



Haverling

L O N D O N B O R O U G H

LOCAL PENSION BOARD AGENDA

4.00 pm

**Tuesday
7 February 2023**

Virtual – via Teams

Members4: Quorum 2

Mark Holder, Scheme Member Representative
Yasmin Ramjohn, Scheme Member Representative
Joanne Sladden, Scheme Employer Representative
Dionne Weekes, Scheme Member Representative

Denise Broom, Scheme Employer Representative
Andrew Frater, Scheme Employer Representative

**For information about the meeting please contact:
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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 LPB 15 NOVEMBER 2022 (Pages 1 - 4)

To approve as correct the minutes of the meeting held on 15 November 2022 (attached) and authorise the Chair to sign them.

5 MINUTES OF THE MEETING PC 22 DECEMBER 2022 (Pages 5 - 8)

The meeting minutes from the 22 December 2022 Pension Committee are attached for noting.

6 LPPA QUARTERLY PERFORMANCE REPORT (To Follow)

7 PENSIONS RISK REGISTER (Pages 9 - 34)

Report attached.

8 PENSIONS ADMINISTRATION STRATEGY (Pages 35 - 38)

Report attached.

9 COP14 COMPLIANCE CHECKLIST (Pages 39 - 42)

Report attached.

10 POSITION OF CHAIR (Verbal Report)

Zena Smith
Democratic and Election Services Manager

**MINUTES OF THE MEETING OF THE
LOCAL PENSION BOARD
Virtual via TEAMS
15 November 2022 (4.00 - 4.59 pm)**

Present:

Mark Holder (Scheme Member Representative), Yasmin Ramjohn (Scheme Member Representative), Joanne Sladden (Scheme Employer Representative) and Dionne Weekes (Scheme Member Representative)

Officers: Debbie Ford, Caroline Guyon, James Grafton, Sam Kemp, Alexandra McMahon, Lilian Thomas

126 CHAIR'S ANNOUNCEMENTS

The Chairman advised members of actions to take if they are disconnected from the video call.

127 APOLOGIES FOR ABSENCE

Apologies for inability to attend the meeting were received from Denise Broom and Andrew Frater.

128 DISCLOSURE OF INTEREST

There were no disclosures of interest.

129 MINUTES OF THE MEETING 6 SEPTEMBER 2022

The minutes of the meeting of 6 September contained errors and the following needed to be corrected before they could be accepted as a true and accurate record:

- Borough was spelled incorrectly
- There were notes in the wrong sections

Once these changes were enacted the minutes were to be accepted as a true and accurate record.

130 PENSIONS COMMITTEE MINUTES 22 SEPTEMBER 2022

The Pensions Committee minutes and feedback by officers 22 September 2022 meeting were noted.

131 LPPA QUARTERLY PERFORMANCE REPORT UPDATE

It was reported that the annual benefit statements were sent out before 31st August 2022.

Refunds SLA was low but there was a 60% increase in caseloads.

Retirement satisfaction scores were shown on Page 30 along with data quality common and conditional data. **Action Point – LPPA to explain what the errors are on that.**

132 **LOCAL PENSIONS BOARD RISK REGISTER**

The Risk register did not go to the Pension's Committee however it would be at next Committee meeting in December.

133 **PENSIONS ADMINISTRATION STRATEGY**

It was explained that the administration system was doing what it should be. A few things were in progress on the data improvement plan.

The Performance report was done based on all data and now the new system would need to be examined to make sure that the data scores had not dropped.

All employers were receiving their log-in details and Communication was being sent to members. The link was on the website and everyone would know about the new system change by the week commencing 5th December 2022. If nothing arrived by then Members were to let Caroline know.

134 **LPPA ANNUAL INTERNAL CONTROL ASSURANCE**

The report was from the LPPA and it was requested that the Committee should look if there were any points that needed clarification and Janet could clarify further.

Action Point – Look and feedback questions. Janet to come in and talk through, members prepare questions beforehand. Then this would be taken to internal auditor and come back to the committee.

135 **PENSION FUND ANNUAL REPORT**

It was explained that the Pension fund Annual Report did not go through the LPB before publication because the meeting in early November was deferred and the timings were not conducive to reviewing; however, the information and the chance to review was still currently possible because the publication was unaudited and the deadline to publish is 1 December therefore if errors were found there was still an opportunity to do so.

Action point – Members were to come back to Debbie if errors were found or to submit any further feedback.

136 **COP14 COMPLIANCE CHECKLIST**

The item was noted by Members.

137 **POSITION OF CHAIR**

No one applied. **Action Point - Caroline would go back to individuals who had been interested for feedback.**

138 **AOB**

Debbie would send out employer contribution rate.

Action Point - Agendas would contain what must be read and what was just for information on large agendas to make it easier for Members to prepare for meetings.

Chairman

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**MINUTES OF A MEETING OF THE
PENSIONS COMMITTEE
Town Hall, Main Road, Romford
13 December 2022 (7.03 - 8.53 pm)**

Present:

COUNCILLORS

Conservative Group	Dilip Patel and Viddy Persaud
Havering Residents' Group	Julie Wilkes and Philip Ruck (Vice-Chair)
Labour Group	Mandy Anderson (Chairman)

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

266 APOLOGIES FOR ABSENCE AND ANNOUNCEMENT OF SUBSTITUTE MEMBERS

Apologies were received from Councillors James Glass and Robert Benham for inability to attend the meeting.

267 DISCLOSURE OF INTERESTS

There were no declarations of interest.

268 MINUTES OF THE MEETING NOVEMBER 8 2022

The minutes of the meeting 8 November 2022 were accepted as a true and accurate record and would be signed by the Chairman after the following amendments were made:

- Item 262 – 2nd paragraph the words “performance fees” should be replaced with “management fees” and further down the word “pay” should be replaced with “overpayment”.

269 PENSION FUND PERFORMANCE MONITORING FOR THE QUARTER

The Committee was presented with a report that provided an overview of how the Fund’s investments were performing, how the individual Investment Managers were also performing against their set targets and any relevant Local Government Pension Scheme (LGPS) updates for the quarter ending 30 September 2022.

It was explained that the Fund increased in value by £1.09m (0.13%) over the quarter, it underperformed the tactical benchmark by -1.08% but outperformed the strategic benchmark by 7.91%. The general position of the Fund was considered plus other matters including any current issues as advised by Hymans.

Both managers from Stafford and Hymans attended and discussed the fund's performance. It was explained that the investment strategy contained growth assets, income generating assets and protection assets as shown in the report and relationships with various managers were also summarised.

The Committee **agreed** the following recommendations.

270 **INVESTMENT CONSULTANCY SERVICES PERFORMANCE REVIEW - 1 OCTOBER 2021 TO SEPTEMBER 2022**

The Committee were presented with a report on the review performance of the Investment Consultant for the period 1 October 2021 to 30 September 2022 against strategic objectives previously set.

It was suggested that a RAG rating be added with letters to the report to make it easier to digest the material.

The Committee **agreed** the recommendations.

271 **CLIMATE RISK MANAGEMENT PLAN PROGRESS REPORT**

The Committee were presented with a report that set out the progress made and further actions required in developing the Fund's Plan for embedding climate risk management within the Fund's investment portfolio.

The Committee **agreed** the recommendations and that Hymans take all the actions as shown in the report.

272 **PENSION FUND RISK REGISTER - UPDATED**

The Committee was provided with a report that updated the committee with the latest version of the Havering Pension Fund ("the Fund") Risk Register (Appendix A), which detailed the potential risks the Fund is exposed to, that the Pensions Committee should be aware of, and the controls in place to manage those risks.

It was explained there were 7 categories and there were 3 other controls in place to manage risks supported by external service providers to the Fund such as actuaries, advisors, auditors, custodian and system administrators, alongside our regulatory bodies as they have procedures in place to identify and managing risk.

A risk was identified within the Pensions team due to the size of the team and demographics that could mean early retirement. **Action Point:**

Members asked Debbie to ask Dave McNamara to acknowledge this was recognised.

The Committee **agreed** the recommendations.

273 LOCAL PENSIONS BOARD ANNUAL REPORT - YEAR ENDING 31 MARCH 2022

The Committee were presented with the Local Pension Board Annual Report 2021/22 which included the work covered by the Board during the year and the future work plan.

The Committee **agreed** the recommendations.

274 MINUTES OF THE LOCAL PENSION BOARD 15 NOVEMBER 2022

The meeting minutes of the 15 November Local Pension Board were **noted** by the Committee.

Chairman

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Havering Pension Fund Risk Register

September 2022

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 Risk Likelihood/Impact score shows in the column “Risk Likelihood/Impact Prior to controls” and the column “Risk Likelihood/Impact Post Controls”. 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.

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Likelihood	A	Green	Amber	Red	Red
	B	Green	Amber	Amber	Red
	C	Green	Green	Amber	Amber
	D	Green	Green	Green	Amber
	E	Green	Green	Green	Green
	F	Green	Green	Green	Green
		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

Risk No.	Risk Owner	Details of Risk	Consequences (Effect) of not addressing the risk	Risk Likelihood/ Impact prior to Controls	Controls/Mitigations	Risk Likelihood/ Impact post Controls	Actions/ Recommendations	Review of Actions taken to date and further actions identified		
RISK TITLE										
No 1. Risk of Inaccurate three yearly actuarial valuation										
Upper Level: S151 Officer/Director of Exchequer and Transactional Services										
1.1	Lower Levels: PFM	Inappropriate assumptions used by actuary in calculations for valuation.	Inappropriate investment risk may be adopted and deficit not reduced.	AMBER B/2	Assumptions for valuation are in compliance with regulation.	GREEN E/3		Risk and Controls Reviewed September 22. Valuation process is on going. Valuation training in place for pensions Committee members by Hymans in December 22.		
					Actuarial assumptions are open to challenge by officers, members during training and as part of the Funding Strategy Statement consultation with stakeholders					
					Valuation results are checked for consistency across LGPS funds via GAD S13 report.					
					Local Government benchmarking/comparisons of assumptions. Asset/Liability review following Valuation and consideration by members					
					Potential for Council Tax increases to plug funding gap.		Valuation completed by a qualified professional actuary.			Risk and Controls Reviewed September 22. Current contract extended to 2025
							Robust, open procurement process in place for appointment of actuary.			
							Annual review of actuary performance undertaken by Pensions Committee.		Service Review submitted to	

Havering Pension Fund Risk Register

Appendix A

Risk No.	Risk Owner	Details of Risk	Consequences (Effect) of not addressing the risk	Risk Likelihood/ Impact prior to Controls	Controls/Mitigations	Risk Likelihood/ Impact post Controls	Actions/ Recommendations	Review of Actions taken to date and further actions identified
							Pensions Committee 08 November 2022.	
1.2	PFM/CMO	Poor quality data provided /personal data not maintained (gaps/incorrect)	Poor quality or Incomplete data could result in an Increase to employer contributions/ inappropriate contribution percentages calculated.	AMBER B/2	Data cleansing/Controls in place to ensure accuracy and completeness of data.	GREEN E/3		Risk and Controls Reviewed September 22.
					Annual Data Improvement plan implemented with agreement from LPPA and regular checking of the Pensions Regulator data scores to identify areas to be fed into the plan			
					Pensions Administration Strategy implemented with effect from 01/10/21 to clarify employer responsibilities regarding data accuracy and timeliness			
RISK TITLE No 2. Risk of Incorrect / Inappropriate Investment Strategy								
Upper Level:S151 Officer								
2.1	Lower Levels: PFM	Lack of or poor professional investment advice given or not taken	Potential for financial loss.	AMBER C/2	Investment Advisor appointed to advise the Fund and is instrumental in setting Investment Strategy. Investmnt Advisor is FCA regulated so is required to evidence they meet the required standards	GREEN D/3		Risk and controls reviewed September 22. No changes required to current controls.
			Loss of investment opportunities and adverse performance.					

Havering Pension Fund Risk Register

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			Growth opportunities are not maximised.					
2.2	PFM	Poor governance of Investment Advisor	Potential for financial loss.	AMBER C/2	Robust, open procurement process in place for appointment of Investment Advisor.	GREEN E/3		Risk and controls reviewed September 22. No changes required to current controls.
					Investment Advisor performance is annually reviewed by the Pensions Committee and conforms to Competitive Markets Order.			
					Option to appoint an Independent advisor to undertake a health check and add robustness to the investment strategy as required.			
2.3	PFM	Lack of understanding and awareness (Pension Committee)	More investment risk may be taken to bridge a gap that does not actually exist and could generate inefficiencies and unintended risks if not fully understood.	AMBER C/2	Investment strategy /risks continually assessed as part of the quarterly monitoring process by the Pensions Committee.	GREEN D/2	Pensions Committee & LPB - Training /	Risk and controls reviewed September 22.
					Investment Advisor attends each quarterly Pension Committee meeting.			Signed up to Hymans online learning platform (LOLA) from August 2022.
					Knowledge and skills training of LPB and Committee Members/Inductions			Completion of modules to be monitored

Havering Pension Fund Risk Register

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					carried out for new LPB and Pension Fund Committee member.		Awareness ongoing - working towards full compliance with CIPFA. Knowledge and Skills framework.	
2.4	PFM	Concentration risk by asset, region and sector/Lack of clear risk appetite.	Potential for a more risk averse Investment Strategy when more risk is required or more investment risk may be taken to bridge a gap that does not actually exist.	AMBER C/2	Investment Strategy Statement (ISS) /risks continually assessed as part of the quarterly monitoring process by the Pensions Committee. Diverse portfolio to reduce concentration. Members are informed of risk vs return consequences on any proposal to change the ISS	GREEN E/3		Risk and controls reviewed September 22. No changes required to current controls.
2.5	PFM	Based upon inaccurate actuarial valuation.	Pension deficit not reduced and potential for Council Tax increases.	AMBER C/2	Liabilities analysed during inter-valuation period in addition to every three years. Close working relationship is encouraged between actuaries and investment advisor in the development of the investment strategy. Made easier as both services undertaken by the same firm.	GREEN E/3		Risk and controls reviewed September 22. No changes required to current controls.

Having Pension Fund Risk Register

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RISK TITLE								
No 3. Risk of Failure of Investments to Perform In-Line with Growth Expectations								
Upper Level: S151 Officer								
3.1	Lower Levels: PFM	Poor Fund Manager selection.	Potential for losses to be incurred.	AMBER C/2	Fund Manager selection now undertaken by LCIV. LCIV is FCA regulated	GREEN E/3		Risk and controls reviewed September 22.
			Reputational risk from poor investments.		Product reviews and due diligence undertaken by Investment Advisor before the Fund invests. Robust, Fund Manager selection process in place (Non LCIV where required)		No changes required to current controls.	
3.2	PFM	Underperformance by Fund Manager	Deficit reduction targets not met/Increased employer contributions.	AMBER C/2	Fund Managers and LCIV attend Pension Committee to present quarterly performance reports and challenge by the Committee and Fund Investment Advisor.	GREEN D/3		Risk and controls reviewed September 22. No changes required to current controls. None of the funds invested in LCIV are classified as either 'on

Havering Pension Fund Risk Register

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								watch' or 'enhanced' monitoring, all on 'normal' monitoring.
3.3	PFM	Poor investment advice provided to the Fund or not taken.	Deficit reduction targets not met.	AMBER C/2	Investment Advisor performance is annually reviewed by the Pensions Committee and close working relationship maintained with officers.	GREEN D/3	Service Review submitted to Pensions Committee 13 December 2022	Risk and controls reviewed September 22. No changes required to current controls.
3.4	PFM	Negative financial market impacts/external factors/increased market volatility (i.e. Recession, COVID 19 Pandemic, inflation)	Economy downturn could result in general fall in investment values.	RED B/1	Diverse portfolio to reduce effects from market volatility.	GREEN D/3		Risk and controls reviewed September 22. No changes required to current controls.
					Close monitoring of Markets by the Fund's investment Advisor in particular during COVID19 pandemic			
					Investment Advisor produces monthly market updates.			
3.5	PFM	Delays in the implementation of the strategy will reduce the effectiveness of the strategy and may impact growth.	The Fund's assets are not sufficient to meet its long term liabilities.	AMBER C/2	Investment advisor/Pensions Committee and officers review fund performance and asset class targets quarterly.	GREEN D/3		Risk and controls reviewed September 22. No changes required to current controls.

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3.6	PFM	Delays in compliance with capital calls/FX Hedges on new illiquid mandates could result in penalty payments.	Penalty payments are charged to the Fund.	GREEN D/3	Robust processes in place to ensure capital calls/FX cash settlements are funded in a timely manner.	GREEN D/4		Risk and controls reviewed September 22. No changes required to current controls.No penalty charges or missed capital calls to date
3.7	PFM	Underperformance of LCIV Fund manager. Failure to achieve Asset Under Management (AUM)Target.	The Fund’s assets are not sufficient to meet its long term liabilities.	AMBER C/1	Monitoring meetings are held with Officers from Havering and LCIV client relations team regularly.	GREEN D/3		Risk and controls reviewed September 22. No changes required to current controls.
					LCIV arrange regular meet the manager sessions that is open to Officers and Committee members.			
					LCIV run monthly business meetings to ensure the Fund is up to date with LCIV events. Summaries are reported back to the Pensions Committee quarterly.			
					LCIV attend Pension Committee, as part of the reporting cycle, to report on sub fund manager performance and LCIV updates. Open to challenge by the Committee and Fund Advisor.			
				Failure to meet AUM target may		Development charges and ad valorem fees are reported at the LCIV General		

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			impact LCIV sefvce delivery		Shareholder meetings - attended and challenged by shareholder reps i.e. Councillors from each borough, SLT..			
			Annual charges may not decrease in line with MTFS expectations.					
3.8	PFM	Fund Managers – noncompliance to the Code of Transparency.	Failure to disclose full management fees in the Pension Fund Annual Report and accounts and being overcharged.	GREEN C/3	Fund Managers complete the Code of Transparency compliance template annually.	GREEN D/3	All fund managers now submit data so further analysis can be undertaken	Risk and controls reviewed September 22. No changes required to current controls.
Page 18					Officers have access to the Byhiras client portal to check submission of templates.			
	3.9	PFM	Climate Risk /ESG Considerations.	Failure to consider the extent of climate change could impact negatively on financial outcomes e.g. stranded assets, carbon taxes etc. Could also result in the Fund missing out on investment opportunities	AMBER C/2	The Committee have developed a set of Investment beliefs that recognises that climate change and the expected transition to a low carbon economy represents a long –term financial risk to Fund outcomes.	GREEN D/2	Climate Risk Plan is currently being developed. Two reports considered at the 26 July and 20 Sept 22 Pensions Committee meeting
					Investment beliefs incorporated as part of the ongoing implementation of investment strategy and some funds have switched to less carbon intensity products.			

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3.10	PFM	Risk that MATS Consolidate existing Pension Fund memberships funded within various Local Authorities into a Pension Fund outside Havering.	If a request to transfer out from the Fund is granted by DLUHC, this could set a precedent for the sector and the potential wider impact on other employers who may also seek to transfer out. There will be	AMBER C/2	The Fund has responded to the consultation issued by DLUHC opposing the transfer on the grounds of the wider risks faced by the Fund.	AMBER C/2	To monitor DLUHC actions re Transfer request from Oasis Community Learning.	DLUHC continuing to consider the Oasis application but do not expect there to be a final decision before Autumn 2022.
					If the Transfer request is granted the Fund will ensure data is correct and work with the actuary to ensure that the settlement of the transfer is valued correctly for exit.		To ensure contact with the Actuary regarding transfers and exit valuations.	
			associated with Climate change.		The Pensions Regulator has set up a working party to consider guidance for pension schemes. The SAB is also expected to incorporate climate change considerations into its guidance for LGPS funds during 2020. climate scenario stress testing is now included in the contribution modelling exercise for the local authority as at the 2022 valuation.		Consultation “LGPS Governance & Reporting of Climate change Risk” now issued – deadline to respond 24 Nov 2022. Officers will monitor progress of regulations and guidance	reporting against relvent matrix. <ul style="list-style-type: none"> Escalating engagement with investee companies on climate-related topics. Further training

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Page 20			an impact on cash flow and Investment Strategy as it is estimated that c10% of the Fund's assets and liabilities would transfer out if all existing MATS followed precedent						
	RISK TITLE								
	No 4. Risk of Failure to comply with Legislative requirements								
	Upper Level for All Risks S151 Officer/Director of Exchequer and Transactional Services								
4.1	Lower Levels: PFM/CMO	Lack of appropriate skills/knowledge of tPR, DLUHC and CIPFA Guidance, Financial Regulations and accounting standards. Unaware of legislative changes/Poor/inac	Potential for breach of legislation resulting in incurring financial penalties from the tPR/legal challenges/ Reputational Damage.	AMBER C/1	Local Pension Board in place to oversee adherence to the Regulations and guidance. Statutory policy documents reviewed annually to ensure compliance with legislation. Officers are members of the CIPFA Pensions Network and participate in the CIPFA Pensions Network/Peer forums to share knowledge & awareness.	GREEN E/3		Risk and controls reviewed September 22. No changes required to current controls	

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Page 21		curate interpretation of the regulations.			Active participation in Legislative Consultations where appropriate. Legislative changes are reported to the Pensions Committee where required.				
					Induction carried out for new Pension Fund Committee and Local Pension Board members.				
					External and in house training provided where required. Continual personal development for all Committee/LPB members and Officers.		Personal development for all Committee/LPB members and officers is on-going		
							Training matrix in place however cannot be fully applied until all CIPFA K&S questionnaires are completed by Local Pension Board and Pensions Committee members.		Signed up to Hymans onlone learning platform (LOLA) from August 2022. Completion of modules to be monitored
					Access to specialist pension media sources.				

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					Financial requirements are subject to external and internal audit with no qualifications.			Risk and controls reviewed September 22. No changes required to current controls
4.2	PFM/CMO	Key person dependency	Loss of corporate knowledge expertise in both administration and finance management.	RED B/1	Experienced personnel in place at present.	GREEN D/2	One Source is undergoing a Review exercise. Succession planning scheduled	OneSource review ongoing
4.3	PFM/CMO	Failure/inability to administer the pension scheme in accordance with regulations.	Non-compliance could result in an adverse external audit report.	AMBER C/2	Local Pension Board in place to oversee adherence to the Regulations and guidance.	GREEN E/3		Risk and controls reviewed September 22. No changes required to current controls
					tPR undertook a review of the Fund's day-to-day practices and operations in 2019 with no overall concerns and officers have since implemented recommendations arising from their review.			Continued monitoring against tPR recommendations
					Experienced personnel in place.			Risk and controls reviewed September 22.
					Attendance at seminars/training to ensure up to date regulatory requirements.			

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					Financial statements are subject to external and internal audit with no qualifications.			No changes required to current controls
RISK TITLE								
No 5. Risk of inability to Manage/Govern the Pension Fund and Associated Services.								
Upper Level for all Risks: S151 Officer/Director of Exchequer and Transactional Services.								
5.1	Lower levels: PFM /CMO	Staffing issues: Loss of corporate knowledge/expertise. Long-term sickness absence. Increase in staff turnover. Lack of resource (Staffing/financial). No knowledge base to store experiences/information.	Negative impacts upon service provision. Potential for Time delays and . Increased costs due to “buying in” external expertise.	AMBER B/1	The London Borough of Havering delegated the pension administration service to Lancashire County Council who have engaged the Local Pensions Partnership Administration (LPPA) to undertake their pension portfolio. LPPA have case type dedicated teams to ensure expertise is maintained Continuous pension training for LPB, Pensions Committee members and staff.	GREEN D/2		Risk and controls reviewed September 22. No changes required to current controls Signed up to Hymans onlone learning platform (LOLA) from August 2022. Completion of modules to be monitored Risk and controls reviewed September 22.
					Participates in the CIPFA Pensions Network/ Peer forums to share knowledge & awareness.			

Havering Pension Fund Risk Register

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					Onesource has introduced a knowledge sharing platform (the Finance Academy)			No changes required to current controls
					Guidance from external agencies (some will be at a cost).			
					Members of Local Authority Pensions Web.			
5.2	PFM	LCIV resourcing – LCIV staff turnover.	Undermines investor confidence in the LCIV.	AMBER C/2	Continued monitoring of LCIV in place.	GREEN D/3		Risk and controls reviewed September 22. No changes required to current controls.
5.3	PFM/CMO	ICT failure/Disaster Recovery.	Loss of infrastructure. Failure of all ICT services.	RED B/1	ICT/ Disaster Recovery in place. Constant security upgrades to computer systems at both Havering, Pensions & Treasury and LPPA.	GREEN D/3		Risk and controls reviewed September 22. No changes required to current controls
					Implementation of COVID-19 working restrictions has maintained service continuity.			
					Use protected portals to send personal information.			
					Internal Firewalls recommended.			
					GDPR good practice is undertaken.			
5.4	PFM/CMO	Cyber Security Risk.	Ransomware risk.	RED B/1	Internal Audit for oneSource Cyber Security carried out in Oct 2018.	GREEN D/3		Risk and controls reviewed September 22.
					LPPA hold a current Cyber Essentials Certificate, issued 13/07/2021. They			

Havering Pension Fund Risk Register

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					also undertake regular penetration testing with a CREST accredited company with any vulnerabilities being remediated			No changes required to current controls
5.5	PFM/CMO	Functionality of Oracle Cloud causes pension fund system issues.	Pension Fund Accounts system malfunction.	AMBER C/2	Oracle team aware of Pension fund system requirements.	GREEN D/2	Monitoring ongoing with regard to system reconciliations and balance sheet requirements.	On going meetings with Reconciliations Manager
					Systems tested at each stage of implementation. Pension Finance Staff undertook testing of General Ledger Revenue codes.			
5.6	CMO	Poor Pension fund administration by the outsourced service LPPA.	Service Delivery failure leading to client/customer complaints and Reputational damage.	RED B/1	Formal agreement in place with administrator, including SLA's.	GREEN E/3		Risk and controls reviewed September 22. No changes required to current controls
					CMO in post to monitor the administration work of LPPA.			
					Service is subject to external auditor report of pension's admin processes. LPPA supply an annual internal assurance report where the control objectives link in to the Pensions Regulator Code of Practice 14.			
5.7	CMO	Poor administration by the employers/payroll providers in the fund.	Service delivery failure leading to client/customer complaints and Reputational damage.	AMBER C/2	Local Pension Board is in place to assist the administering authority in effective and efficient governance of the Havering Pension Fund.	GREEN E/3		Risk and controls reviewed September 22. No changes required to current controls
					Pensions Administration Strategy in place to clarify the responsibilities of			

Havering Pension Fund Risk Register

Appendix A

Risk No.	Risk Owner	Details of Risk	Consequences (Effect) of not addressing the risk	Risk Likelihood/ Impact prior to Controls	Controls/Mitigations	Risk Likelihood/ Impact post Controls	Actions/ Recommendations	Review of Actions taken to date and further actions identified
Page 26					scheme employers and provide timescales for the submission of data.			
					LPPA have a programme of employer training and a dedicated employer engagement team to provide support.			
					CMO maintains regular contact with scheme employers to provide support			
			Inaccurate data provided give rise to inaccurate data and financial reputational consequences such as actuary to set contribution rates with a high margin of error.		CMO in post to monitor the administration work of LPPA.			
					Actuary undertake data checks/cleaning as part of triennial review process.			
					Data cleanse checks undertaken as part of the year end pensions administration process			
					Annual data improvement plan implemented with agreement from LPPA and regular checking of the Pensions Regulator data scores to identify areas to be fed into the plan			
			Pension costs and payments delayed or incorrect.		Monthly reconciliations to monitor cash flow carried out.			
					CMO monitors benefit payments from the Fund			
			Admission agreements not		Employer onboarding process in place Service handover completed when process of admitting bodies to the		Strengthen the process for onboarding new	

Havering Pension Fund Risk Register

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Risk No.	Risk Owner	Details of Risk	Consequences (Effect) of not addressing the risk	Risk Likelihood/ Impact prior to Controls	Controls/Mitigations	Risk Likelihood/ Impact post Controls	Actions/ Recommendations	Review of Actions taken to date and further actions identified
			completed by the transfer date.		fund transferred from LPPA to in-house on 1 April 2021.		employers and Bond reviews	
					Bond or guarantee reviews in place and reviewed every three years as part of valuation process.			
5.8	PFM	Failure/inability to undertake the accounting of the pension scheme appropriately.	Qualified opinion on the accounts by external auditor.	AMBER C/2	Pension Fund accounts subject to external audit.	GREEN E/3	Eternal audit of accounts not been carried out for 2020/21 and 2021/22. Keep under review	Risk and controls reviewed September 22. No changes required to current controls.
					Experienced personnel in place.			
					Pension Fund uses the service of an external custodian to verify asset values and performance.			
					Fund Managers performance is monitored quarterly. Fund Managers present at Pension Fund Committee meetings.			
					Monitoring of internal control reports of fund managers to ensure operations administered correctly.			
					Attendance at accounting seminars/training to ensure adherence to guidance and regulations.			

Havering Pension Fund Risk Register

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5.9	PFM/CMO	Poor communications with stakeholders.	Disaffection and actions against the Council.	GREEN C/3	The Council has in place a complaints system to address complaints via the website that goes all the way up to the pension’s ombudsman.	GREEN E/3		Risk and controls reviewed September 22. No changes required to current controls.
					The Pension Fund has a communications strategy that is updated annually and reviewed every 3 years. The strategy is reviewed by the local pensions board and approved by the pensions committee			
					LPPA has an LGPS dedicated website that contains all relevant information for scheme members and employers.			
					The Fund has a pensions dedicated page within the Havering Council website where fund specific information is published and the Fund publishes an Annual Report			
5.10	PFM/CMO	Excessive charges by suppliers.	Fund incurring unnecessary costs	AMBER C/2	Third Party Fee Invoices checked prior to payment.	GREEN E/4		Risk and controls reviewed September 22. No changes required to correct controls.
5.11	CMO	The Data migration from Altair to UPM (Universal Pensions Management) in	Member’s records may not be accurate which would leave LPPA	RED B/1	LPPA have a dedicated project team and robust project plan in place that includes rigorous testing of data migration and calculations.	GREEN D/2	LPPA are providing regular updates to clients and employers as to	Havering data migrated to UPM in November 2022. Continued

Havering Pension Fund Risk Register

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		November 2022 is not complete and accurate.	unable to calculate the correct level of pension benefits		The project risk register has been presented to the local pensions board		the progress of the project.	monitoring in place to ensure accurate transfer
RISK TITLE								
No 6. Risk of failure to on board or exit employers/members effectively.								
Upper Level for all Risks:S151 Officer/Director of Exchequer and Transactional Services								
6.1 Page 29	Lower Levels: PFM/CMO	Delays in internal processing of documentation/ admission agreements.	Contribution delays from the employers & members until onboarding has been completed impacts cash flow	AMBER C/2	Monthly contribution schedules maintained by the Havering Pensions Team.	GREEN E/3		Risk and controls reviewed September 22. No changes required to correct controls
					Reconciliations between General Ledger and contribution schedules undertaken monthly.			
					Reconciliations between General Ledger and Altair undertaken quarterly with any queries referred to LPPA/CMO for investigation.			
					Pensions Administration Strategy in place to clarify the responsibilities of scheme employers and provide timescales for the submission of contribution payments.			
				Late payments of pension benefits			CMO works closely with LPPA. Carries out spot checks to review LPPA work on a regular basis.	

Havering Pension Fund Risk Register

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Risk No.	Risk Owner	Details of Risk	Consequences (Effect) of not addressing the risk	Risk Likelihood/ Impact prior to Controls	Controls/Mitigations	Risk Likelihood/ Impact post Controls	Actions/ Recommendations	Review of Actions taken to date and further actions identified
Page 30					Pensions Administration Strategy in place to clarify the responsibilities of scheme employers and provide timescales for the submission of data			
				Adverse External Audit Opinion on internal controls.	Service handover completed when process of admitting bodies to the fund transferred from LPPA to in-house on 1 April 2021.			
					LPPA performance report presented to the Local Pension Board at every meeting.			
					Escalation to Heads of Service where required.			
6.2	PFM/CMO	Poor communications with stakeholders/ lack of understanding by employers with regard to their responsibilities.	Potential breach of regulations and member entitlement. Potential for litigation.	AMBER C/2	Script in place to deliver to new Academy employers, with feedback process in place.	GREEN E/3		Risk and controls reviewed September 22.
					Admission policy and manual completed in November 2017			No changes required to correct controls
					TUPE manual completed in November 2017.			
					Pensions Administration Strategy in place to clarify the responsibilities of scheme employers			
					CMO maintains contact with employers to provide dedicated point of contact.			
					Database maintained on all contact details for LGPS communications.			

Havering Pension Fund Risk Register

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Risk No.	Risk Owner	Details of Risk	Consequences (Effect) of not addressing the risk	Risk Likelihood/ Impact prior to Controls	Controls/Mitigations	Risk Likelihood/ Impact post Controls	Actions/ Recommendations	Review of Actions taken to date and further actions identified	
			Employer’s liabilities may fall back onto other employers and ultimately local taxpayers.		Actuarial assessment completed for all new admission requests to assess the level of financial risk.				
					Bonds and suitable guarantees put into place to protect the Fund in case of default.				
6.3	CMO	Member data incomplete or incorrect.	Incorrect member data causes processing delays.	AMBER B/2	LPPA raise queries with scheme employers.	GREEN E/3		Risk and controls reviewed September 22. No changes required to correct controls	
Page 31						Member self-service – online tool for members to check and update personal data.			
						Annual data cleansing and checks are undertaken as part of the year end administration process			
						Data is reviewed as part of the triennial valuation exercise.			
						Reconciliations between General Ledger and UPM undertaken quarterly identifies member mismatches.			
6.4	PFM/CMO	Government white paper on academies, which sets out that it wants all LEA’s to convert to academy status within the next 8 years.	There are 42 schools currently with the LEA that may need to convert, which could impact existing resources to onboard and administer.	AMBER D/3	To monitor development of Government plans	AMBER D/3	Havering to liaise with LPPA to have appropriate plans in place to review resources for implementation and ongoing monitoring.	Risk and controls reviewed September 22. No changes required to correct controls	

Havering Pension Fund Risk Register

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Risk No.	Risk Owner	Details of Risk	Consequences (Effect) of not addressing the risk	Risk Likelihood/ Impact prior to Controls	Controls/Mitigations	Risk Likelihood/ Impact post Controls	Actions/ Recommendations	Review of Actions taken to date and further actions identified
			Cost implications for the Administration contract due to increased levels of employers and employees to manage.					
Page 32	RISK TITLE							
	No 7. Risk of Pension Fund Payment Fraud							
	Upper Level for all Risks: S151 Officer/Director of Exchequer and Transactional Services.							
7.1	Lower Levels: CMO	Pension overpayments arising because of non-notification in change of circumstances.	Financial loss. Reputational damage of Pension Administration and Council.	GREEN C/3	Participate in the National Fraud Initiative (bi-annually). Signed up for DWP database Tell us Once – DWP inform Havering of deaths relating to members of the Havering LGPS fund. Monitored on a daily basis September 20 – Mortality Screening outsourced to an external supplier. Checks carried out monthly Address checked for deferred pensions prior to payment.	GREEN E/4		Risk and controls reviewed September 22. No changes required to correct controls

Havering Pension Fund Risk Register

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					Process is in place to investigate return of payment by banks.			
					Internal audit checks carried out.			
7.2	PFM/CMO	Internal staff fraud/ Staff acting outside of their levels of authorisation.	Potential for financial loss.	AMBER C/2	Segregation of duties.	GREEN E/3		Risk and controls reviewed September 22. No changes required to correct controls
					Pension Fund bank account reconciled to General Ledger monthly.			
					Internal audit checks carried out.			
					Internal disciplinary process in place.			
7.3	PFM/CMO	Conflict of interest.	Inappropriate decision making.	AMBER C/2	Register of interests declarations covered at each Local Pensions Board/Committee meetings.	GREEN E/3		Risk and controls reviewed September 22. No changes required to correct controls

Havering Pension Fund Risk Register

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CMO	Contract Monitoring Officer - Caroline Guyon
CIPFA	Chartered Institute of Public Finance and Accountancy
DLUHC	Department for Levelling UP,Housing & Communities
DWP	Department for Work and Pensions
ESG	Environmental,Social and Governance
FCA	Financial Conduct Authority
GAD	Government Actuary's Department
ICT	Information and Communications Technology
LCIV	London Collective Investment Vehicle
LGPS	Local Government Pension Scheme
LPB	Local Pension Board
LPPA	Local Pensions Partnership Administration
PFM	Pension Fund Manager – Finance – Debbie Ford
SAB	Scheme Advisory Board
SLA	Service Level Agreement
SLT	Society of London Treasurers
TCFD	Task Force on Climate-related Financial Disclosures
tPR	The Pensions Regulator

PAS Code	Function/Task	Performance Standard	Frequency of Monitoring	Internal/LPPA Reporting	Outcome	Comments/Progress	Date Check Completed
2.1 SCHEME EMPLOYERS - GOVERNANCE							
2.1.1	Designate a named individual to act as a Pensions Liaison Officer who is the main contact with regards to any aspect of administering the LGPS	Within 30 days of becoming a scheme employer or a change of named contact	Annually	Internal	Share with LPPA and Finance	via questionnaire	
2.1.2	Formulate, publish and keep under review policies in relation to all areas where the employer may exercise a discretion within LGPS	A copy of the policy document is to be supplied to the administering authority within 30 days of becoming a scheme employer or a change in policy	As and when Regulations change	Internal	Publish policies to LBH website	via questionnaire	
2.1.3	Appoint person for stage 1 internal dispute process (IDRP) and ensure this is noted within the discretions policy	Within 30 days of becoming a scheme employer or a change of appointed person	Annually	Internal	Maintain an IDRP Register stored locally	via questionnaire	
2.1.4	Notify the administering authority of a receipt of a complaint under IDRP	Within 7 days of receipt of the complaint	Annually	Internal	Maintain an IDRP Register stored locally	via questionnaire	
2.1.5	Notify the administering authority that the stage 1 IDRP decision has been made	Within 7 days of making the determination	Annually	Internal	Maintain an IDRP Register stored locally	via questionnaire	
2.1.6	Distribute any information provided by the administering authority or administrators to scheme members/potential scheme members	Individual requirement within timescale specified in each instance	Annually	Internal	Record as part of the Communication Review	via questionnaire	
2.2 SCHEME EMPLOYERS - FUND ADMINISTRATION							
2.2.1	Ensure correct employee contribution rate is applied and reviewed in line with the contribution bands	Immediately on commencing scheme membership and in line with employer discretion	Annually	LPPA part of year end processing?	Maintain a monitoring log		
2.2.2	Ensure correct employer contribution rate is applied as advised by the administering authority and determined by the Fund Actuary	Immediately as directed in line with the Rates and Adjustments certificate	Monthly	Internal	Maintain a schedule of contributions		
2.2.3	Ensure correct deduction of employee contributions	Each payroll cycle	Monthly	Internal	Maintain a schedule of contributions		
2.2.4	Arrange the deduction of any employee additional contributions and any amendments as required	Each payroll cycle as required					
2.2.5	Arrange the deduction of Additional Voluntary Contributions (AVCs) and payment to the relevant AVC provider	Each payroll cycle as required					
2.2.6	Remit the employer and employee contributions to the Fund and provide a monthly report, to include details of any additional contributions and AVCs, in the format specified by the administering authority	Payment via BACS by 22 nd of the month following the deduction The monthly report must be sent as specified in the completion notes by the same deadline	Monthly	Internal	Maintain a schedule of contributions		
2.2.7	Refund any employee contributions when an employee opts out of the pension scheme within 3 months of joining	From the earliest available payroll after the opt out form is received					
2.2.8	Remit strain cost payments to the Fund in relation to early payment of benefits following flexible, redundancy, efficiency, employer consent or ill health retirements	Within 30 days of receipt of the Fund's invoice	Quarterly	Finance to Report	Maintain a monitoring log		

Remit any other charges to the Fund in respect of work carried out on behalf of the employer by the accounts team, administration team or Fund actuary in line with the charging policy

2.2.9 Within 30 days of receipt of the Fund's invoice Quarterly Finance to Report Maintain a monitoring log

2.3 SCHEME EMPLOYERS - RESTRUCTURES AND OUTSOURCING

2.3.1	Notify the administering authority of any services that are being outsourced and will involve a Tupe transfer of staff to another organisation	Immediately at the decision to tender and prior to the launch of the tender process. A Pensions Information Memorandum must be obtained to include with Invitation to Tender documentation to potential bidders, to confirm pension costs.	As and when a notification is received	Internal	Maintain a register of outsourced services for ease of review
2.3.2	Respond to requests for information from the administering authority or LPPA	Within 21 days of receipt	As and when required	Internal	Maintain a monitoring log
2.3.2	Work with the administering authority to arrange for an Admission Agreement to be completed and Fund security to be established	At least 90 days in advance of the contract commencement date	As and when required	Internal	Maintain a monitoring log
2.3.3	Notify the administering authority of any decision to extend existing outsourced contracts beyond the initial end date	Within 30 days of the decision to extend	As and when required	Internal	Maintain a register of outsourced services for ease of review
2.3.4	Notify the administering authority that the contract is due to cease	At least 90 days before the end of the contract	As and when required	Internal	Maintain a register of outsourced services for ease of review

2.4 SCHEME EMPLOYERS - DATA QUALITY AND SCHEME ADMINISTRATION

2.4.1	Provide the end of year return as specified by the administering authority to update member records, feed into valuation/GAD cost sharing exercise and annual benefit/annual allowance statements	Completed and validated return to be submitted by the specified deadline (usually 30 April) via the LPPA Portal	Annually	LPPA	Maintain a monitoring log
2.4.2	To resolve queries resulting from the annual return process	As soon as possible but no later than 21 days from date of receipt. In circumstances where an employer submits a late annual return shorter timescales may be required as advised by the administering authority or LPPA.	Annually	LPPA	Maintain a monitoring log
2.4.3	To action all requests for data, information or delayed forms	To fully answer all queries from the administering authority or LPPA within 21 days of receipt of the query	Monthly	LPPA	Maintain a monitoring log
2.4.4	Ensure Automatic Re-enrolment requirements are met	Engage with payroll department as soon as notification is received from the Pensions Regulator			
2.4.5	Notify new joiners/additional employments in the format specified by the administering authority	Within 14 days of the member's first pensionable pay run after contractual or automatic enrolment date via the new joiner form on the LPPA Portal.	Monthly	LPPA	Maintain a monitoring log
2.4.6	Direct all eligible new employees to the pension scheme website www.lppapensions.co.uk	At date of employee appointment	Annually	Internal	Record as part of the Communication Review via questionnaire

2.4.7	Action and notify movement between the main and 50:50 scheme following member election or automatic re-enrolment in the format specified by the administering authority	Action from the next available payroll and notify via the scheme movements form on the LPPA Portal within 30 days of the change	Annually	LPPA part of year end processing?	Maintain a monitoring log
2.4.8	Notify all child related absence, reserved forces leave or periods of unpaid authorised or un- authorised leave without pay in the format specified by the administering authority	Within 30 days of the start of the leave and confirmation that the member has returned within 30 days via the absence/return from absence notification forms on the LPPA Portal			
2.4.9	Notify of a change to members contractual hours or weeks	Within 30 days of the pay run implementing the change via the change of hours form on the LPPA Portal	Annually	LPPA part of year end processing?	Maintain a monitoring log
2.4.10	Notify of any new/revised additional contribution elections	Within 30 days of the pay run implementing the additional contributions via the employer contact form on the pensions website	Annually	LPPA part of year end processing? Cross checked with monthly return data	Maintain a monitoring log
2.4.11	Notify of early leavers or opt outs in a format specified by the administering authority	Within 30 days of the members final pensionable pay run via the leaver form on the LPPA Portal	Monthly	LPPA	Maintain a monitoring log
2.4.12	Notify of retirements (age, redundancy, efficiency, ill health or flexible) in a format specified by the administering authority	Within 7 days of the members final pensionable pay run via the leaver form on the LPPA Portal	Monthly	LPPA	Maintain a monitoring log
2.4.12	Notify of the relevant tier for an ill health retirement in a format specified by the administering authority	The relevant ill health certificate should be completed by the Occupational Health Practitioner and uploaded with the leaver form on the LPPA Portal	Monthly	LPPA	Maintain a monitoring log
2.4.13	Notify of the death of an employee and provide next of kin details in a format specified by the administering authority	Within 3 working days of knowledge of the death of the employee via the bereavements form on the LPPA website. Followed by the leaver form on the LPPA Portal within 7 days of the final pay run.	Monthly	LPPA	Maintain a monitoring log
2.4.14	Notify of the revision to a member's leaver information following a payment after leaving in a format specified by the administering authority	Within 30 days of the pay run via the leaver form on the LPPA Portal	Monthly	LPPA	Maintain a monitoring log
2.4.15	To Notify of intent to request a bulk estimate retirement calculations to seek both member pension details and employer strain costs	As soon as practical to allow time to consider resource planning via email to the Pensions Projects and Contracts Manager	Monthly	LPPA	Maintain a monitoring log
2.4.16	Request estimate retirement calculations to seek member pension details and employer strain costs (where applicable) in a format specified by the administering authority	With as much notice as possible but at least 30 days prior the date figures are required via the estimate request form on the LPPA Portal	Monthly	LPPA	Maintain a monitoring log

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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 Code	London Borough of Havering Approach / Evidence	Frequency	Last	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	31/12/2022	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 Chargin Policy has been updated to cover this.	As and when required		Fully completed	Fully compliant		
G9	If the administration of contributions outsourced to a service provider, is there a process in place to obtain regular information on the payment of contributions to the scheme?	167	Contribution monitoring is performed internally by the LBH Pensions Team and Pension Fund Finance.	As and when required		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 before 31st August 2022. All statements were issued online with statements posted to anyone that has opted out of e-coms.	Annual check	31/08/2022	Fully completed	Fully compliant		
H2	Do these meet the legal requirements in relation to format?	188	The statements provide all the required information.	Annual check	31/08/2022	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	All pension fund members, including active, deferred and pension credit members, receive an annual statement (ie members do not need to request a statement). Where a statement is requested outside of the annual benefit statement process, these are actioned in line with the SLA..	Annual check	31/08/2022	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	Annual check	31/08/2022	Fully completed	Fully compliant		
H5	Has an annual benefit statement been provided to all members with AVCs within the required timescales?	194	The statements are sent directly to the members by the AVC providers.		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 format?	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 10 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 either the LPPA or 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	Ongoing	31/12/2022	Fully completed	Fully compliant	Both the LPPA and LB Havering pensions websites are regularly reviewed	
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 LPPA to see whether
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		
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		

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