Fully Completed
In Progress
Not Started
Not Yet Relevant

**Compliant**

Fully Compliant
Partially Compliant
Non Compliant
Not Yet Relevant

**Page 68**  
**Definitions**

PSPA134	Public Service Pensions Act 2013
LGPS	Local Government Pension Scheme
TPR	The Pensions Regulator
TPR CODE	The Pensions Regulator's Code of Practice No 14 Governance and administration of public service pension schemes
Scheme Manager	This is the London Borough of Havering
Administering Authority	The LGPS specific term for Scheme Manager
LBH	The London Borough of Havering
IDRP	Internal Disputes Resolution Procedure
SAB	The National LGPS Scheme Advisory Board
PC	Pensions Committee
LPB	Local Pensions Board
LPPA	Local Pensions Partnership Administration
MSS	Member Self Service
CMS	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
<b>Reporting Duties</b>			
A1			
A2			
A3			
<b>Knowledge and Understanding</b>			
B1			
B2			
B3			
B4			
B5			
B6			
B7			
B8			
B9			
B10			
B11			
B12			
<b>Conflicts of Interest</b>			
C1			
C2			
C3			
C4			
C5			
C6			
C7			
C8			
C9			
C10			
C11			
<b>Publishing Information</b>			
D1			
D2			
D3			
D4			
<b>Risk and Internal Controls</b>			
E1			
E2			
E3			
E4			
E5			
E6			
E7			
E8			
<b>Maintaining Accurate Member Data</b>			
F1			
F2			

F3			
F4			
F5			
F6			
F7			
F8			
F9			
F10			
F11			
<b>Maintaining Contributions</b>			
G1			
G2			
G3			
G4			
G5			
G6			
G7			
G8			
G9			
<b>Providing Information to Members and Others</b>			
H1			
H2			
H3			
H4			
H5			
H6			
H7			
H8			
H9			
H10			
H11			
H12			
<b>Internal Dispute Resolution</b>			
I1			
I2			
I3			
I4			
I5			
I6			
I7			
I8			
I9			
<b>Reporting Breaches</b>			
J1			
J2			
J3			

## A - Reporting Duties

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

### Legal Requirements

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

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

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
A1	Is your scheme registered with the Pension Regulator?	n/a	Yes - 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?	n/a	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?	n/a	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.

TPR Code Ref 34

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

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

TPR Code Ref 35

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

TPR Code Ref 36

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
B1	Are there policies and arrangements in place to support pension board members in acquiring and retaining knowledge and understanding?	38	A joint training strategy has been developed and was agreed by the Pensions Committee on the 24 November 2015 and presented to the Local Pension Board (LPB) at its meeting on the 6 January 2016. The Training Strategy covers both committee and board members. To assist in achieving the training strategy objectives the fund will aim for full compliance with the CIPFA Knowledge and Skills Framework. Training register is maintained throughout the year detailed in the annual report.	Annual check	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?	38	On a day to day basis the Pension Fund Manager (Onesource Pensions and Treasury) maintains compliance with the policy and annual reporting. Training is also arranged by Pensions Administration as applicable.	As and when required		Fully completed	Fully compliant		

B3	Is the Fund providing assistance to pension board members to determine the degree of knowledge and understanding required?	48	The CIPFA Knowledge and Skills self assessment was undertaken when the LPB was first set up. The LPB also undertook induction training held by Hymans (generic to the LGPS) and followed up by officers (Havering Pension Fund focus). Ongoing training is provided and attendance published in the Pension fund Annual report.	Ongoing		Fully completed	Fully compliant	Induction training has been carried out for all existing board members.	Do Board Members wish to comment here? Would it be useful to review the self assessment (See B10)?
B4	Are the roles and responsibilities of pension boards and members of pension board clearly set out in scheme documentation?	47	The roles and responsibilities are set out in the Board Members Terms of Reference 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
B5	Are pension board members aware of their legal responsibility in terms of Knowledge and Understanding?	50	This is detailed in Terms of Reference which 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?
B6	Have all pension board members got access to copies of the scheme rules and relevant Fund documentation?	40	Scheme Regulations are available on the lgpsregs.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
B7	Is there an up-to-date list of the Fund specific documents with which pension board members need to be conversant in?	46	LBH Has created and will maintain a list of documents that the Board members will need to be conversant with.	As and when required but at least annually	31/08/2020	Fully completed	Fully compliant		Revised list to be circulated
B8	Are all pension board members investing sufficient time in their learning and development?	55	A number of training sessions have been arranged and attendance to date is good. A log is maintained of who has attended training and this is published in the annual report. The CIPFA Knowledge and Skills Framework self-assessment form will also become a personalised training plan for each member and will be used to document areas of learning and continued development.	Ongoing		Fully completed	Fully compliant		Do Board Members wish to comment here?
B9	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		
B10	Is there a process in place for regularly assessing the pension board members' level of knowledge and understanding is sufficient for their role, responsibilities and duties?	57	See comments in B3 - the knowledge and skills analysis will be carried out annually.	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?
B11	Are records of learning activities being maintained?	60	A log is maintained of who has attended training and this is published in the annual report.	Annual check	31/03/2020	Fully completed	Fully compliant		

B12	Have the pension board members completed the Pension Regulator's toolkit for training on the Code of Practice number 14?	59	The modules within the Pensions Regulator online toolkit are available to Board Members and completed courses have been recorded in the training log. In addition, to the COP14 training, general online training is also available via the Pensions Regulator	Annual check	31/03/2020	In progress	Partially compliant		There is generic training available for trustees plus additional training specific to public service schemes and the COP14. Links to be provided
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### C - Conflicts of interest

#### Legal Requirements

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

TPR Code Ref 62

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

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

TPR Code Ref 63

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

TPR Code Ref 64

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
C1	Does the Fund have a conflict of interest policy and procedure, which includes identifying, monitoring and managing potential conflicts of interest?	76	A conflicts of interest Policy for the Local Pension Board (LPB) was adopted at a Council meeting held on the 25 March 2015. This is available to view on Havering.gov pensions web pages.	Annual	31/12/2020	Fully completed	Fully compliant		Documentation to be published to the new havering.gov pensions web pages
C2	Do pension board members have a clear understanding of their role, the circumstances in which they may have a conflict of interest and how to manage potential conflicts?	78	The LPB are aware of their roles and responsibilities and some of the LPB members have completed the TPR online toolkit module covering conflicts of interest.	Ongoing		Fully completed	Fully compliant		Do Board Members wish to comment here? Some training is outstanding (see B12)
C3	Have all Pension Board members provided appropriate information for the Administering Authority to determine whether a conflict exists (on appointment and from time to time)?	79	The Council maintain appropriate records of declared conflicts of interest and manage any potential conflicts to ensure they do not become actual or perceived conflicts of interest. Records will be lodged in advance of the Board Member's appointment and will be maintained by the Council's Monitoring Officer.	Ongoing		Fully completed	Fully compliant		
C4	Does the appointment process for pension board members require disclosure of interests and responsibilities which could become conflicts of interest?	80	There is a duty on all prospective Local Pension Board members to declare interests prior to their appointment to the Board. No declarations to 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 agendas	Ongoing		Fully completed	Fully compliant		
C5	Is the conflicts policy regularly reviewed?	76	There is an agreed and documented conflicts policy and procedure which includes identifying monitoring and managing potential conflicts of interest and keep under review from time to time.	As and when required		Fully completed	Fully compliant		

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 when 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		

**D - Publishing information about schemes**

**Legal Requirements**

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

TPR Code Ref 92

The information must include:

TPR Code Ref 93

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

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
D1	Does the Administering Authority publish information about the pension board?	95	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?	96	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.	As and when required		In progress	Partially compliant		As D1

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

## E - Managing risk and internal controls

### Legal Requirements

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

TPR Code Ref 101

Internal controls are defined in the legislation as:

TPR Code Ref 102

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

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

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach/ Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
E1	Is there an agreed process for identifying and recording scheme risks?	105	The Administering Authority's overall policy on risk is to identify all risks to the Fund and to consider the position both in aggregate and at an individual risk level. The Administering Authority monitors the potential risks to the Fund, and will take appropriate action to mitigate the impact of these on the fund wherever possible. Risks are identified and assessed in line with the Authority's risk management process, with risks being identified within Service Plans. Internal Controls operate in the day to day activities that fall under the administration and management of the scheme. Internal controls of the scheme assets include monitoring these quarterly and presenting formal reports to the Pensions Committee and risk is addressed as part of the quarterly monitoring processes. Risk implications are a standard inclusion in reports to the Pensions Committee and the Local Pension Board. LPPA have recruited a Head of Risk and Compliance and provide a monthly risk and compliance report which is presented to the Board	Ongoing		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.

E3	Does the Administering Authority have a risk register to record all risks identified and action taken?	108	A Risk Register was adopted in June 2015 to record identified risks and required action. It is included in the Annual Report.	Annual check	12/01/2020	Fully completed	Fully compliant	Risk register reviewed and agreed by Pensions Committee January 2021	The LPP are currently in the process of compiling an employer level risk register to assess the employers in the LBH Fund. - Is this in place?
E4	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
E5	Does the Administering Authority regularly review the risk register?	115	A Risk Register was adopted in June 2015 to record identified risks and required action. 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	
E6	Is there a standing item on the Pension Board agenda to review scheme risks?		The review of the risk register is a standing item on the Local Pension Board agenda	Ongoing		Fully completed	Fully compliant		
E7	Does the Administering Authority have adequate systems, arrangements and procedures (internal controls) in place for the administration and management of the Fund and are they documented ?	116	There are a large range of internal controls in place. Some examples are: - Restricted access to the building - Altair (pension admin system) is tested at a national level 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 documented procedures are in place where required and ensure that the LPPA Annual Assurance Report provides the evidence required to satisfy this point
E8	Do these procedures apply equally to outsourced services, are internal controls reflected in contracts with third party providers and is there adequate reporting in relation to those controls?	119	LBH and LPP 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').

TPR Code Ref 123

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

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

No.	TPR Requirement	TPR	London Borough of Havering Approach / Evidence	Frequency of	Last Review	Check	Compliant	Notes	Action
F1	Do member records hold the information required as defined in the Record Keeping Regulations and is it accurate?	126	LBH/LPPA use Altair as their administration system. It records all member and beneficiary information set out in Record Keeping Regulations.	Ongoing		Fully completed	Fully compliant		
F2	Does the Fund have the appropriate processes in place so employers can provide timely and accurate information?	128/ 129	Prior to the beginning of the scheme year all employers are provided with an updated employee contribution table and the monthly pay and contribution spreadsheet including guidance for completion. New employers admitted to the pension fund, or anyone outsourcing their payroll services, are provided with all relevant information to meet their responsibilities as a scheme employer. LPPA have a secure portal for the submission of all member specific information, new starter forms, leaver forms, end of year data etc. All employers have an administration responsibility to ensure the correct users within their organisations have access to the portal.	Ongoing		Fully completed	Fully compliant		Pension Administration Strategy (PAS) to be put in place although not currently mandatory it is considered good practice
F3	Does the Fund keep records of and reconcile transactions as required by the Record Keeping Regulations?	131/ 132	The specific requirements of the record keeping regulations are adhered to except that employer contributions are not recorded to the member record on Altair as they have no impact on a members benefits. These are recorded at employer level by Pension Fund Accounts and the data can be obtained for all members if required. 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	Ongoing		Fully completed	Fully compliant	The overpayment write off policy was agreed by Pensions Committee in November 2020 for another 12 months.	Record keeping would benefit from an exercise to reconcile One Oracle payroll to Altair to check for discrepancies. Initial work has started to identify the scope of the project.
F4	Are records kept of pension board meetings as required by the Record Keeping Regulations?	133	This is the responsibility of the Clerk for Committee and all details are posted on LBH website.	Ongoing		Fully completed	Fully compliant		
F5	Are records kept of decisions made by the pension board, outside of meetings as required by the Record Keeping Regulations?	134	The LPB does not make decisions outside of normal meetings	Ongoing		Fully completed	Fully compliant		
F6	Are records retained for as long as they are needed?	135	GDPR allows pension records to be held indefinitely 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.	Ongoing		Fully completed	Fully compliant		

F7	Does the Administering Authority have policies and processes to monitor data on an ongoing basis?	136	There is no formal policy or documented procedure for the checks that are carried out, but there is confidence in the accuracy and completeness of the vast majority of data required. 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.	Ongoing		In Progress	Partially compliant		To implement a data improvement plan
F8	Does the Administering Authority carry out a data review at least annually?	138	A full data check is carried out each year end to ensure accurate record keeping.	Annual check	31/03/2020	Fully completed	Fully compliant		
F9	Is a data improvement plan in place which is being monitored with a defined end date?	141	There is currently no plan in place	Annual check		In Progress	Partially compliant	Data scores have now been received and are very good. However a formal data improvement plan needs to be written.	A draft Data Improvement Plan has been written for approval
F10	Are processes and policies in place to reconcile scheme data with employer data?	142	The year end process ensures that scheme data is reconciled against employer, although this does not currently include postal or email addresses.	Annual check	31/03/2020	Fully completed	Fully compliant		Investigate whether addresses can be reconciled with future year end data.
F11	Do the Administering Authority's member data processes meet the requirements of the Data Protection Act 1998 and the data protection principles?	143	The data processes meet the requirements with regard to what is held, how it is used and how long it can be held for. Information shared securely via encrypted email, password protected documents or secure online portals.	Ongoing		Fully completed	Fully compliant		

## 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 paid electronically) or earlier date if required by the scheme regulations	To TPR: Within a reasonable period – 10 working days

No.	TPR Requirement	TPR	London Borough of Havering Approach / Evidence	Frequency of	Last Review	Check	Compliant	Notes	Action
G1	Does the Fund have procedures and processes in place to identify payment failures?	150	A comprehensive monitoring spreadsheet is maintained for each employer with an external payroll to identify late payments. LBH does not currently have any problems with late payments.	Ongoing		Fully completed	Fully compliant		

G2	Do those processes and procedures include a contributions monitoring record to determine whether contributions are paid on time and in full?	156/157	This is incorporated into the monitoring spreadsheet. 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.	Ongoing		Fully completed	Fully compliant		
G3	Do those processes and procedures include monitoring payments against the contributions monitoring record on an ongoing basis?	161	For employers with an external payroll, the money paid in and verified by the bank statement is compared to the totals on the monthly data submissions. The Pension Fund Accounts Team reconcile the data and money received into the pension fund against the 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		
G5	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 investigations 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	The monthly pay and contribution return, provided by employers with external payrolls, has all required information, including splits for 50:50 scheme members, and guidance for the accurate completion of the return. Monthly reports are supplied to the Pension Fund Accounts Team regarding the LBH paid employers.	Ongoing		Fully completed	Fully compliant		
G8	Is there a satisfactory process in place to assess the materiality of any payment failures and ensure that those which are material are reported to the Regulator within a reasonable period?	173	Payments which are paid within 2-5 days of their due date are not considered material. A procedure note is in place and the Charging 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 Code Ref 187

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
H1	Has an annual benefit statement been provided to all active members within the required timescales?	188	Active and deferred benefit statements were issued by 31st August 2020. There were a few that were not issued due to having queries on the record.	Annual check	31/08/2020	Fully completed	Fully compliant		
H2	Do these meet the legal requirements in relation to format?	188	The statements used, when read in conjunction with the covering letter, do provide all the required information.	Annual check	31/08/2020	Fully completed	Fully compliant		
H3	Has a benefit statement been provided to all active, deferred and pension credit members who have requested one within the required timescales?	191	Deferred Benefits Statements and Pension Credit Statements are produced annually as part of the year end process (ie members do not need to request a statement).	Annual check	31/08/2020	Fully completed	Fully compliant		
H4	Does this meet the legal requirements in relation to format?	192	The statements currently include all information required under the Disclosure Regulations, apart from the method of calculation.	Annual check	31/08/2020	In Progress	partially compliant		To speak to LPP
H5	Has an annual benefit statement been provided to all members with AVCs within the required timescales?	194	The statements are sent directly to the members by the AVC providers.	Annual check	31/08/2020	Fully completed	Fully compliant	Providers have confirmed that they are compliant with this point.	
H6	Do these meet the legal requirements in relation to	195	Providers have confirmed that they are compliant with this point.		30/11/2018	Fully completed	Fully compliant		
H7	Is basic scheme information provided to all new and prospective members within the required timescales?	200	All relevant scheme information is available on the LPPA Pension Website for all new and prospective members to view at any time. LPPA write to all new scheme 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.	Ongoing		Fully completed	Fully compliant		
H8	Does this meet the legal requirements in relation to format?	200	All scheme information is available on the Havering pensions website. There is a guide to the scheme which provides the required information other than: - The statement regarding whether a charge may be made - although no charges are applied to LGPS benefits - There are other guides and factsheets, including the IDRPA leaflet.	Ongoing		In Progress	partially compliant		Need to be reviewed following the release of the new LPPA website
H9	Is all other information provided in accordance with the legal timescales?	201	It is not possible to confirm whether disclosure timescales are being met in all cases as the reporting is not available. Disclosure timescales are reviewed by the Pensions Projects and Contracts Manager as part of the monthly monitoring of cases.	Ongoing		In Progress	partially compliant		A query has been raised with LPP to see whether more automated reporting can be implemented

H10	Where any information is only provided electronically (i.e. instead of any hard copy) does it comply with the legal requirements?	203	Annual Benefit Statements are provided online. Disclosure requirements were met and members have the opportunity to elect to receive a paper copy. Initial contact with new members is via mail and recommends signing up to the Member Self Service (MSS) facility to be able to access future statements. Hard copies of documents can be provided of intranet material if required. Correspondence with members via email is carried out at member request.	Ongoing		Fully completed	Fully compliant		Specific information needs to be given regarding online ABS at joiner/leaver events - to be raised with LPP
H11	Does the Administering Authority aim to design and deliver communications in a way that ensures scheme members are able to engage with their pension provision?	207	Both Havering as the Administering 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		
H12	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 213

and people with an interest in the scheme.

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

TPR Code Ref 215

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

The Act also states that the procedure must include:

TPR Code Ref 218

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

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

TPR Code Ref 216

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
I1	Has the Administering Authority put in place an internal dispute resolution procedure?	213	There is a formal process in place. This is documented in the IDRP factsheet which is available from the pensions team or on the 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		
I2	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		

13	Does the information made available to applicants about the procedure clearly state the procedure and process to apply for a dispute to be resolved including: - who it applies to - who the specified person (stage 1) is - the timescales for making applications - who to contact with a dispute - the information that an applicant must include - the process by which decisions are reached?	224	The IDRPs Factsheet includes all specified information along with a form for the person with an interest in the scheme to complete.	Annual check	31/08/2020	Fully completed	Fully compliant		
14	Has the Administering Authority ensured that employers who make first stage decisions also have IDRPs in place?		Some of our scheme employers have published their stage 1 IDRPs adjudicator details along with their scheme discretions, available on the pension scheme website. This has not been followed up with all employers	Ongoing		In Progress	Partially compliant		Liaise with employers to agree a stage 1 process (which could be use of the LBH stage 1 appointed person).
15	Are the timescales in the procedure adhered to including sending an acknowledgment on receipt of an application?	228	LPPA has a dedicated complaints team which assist in the monitoring of IDRPs timescales	As and when required		Fully completed	Fully compliant		Having would benefit from have a central register of IDRPs cases as and when they arise in the future
16	Does the Administering Authority notify and advertise the procedure appropriately?	235	There is a paragraph in all standard letters for notification of benefits and new starters. The guide is also on the Havering Pensions website	Ongoing		Fully completed	Fully compliant		
17	Are the notification requirements in relation to TPAS and the Pensions Ombudsman being adhered to?	238	The TPAS and Ombudsman details are provided at the required stages	Annual check	31/08/2020	Fully completed	Fully compliant		
18	Does the Administering Authority regularly assess the effectiveness of its arrangements?	234	No formal reporting as such is in place. LBH have very few IDRPs cases they are almost exclusively Tier 3 Ill health cases.	As and when required		Fully completed	Fully compliant		Having would benefit from have a central register of IDRPs cases as and when they arise in the future
19	Does the Administering Authority regularly assess the effectiveness where employers carry out a stage one process?	234	No formal reporting as such is in place. Our employers have very few IDRPs cases they are almost exclusively Tier 3 Ill health cases.	As and when required		Fully completed	Fully compliant		Having would benefit from have a central register of IDRPs cases as and when they arise in the future

**J - Reporting breaches of the law**

**Legal Requirements**

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

TPR Code Ref 241

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

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

TPR Code Ref 242

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

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

TPR Code Ref 243

No.	TPR Requirement	TPR	London Borough of Havering Approach / Evidence	Frequency of	Last Review	Completed	Compliant	Notes	Action
J1	Is the Administering Authority satisfied that those responsible for reporting breaches under the legal requirements and TPR guidance understand the requirements?	244	The reporting arrangements are published in on the Havering Pension website	Annual check	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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## Pensions Communications Campaign

### Background

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

### Aims

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

Item	Medium	Audience	Frequency	When
MPO - Member Self Service	LBH Pop Ups	LBH Corporate Staff		13/05/20, 19/06/20, 03/08/20, 19/10/20
	Core Brief			
	Intranet Page			
	Global News			
	Leaflet	Satelite Offices		
	Leaflet	School Staff		
	Employer Email	Academies		01/03/21 (ext)
	Employer Email	Admitted Bodies		01/03/2021
Expression of Wish forms	LBH Pop Ups	LBH Corporate Staff		13/05/20, 19/06/20, 19/10/20, 15/02/21
	Core Brief			
	Intranet Page			
	Global News			
	Leaflet	Satelite Offices		
	Leaflet	School Staff		

	Employer Email	Academies		01/03/2021 (ext)
	SBN Meeting			
	Employer Email	Admitted Bodies		01/03/2021
Pensions Website	LBH Pop Ups	LBH Corporate Staff		
	Core Brief			
	Intranet Page			
	Global News			
	Leaflet	Satelite Offices		
	Leaflet	School Staff		
	Employer Email	Academies		01/03/2021 (ext)
	Employer Email	Admitted Bodies		01/03/2021
LPP Contact Details	LBH Pop Ups	LBH Corporate Staff		
	Core Brief			
	Intranet Page			
	Global News			
	Leaflet	Satelite Offices		
	Leaflet	School Staff		
	Employer Email	Academies		01/03/21 (ext)
	Employer Email	Admitted Bodies		01/03/2021
Retirement Process	Global News	LBH Corporate Staff		01/07/2020
	Pensions Website (Factsheet)	All Staff		
	Intranet (link to Factsheet)	LBH Corporate Staff		
	Email (Factsheet)	External employees		
	Email (Factsheet)	School Staff		
	Factsheet	Satelite Offices		
Ad Hoc Pension Sessions				
Pension Roadshows				
School Business Managers Network				