



# Haverling

LONDON BOROUGH

## LOCAL PENSION BOARD AGENDA

**4.00 pm**

**Tuesday  
25 April 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 7 FEBRUARY 2023 (Pages 1 - 4)

To approve as correct the minutes of the meeting held on 7 February 2023 (attached) and authorise the Chair to sign them.

### 5 THE PENSIONS COMMITTEE RECENT MEETING MINUTES 21 MARCH 2023 (Pages 5 - 8)

Pension Committee Meeting minutes from 21 March 2023 attached for noting .

### 6 PENSIONS ADMINISTRATION STRATEGY (Pages 9 - 12)

Report attached.

### 7 CODE OF PRACTICE 14 (Pages 13 - 16)

Report attached.

### 8 RISK RATINGS (Pages 17 - 22)

Report attached.

### 9 COMMUNICATIONS 2023/24 (Pages 23 - 24)

Report attached.

### 10 INDEPENDENT CHAIR - VERBAL UPDATE (Verbal Report)

### 11 ANNUAL GENERAL MEETING UPDATE - VERBAL REPORT (Verbal Report)

**Zena Smith**  
**Democratic and Election Services Manager**



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**MINUTES OF THE MEETING OF THE  
LOCAL PENSION BOARD  
Virtual via Teams  
7 February 2023 (4.05 - 5.35 pm)**

**Present:**

Andrew Frater (Scheme Employer Representative), 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, Tara Haroon, James Grafton, Sam Kemp, Alexandra McMahon, Lilian Thomas

Guests: Mark Waterworth (LLPA), Greg Smith (LLPA)

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

**139 CHAIR'S ANNOUNCEMENTS**

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

**140 APOLOGIES FOR ABSENCE**

Apologies were received from Denise Broom (Scheme Employer Representative).

**141 DISCLOSURE OF INTEREST**

There were no disclosures of interest.

**142 MINUTES OF THE MEETING LPB 15 NOVEMBER 2022**

The minutes of the meeting of 15 November 2022 were accepted as a true and accurate record.

**143 MINUTES OF THE MEETING PC 22 DECEMBER 2022**

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

Members were reminded that there would be a training session titled: Education session on climate metrics - 2023 Key Action from Embedding Climate Risk Management into the Fund' paper presented in December 2022. This would take place via Teams on 6 March 2023 at 16:00.

The sign in is as follows:

Meeting ID: 337 258 427 124

Passcode: seN5hP

144 **LPPA QUARTERLY PERFORMANCE REPORT**

The Board were presented a report from Greg Smith of the Local Pensions Partnership.

GS explained that LPPA had moved to a new pension system called UPM. Clients were phased onto the system and there was a relaxation of service levels for November, December and January to allow for teething problems.

Things were still not on track and it was expected that service level agreements would return to the targeted 95% after approximately six months. There were also currently call centre waiting times of 9 minutes and there was a target to get those times down to under 4 minutes.

Members raised concerns over communication with LPPA and needed assurances that year end information would be provided. GS assured that communications would be improved in the future given that there was a new executive team in place that had significant LGPS experience. There was also a client forum scheduled for the end of February whereby they would be going through how to get to back to level within the agreement, how wait times would be reduced, how to make tangible improvements and how to roll out the new pensions administration system whilst improving customer relationships.

The Board agreed that LPPA needed to be kept to account and any further issues would be raised with them.

145 **PENSIONS RISK REGISTER**

The Board were presented with a summary of the risk register. It was explained that it was presented to the Pensions Committee. They requested that coloured wording be added because the risks were not clear.

It was suggested that benchmarks should be added to the risk register and all risks should be measurable.

The Board noted the report.

146 **PENSIONS ADMINISTRATION STRATEGY**

The Board were presented with a report outlining the Pension Administration Strategy. It was explained a 12 month strategy was created and communications were sent to employers with a short paragraph about outsourcing in the hopes of raising awareness. It was noted that Caroline Guyon (CG) needed to work with LPPA to establish what support could be provided via reporting from the UPM system. It was agreed that it was

important to consider any items that the LPPA were not able to help with and to further decide what could be done with the information provided.

CG would bring back an update to the next meeting.

The Board noted the report.

147 **COP14 COMPLIANCE CHECKLIST**

The Board were presented with a report that contained the COP14 Checklist.

It was explained that there were robust processes in place and there were no issues with employers and late payment of contributions. Work was required around the LPPA reports against SLA disclosure timescales. CG would discuss with Greg and his team to see if that could be implemented.

148 **POSITION OF CHAIR**

It was explained to the Board that initially when the advertisement was posted for position of Chair, there were a number of people interested in the position.

However, once the packs, the terms of reference and the information about the allowances were sent through to the interested parties, no one applied. The feedback CG received was that the pay was not sufficient.

After research of what other London Boroughs were paying, it was suggested that £8000 should be allocated from the Pension Board budget. This amount would need to be approved and then the position would be re-advertised.

The requirements for the position would be as follows: attendance of 5 meetings a year including the AGM, the expectation of the ability to challenge officers and have a strong understanding of the regulatory requirements. Therefore, the allowance would reflect that level of importance. The job description with terms of reference was already a part of the pack and the Committee would need to review the performance of the Chair.

CG thought the fund manager would be involved in the process of overseeing the role as well; however, she would look into this further. CG would also enquire to the Pension Officer Group for clarity on where the responsibility sits for specific aspects of the chair.

The next step would be to investigate the performance review process further to ensure the Board were happy with the process of monitoring performance output before appointing a Chair for the 4 year term and pending approval of the 151 Officer.

The Board **noted** the Officers' recommendations.

149 **DRAFT LOCAL PENSION BOARD BUDGET 23/24 TO 26/27**

The Board was presented with the LPB Draft Budget for 23/24-26/27. It was explained that budget revisions were made from the last four year budget in regards to the Members allowance and traveling. It was revised from the previous budget of £3,000 to £12,000 from 23/24 onwards to include the allowance for the new Chair.

There were 3 new members appointed since the last four year budget and also to fund the appointment allowances and travel for an independent chair. Therefore that cost was put up to £12,000. Communications and computing the previous budget added another £500. Incorporated with printing and stationery and office expenses added up to another £3900. The professional advice was revised to £5000 because it was never used in the four years previously. Therefore, it was put partly towards the £12,000 and the actual £8000 for the new Chair and the training and development of £10,000. The budget for the next four years was set at £31,900.

Members who did not plan on claiming there allowances were asked to email LT as soon as possible.

It was also noted that DF would chase the Ill Health Liability Insurance (IHLN) notifications.

The board **agreed** the recommendation of an independent chairman at a cost of no more than £8000 and dependent on outcome of performance measures.

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**Chairman**



**MINUTES OF A MEETING OF THE  
PENSIONS COMMITTEE  
Town Hall, Main Road, Romford  
21 March 2023 (7.04 - 9.34 pm)**

**Present:**

**COUNCILLORS**

**Conservative Group** Dilip Patel and Viddy Persaud

**Havering Residents' Group** Julie Wilkes, Philip Ruck (Vice-Chair) and James Glass

**Labour Group** Mandy Anderson (Chairman)

**Trade Union Observers:** Derek Scott

All decisions were taken with no votes against.

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

**275 APOLOGIES FOR ABSENCE AND ANNOUNCEMENT OF SUBSTITUTE MEMBERS**

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

**276 DISCLOSURE OF INTERESTS**

There were no declarations of interest.

**277 MINUTES OF THE MEETING 13/12/22**

The minutes of the meeting 13 December 2022 were accepted as a true and accurate record and signed by the Chairman.

**278 MINUTES OF THE LOCAL PENSION BOARD 07/02/23**

The Local Pension Board minutes of 07/02/23 were noted.

**279 EXCLUSION OF THE PUBLIC**

It was agreed that the public should be excluded from the meeting on the grounds that it was likely that, in view of the nature of the business to be transacted or the nature of proceedings, if members of the public were present during these items there would be disclosure to them of exempt

information within the meaning of paragraph 3 and 5 of schedule 12A to the Local Government Act 1972.

280 **PENSION FUND PERFORMANCE MONITORING FOR THE QUARTER ENDED DECEMBER 2022**

The Committee were 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 ended **31 December 2022**.

It was explained that significant events had occurred after the production of the report and there were addressed further. The Fund increased in value by **£4.53m** over the quarter; however, it underperformed the tactical benchmark by -4.46% and outperformed the strategic benchmark by 5.68%.

Hymans discussed the Fund's performance and various issues that arose from the monitoring of the other managers.

The Committee **agreed** the recommendations.

281 **INVESTMENT STRATEGY UPDATE - CONSIDERATIONS**

The Committee were presented with a report that included a paper produced by the Fund Investment Advisor. Exempt Appendix A set out a follow up on the Fund's Actuarial valuation as at 31 March 2022, reviewing if any changes were necessary to the current Investment Strategy Statement.

The Committee **agreed** the recommendations.

282 **DRAFT CLIMATE RISK POLICY**

The Committee were presented with a report that set out the proposed content of a draft climate transition plan and policy for discussion before the final version would be submitted for approval at a later meeting.

Hymans discussed the outline structure and content of the proposed climate policy and gathered views and feedback with the aim of finalising the policy at the following Committee meeting in July 2023.

The Committee **agreed** the recommendations.

283 **REVIEW OF OVERPAYMENT WRITE OFF POLICY**

The Committee were presented with a report that ensured that it was good practice to ensure the Authority had a policy in place regarding the treatment of overpaid pensions following the death of a pensioner or dependant member.

It was explained that the policy was introduced in March 2019 enabling overpayments of pension of less than £250 net following the death of a pensioner or dependant member, where there was no ongoing dependant pension payable, to be automatically written off. This ensured that any overpayments were treated in a fair and equitable manner and it would prevent the administration team seeking individual write off approvals. It was agreed that the policy would be reviewed annually.

Furthermore, during 2021/22, the overpayments written off in line with the policy totalled £4,321.89, which fell within the expected average of £5,000 in any financial year.

The Committee **agreed** the recommendations.

**284 PENSIONS ADMINISTRATION BUDGET 2023/24**

The Committee were presented with a report on the administration of the Havering Local Government Pension Scheme (LGPS) and it was provided via a shared service agreement with Lancashire County Council (LCC) who delegated the function to the Local Pensions Partnership Administration (LPPA). The report detailed the LPPA's proposed budget for 2023/24 of £0.533m, an overall increase of 2.66% from 2022/23.

The Committee **agreed** the recommendations.

**285 REVIEW OF VOTING AND ENGAGEMENT ACTIVITY JUNE 2022**

The Committee were presented with a report that was produced by the Fund's Investment Advisor (Hymans), and presented with a summary of the Fund's investment managers' Voting and Engagement activities over the 12-month period to **30 June 2022**.

The Committee **agreed** the recommendations.

**286 ACTUARIAL VALUATION REPORT AS AT 31 MARCH 2022**

The Committee were presented with a report that provided the 2022 Actuarial Valuation Report and was prepared by the Fund's Actuary in accordance with Regulation 62 of the Local Government Pension Scheme Regulations 2013.

The report set out an actuarial valuation of the assets and liabilities of the pension fund as at 31 March 2022 and also set out the minimum contributions to be paid by each employer from 1 April 2023 to 31 March 2026 as determined by the Fund's Actuary.

The Committee **agreed** the recommendations.

287 **SERVICE REVIEW OF THE PENSION FUND CUSTODIAN OCTOBER 2021 TO 30 SEPTEMBER 2022**

The Committee were presented with a report that reviewed the performance of the Custodian, Northern Trust, for the period 1 October 2021 to 30 September 2022.

The Committee **agreed** the recommendations.

288 **VARIOUS ADMISSIONS INTO HAVERING PENSION FUND**

The Committee were presented with various admissions into the Havering Pension Fund. Approval for Kindred, May Harris Multi Services and Mears Group were sought for admission into the Havering Pension Fund.

The Committee **agreed** the recommendations on all 3 reports.

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**Chairman**

PAS Code	Function/Task	Performance Standard	Frequency of Monitoring	Internal/LPPA Reporting	Outcome	Comments/Progress	Date Check Completed
<b>2.1 SCHEME EMPLOYERS - GOVERNANCE</b>							
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	
<b>2.2 SCHEME EMPLOYERS - FUND ADMINISTRATION</b>							
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	Monthly	Internal		Introduce a checklist as part of monthly reconciliations	
2.2.5	Arrange the deduction of Additional Voluntary Contributions (AVCs) and payment to the relevant AVC provider	Each payroll cycle as required	Monthly	Internal		Introduce a checklist as part of monthly reconciliations	
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 <sup>nd</sup> 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	Monthly	Internal		Introduce a checklist as part of monthly reconciliations	
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  
Annually Internal Use this years employer communications plan to identify AE dates for future monitoring

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	Monthly	LPPA	Maintain a monitoring log
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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**I - Internal Dispute Resolution**

**Legal requirements**

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

TPR Code Ref 213

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

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

TPR Code Ref 216

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No.	TPR Requirement	TPR Code	London Borough of Havering Approach / Evidence	Frequency	Last	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	31/08/2022	Fully completed	Fully compliant		
I2	Does the Administering Authority's process highlight or consider whether a dispute is exempt?	214	Exempt disputes are covered in the IDRP factsheet	Annual check	31/08/2022	Fully completed	Fully compliant		
I3	Does the information made available to applicants about the procedure clearly state the procedure and process to apply for a dispute to be resolved including: - who it applies to - who the specified person (stage 1) is - the timescales for making applications - who to contact with a dispute - the information that an applicant must include - the process by which decisions are reached?	224	The IDRP Factsheet includes all specified information along with a form for the person with an interest in the scheme to complete.	Annual check	31/08/2022	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		Havinging 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	31/08/2022	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		Havinging 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		Havinging 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 Code	London Borough of Havering Approach / Evidence	Frequency	Last	Complete	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 on the Havering Pension website	Annual check	31/08/2022	In Progress	Partially compliant		A register of breaches must be set up and maintained. New officers would benefit from training
J2	Does the Administering Authority have appropriate procedures in place to meet their legal obligations for identifying and assessing	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	Annual check	31/08/2022	In Progress	Partially compliant		A register of breaches must be set up and maintained.
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	31/08/2022	In Progress	Partially compliant		A register of breaches must be set up and maintained.

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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.

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
<b>RISK TITLE</b>								
<b>No 1. Risk of Inaccurate three yearly actuarial valuation</b>								
Upper Level: S151 Officer/Director of Exchequer and Transactional Services								
3.1 Page 19	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 an impact on cash flow and Investment Strategy as it is estimated that 10% of the Fund's assets and liabilities would	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.  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.	AMBER C/2	To monitor DLUHC actions re Transfer request from Oasis Community Learning.  To ensure contact with the Actuary regarding transfers and exit valuations.	DLUHC continuing to consider the Oasis application but do not expect there to be a final decision before Autumn 2022.

**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
			transfer out if all existing MATS followed precedent					
<div style="display: flex; justify-content: space-between;"> <span style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 20</span> <div> <p><b>RISK TITLE</b></p> <p><b>No 6. Risk of failure to on board or exit employers/members effectively.</b></p> </div> </div>								
<p><b>Upper Level for all Risks:S151 Officer/Director of Exchequer and Transactional Services</b></p>								
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.	<p>There are 42 schools currently with the LEA that may need to convert, which could impact existing resources to onboard and administer.</p> <p>Cost implications for the Administration contract due to increased levels of employers and</p>	AMBER D/3	To monitor development of Government plans	AMBER E/3	Havering to liaise with LPPA to have appropriate plans in place to review resources for implementation and ongoing monitoring.	<p>Risk and controls reviewed September 22.</p> <p>No changes required to correct controls. Update February 2023 – The Schools Bill has been scrapped by Government. A regulatory review continues</p>



**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
			employees to manage.					

## Havering Pension Fund Risk Register

## Appendix A

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
LPFA	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

**LB HAVERING PENSION FUND - EMPLOYER COMMUNICATION PLAN 2023/24**

Our aims for communicating with our scheme employers are: 1) to improve relationships 2) to assist them in understanding their role as a scheme employer 3) to assist them in understanding funding/cost requirements 4) to work together to achieve accurate scheme actuary data submissions 5) to ensure smooth staff transfers 6) to improve the service our pension fund members receive

Timeline:	Date Sent	Audience:	Overview:	Detail:	Links:
April		EXTERNAL PAYROLL	Monthly Return, training - LPPA website - Mid Month REMINDER for EOY returns	The LPPA website provides LGPS information for all of their clients, including forms, guides, newsletters, links to related sites including My Pension Online Member Self Service and contact information.	<a href="https://www.lppapensions.co.uk/employers/">https://www.lppapensions.co.uk/employers/</a>
May		EXTERNAL PAYROLL	Monthly Return	The LPPA website provides specification, guides and links to training	<a href="https://www.lppapensions.co.uk/employers/">https://www.lppapensions.co.uk/employers/</a>
June		SCHEDULED BODIES	Tupe & outsourcing and Havering website	Havering Pension website provides information specific to Havering Fund members such as our retirement process factsheet and planning guide, IDRPs policy, Annual report and accounts and information about the Local Pensions Board.	<a href="#">LGPS Pension Administration   The London Borough Of Havering</a>
July		ALL	UPM, Get members on PensionPoint, expression of wish	Follow up with LPPA to measure success	<a href="#">Forms &amp; documents • Local Pensions Partnership Administration (lppapensions.co.uk)</a>
August		ALL	Pensions websites and LPPA Contact details	brief intro of pension and send contact details for LPPA	<a href="#">Forms &amp; documents • Local Pensions Partnership Administration (lppapensions.co.uk)</a>
September		ALL	Reminder ABS's are online. Encourage contact with members to complete expression of wish	Follow up with LPPA to measure success	
October		ALL	Discretions and IDRPs	It is a requirement under the LGPS Regulations that all scheme employers formulate publish and keep under review a statement of their policy concerning all mandatory discretions under the regulations. You should arrange to publish a copy of the statement and a copy must be sent to Havering as the administering authority and we will also publish this on our website.	<a href="#">Discretions • Local Pensions Partnership Administration (lppapensions.co.uk)</a>
November		ALL	Automatic Enrolment	Use to create a register of employer AE dates for future monitoring. Offer assistance with early engagement	
December					
January					
February		ALL	Year End. New Financial Year Info - LGA. Contributions Rates	Attach new pay and contributions schedule and new contribution bands for employee contributions. Reminder - Your employer rate may change from 01/04/2023 therefore please check your Rates and Adjustment Certificate for the correct percentage.	
March					

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