



# Haverling

LONDON BOROUGH

## LOCAL PENSION BOARD AGENDA

**4.00 pm**

**Tuesday  
17 September 2024**

**Microsoft Teams**

Members 6: Quorum 3

Mark Holder, Scheme Member Representative  
Yasmin Ramjohn, Scheme Member Representative  
Joanne Sladden, Scheme Employer Representative  
Dionne Corrodus-Weekes, Scheme Member Representative  
Jonathan Bunt, Independent, Chairman  
Andrew Frater, Scheme Employer Representative

**For information about the meeting please contact:  
Luke Phimister 01708434619  
luke.phimister@onesource.co.uk**

## **AGENDA ITEMS**

### **1 CHAIR'S ANNOUNCEMENTS**

The Chair will announce details of the arrangements in case of fire or other events that might require the meeting room or building's evacuation.

### **2 APOLOGIES FOR ABSENCE**

(if any) – receive.

### **3 DISCLOSURE OF INTEREST**

Members are invited to disclose any interest in any items on the agenda at this point of the meeting.

*Members may still disclose any interest in an item at any time prior to the consideration of the matter.*

### **4 MINUTES OF THE MEETING (Pages 3 - 4)**

To approve as correct the minutes of the meeting held on 4<sup>th</sup> June 2024 (attached) and authorise the Chair to sign them.

### **5 PENSIONS ADMINISTRATION & LEGISLATION UPDATE (Pages 5 - 52)**

### **6 TO RECEIVE FEEDBACK FROM RECENT MEETINGS OF THE PENSIONS COMMITTEE**

Minutes of previous Pensions Committee will be circulated when available.

### **7 COMMUNICATIONS PLAN UPDATE (Pages 53 - 62)**

### **8 PENSIONS COMMITTEE PAPER REVIEW (Pages 63 - 72)**

### **9 POLICY REVIEWS UPDATE (Pages 73 - 102)**

### **10 TRAINING UPDATE REPORT (Pages 103 - 110)**

### **11 AGM UPDATE**

**Zena Smith**  
**Head of Committee and Election Services**

# Public Document Pack Agenda Item 4

**MINUTES OF THE MEETING OF THE  
LOCAL PENSION BOARD  
Microsoft Teams  
4 June 2024 (4.05 - 5.56 pm)**

**Present:**

Jonathan Bunt (Independent) (Chairman), Andrew Frater (Scheme Employer Representative), Mark Holder (Scheme Member Representative), Yasmin Ramjohn (Scheme Member Representative) and Dionne Corrodus-Weekes (Scheme Member Representative)

**204 CHAIR'S ANNOUNCEMENTS**

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

The Chair, on behalf of all officers and members, gave thanks to Denise Broom for her dedication and hard work during her time on the Board and wished her the best for the future.

**205 APOLOGIES FOR ABSENCE**

Apologies were received from Denise Broom and Joanne Sladden

**206 DISCLOSURE OF INTEREST**

There were no disclosures of interests.

**207 MINUTES OF THE MEETING**

The minutes of the previous meeting were agreed as a correct record.

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

The Board were updated following the previous Pensions Committee meeting.

**209 TRAINING REPORT UPDATE**

The Board were presented with an update in their training.

Members noted they needed to complete their training to avoid any future issues.

The Board noted the report.

**210 PENSIONS COMMITTEE PAPERS REVIEW**

The Board was presented with reports from the Pensions Committee for review.

Members noted the papers had been previously presented to the Council's Pensions Committee. The main point highlighted for members was that the fund had underperformed against its benchmark.

The Board noted the report.

**211 RISK REGISTER UPDATE**

The Board was presented with the Risk Register.

The members discussed alternative ways of presenting the register which officers would follow up on outside of the meeting.

The Board noted the report.

**212 PENSIONS ADMINISTRATION AND LEGISLATION UPDATE**

The Board was presented with a Pensions Administration and Legislation update.

Officers from LPPA explained that the SLA for the quarter was 98.3% and for April and May it was 99%. It was also noted that LPPA receive between 13,000 and 14,000 calls per month with an average wait time in line with their target of 4 minutes and the majority wait time under 2 minutes. Members noted the average number of calls for Havering per month was 300.

The Board noted the report.

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**Chairman**

## LOCAL PENSIONS BOARD

**Subject Heading:**

Pensions Administration and Legislation  
Update

**OMT Lead:**

James Cocks  
Assistant Director of Transactional People  
Services

**Report Author and contact details:**

Caroline Guyon  
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**Policy context:**

Local Government Pension Scheme  
Regulations 2013.

**SUMMARY**

This report reviews the performance of the Local Pensions Partnership Administration (LPPA) against the agreed service levels for the period April to June 2024.

It also provides an update on recent developments within the Local Government Pension Scheme (LGPS) regulatory environment.

**RECOMMENDATIONS**

It is recommended that members note the report.

**REPORT DETAIL**

**1. Administration Update**

- 1.1 From 1 November 2017, 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. The Local Pensions Partnership was formed in 2016 through a collaboration between Lancashire County Council and the London Pensions Fund Authority and provides pension services to the Local Government Pension Scheme, Police and Firefighter Schemes
- 1.2 LPPA provide a quarterly performance report (attached as Appendix A)
- 1.3 LPPA introduced 3 year Efficiency and Service Improvement Plan that currently has 10 live projects, including the improvement of the monthly returns process and the member and employer portals. The ESIP programme has already successfully introduced the automation of the refund quote process and production of deferred statements.
- 1.4 Overall performance against SLA for Q1 is reported at 99%. The reported service is now achieving results in excess of the required 95% target in all areas (in Q4 retirements from an active status were at 94.3%, all other case types were meeting the target). Regular client meetings are held to discuss performance and challenge the service levels reported in line with the independent monitoring of completed cases by the Havering Pensions Team.
- 1.5 The independent checking of cases completed within the quarter notes a discrepancy with the starting point of the SLAs in some cases. The contract states the SLA will be triggered on the date the last piece of information required to complete a case is received. However examples have been identified where this is not the case. LPPA advised the SLA is triggered on the day the benefit calculation is run as this is when the final check is completed to ensure all information is present and correct. Unfortunately this leaves a lack of transparency regarding the actual time it takes to complete a case, although

**Local Pensions Board, 17 September 2024**

LPPA are considering working toward elapsed time reporting. The discrepancies are being challenged and discussions with LPPA are ongoing.

- 1.6 Looking at the 3 highest priority cases, members should note the following (to note From Q1, Deaths includes 'Overpayments' and 'Update Pension and Payroll' processes):

Case Type	SLA Target	Brought Forward	Received in Period	Completed	Carried Forward	Completed on time
Retirement (Active)	5 working days	88	317	283	122	98.3%
Retirement (Deferred)	5 working days	81	135	130	86	97.5%
Deaths	5 working days	253	181	208	226	97.9%

- 1.7 When looking at retirement satisfaction surveys, the results remain disappointing with a limited number of members responding. The table below provides the breakdown of the Q1 responses

	Surveys Issued	Surveys Taken	Satisfied	Neutral	Dissatisfied
Ret from Active	37	20	8	2	10
Ret from Deferred	55	9	6	1	2

- 1.8 LPPA received 4 complaints during Q1 and carried forward 3 complaints from Q4. Of the 4 cases completed in the quarter, 2 were upheld, 1 was not upheld and 1 was withdrawn. 3 cases will carry forward to Q2.

- 1.9 Calls into the LPPA's contact centre are now recorded at a client level with 1014 calls being answered during the quarter. The average wait time for callers across the quarter was 2 minutes 28 seconds with 16 people having to wait more than 15 minutes.

- 1.10 Members are directed to the contact centre survey on the completion of their call. Satisfaction levels are shown below:

	Surveys Taken	Satisfied	Neutral	Dissatisfied
Contact Centre Overall	53	39	9	5
Contact Centre Agent	57	52	3	2

- 1.11 The report details the data quality and the Pension Regulator data scores for common and scheme specific data. At the end of Q1 our common data score was 97.7% (previously 98.1%) and the scheme specific data score was 73.6% (previously 89.4%). The fall in the scheme specific score is seasonal, relating to the processing of Pensions Increase and Annual Allowance calculations. We expect to see the score back to a normal level by Q3.

- 1.12 LPPA is partnering with Civica and Intellica to improve data quality ahead of the 2025 valuation and in readiness for Pension Dashboards. The project is being scoped and the creation of system test environments is underway. Delivery dates are to be finalised but an update is expected during Q2.

## **2. Legislation Update**

### **2.1 The McCloud Remedy**

- 2.1.1 The Regulations were laid on 8 September 2023, coming into force on 1 October 2023 to allow underpin protections to be extended to all members of the scheme who meet the relevant criteria.
- 2.1.2 All McCloud flagged cases will need to be reviewed by August 2025. UPM system functionality to enable previously completed cases to be revisited is due in October 2024.
- 2.1.3 LPPA are now calculating the underpin for all active cases with a McCloud flag and whose data has been verified as being present and correct. LPPA will report the additional costs of the McCloud remedy on a quarterly basis, from Q2/Q3.
- 2.1.4 We are currently reviewing the Scheme Advisory Board guidance to establish the correct method of dealing with potentially 'missing data' for members who were on the Havering payroll during the remedy period.

### **2.2 The Pension Regulator's General Code of Practice**

- 2.2.1 tPR's new General Code of Practice came into force on 27<sup>th</sup> March 2024. The code contains new governance requirements and sets out tPR's expectations of how occupational pension schemes should be managed and the policies, practices and procedures that should be in place.
- 2.2.2 We are required to undertake a gap analysis to identify any areas of partial or non-compliance and have a plan in place to address the shortcomings. There is no official deadline for having the plan in place but the LGA felt 6 months would be reasonable.
- 2.2.3 Work is well underway to assess Havering's compliance with the code and we are working with LPPA to gather the final pieces of evidence and address some formatting issues with Hymans within the checker tool.
- 2.2.4 Once this has been completed, the full report will be shared with Board members for comment/review ahead of the next meeting.

### **2.3 Pensions Investment Review**

- 2.3.1 The Government has launched a pensions review, aimed at boosting investment, tackling waste and increasing pensions savings. As part of the review, they will focus on the investment potential of the £360 billion assets held in the LGPS nationally and tackle the sum being spent on fees. There may be a drive towards consolidation between Funds. The project appears to be moving at pace and a call for evidence has very recently been published.



## **IMPLICATIONS AND RISKS**

**Financial implications and risks:**

The Administering Authority must ensure the Shared Service Agreement is working efficiently, providing value for money and meeting the statutory requirements of the Fund via the monitoring of the work of LPPA.

**Legal implications and risks:**

Havering as the Administering Authority must ensure the Local Government Pension Scheme Regulations are adhered to however there are no specific legal implications within the report.

**Human Resources implications and risks:**

There appear to be no HR implications or risks arising directly as a result of this report.

**Equalities implications and risks:**

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to:

- (i) the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) the need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- (iii) foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are: age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants. We will ensure that disabled people with sensory impairments are able to access the strategy.

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# Quarterly Administration Report

Havering Pension Fund

1st April - 30th June 2024

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# DEFINITIONS

## Page 9

### Total Fund Membership

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

## Page 10 & 11

### Current Age Demographic

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

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

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

Pensioner Members – pensioners and dependants who are currently receiving a pension.

## Page 13

### Casework Performance - All Cases

Performance is measured once all information is made available to LPPA to enable them to complete the process.

Relevant processes are assigned a target timescale for completion, and the performance is measured as the percentage of processes that have been completed within that timescale.

## Page 14

### Casework Performance - Standard

'Deaths' are included as a specific process, but it is important to highlight that processing can take a significant amount of time to complete fully. Furthermore, there can be seasonal aspects which impact case volumes ie. higher mortality rates during winter.

The category of 'Other' on this page covers processes including, but not limited to:

- APC/AVC Queries
- Additional Concs Cessation
- Change of Hours
- Change of Personal Details
- Under Three Month Opt-Out
- Main to 50/50 Scheme Changes
- Ill Health Reviews
- Complaints

Please note that this page includes cases that have met the SLA target, but the stop trigger may also have been actioned before the process has been completed.

## Page 15

### Ongoing Casework at the end of the Reporting Quarter

Please note the number of processes brought forward, does not match the corresponding number of outstanding processes reported in the previous quarter (due to various reasons which can include but are not limited to, the deletion of a process, or changes to the process category that a case is assigned to).

From Q1 2024/25, "Deaths" include over / under payments, and updates to pension and payroll processes (multiple associated processes can be triggered within a case, including the setup of multiple beneficiaries, and making multiple payments to individuals).

## Page 17 & 18

### Contact Centre Performance

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

## Page 20 & 21

### Contact Centre Call Satisfaction

Members are given the option to answer two questions, following a call with the LPPA Contact Centre (these relate to general satisfaction with LPPA, and satisfaction with the adviser they have spoken to – both responses follow a three-point rating scale).

## Page 22 & 23

### Retirement Satisfaction

Graphs show a breakdown of quarterly retirement surveys (emails issued and responses received)

- Retirements processed / completed - members can have multiple process counts.
- Surveys issued - does not equal retirement processes for several reasons; ill health retirements do not receive a survey; not all members provide an email address; members with multiple retirement processes only receive one survey email; there is a planned delay in issuing surveys to allow for initial payments to be paid).

Satisfaction / Dissatisfaction is included as a % of email surveys issued. This demonstrates that a significant number of surveys are not completed (work is ongoing to encourage an increase in the number of responses to email surveys issued).

The Satisfaction Scores highlighted in Green and Red compare the satisfied / dissatisfied responses received, as a % of total survey responses - this is the true measure of member satisfaction.

Satisfied responses include very satisfied (with the service) and satisfied.

Dissatisfied responses include dissatisfied and very dissatisfied.

Neutral responses are not included in the data tables.

## Page 25

### Member Online Portal

The number of member records by status, that are registered for LPPA's member self-service portal, PensionPoint.

## Page 29

### Common/Scheme Specific Data Fails

The Pensions Regulator requires administrators to keep member data up to date to ensure benefits are accurately paid. This is split by Common Data (basic details that are specific to the Member) and Scheme Specific Data (data that is related to a member data and specific circumstances surrounding their record).

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

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

# OUR CORE VALUES

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

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

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



# STATUTORY DEADLINES

✓ COMPLETED    📅 DUE

Page 15

	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25
Annual Benefit Statement and Newsletter to Deferred Members					📅							
Pension Increases		✓										
P60s and Newsletter to Pensioners		✓										
Annual Benefit Statement and Newsletter to Active Members					📅							
Pension Saving Statements							📅					

# EXECUTIVE SUMMARY

Forward thinking...  
Working together...  
Doing the right thing...  
Committed to excellence...

**This performance report covers the reporting period of Q1 2024/25 (April – June 2024)**

## Casework SLA performance

Overall operational casework performance was 99.0% against overall Service Level Agreements (SLAs) for the quarter.

## Contact Centre

Contact Centre wait times have been consistently under the targeted 4-minute wait time with an average wait time over the quarter of 2 minute 28 seconds.

## Satisfaction scores

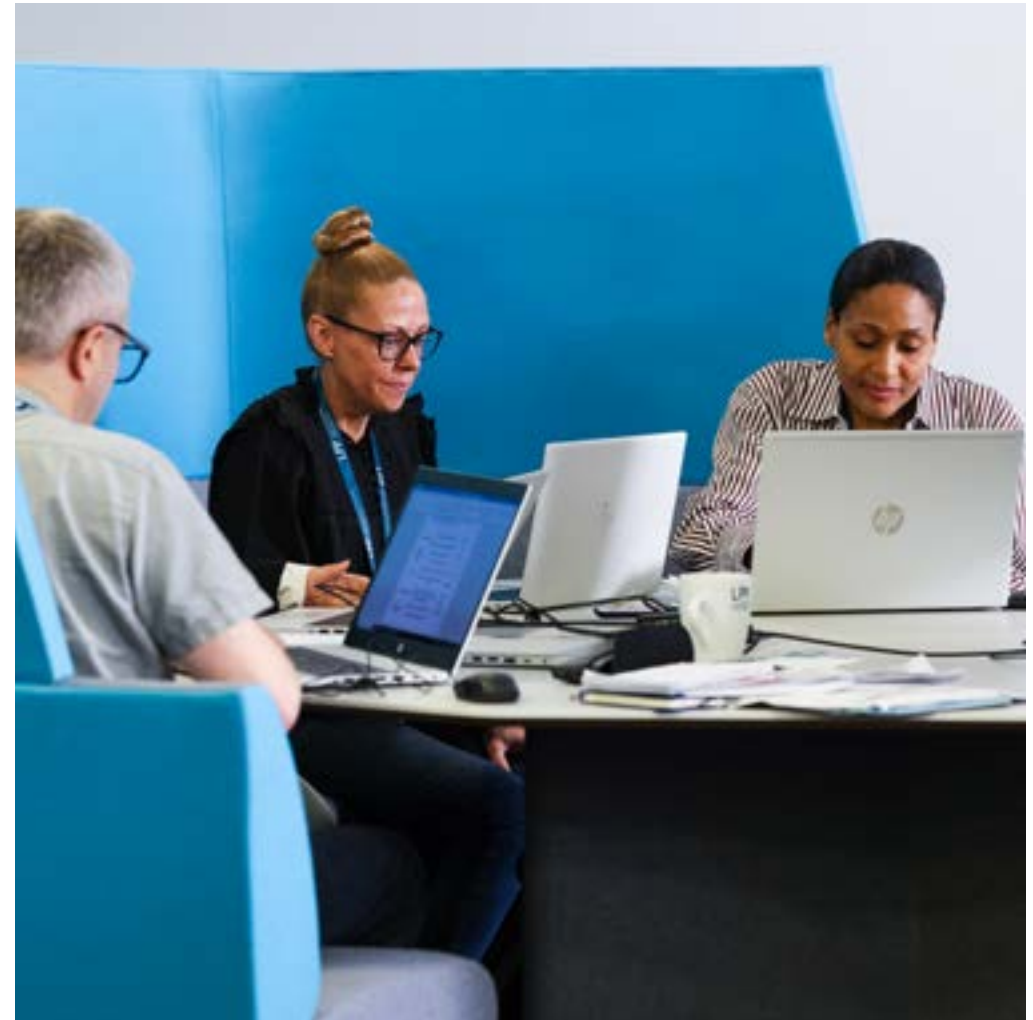
This report includes a new presentation of member satisfaction for retirements. The majority of those surveyed about their retirement experience do not respond. Of those that responded to the survey, the customer satisfaction was 48.3%. Low survey responses can lead to high volatility in the satisfaction scores.

Contact Centre satisfaction now includes both overall satisfaction and satisfaction with the individual call handler that the member spoke to. Satisfaction with the individual call handler is typically higher than overall satisfaction, with satisfaction rates for the quarter at 91.2% and 68.4% respectively.

## Outlook

Activity levels are, and are expected to remain high, due to:

- Embedding of monthly returns for all employers and managing the associated spikes in work driven by the late and concentrated submission of monthly return files from some employers
- Production of Annual Benefit Statements ahead of the 31st August deadline.
- Efficiency and Service Improvement Programme (ESIP) of work.
- Activity to continue to improve the member experience in key areas.
- Significant regulatory change including implementation of McCloud remedy and the Pensions Dashboard.





# LPPA PROJECTS - UPDATE

## McCloud Remedy

Following the McCloud judgment, changes to all public service pension schemes that provided transitional protections to older members, including the LGPS came into force on 1st October 2023. The changes were designed to rectify unlawful discrimination against younger scheme members. In the LGPS, the impact is an extension of the underpin to all eligible members. The national timeline for revisiting all member cases is Oct 23 – Aug 25.

A dedicated project manager and team remains in place overseeing and delivering all the key areas of the project including:

- Data capture and data cleanse from employers to ensure that hours changes and service breaks have all been recorded correctly.
- System design and development is thoroughly tested prior to release into the live environment.
- Appropriate communication plans are in place and delivered.
- Contact Centre and Operational colleague training & business readiness.

## Current Position

- Employers were given to 31st March 2024 to confirm that all data held in respect of remedy (e.g. hours, service, etc.) is correct.
- Eligibility flags are in place to identify all members in scope for remedy.
- We are now calculating benefits and applying the underpin for active members retiring (for those members with a McCloud eligible flag, and whose data has been verified as being present and correct).
- Systems functionality to revisit eligible revision cases (e.g. those that have already retired) in line with nationally agreed cohorts and timescales is due in October 24.

## Efficiency and Service Improvement Programme

LPPA mobilised an Efficiency and Service Improvement Programme (ESIP) shortly after the move to the new administration system (UPM). ESIP is designed to leverage the investment in UPM, delivering automation and improved self-service capability. ESIP currently has 10 projects in flight. ESIP's automation of Deferred (CARE only) Retirement Quote is on track to go live in July (this is the third process automation following the automation of refund quotes and deferred statements). Other activity in flight includes work to improve the monthly returns process and the member and employer online portals.

Forward thinking...  
Working together...  
Doing the right thing...  
Committed to excellence...

## Data Project

LPPA is partnering with Civica and Intellica on a data project to improve data quality ahead of valuation and the introduction of the Pensions Dashboard. Work is well underway on the creation of the systems test environments. As part of the initiation phase, we have been working closely with our supplier to work through a series of detailed workshops and agree the scope of the Data Validation Checks (DVCs) that we will check the integrity of member data against.

The project is working towards producing a series of dashboards to give us clear visibility of the integrity and accuracy of the data that we hold to comply with regulatory change and to enable us to launch more self-service and automation for members and employers.

While we are working through the early phases of the project, delivery dates are yet to be finalised, but we expect to be able to share the initial dashboard results with the Fund during Q2 i.e. between July – September 2024.

## Pensions Dashboard

The Pensions Dashboard will enable individuals to access their pensions information online, securely and all in one place. The connection date for public sector schemes to connect to the Pensions Dashboard is 31st October 2025. The dashboard project has been mobilised with a full-time project manager. Work is well underway on documenting full business requirements, including:

- Systems requirements (including the rules for partial matching of records and the treatment of AVCs); and
- the business readiness aspects of the project (e.g. readiness to deal with new inbound enquiries relating to dashboard).

Civica are LPPA's Integrated Service Provider (ISP) for dashboard connection.

# Fund Membership

## In this section...

- Total fund membership
- Current age demographic

# TOTAL FUND MEMBERSHIP

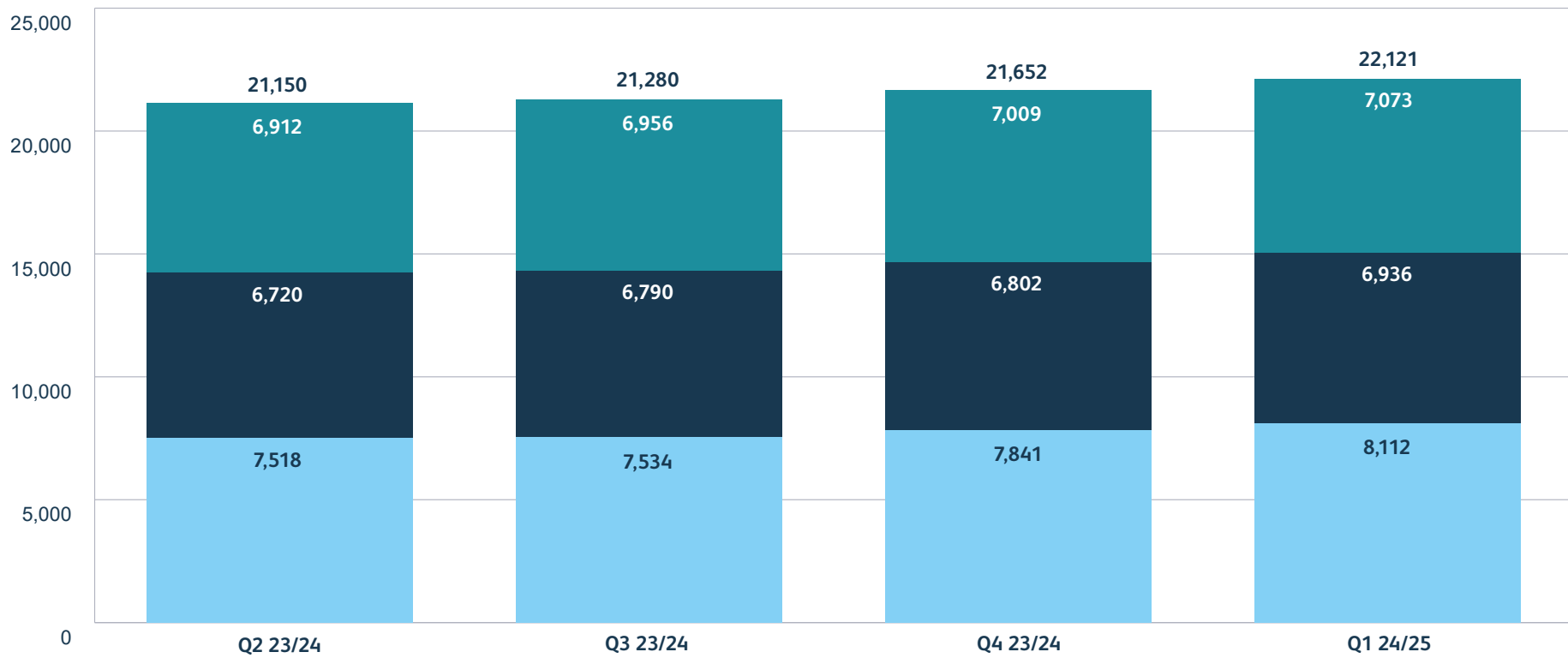


## TOTAL FUND MEMBERSHIP

CLIENT SPECIFIC

Active Contributors   Deferred Beneficiaries   Pensioners & Dependants

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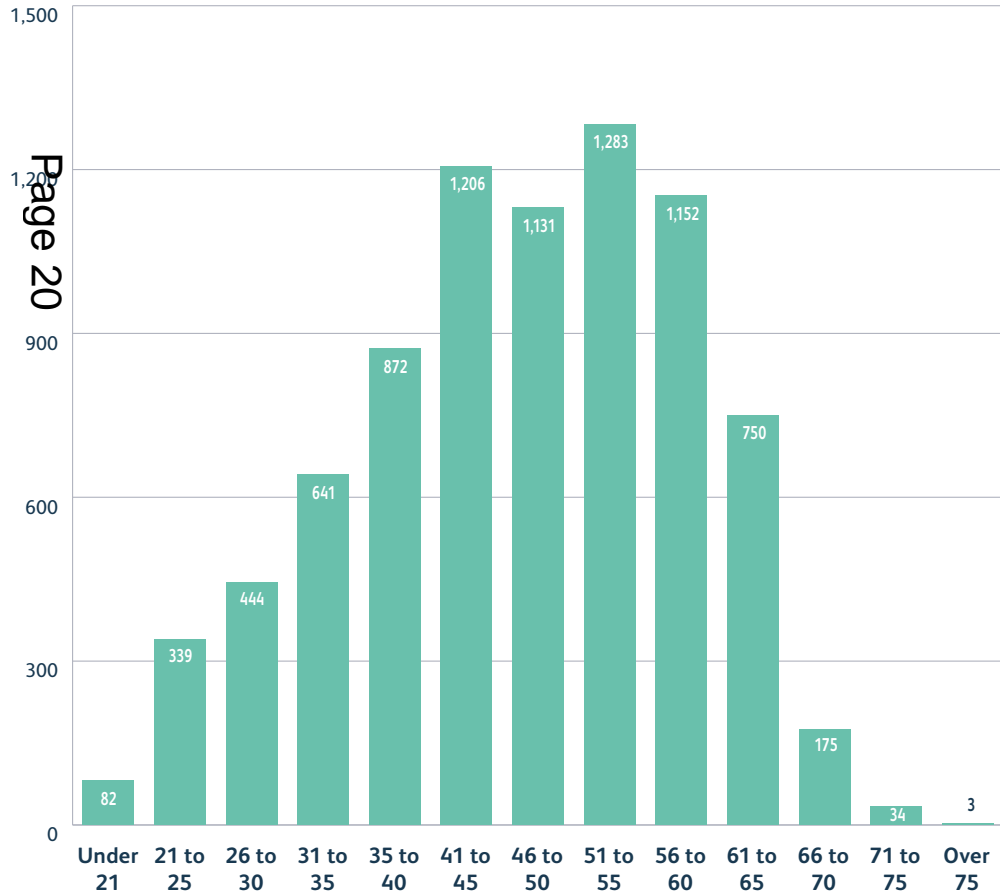
# TOTAL FUND MEMBERSHIP



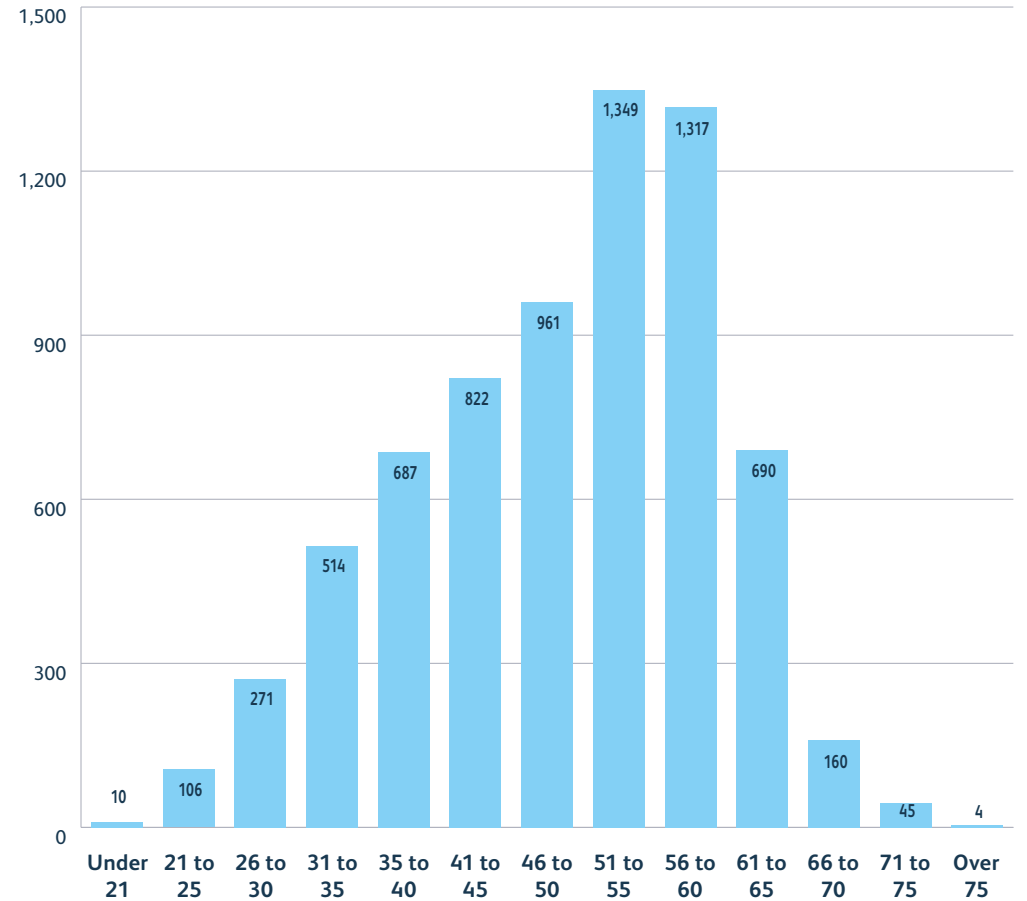
## CURRENT AGE DEMOGRAPHIC

CLIENT SPECIFIC

Active



Deferred

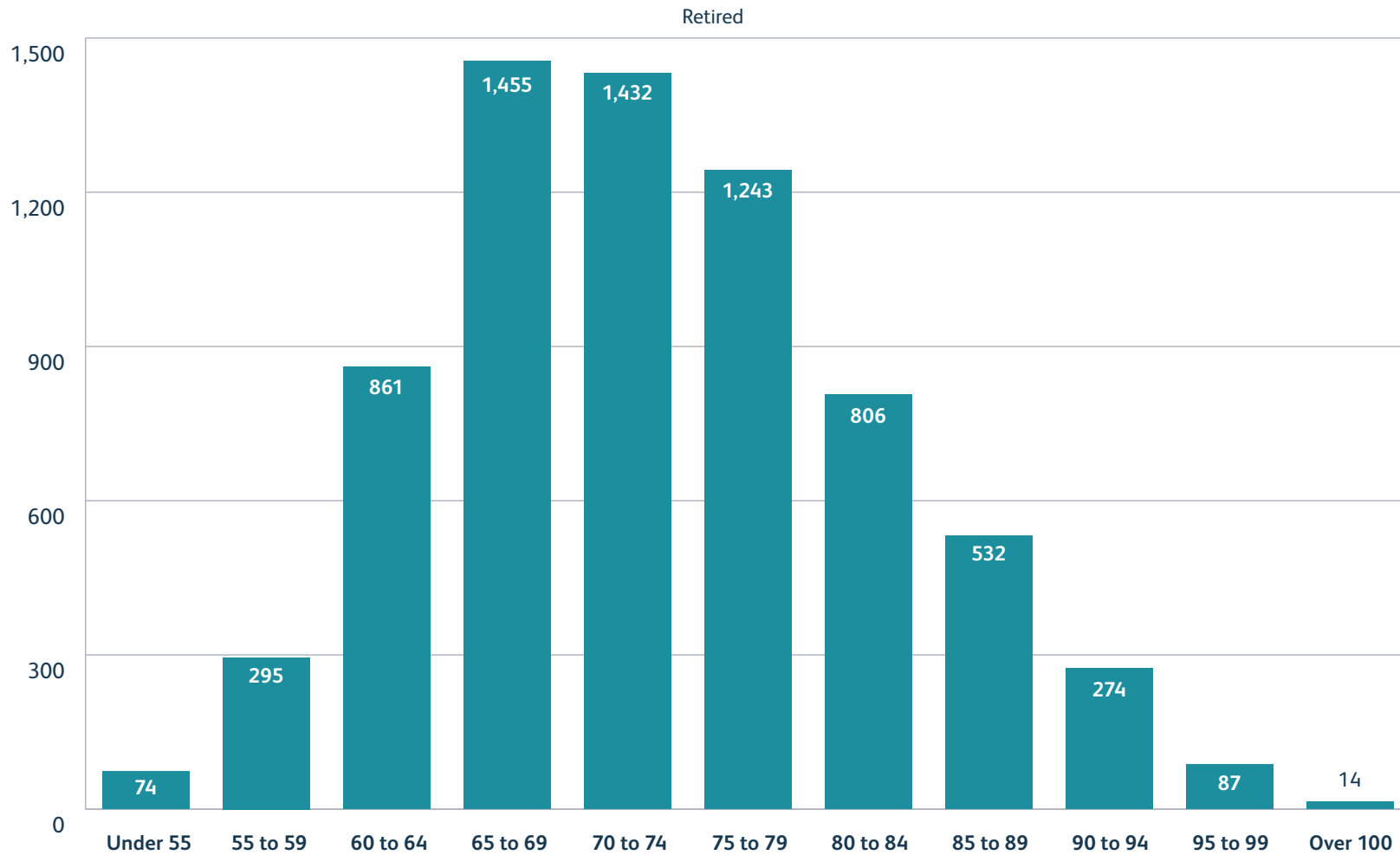


# TOTAL FUND MEMBERSHIP



## CURRENT AGE DEMOGRAPHIC

CLIENT SPECIFIC



# Casework Performance

## In this section...

- Performance – all cases
- Performance standard
- Ongoing casework at the end of the reporting quarter

# CASEWORK PERFORMANCE



## PERFORMANCE – ALL CASES

CLIENT SPECIFIC

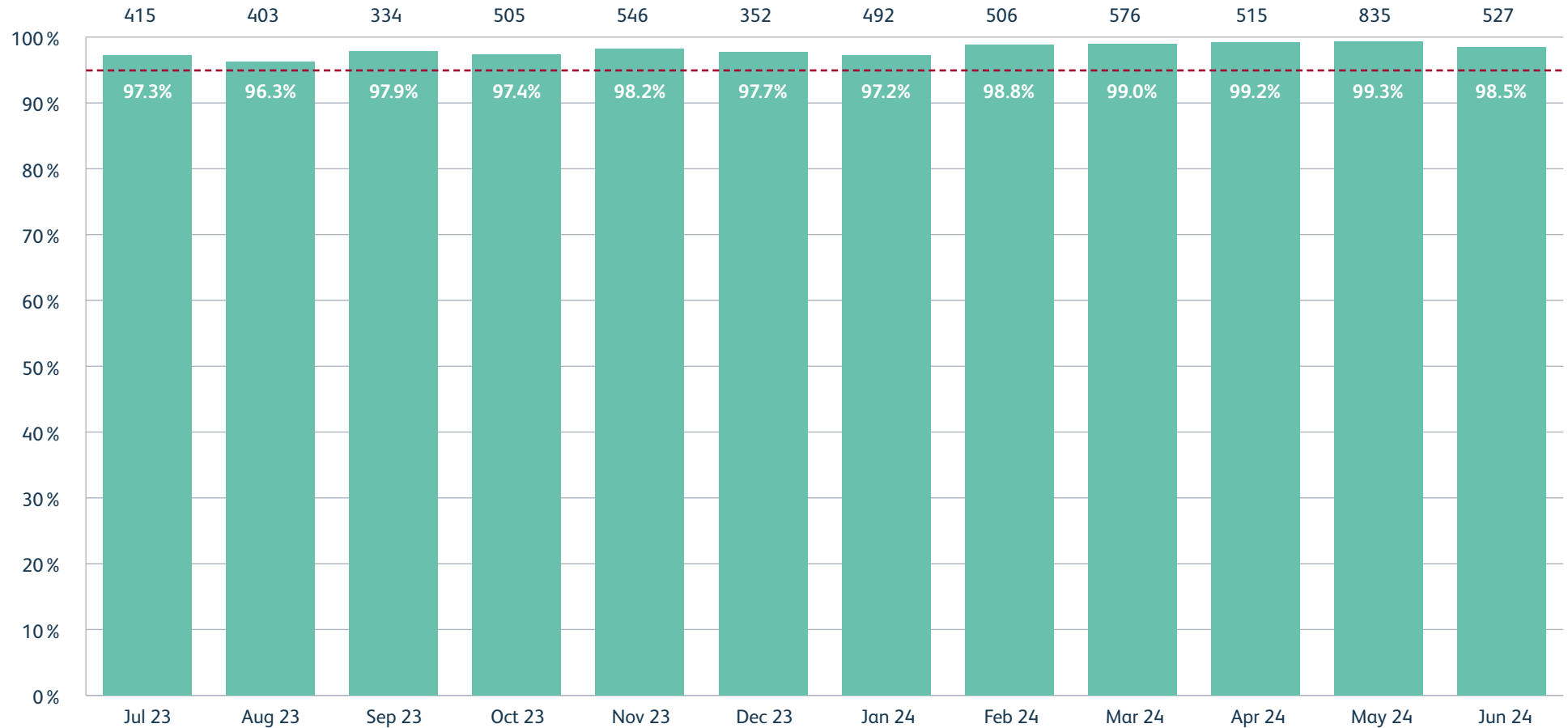
----- Target

The quarterly SLA performance was 99.0%

Total completed cases included for each month.

Page 23

Performance



# CASEWORK PERFORMANCE

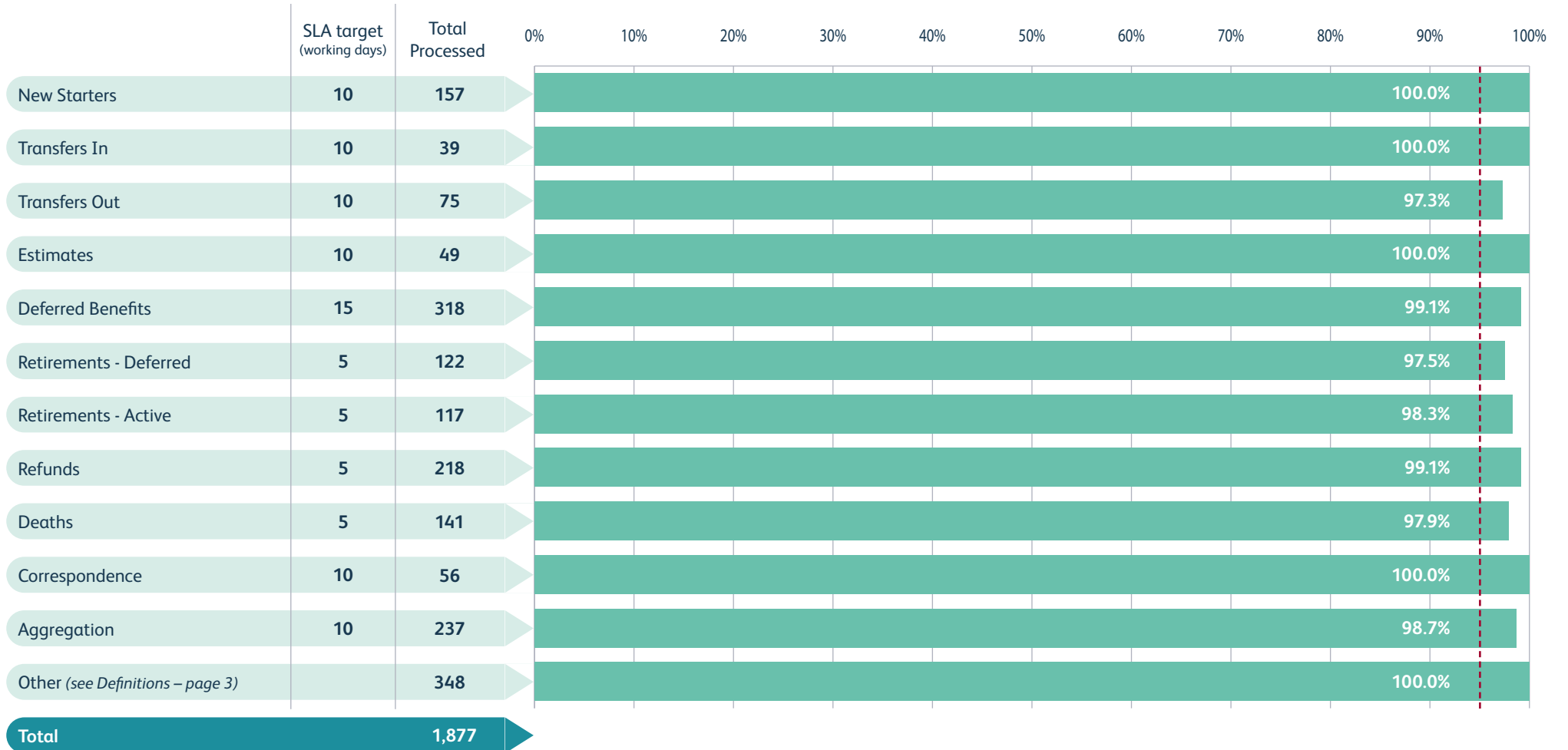


## PERFORMANCE STANDARD

## CLIENT SPECIFIC

----- Target (95%)

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# CASEWORK PERFORMANCE

Please note:

\*From Q1, Deaths includes 'Overpayments' and 'Update Pension and Payroll' processes.

## ONGOING CASEWORK AT THE END OF THE REPORTING QUARTER CLIENT SPECIFIC

The following table is created by identifying all reportable casework within UPM, and includes those that have subsequently Completed / Aborted / Remain Outstanding within the quarter. The figures in this table cannot be compared to those in the previous slide for a number of reasons including: the table includes aborted cases, but the horizontal bar graph does not; the SLA 'stop trigger' can be actioned before the process has been completed.

	Brought Forward at 01/04/24	Received (Inbound)	Completed (Outbound)	Outstanding as of 30/06/24
New Starters	20	403	397	26
Transfers In	142	84	74	152
Transfers Out	164	96	94	166
Estimates	22	55	57	20
Deferred Benefits	298	1,043	934	407
Retirements - Deferred	81	135	130	86
Retirements - Active	88	317	283	122
Refunds	66	481	386	161
Deaths*	253	181	208	226
Correspondence	40	131	126	45
Aggregation	318	374	323	369
Other	66	364	370	60
<b>Total</b>	<b>1,558</b>	<b>3,664</b>	<b>3,382</b>	<b>1,840</b>

# Contact Centre Calls Performance

The Contact Centre deals with all online enquiries and calls from Members for all funds that LPPA provides administration services for.

## **In this section...**

- Wait time range
- Calls answered

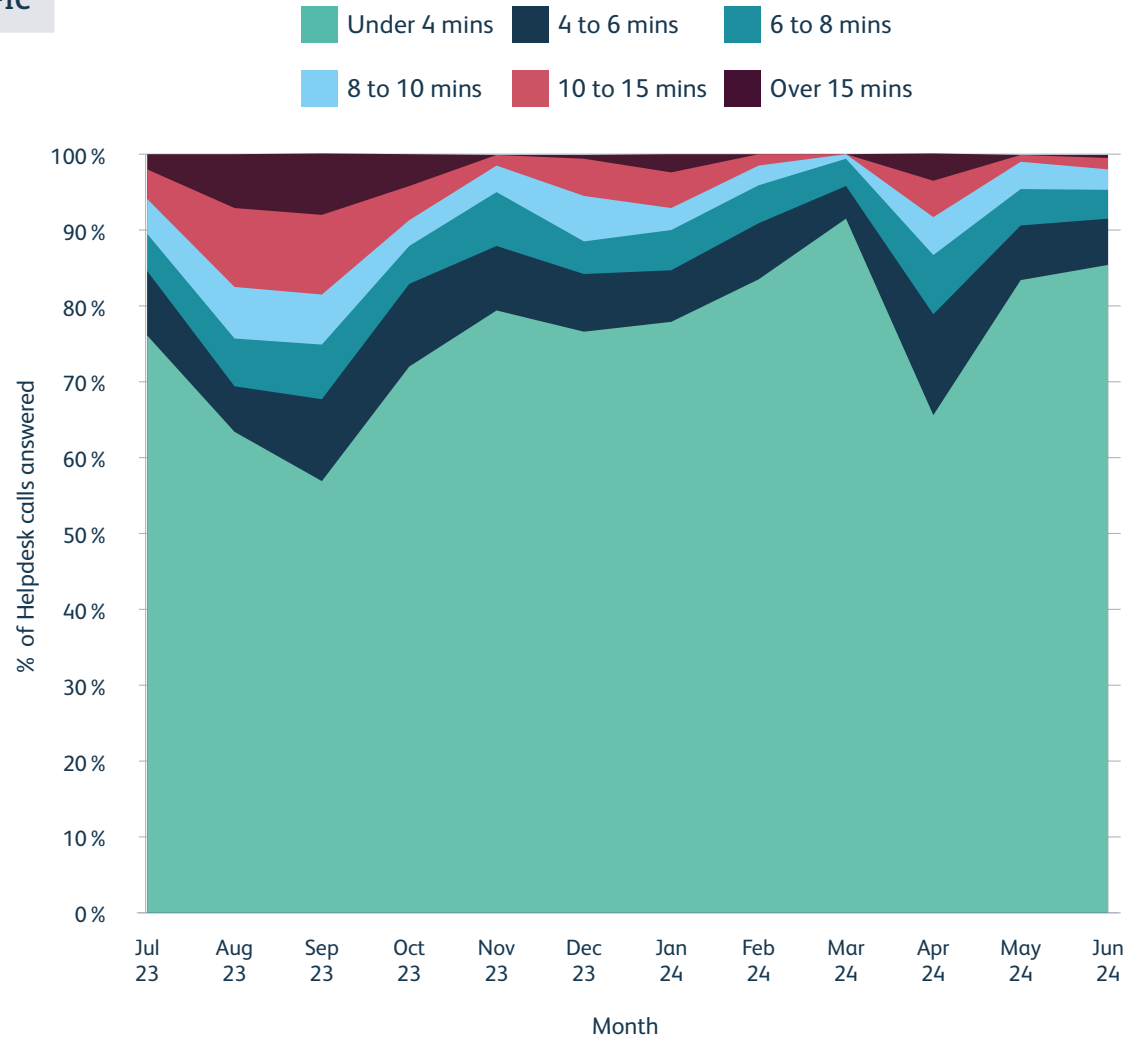
# CONTACT CENTRE CALLS PERFORMANCE



## WAIT TIME RANGE

CLIENT SPECIFIC

	Under 4 mins	4 to 6 mins	6 to 8 mins	8 to 10 mins	10 to 15 mins	Over 15 mins
Jul 23	76.1%	8.5%	4.9%	4.6%	3.9%	2.0%
Aug 23	63.4%	6.0%	6.3%	6.8%	10.4%	7.1%
Sep 23	56.9%	10.8%	7.2%	6.6%	10.5%	8.1%
Oct 23	72.0%	10.9%	5.0%	3.4%	4.5%	4.2%
Nov 23	79.4%	8.5%	7.1%	3.5%	1.4%	0.0%
Dec 23	76.6%	7.6%	4.3%	6.0%	4.9%	0.5%
Jan 24	77.9%	6.8%	5.3%	2.9%	4.7%	2.4%
Feb 24	83.5%	7.4%	5.0%	2.6%	1.5%	0.0%
Mar 24	91.5%	4.3%	3.6%	0.6%	0.0%	0.0%
Apr 24	65.6%	13.3%	7.8%	5.0%	4.8%	3.6%
May 24	83.4%	7.2%	4.8%	3.6%	0.9%	0.0%
Jun 24	85.4%	6.1%	3.8%	2.7%	1.5%	0.4%



# CONTACT CENTRE CALLS PERFORMANCE



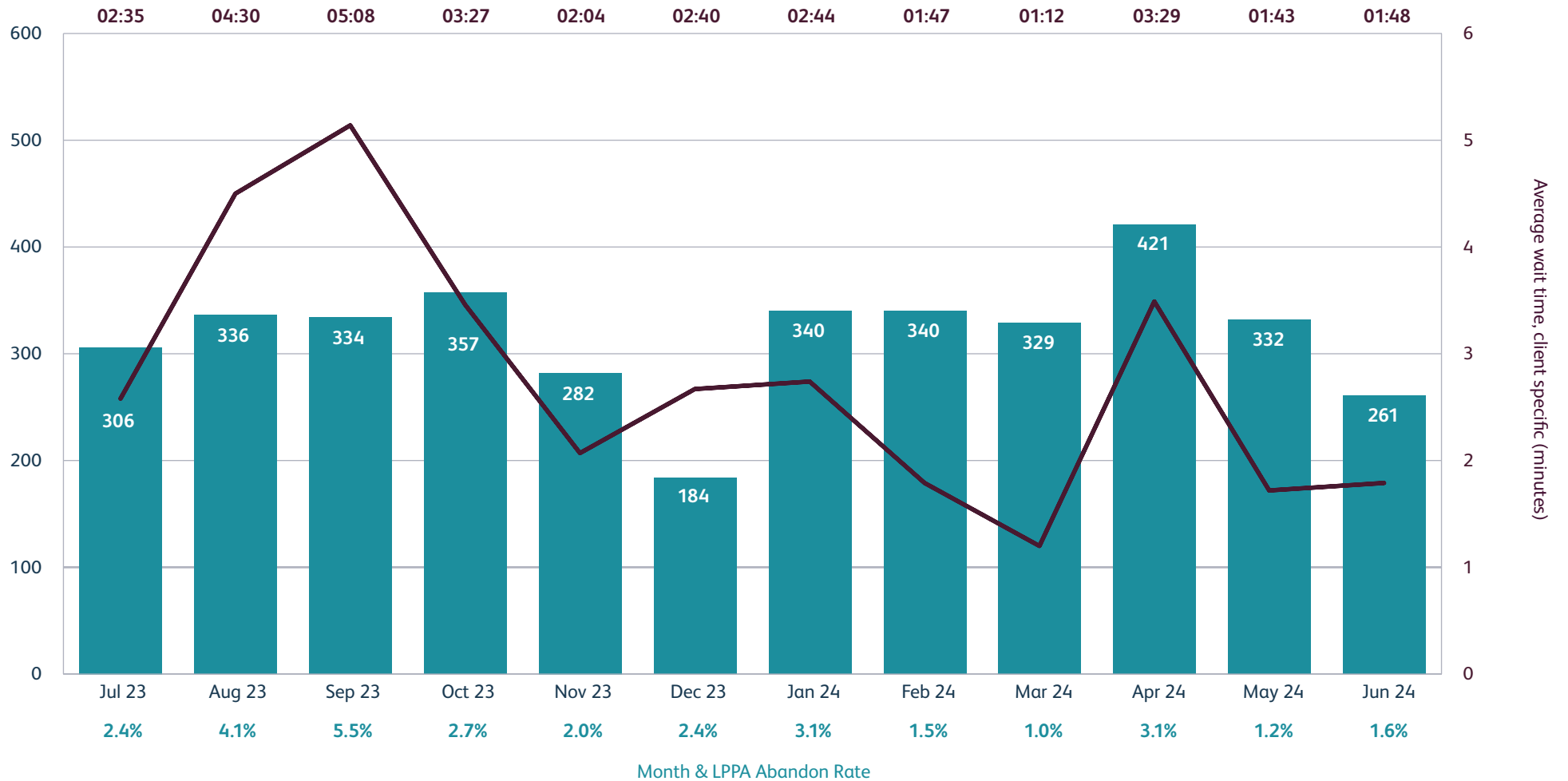
## CALLS ANSWERED

CLIENT SPECIFIC

— Average wait time (mm:ss)

Quarterly average wait time was 2 minutes 28 seconds

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Average wait time, client specific (minutes)

# Customer Satisfaction Scores

## In this section...

- Contact Centre calls satisfaction
- Contact Centre calls satisfaction - Agent
- Retirements - Active
- Retirements - Deferred

# CUSTOMER SATISFACTION SCORES

**Please note:**

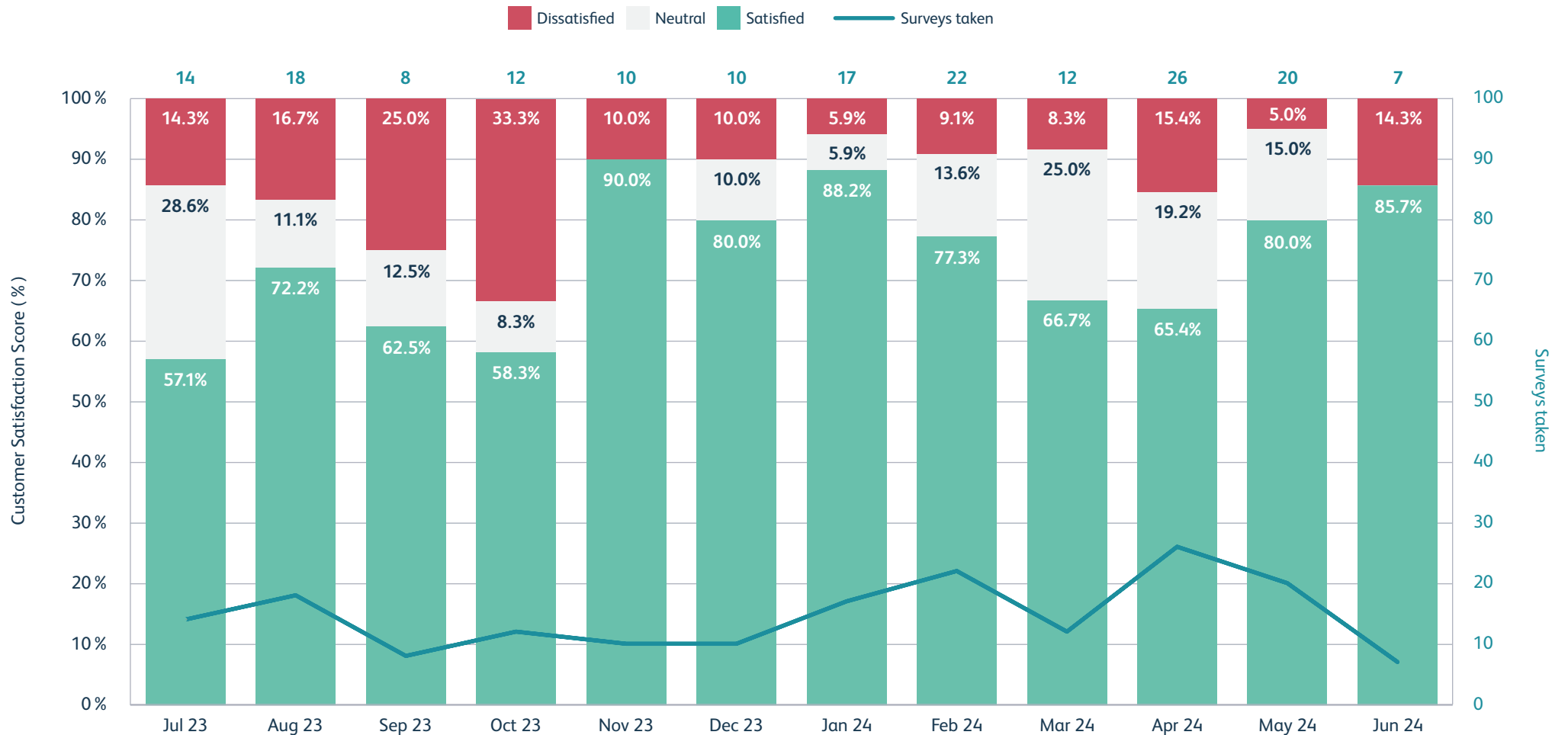
The graph measures monthly member satisfaction with LPPA (“How satisfied are you with the overall service you have received from LPPA?”).

Survey responses as a % of Q1 calls answered - 5.2%

## CONTACT CENTRE CALLS SATISFACTION - OVERALL CLIENT SPECIFIC

Overall member satisfaction for the quarter was 68.4%

Page 30



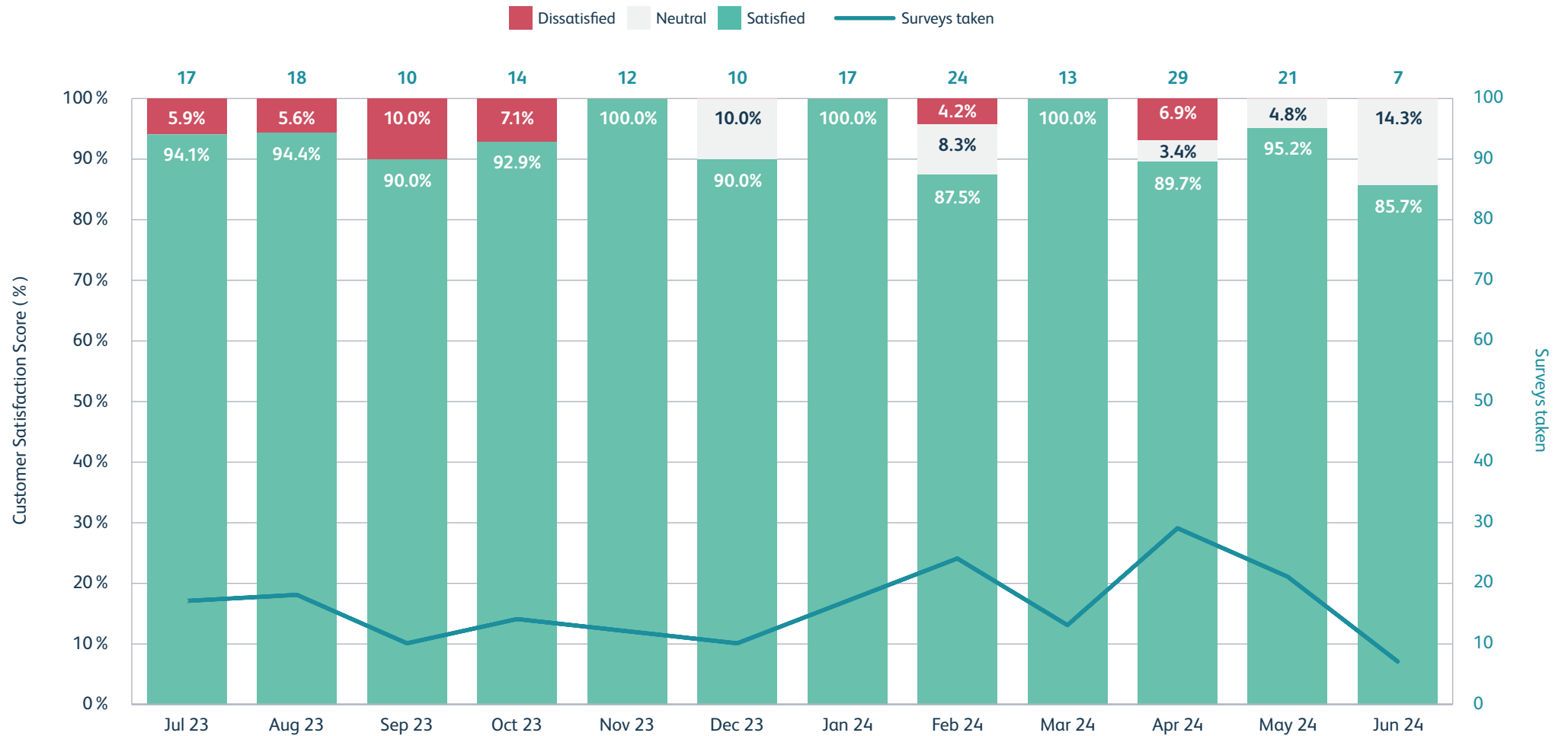
# CUSTOMER SATISFACTION SCORES

**Please note:**

The graph measures monthly member satisfaction with the Contact Centre adviser (“In connection with the adviser you have just spoken to, how satisfied are you with the service they provided?”)

## CONTACT CENTRE CALLS SATISFACTION - AGENT CLIENT SPECIFIC

Agent specific member satisfaction for the quarter was 91.2%



# CUSTOMER SATISFACTION SCORES

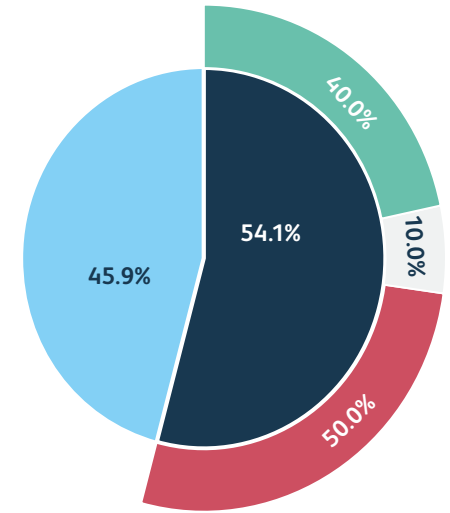
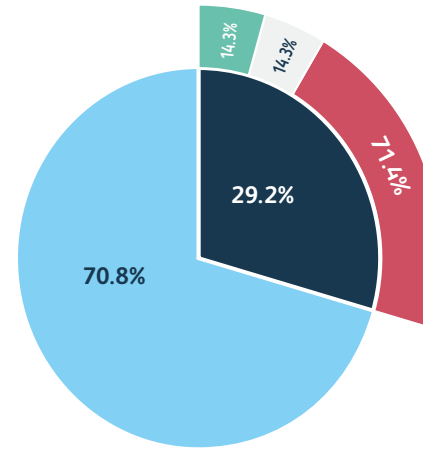
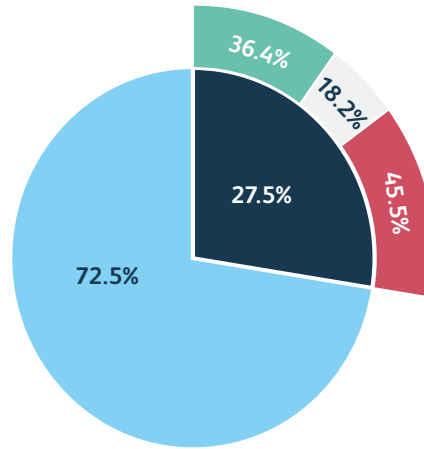
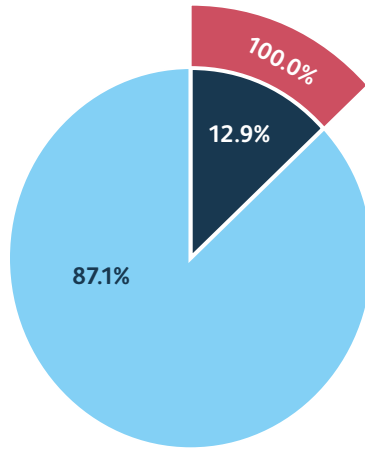
**Please note:**

Graphs show a breakdown of quarterly retirement surveys:

- Retirements processed / completed (members can have multiple process counts)
- Surveys issued (does not equal retirement processes as not all members provide an email address; members with multiple retirement processes only receive one survey email; ill health retirements do not receive a survey email; there is a planned delay in issuing surveys to allow for initial payments to be paid). We extended this period in Q4, which explains the drop in the number of email surveys issued.
- The Satisfaction Scores highlighted in Green and Red compare the satisfied / dissatisfied responses received, as a % of total responses (the true measure of member satisfaction).\*

## RETIREMENTS - ACTIVE

### CLIENT SPECIFIC



	Q2 23/24		Q3 23/24		Q4 23/24		Q1 24/25	
<b>Retirements processed, completed</b>	51		65		49		50	
<b>Surveys issued and as a % of retirements</b>	31	60.8%	40	61.5%	24	49.0%	37	74.0%
Satisfied Responses (as a % of surveys issued)	0	0.0%	4	10.0%	1	4.2%	8	21.6%
Dissatisfied Response (as a % of surveys issued)	4	12.9%	5	12.5%	5	20.8%	10	27.0%
<b>Non Responses and as a % of surveys issued</b>	27	87.1%	29	72.5%	17	70.8%	17	45.9%
<b>Responses and as a % of surveys issued</b>	4	12.9%	11	27.5%	7	29.2%	20	54.1%
<b>Satisfied Responses and as a % of responses</b>	0	0.0%	4	36.4%	1	14.3%	8	40.0%
<b>Dissatisfied Responses and as a % of responses</b>	4	100.0%	5	45.5%	5	71.4%	10	50.0%

\*More information on data / results are included in the Definitions page earlier in this report.



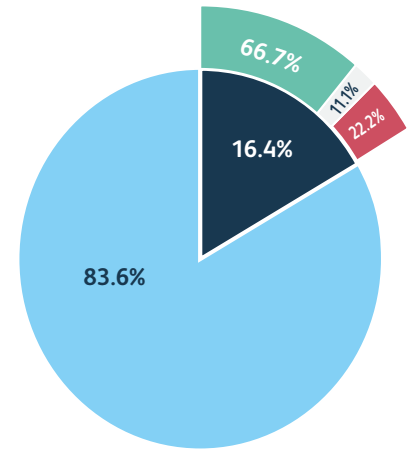
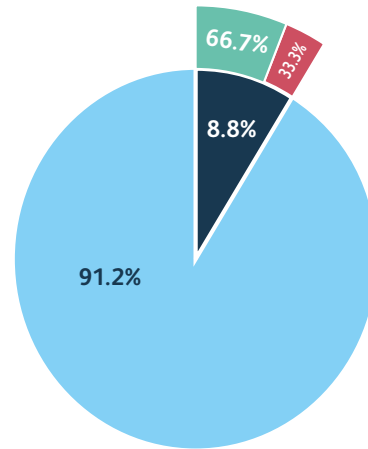
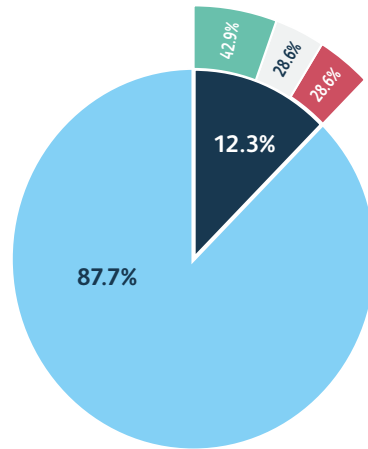
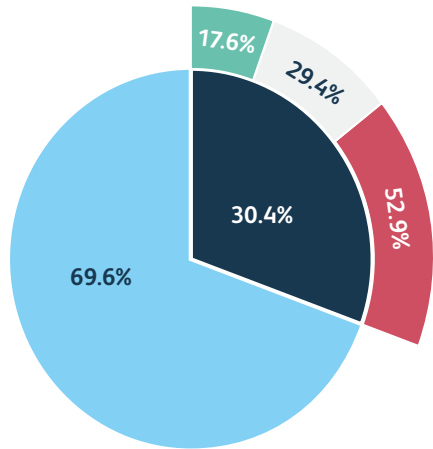
# CUSTOMER SATISFACTION SCORES



## RETIREMENTS - DEFERRED

CLIENT SPECIFIC

- Satisfied
- Neutral
- Dissatisfied
- Responses
- Non responses



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	Q2 23/24		Q3 23/24		Q4 23/24		Q1 24/25	
<b>Retirements</b> processed, completed	79		82		82		85	
<b>Surveys issued</b> and as a % of retirements	56	70.9%	57	69.5%	34	41.5%	55	64.7%
Satisfied Responses (as a % of surveys issued)	3	5.4%	3	5.3%	2	5.9%	6	10.9%
Dissatisfied Response (as a % of surveys issued)	9	16.1%	2	3.5%	1	2.9%	2	3.6%
<b>Non Responses</b> and as a % of surveys issued	39	69.6%	50	87.7%	31	91.2%	46	83.6%
<b>Responses</b> and as a % of surveys issued	17	30.4%	7	12.3%	3	8.8%	9	16.4%
<b>Satisfied Responses</b> and as a % of responses	3	17.6%	3	42.9%	2	66.7%	6	66.7%
<b>Dissatisfied Responses</b> and as a % of responses	9	52.9%	2	28.6%	1	33.3%	2	22.2%



# Member Online Portal

## In this section...

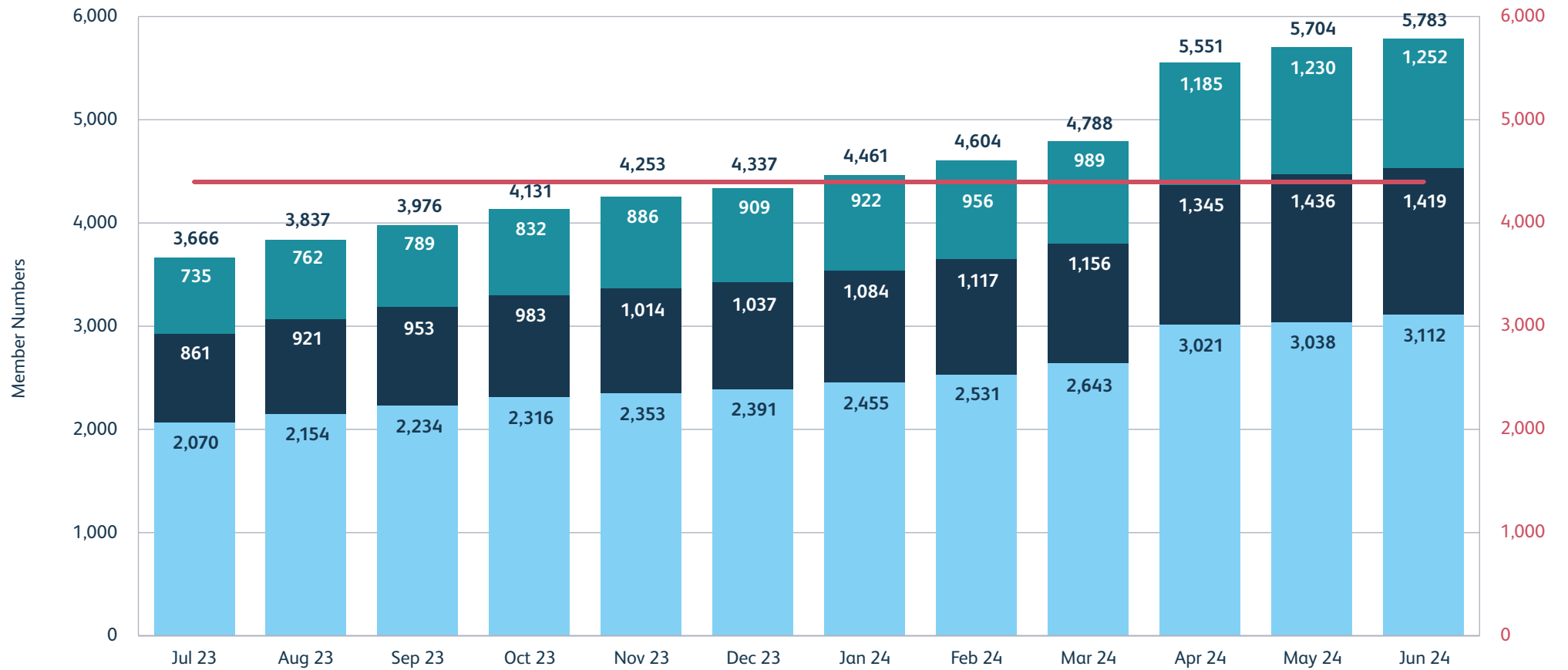
- Total members registered

▾ TOTAL MEMBERS REGISTERED

CLIENT SPECIFIC

Active Deferred Pensioner

— 4,395 (previous My Pension Online registrations as of October 2022)



# Employer Engagement & Member Communication Activity

## In this section...

- Delivered
- Scheduled
- Engagement communications (Employers & Members)

# EMPLOYER ENGAGEMENT & COMMUNICATION ACTIVITY



## DELIVERED

ALL LPPA

- Member training sessions were delivered, including Making Sense of Your (LGPS) Pension, and Making Sense of Your Retirement.
- Employer training sessions were successfully delivered including:
  - Monthly Returns (successfully submitting files and resolving data queries).
  - LGPS Scheme Essentials (including support with calculating final pay, CARE pay and assumed pensionable pay).
  - Scheme Leavers (support with submitting leaver details using the employer portal).
  - Employer Responsibilities (support with ongoing pension administration responsibilities).
  - Absence and Ill Health (support with managing different types of absence in the LGPS).
- P60 notification communications were issued to retired members in April and May and completed by the statutory deadline.
- Email communications were issued to employers as a reminder to submit any outstanding monthly return files (22/23) by the April deadline (links to support resources on the LPPA website were also provided).
- Our employer newsletter (Pension Pulse) was issued with features including:
  - The importance of on-time leaver notifications.
  - Website resources available to your employees.
  - Employer training available to attend.

- The 2024 LPPA retiree's online newsletter was issued to members. This included updates on:
  - 2024 pension increases.
  - Understanding your P60.
  - Pension pay dates (2024/25).
  - Information on 'returning to work in retirement' and 'how to spot a pension scam'.
  - Information on McCloud remedy.
- Several important updates were made to the LPPA pensions website in Q1, including:
  - Retirements (how final LGPS benefits are calculated).
  - Updated Annual Allowance (2024/25) figures.
  - Updated 2024/25 pensioner pay dates.
  - Contribution rates.
  - Complaints and Appeals.
  - Understanding your 2023/24 Annual Benefit Statement.



## DELIVERED

ALL LPPA

- Email notifications will be issued to active and deferred members, highlighting that their Annual Benefit Statement (ABS, 2023/24) will be available by the 31 August 2024.
- ABS documents will be issued in the post to members who request a paper copy.
- The annual (online) newsletter will also be issued to active and deferred members, and will include updates on ABS timescales, and how to access their document.
- Further improvements will be made to the LPPA pensions website.

# Data Quality

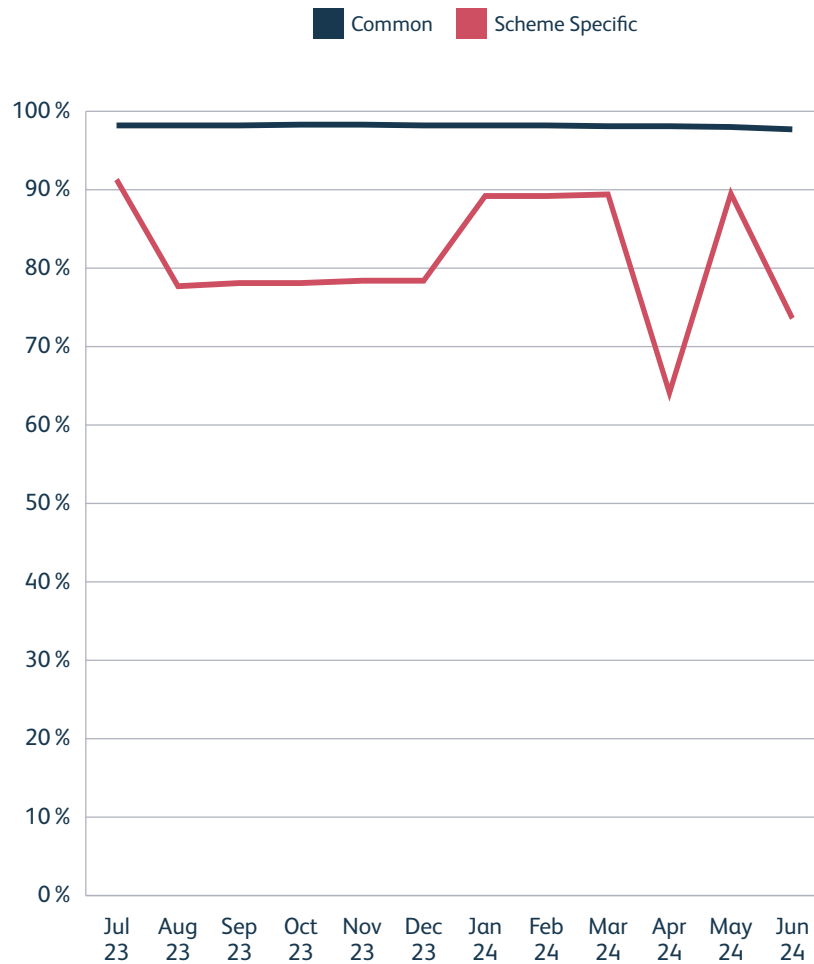
## In this section...

- TPR data scores
- Common data
- Scheme specific data

# DATA QUALITY

## TPR DATA SCORES

CLIENT SPECIFIC



**Please note:**

Fall in Q1 Scheme Specific Data score is seasonal, and specifically related to the processing of Pensions Increase for deferred members and Annual Allowance calculations (which follow employer submission of data returns and ABS processing).

	Common (Target 95%)	Scheme Specific (Target 90%)
Jul 23	98.2%	91.3%
Aug 23	98.2%	77.7%
Sep 23	98.2%	78.1%
Oct 23	98.3%	78.1%
Nov 23	98.3%	78.4%
Dec 23	98.2%	78.4%
Jan 24	98.2%	89.2%
Feb 24	98.2%	89.2%
Mar 24	98.1%	89.4%
Apr 24	98.1%	64.1%
May 24	98.0%	89.5%
Jun 24	97.7%	73.6%

# END OF QUARTER DATA QUALITY

(TPR SCORES)

## COMMON DATA

CLIENT SPECIFIC

Data Item	Active	Deferred	Pensioner / Dependant
Invalid or Temporary NI Number	2	6	17
Duplicate effective date in status history	2	21	6
Gender is not Male or Female	16	0	0
Duplicate entries in status history	9	26	14
Missing (or known false) Date of Birth	0	0	0
Date Joined Scheme greater than first status entry	3	2	0
Missing Surname	0	0	0
Incorrect Gender for members title	0	0	0
Invalid Date of Birth	4	0	0
No entry in the status history	3	0	0
Last entry in status history does not match current status	132	10	5
Member has no address	52	148	23
Missing Forename(s)	0	0	0
Missing State Retirement Date	16	0	0
Missing postcode	52	168	51
Missing Date Joined Pensionable Service	1	0	0
<b>Total Fails</b>	<b>292</b>	<b>381</b>	<b>116</b>
<b>Individual Fails</b>	<b>214</b>	<b>210</b>	<b>84</b>
<b>Total Members</b>	<b>8,112</b>	<b>6,936</b>	<b>7,073</b>
<b>Accuracy Rate</b>	<b>97.4%</b>	<b>97.0%</b>	<b>98.8%</b>
<b>Total accuracy rate</b>	<b>97.7%</b>		

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## SCHEME SPECIFIC DATA

CLIENT SPECIFIC

Data Item	Fails
Divorce Records	0
Transfer In	25
AVCs/Additional Contributions	13
Deferred Benefits	4
Tranches (DB)	35
Gross Pension (Pensioners)	2
Tranches (Pensioners)	134
Gross Pension (Dependants)	7
Tranches (Dependants)	17
Date of Leaving	304
Date Joined Scheme	314
Employer Details	3
Salary	266
Crystallisation	81
CARE Data	699
CARE Revaluation	3
Annual Allowance	4,370
LTA Factors	192
Date Contracted Out	5
Pre-88 GMP	162
Post-88 GMP	331
<b>Total Fails</b>	<b>6,967</b>
<b>Individual Fails</b>	<b>5,831</b>
<b>Total Members</b>	<b>22,121</b>
<b>Accuracy Rate</b>	<b>73.6%</b>



# LPP

Local Pensions Partnership  
Administration

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# Havering Local Pension Board

## AAF 01/20 Type 1 Report

Page 43

Janet Morville-Smith

Tuesday, 10 September 2024

# LPP

Local Pensions Partnership  
Administration



## What Is AAF 01/20?



Page 44

AAF 01/20 reporting is where KPMG provides an assurance opinion over our controls.

The report is available to our existing clients and their auditors.

### Why?

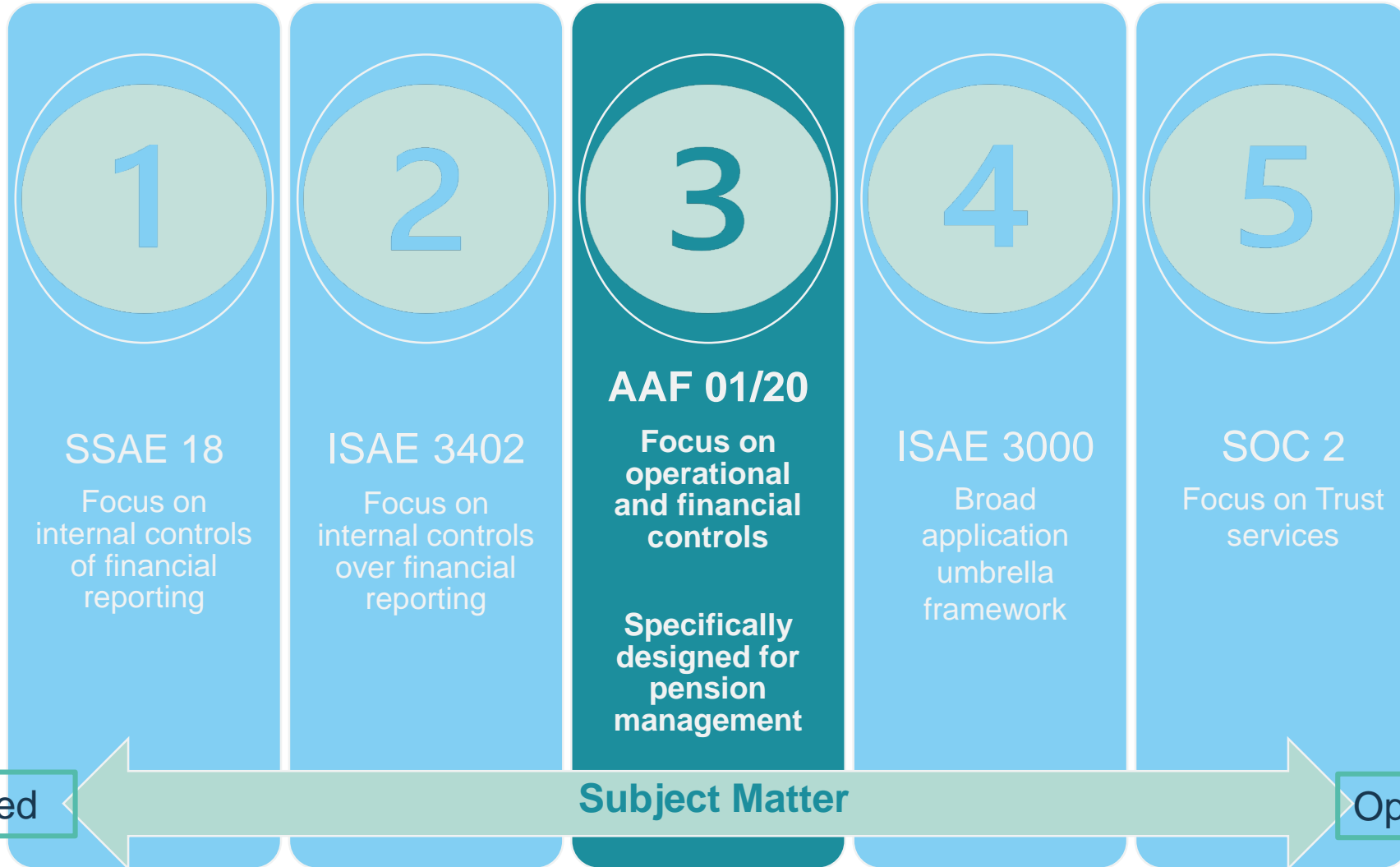
- **Customers demand it.** More and more, customers demand assurance and transparency over the controls we operate.
- **Reduce audit effort** through one report being made available to multiple parties.

### Who?

- **Service organisation = LPPA** – who design and operate their control framework.
- **Our customers and wider stakeholders:** the organisations who require assurance - **You**.
- **Service auditor = KPMG.**

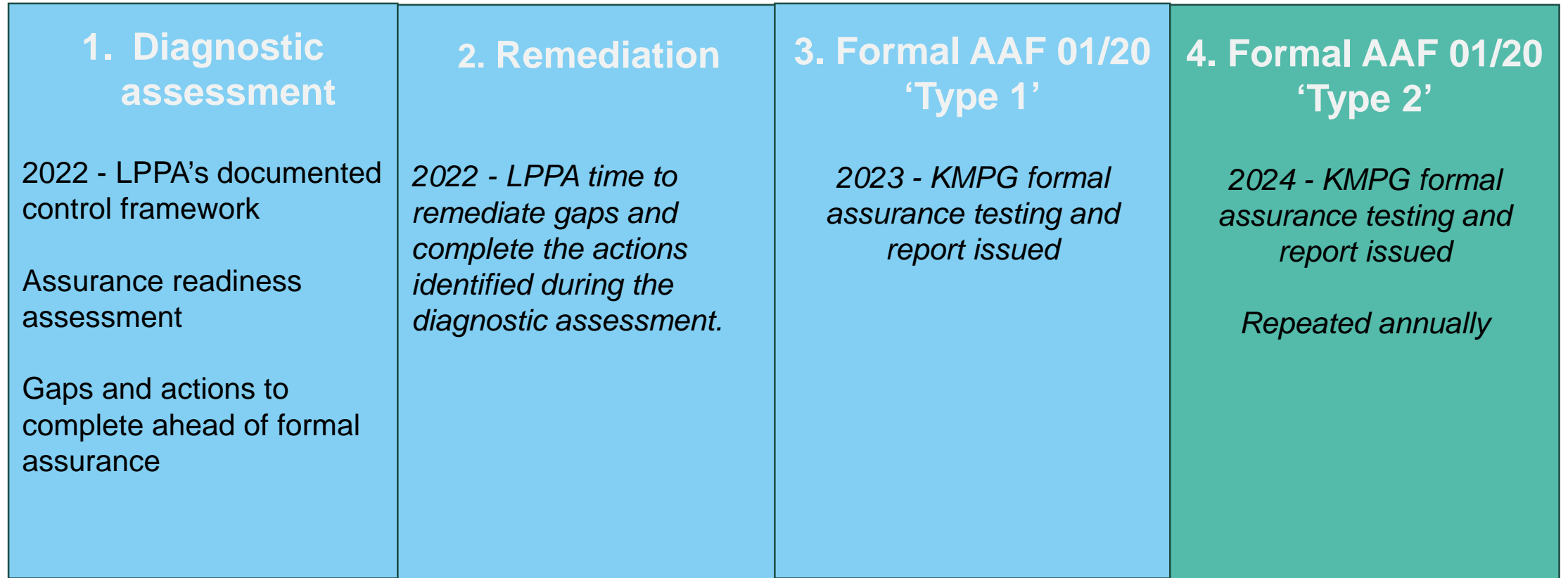
# Reasonable Assurance

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# Approach at a glance

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# Control Objectives: Pension Administration

## Accepting clients

- New client agreements and amendments are authorised prior to initiating pension administration activity.
- Pension scheme member details and accounts are completely and accurately set up onto relevant systems in accordance with the scheme rules and individual elections.
- Opening balances for client take-ons are completely and accurately recorded and communicated to clients in line with client instructions.

## Authorising and processing transactions

- Transfers-in received, and where applicable allocation of members' funds to investment options are processed completely, accurately and within agreed timescales.
- Benefits payable and transfer values are calculated in accordance with scheme rules and relevant legislation and are paid within agreed timescales.

## Maintaining financial and other records

- Member records consist of up-to-date and accurate information
- Requests to change member records are validated for authenticity
- Contributions and benefit payments are completely and accurately recorded in the proper period
- Investment transactions, balances and related income are completely and accurately recorded in the proper period

## Safeguarding assets

- Member records are securely held and access is restricted to authorised individuals

- Cash in scheme bank accounts is safeguarded and payments are suitably authorised

## Managing and monitoring compliance and outsourcing

- Receipts of contributions are monitored against required timescales
- Pensions administration activities are governed by service level agreements that are authorised and subject to regular review. Service performance is regularly monitored and assessed against the standards set out in service level agreements.
- Transaction errors are identified, reported to clients and resolved in accordance with established policies

## Reporting to clients

- Periodic reports to participants and scheme trustees are complete, accurate, and provided within required timescales

# Control Objectives: Information Technology

## Restricting access to systems and data

- Physical access to In scope systems is restricted to authorised individuals
- Logical access to In scope systems and data is restricted to authorised individuals in accordance with job roles and/or business requirements
- Client and third party access to In scope systems and data is restricted and/or monitored
- Segregation of incompatible duties within and across business and technology functions is formally defined, implemented, updated and enforced by logical security controls

## Maintaining integrity of the systems

- Scheduling and internal processing of data is complete, accurate and within agreed timescales
- Transmission of data to/from external parties is complete, accurate, executed within agreed timescales and secure in line with external party agreements
- Network perimeter security devices are installed and changes are tested and approved
- Anti virus definitions are periodically updated across all terminals and servers, deployment and settings are periodically reviewed and updated when required; and patterns of attempted external breaches are monitored
- Data received from external parties is scanned for known vulnerabilities, any compromised data is quarantined and definitions of threats are periodically updated

## Maintaining and developing systems hardware and software

- Development and implementation of both in house and third party In scope systems are authorised, tested and approved

- Data migration or modification is authorised, tested and, once performed, reconciled back to the source data

- Changes to existing In scope systems, including hardware upgrades, software patches and direct configuration changes, are authorised, tested and approved in line with policy

## Recovering from processing interruptions

- IT related Disaster Recovery Plans are documented, updated, approved and tested
- In scope systems and data are backed up and tested such that they can be restored completely and within agreed timescales
- Problems and incidents relating to In scope systems are identified and resolved within agreed timescales

## Managing and monitoring compliance and outsourcing

- Outsourced activities provided by Subservice Organisations are governed by contracts and service level agreements that are authorised and subject to regular review
- The services provided by Subservice Organisations are regularly monitored and assessed against the standards set out in the service level agreement.



# AAF 01/20 Report Rating

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The opinion covers whether:

- The description is fairly presented.
- The Control Activities related to the Control Objectives were suitably designed to achieve the Control Objectives.
- (Type II only) The Control Activities are operated with sufficient effectiveness to achieve the Control Objectives

## Overall Opinion Options

### Unqualified

No Exceptions

Minor Exceptions

No applicable Control Objective

### Qualified

Exceptions impacting the achievement of any given control objectives

Limitation of testing

### Adverse

Pervasive exceptions

# LPPA's AAF 01/20 'Type 1'

Type 1 report issued with an **Unqualified rating**



## Scope

112 Unique Controls Tested

384 Items of Evidence Reviewed



## Results

107 Unique Controls with No Exceptions Noted

5 unique control exceptions noted.



## Next Steps

'Type 2' work has commenced  
Type 2 Report due 2025

# LPPA's AAF 01/20 'Type 1'

Type 1 report issued with an **Unqualified rating**



## Results

5 unique control exceptions noted. These did not affect the effectiveness of the Control itself.

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Control	Exception Noted	Action Taken
Physical Post uploaded to UPM within 3 working days	The End-of-Day Tracker does not show that management validated post was uploaded to UPM within three working days of receipt. Specifically, it does not detail the ID's / aged dates of items carried forward to the next day. Therefore, there is a risk that a given item is carried forward over multiple days, not identified by the Post team's review, and therefore misses the SLA.	The end-of-day tracker for physical post has been updated to record the date-received of the oldest carried-forward item, which will enable us to demonstrate that post is being processed in a timely manner.
Payroll Calendar rolled forward and reviewed by Payroll Manager	Management were unable to provide evidence to demonstrate that the calendar has been rolled forward or reviewed by the Payroll Manager.	The Payroll Manager will send an email confirming their review of the updated calendar
Bereavement cases which have not been completed coming up to 2 years are reviewed monthly	We were informed that there had been no monthly review of bereavement cases performed within the last three months.	The Bereavement Operations Manager will be responsible for actioning this report each month moving forward.
Annual Benefit Statement to be checked by an independent person prior to issue	The Active/Deferred ABS Checklist did not evidence who had performed the checks and whether these had been done before the ABS was sent to the member.	The ABS Checklist holds all relevant columns, including the name of the records checker and producer, for future years.
SLA review meetings to take place with Hugh Symons	There has been no SLA review meeting with Hugh Symons within the last three months.	Review is now undertaken on a quarterly basis.

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## LOCAL PENSIONS BOARD

**Subject Heading:**

Havering Pension Fund Communication  
Plans 2024/25

**OMT Lead:**

James Cocks  
Assistant Director Transactional People  
Services

**Report Author and contact details:**

Alex McMahon  
Alexandra.McMahon@havering.gov.uk

**Policy context:**

Local Government Pension Scheme  
Regulations 2013

**SUMMARY**

This is the 2024/25 Communications Plan in accordance with the Communications Policy for the London Borough of Havering Pension Fund, in relation to the Local Government Pension Scheme (LGPS) which was agreed/published in November 2021. The Communications Policy will be reviewed again in November 2024.

It details key communications with stakeholders, the method and frequency of the communications.

There is a plan for both Employers and Members and evidence is provided on the progress made to date.

**RECOMMENDATIONS**

Board Members to note and feedback on the report. Specifically noting the communications sent so far and those planned for the coming months.

**REPORT DETAIL**

1. Regulation 61 of the Local Government Pension Scheme Regulations 2013 requires an Administration Authority to prepare and publish a written statement covering communications with members and scheme employers.
2. The key objectives of the Communication Policy are to communicate in the most appropriate medium for the audience, educate the various stakeholders of the benefits of the LGPS and to improve the service our members receive.
3. There is a Plan for both Members (Appendix A) and Employers (Appendix B) setting out the information we have shared and intend to share on a monthly basis. The Plan is reviewed with the communications adjusted/amended if required to accommodate any time sensitive updates to scheme legislation.
4. Employer Communications have been sent to targeted audiences in certain months in order to assist those Employers failing to meet expectations in a timely manner.
5. Member Communications were not sent in May and June as time during those months were spent preparing our new intranet page and updating factsheets ready for the new Intranet to be launched.

6. Information is attached as Appendix C detailing the percentage of active members registered for PensionPoint and those that hold a nominated beneficiary. A further report will be obtained later in the year to gauge the effectiveness of the communications.
7. As part of the communications to prospective members, we ask Employers to distribute information to all staff detailing the benefits of being a member of the LGPS. We have recently prepared and shared a factsheet on the 50/50 Section of the LGPS to raise awareness of this during times of financial hardship and an increasing cost of living.

## **IMPLICATIONS AND RISKS**

### **Financial implications and risks:**

There is a risk of breaching the Fund's statutory obligations if communications with its scheme members, member representatives, prospective members and scheme employers is not met.

Budgetary provisions are available and any communication costs are met by the Pension Fund either as a direct charge to the fund, via contract costs from the third party administrative provider or as recharge from the Council.

### **Legal implications and risks:**

The relevant legal duties are set out in the body of the Report and there are no other apparent legal implications.

### **Human Resources implications and risks:**

There appear to be no HR implications or risks arising directly as a result of this report.

### **Equalities implications and risks:**

The policy states that requests for documents in alternative font, format and language can be accommodated.

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to:

- (i) the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) the need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- (iii) foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are: age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants. We will ensure that disabled people with sensory impairments are able to access the strategy.



**LB HAVERING PENSION FUND - MEMBER COMMUNICATION PLAN 2024/25**

- The key objectives of the communications policy are:
- To improve the understanding of members, their representatives and perspective members of the benefits of the Local Government Pension Scheme
    - Assist Scheme employers in understanding their roles and responsibilities within the LGPS and to provide guidance and support
      - To improve the service that Pension Fund Members receive
        - Use plain English for all communications
    - Identify and use the most appropriate communication method to take account of stakeholders' different needs
      - To communicate in the most effective and cost efficient way

Time line:	Date Requested/ Sent:	Audience:	Method of distribution:	Overview:	Detail:	Links:
April	<a href="#">16/04/2024</a>	LBH CORPORATE	GlobalEmail	Useful Links and Contact details: LPP Contact details - reminder that pensions administration is outsourced.	Details of LPPA shared for those in LGPS. Advertised their training.	<a href="#">PensionPoint - Log in to your LPPA online portal - Home (lppapensions.co.uk)</a>
May	was awaiting intranet	LBH CORPORATE	GlobalEmail	Benefits of LGPS - encouraging new members	Share 10 Good Reasons to join LGPS and details on 50/50 scheme.	
		Scheduled	Email to employer to be distributed			
		LA Schools	HES Newsletter			
June		LBH CORPORATE	GlobalEmail	Corporate LBH email - get our own staff on pensionpoint, expressions of wish	Follow up with LPPA to measure success	<a href="#">Forms &amp; documents • Local Pensions Partnership Administration (lppapensions.co.uk)</a>
July	<a href="#">24/07/2024</a>	LBH CORPORATE	GlobalEmail	Planning for Retirement - Pension Point	Link in any online training LPPA are offering at the time. Retirement Planning Guide, Retirement Factsheet.	
	<a href="#">24/07/2024</a>	Scheduled/ Admitted Bodies	Email to employer to be distributed			
	<a href="#">24/07/2024</a>	LA Schools	HES Newsletter			
Aug	<a href="#">28/08/2024</a>	LBH CORPORATE	GlobalEmail	Factsheet on 50/50 and Benefits of the Scheme, for intranet and to Employers to filter down.		
	<a href="#">28/08/2024</a>	Scheduled/ Admitted Bodies	Email to employer to be distributed			
Sept		Public	Website Update	ABS's ONLINE REMINDER & Expression of Wish	Pensions Awareness Day feels like a great opportunity to remind you about the benefits of being a member of the Local Government Pension Scheme. Etc	
		LBH CORPORATE	GlobalEmail			
		Scheduled/ Admitted Bodies	Email to employer to be distributed			
		LA Schools	HES Newsletter, or email to Headteachers for cascade			
Oct		Affected Staff	Targeted Email	Annual Allowance - Pension Savings Statements go out		
Nov		LBH CORPORATE	GlobalEmail	Register for PensionPoint		
		Scheduled/ Admitted Bodies	Email to employer to be distributed			
		LA Schools	HES Newsletter			
Dec		LBH CORPORATE	GlobalEmail	Useful Links and Contact details: LPP Contact details - reminder that pensions administration is outsourced. Expressions of Wish	Provide details of latest LPPA newsletter (Contact Judith Richards at LPPA for latest). PensionPoint, LPPA Contact Us. LGPS Members website	<a href="#">PensionPoint - Log in to your LPPA online portal - Home (lppapensions.co.uk)</a> <a href="#">Forms &amp; documents • Local Pensions Partnership Administration (lppapensions.co.uk)</a> <a href="#">Contact us • Local Pensions Partnership Administration (lppapensions.co.uk)</a>
		Scheduled/ Admitted Bodies	Email to employer to be distributed			
		LA Schools	HES Newsletter			
Jan		LBH CORPORATE	GlobalEmail	Planning for Retirement	Link in any online training LPPA are offering at the time. Retirement Planning Guide, Retirement Factsheet.	
		Scheduled/ Admitted Bodies	Email to employer to be distributed			
		LA Schools	HES Newsletter			
Feb		LBH CORPORATE	GlobalEmail	Benefits of LGPS - encouraging new members	Share 10 Good Reasons to join LGPS and details on 50/50 scheme.	
		Scheduled	Email to employer to be distributed			
		LA Schools	HES Newsletter			
March				to follow		

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### LB HAVERING PENSION FUND - EMPLOYER COMMUNICATION PLAN 2024/25

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	29/04/2024	Targeted Audience	Telephone and Email chasers for Discretions Policy Documents	Following my last email of 5th March, telephone chasers and emails where necessary sent.	
	<a href="#">30/04/2024</a>	Targeted Audience	REMINDER for Monthly Return No 12 submission - New EOY process - and to clear any existing queries.	Reminder to employers to submit final Monthly Return.	<a href="https://www.lppapensions.co.uk/employers/">https://www.lppapensions.co.uk/employers/</a>
May	<a href="#">24/05/2025</a>	ALL	Introduction of Employer Handbook and reminder of PAS and Charging Schedule. Offer early engagement and assistance.	Draft a return document for employers to declare their understanding and agreement. Collect contact details and any other useful info from employers. Including Automatic Enrolment dates in order to create a register for future monitoring.	
June	<a href="#">25/06/2024</a>	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, IDR policy, Annual report and accounts and information about the Local Pensions Board.	<a href="#">LGPS Pension Administration   The London Borough Of Havering</a>
July	<a href="#">16/07/2024</a>	Targeted Audience	Chasing up Employer Guide forms and Discretions		
August	<a href="#">27/08/2024</a>	ALL	LPPA Training, LGA - Fundamentals training and workshops. LGPS Regs website - bitesize training.	Refer employers to LGPS website for LGA bitesize training. Also included contact details for LPPA	<a href="https://www.lgpsregs.org/employer-resources/employer-bite-size-training.php">https://www.lgpsregs.org/employer-resources/employer-bite-size-training.php</a>
September		ALL	Reminder ABS's are online. Encourage contact with members to complete expression of wish. Flyer for EoW produced and sent	Martin Lewis has recently discussed the importance of this. Follow up with LPPA to measure success	
October		ALL	Discretions - Annual Review	Review existing Discretions and confirm if still appropriate, email is sufficient. If changes needed, request new document.	<a href="#">Discretions • Local Pensions Partnership Administration (lppapensions.co.uk)</a>
November		ALL	Employer Forum	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>
December		ALL	Get Ready for Valuation - importance of monthly returns and clean data.		
January			to follow		
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 01/04/2025 therefore please check your Rates and Adjustment Certificate for the correct percentage.	
March		ALL	Get Ready for Valuation - importance of monthly returns and clean data.		

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Employer No	Employer Name	Actives	Registered on PensionPoint (%)	% of Active records with a Nomination
10497	Ardleigh Green Infants	38	44.74%	28.90%
10498	Mears Group Plc	7	71.43%	85.70%
10499	OCS Food co Ltd	1	0.00%	0.00%
10500	L.B.OF HAVERING	5196	39.15%	35.40%
10502	ABBS CROSS SCHOOL	42	30.95%	28.60%
10503	Frances Bardsley Academy	87	47.13%	42.40%
10506	COOPERS COBORN	80	56.25%	43.80%
10507	SACRED HEART OF MARY	62	50.00%	41.40%
10515	SLM Fitness and Health Ltd	9	22.22%	22.20%
10516	SLM Community Leisure C T	27	55.56%	55.60%
10519	Harris Academy Rainham	65	27.69%	26.60%
10520	DRAPERS ACADEMY	223	25.56%	8.00%
10521	THE BRITTONS ACADEMY	58	41.38%	37.90%
10522	CAMPION SCHOOL	114	33.33%	28.90%
10523	HALL MEAD SCHOOL	83	45.78%	43.90%
10524	ST EDWARDS SNR ACADEMY	45	42.22%	35.60%
10525	EMERSON PARK SCHOOL	68	38.24%	29.90%
10526	REDDEN COURT SCHOOL	132	42.42%	22.10%
10527	THE ROYAL LIBERTY SCHOOL	1	0.00%	0.00%
10529	Hornchurch High Sch (Albany)	89	31.46%	19.80%
10531	UPMINSTER INFANT ACADEMY	39	43.59%	20.00%
10532	UPMINSTER JUNIOR ACADEMY	41	48.78%	34.10%
10533	BOWER PARK ACADEMY	54	35.19%	29.10%
10534	DRAPERS BROOKSIDE JNR SCHOOL	35	37.14%	32.40%
10535	LANGTONS JUNIOR ACADEMY	42	21.43%	28.60%
10536	OASIS ACADEMY PINEWOOD	44	29.55%	27.90%
10539	RISE PARK INFANT ACADEMY	46	43.48%	31.10%
10540	RISE PARK JUNIOR ACADEMY	53	45.28%	19.20%
10542	DRAPERS PYRGO PRIORY PRI SCH	66	33.33%	36.90%
10543	Lime Academy Forest Approach	123	26.83%	16.10%
10545	DRAPERS MAYLANDS	74	31.08%	3.80%
10546	LIME ACADEMY RAVENSBOURNE	108	31.48%	16.20%
10547	DRAPERS BROOKSIDE INFANTS	53	20.75%	13.20%
10549	BENHURST PRIMARY SCHOOL	34	23.53%	32.40%
10550	CONCORDIA ACADEMY	68	25.00%	13.10%
10551	OLIVE ACADEMY TRUST	8	62.50%	37.50%
10552	MARSHALLS PARK ACADEMY	86	30.23%	25.90%
10553	ROYAL LIBERTY ACADEMY	40	65.00%	47.40%
10554	ACCENT CATERING	5	100.00%	100.00%
10555	SCARGILL INFANT ACADEMY	35	37.14%	31.40%
10556	SCARGILL JUNIOR ACADEMY	29	31.03%	34.60%
10557	WHYBRIDGE JUNIOR ACADEMY	37	40.54%	21.60%
10559	Harrow Lodge Primary School	67	44.78%	32.30%
10561	Gaynes Academy	21	28.57%	19.00%
10562	Hacton Academy	77	41.56%	27.50%
10563	Sanders Academy	37	37.84%	27.00%
10564	Dame Tipping Academy	11	9.09%	9.10%
10565	Lewis and Graves Partnr Ltd	2	50.00%	0.00%
10568	Drapers MAT	13	53.85%	31.30%
10570	Harrison Catering (Gayness)	1	0.00%	100.00%
10573	May Harris (Royal Liberty Ac)	4	25.00%	50.00%
10575	Corbets Tey Sch	180	30.56%	18.40%
10576	OLIVE ACADEMIES MAT	13	23.08%	30.80%
10577	MERCURY LAND HOLDINGS LTD	1	100.00%	100.00%
10578	OLIVE DINING LTD	6	16.67%	66.70%
10580	Ardleigh Green Juniors	33	36.36%	30.30%
10581	Urbaser-UK (Waste and Street Cleansing service)	66	31.82%	56.10%
10582	The Compass School (Unity Schools Trust)	19	47.37%	5.30%
10583	CaterLink (St Edwards)	5	20.00%	80.00%
10584	Harris Rainham Sixth Form HV	1	0.00%	0.00%
10585	Empower MAT HV	35	62.86%	51.40%

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## LOCAL PENSIONS BOARD

17 September 2024

**Subject Heading:**

**Review of Pension Committee Papers**

**SLT Lead:**

**Kathy Freeman Strategic director of Resources**

**Report Author and contact details:**

*Debbie Ford*  
*Pension Fund Manager (Finance)*  
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**Policy context:**

Oversight and Scrutiny with respect to decisions taken by the Pension Committee

**Financial summary:**

None directly

### SUMMARY

The Pension Board is invited to note the reports from the most recent Pension Committee meeting held on 25 June 2024.

Reports presented to Pensions Committee provides evidence to the Board as to the Fund's compliance with scheme regulations relating to the governance and administration of the scheme.

### RECOMMENDATIONS

1. To note the report.
2. The Local Pension may want to consider how it will assist the committee in delivering the work plan as set out in Item 4.6.

**REPORT DETAIL**

**1. Background**

The papers from the most recent Pension Committee meeting are available online for the December meeting on the council's website: [Pensions Committee - 25 June 2024 Supplementary pack](#) with the exception of exempt papers, which can be made available on request. **Highlights of all papers are covered below:**

**2. Pension Fund Performance Monitoring for the quarter ending 31 March 2024 (Agenda Item 5 – supplementary pack).**

**2.1 Report presented to Pensions Committee provides evidence to the Board as to the Fund's compliance with scheme regulations relating to the governance and administration of the scheme and to provide assurances that its monitoring processes are in line with TPR best practice.**

**2.2** *TPR Best practice includes:*

*Having procedures in place to monitor their scheme's investments and performance:*

- *these procedures should compare investment performance against the stated investment principles at least quarterly*
- *these procedures should consider fees and costs and whether they are justified*
- *these procedures should consider investment returns both before and after fees, and against relevant benchmarks*
- *these procedures should consider fees and costs and whether they are justified*

*Set expectations for their investment managers to:*

- *ensure monitoring information is prepared and considered at least quarterly and at shorter intervals as appropriate for the size and complexity of your scheme*
- *compare net investment returns to any relevant market or industry benchmarks*
- *consider environmental, social and governance (ESG) factors, including shareholder engagement,*

**2.3** The following is a summary of evidence to support the above:

**2.4** The Committee considered the quarterly investment performance of the Fund covering the quarter as at 31 March 2024.

**2.5** The Fund asset value at 31 March 2024 was £970.0m compared with £932.1m at 31 December 2023; an increase of £37.9m. This movement



is attributable to increases across most asset classes and a decrease in cash Foreign Exchange (FX) (£4.1m).

- 2.6 The Fund has appointed Northern Trust (NT) as the Fund's custodian and performance measurer. They produce both monthly and quarterly performance reports showing returns against the tactical benchmark (set for each fund manager) and strategic benchmarks (used to assess the expected fund liabilities and gives an indication of whether the funding level has improved or weakened).
- 2.7 The Fund's performance of 3.67% was slightly behind the tactical benchmark (-0.38%) but remains ahead of the strategic benchmark over the longer time periods 10.79% over 3 years).
- 2.8 The NT performance reports are used by our Investment Advisor (Hymans) and feeds into their quarterly monitoring reports, where performance is also compared against the strategy targets. Hymans report, pages 3 -5 refer. Full details of the Fund's asset allocation and individual manager performance are included within Appendix A (Pensions Committee 25 June 2024 - Supplementary Document pack – item.
- 2.9 Hymans attend the Pensions Committee quarterly to present their report and this report also provides an overview of markets and any impacts this has had on performance. In advance of the committee meeting they are sent the presentation pack of the fund manager attending in order to prepare questions and challenges to the fund manager. Hymans will also highlight any performance concerns to the committee and offer advice if any further actions are necessary
- 2.10 At each reporting cycle meeting the committee will invite a fund manager to attend the meeting. The manager attending the meeting was **Royal London** who manage the **Multi Asset Credit Fund (MAC)** and **Index Linked (I/L) Bonds**. Their report (exempt) has been separately distributed to Board members on the 1 August 2024.
- 2.11 Value of the Royal London portfolio as at March 24 was £89.6m – split between MAC (£65.7) and I/L bonds (£23.9m). This is managed as a combined portfolio against a consolidated benchmark.
- 2.12 In terms of the portfolio's actual allocations, the portfolio is materially overweight MAC (73% vs 60% benchmark weight) and underweight index-linked gilts, (27% vs 40% benchmark weight). This is a result of the portfolio's MAC component outperforming the index-linked gilts component and the suspension of any further rebalancing.
- 2.13 Royal London reported that managing the mandate against a consolidated benchmark was a contributing factor to the underperformance (-2.0% over the last 12 months).

- 2.14 **Actions from the meeting** – Hymans to review restructuring the benchmark with the focus being around the merits of disaggregating the benchmark into separate MAC/I/L bond components. Review completed and officers are in discussion with Royal London to implement the Hymans recommendation to separate the benchmarks.
- 2.15 The Fund Manager also reports on how ESG factors impact the portfolio.
- 2.16 **London CIV**  
The Funds holds 59% of its assets within the London Collective Investment Vehicle (LCIV), five mandates directly managed by LCIV (40%) and three indirectly managed by Legal & General (19%). The governance of investments held within LCIV is their responsibility but it is crucial that the Fund has assurances that the governance arrangements are robust and regular communication and contact is maintained.
- 2.17 LCIV produce Quarterly Investment reports, which includes an Investment Summary with valuation and performance data for each of our holdings and an update on activities at London CIV, a market update and Fund commentary from the London CIV Investment Team as well as key portfolio data and a summary of ESG activity during the quarter.
- 2.18 The Fund receives monthly transactions and investment statements from the LCIV custodian which are used to reconcile against the Funds custodian reports.
- 2.19 The LCIV hosts Virtual weekly “coffee with the Chief Investment Officer (CIO). Opportunity to share news or in-depth discussions on a fund manager or asset classes. Attended by Officers, recordings available.
- 2.20 LCIV also hosts monthly business update meetings, which include updates from LCIV Chief Officers and includes covering current fund offerings, fund performance; fund updates (including those funds for which enhanced monitoring is in place) and the pipeline for new fund launches. In addition, relevant topical issues are included as appropriate. Attended by Officers, recordings available.
- 2.21 All Havering investments funds are on ‘normal’ monitoring status.
- 2.22 In depth reviews are held annually unless there are concerns about performance whereby the reporting cycle is reduced to six months, Closer six monthly monitoring is in place for the Absolute Return Fund, next scheduled review to be held in May 2024.
- 2.23 The Committee was provided with LGPS updates, as follows:
- **Annual Report Guidance** – new guidance issued March 2024 – will apply from 2023/24 report onwards but on a best endeavours basis for 2023/24 only.

- **Economic Activity of Public Bodies (Overseas Matters) (EAPBOM) Bill** - also known as the Boycotts, Divestments and Sanctions Bill. Seeks to prevent public authorities making decisions about investments resulting from political or moral disapprovals but will not prevent from complying with formal UK government sanctions.
- **Cost Control Mechanism 2020** – report published 29 February 2024, delayed due to outwaiting the McCloud outcomes. The mechanism measures the cost of LGPS and any changes of more than 3% means a review of benefits is triggered. No requirement for change required.

**3. Pension Fund Accounts (Agenda item 6 – supplementary pack)**

- 3.1 Committee noted the unaudited Pension Fund accounts for the year ending 31 March 2024 and considered if there were any issues needed to be brought to the attention of the Audit Committee.**
- 3.2 The Audit Committee have the responsibility to approve the Authority’s full statement of accounts, which include the Pension Fund accounts.
- 3.3 The Accounts have been compiled in line with the Chartered Instituted Institute of Public Finance & Accountancy (CIPFA) “LGPS Funds Accounts 2020/21 example accounts.”
- 3.4 Key movements to note from the 2023/24 accounts are:
- The Net Assets of the Fund has increased to £969m for 2023/24 from £896m in 2021/22, an increase of (£73m).
  - The increase of (£73m) is compiled of change in market value of investments (£54m), investment income of (£18m) and net additions of cash of (£1m).
- 3.5 The Accounts and Audit (amendment) Regulations 2022 (SI 2022/708) came into force on 22nd July 2022 and revised the statutory deadline for publishing the audited financial statements to 30 September for 2022/23 accounts and the subsequent 5 years, until the 2027/28 accounts have been completed. The deadline for the Council to produce and publish draft accounts has reverted back to the 31st May for the 2022/23 accounts and beyond as per the Accounts and Audit Regulations 2015.
- 3.6 The Authority and the Pension fund accounts were published in line with the statutory deadline.
- 3.7 Report presented to Pensions Committee provides evidence to the Board as to the Fund’s compliance with scheme regulations relating to the governance and administration of the scheme.**

**4 2024/25-2026/27 business Plan /Annual report on the work of the Pensions committee 2023/24 (Agenda item 7 supplementary pack)**

- 4.1 Committee noted the work of the committee during 2022/23 and agreed the Business Plan for the three year rolling period 2024/25 to 2026/27. They also considered whether to make any additions to the work plan.**
- 4.2 The report sets out the work undertaken by the Pensions Committee during 2023/24 and the plan of work for the forthcoming three years.
- 4.3 The Business Plan is compiled in line with CIPFA guidance “Principles for Investment Decision Making & Disclosure in the LGPS” and suggests that the Business Plan is submitted to the committee for consideration.
- 4.4 To meet best practice, the Fund considers it appropriate to prepare a report on the activity of the Committee on an annual basis and this will be adopted as the Business Plan.
- 4.5 The report is also required to meet the Council’s Constitution – Part 4 Rules of Procedure - ordinary meetings of the Council will receive reports for the previous year’s Pension Committee activity from the Chair.
- 4.6 In addition to the annual cyclical work programme set out in Appendix A - Annex B of the Business Plan, there are a number of key issues that are likely to be considered by the Pensions Committee in the coming year and beyond and will be added to the meeting cycle as appropriate:
- a. Continued development/monitoring of Climate Risk Policy
  - b. Develop and implement approach for climate related engagement
  - c. Task Force on Climate Related Financial Disclosures (TCFD) reporting compliance/gap analysis (subject to regulatory publications)
  - d. Implementation of the interim and long-term Investment strategy
  - e. Consider Local investment & Levelling Up agenda (ongoing considerations at present)
  - f. Potential consideration of Private Equity investment (consider alongside local investment)
  - g. London CIV Pooling progression/Continued consideration of transfer of assets to the London CIV (particularly Multi Asset Credit, Index linked assets)
  - h. Equity portfolio review – including review of emerging market allocation and reflecting net-zero related commitments
  - i. Review of RLAM mandate & Index linked gilts objectives
  - j. Consideration of reallocating into Private Debt/Infrastructure close ended funds
  - k. Governance review of London CIV
  - l. Planning for SAB Good Governance guidance compliance - once guidance is issued
  - m. TPR New Code of Practice compliance check – develop action plan

- n. New training policy to reflect Good Governance and TPR compliance
  - o. Risk Register –independent oversight of scoring
  - p. Cost transparency analysis
  - q. New contract – Actuary (current contract expires 15 July 2025)
  - r. New contract – Investment Advisor (current contract expires 31 March 2026)
  - s. New contract – Custodial Services (current contract expires 30 September 2026)
  - t. Administration issues i.e. ongoing work associated with the McCloud ruling – readiness for Pensions Dashboard
  - u. New Employer admissions
  - v. Covenant Risk Review
  - w. SAB developments
  - x. Consideration of LGPS Regulation changes and consequential policy, as applicable
  - y. Topical issues discussed as appropriate
  - z. Continued training and development (include training programme following Local Elections May 2026)
- 4.7 The above list is not exhaustive nor set in stone and Members were asked to consider if there are any other areas of work that they require to be included.
- 4.8 **Report presented to Pensions Committee provides evidence to the Board as to the Fund’s compliance with scheme regulations relating to the governance and administration of the scheme.**
- 4.9 **When considering its own work plan the Local Pension may want to consider how it will assist the committee in delivering the work plan.**

**5 Pensions Administration Budget (Agenda item 8)**

- 5.1 **Committee approved the 2024/25 budget of £0.648m for the provision of London Pensions Fund Authority (LPPA) Pension Administration service.**
- 5.2 The Council has delegated its pension administration functions to LPPA via a shared service agreement with Lancashire County Council. As the LPPA is a non- profit entity the contract is based on a full cost recovery basis. The fund has the option to not agree the proposed budget, in such case the budget will be set at the current budget plus an increase based on Consumer Price Index (CPI) as at January.
- 5.3 Budget increased by £86,391 (15.38%) on 2023/24 budget. 5.37% attributable to an increase in membership numbers, up by 1,077 and 9.51% attributable to increase in price per member of £2.66 from £27.98 to £30.64).

5.4 The Fund refers proposed budget to its Pension committee for approval. The cost of Pension Administration is recharged annually to the Fund, the contract costs are factored into the budget and any increase in contract costs, once agreed, the budget will be increased and the additional cost met within the Fund.

5.5 **Report presented to Pensions Committee provides evidence to the Board as to the Fund's compliance with scheme regulations relating to the governance and administration of the scheme.**

**6 Review of Pensions Fund Admission Policy (Agenda Item 9 - policy in supplementary pack)**

6.1 **Committee approved the amendments to the Admissions policy to reflect the current Funding Strategy Statement**

6.2 The Admissions Policy was reviewed by the Funds Actuary and updated to reflect:

- the new pass through requirements of the Funding Strategy Statement (FSS)
- simplification of outsourcing/admissions for academies and Local Education Authorities (LEAs) and to achieve additional employer guarantees for academy outsourcing (via the newly extended Department for Education (DfE) guarantee). The new DfE guarantee will now apply to all academy outsourcings as long as they are done on a pass through basis and are closed to new entrants.

6.3 The revised FSS was approved at the Committee meeting of 7 November 2023 and applies to all employers in the Fund from 1 January 2024.

6.4 **Report presented to Pensions Committee provides evidence to the Board as to the Fund's compliance with scheme regulations relating to the governance and administration of the scheme.**

**7 Admission of CleanTEC Services LTD & Aspens Services Ltd (Agenda item 10)**

7.1 The Committee agreed to admit CleanTec Services Ltd & Aspens Services Ltd (catering to the Employer Learning Academy Trust) into the Havering Pension Fund, enabling the 3 members with CleanTec and 24 members with Aspens Services continued membership to the LGPS.

7.2 CleanTEC contract, providing catering services to Elm Park School, commenced 13 June 2023 and due to expire 12 June 2027

7.3 Aspens Services Ltd, providing catering to the Employer Learning Academy Trust, commenced 1 September 2023 and due to expire 31 August 2026.

- 7.4 CleanTEC and Aspens will be admitted on a pass through basis and therefore they are not required to obtain an indemnity bond. The employer rate for both employers as per the Funding Strategy Statement is set at 25%.
- 7.5 Admissions to the Fund follow the provisions of The Local Government Pension Scheme (LGPS) Regulations 2013, Schedule 2, Part 3 and follows New Fair Deal Guidance.
- 7.6 **Report presented to Pensions Committee provides evidence to the Board as to the Fund's compliance with scheme regulations relating to the governance and administration of the scheme.**

**IMPLICATIONS AND RISKS**

**Financial implications and risks:**

This report provides feedback from items that have already been presented to the Pensions Committee on the 25 June 24.

Report clearance was achieved as part of that process and no new recommendations are necessary. Therefore, there are no direct financial implications arising from the recommendations in this report to the Local Pension Board.

**Legal implications and risks:**

This report provides feedback from items that have already been presented to the Pensions Committee on the 25 June 24

Report clearance was achieved as part of that process and no new recommendations are necessary. Therefore, there are no legal implications arising from the recommendations in this report to the Local Pension Board.

**Human Resources implications and risks:**

This report provides feedback from items that have already been presented to the Pensions Committee on the 25 June 24

Report clearance was achieved as part of that process and no new recommendations are necessary. Therefore, there are no Human Resources implications arising from the recommendations in this report to the Local Pension Board.

**Equalities implications and risks:**

This report provides feedback from items that have already been presented to the Pensions Committee on the 25 June 24

Report clearance was achieved as part of that process and no new recommendations are necessary. Therefore, there are no Human Resources implications arising from the recommendations in this report to the Local Pension Board.

**BACKGROUND PAPERS**

Background Papers List

None



## Local Pensions Board

**Subject Heading:**

Policy Reviews 2024

**OMT Lead:**

James Cocks  
Assistant Director of Transactional People  
Services

**Report Author and contact details:**

Caroline Guyon  
01708 4321852  
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**Policy context:**

Local Government Pension Scheme  
Regulations 2013

**SUMMARY**

There are a number of Pension Fund policies due for review this year. This report presents the drafts of those policies for noting or comment by Board members.

Final approval is delegated to the Pensions Committee at the meeting to be held on 5 November 2024.

**RECOMMENDATIONS**

Members note the policies, providing any feedback to be considered for incorporating into the final version for Committee approval in November 2024.

**REPORT DETAIL**

1. There a number of Pension Fund Policies due for review and update in 2024. It is good practice for the Local Pension Board to have sight of the draft policies prior to presentation to the Pensions Committee for approval.
2. The November Pensions Committee is generally used as a housekeeping meeting to ensure cyclical policy reviews are kept outside of the main meetings.
3. **Communications Policy 2024-2027**
  - 3.1 Regulation 61 of the Local Government Pension Scheme Regulations 2013 requires an Administration Authority to prepare and publish a written statement covering communications with members and scheme employers.
  - 3.2 The statement must set out the following:
    - Communications with members, representatives of members, prospective members and scheme employers
    - The provision of information and publicity about the scheme to the above
    - Format, frequency and distribution method of the information or publicity
    - The promotion of the scheme to prospective members
  - 3.3 The policy has been updated this year to incorporate some new guides and factsheets that are available to members and employers and to simplify the layout with the introduction of a glossary of terms.

- 3.4 The policy has been reviewed in line with the Pensions Regulators new General Code of Practice and meets the relevant criteria. Pending information from the LPPA, some minor adjustments may be required regarding the availability of communications in alternative formats.
- 3.5 Appendix A to this report is the draft Havering Pension Fund Communication Strategy 2024 – 2027.

**4. Policy regarding the overpayment of pension following the death of a pensioner or dependant member**

- 4.1 It is good practice to ensure the Council has a policy in place regarding the treatment of overpaid pensions following the death of a pensioner or dependant member.
- 4.2 A 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 is no ongoing dependant pension payable, to be automatically written off.
- 4.3 Based on research prior to the introduction of the policy, the levels of written off debt expected to be written off was no more than £5k per annum. No single year has exceeded this since the implementation of the policy.
- 4.4 The only change to the policy is to recommend the review takes place every three years, rather than annually.
- 4.5 Appendix B to this report is the draft Overpayment Policy for 2024 – 2027.

**5 Policy for Reporting Breaches of the Law**

- 5.1 It is a requirement of the General Code of Practice that the Fund has a Policy for Reporting Breaches of the Law. We have previously used the Council's Whistleblowing Policy but we are now introducing a Fund Specific Breaches Policy.
- 5.2 The policy will need formal approval by both the Strategic Director of Resources as the named Responsible Officer and then Pensions Committee in November 2024. If agreed the policy will be effective from December 2024.
- 5.2 A record of breaches is currently maintained and this will be presented to the Local Pensions Board for noting in the Q1 meeting for 2025 and annually thereafter. Material breaches will be reported as and when they occur.

5.3 Appendix C to this reports if the draft Reporting Breaches of the Law Policy

## **6 Other Policies for Review**

6.1 The Pensions Administration Strategy and the associated Charging Policy are also due for review and presentation to the Pensions Committee in November.

6.2 Due to time restraints, these documents will be reviewed, taking account of the Pensions Regulator's General Code of Practice and circulated to Local Pension Board Members for review and comment outside of the meeting.

### **IMPLICATIONS AND RISKS**

#### **Financial implications and risks:**

There is a risk of breaching the Fund's statutory obligations policies are not in place and reviewed regularly

#### **Legal implications and risks:**

The legal duties are set out in the individual policy where relevant and there are no other apparent legal implications.

#### **Human Resources implications and risks:**

There appear to be no HR implications or risks arising directly as a result of this report.

#### **Equalities implications and risks:**

The policy states that requests for documents in alternative font, format and language can be accommodated.

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to:

- (i) the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) the need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- (iii) foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are: age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants. We will ensure that disabled people with sensory impairments are able to access the strategy.

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

**HAVERING PENSION FUND  
COMMUNICATIONS POLICY**

**2024-2027**

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## 1. Introduction

An effective communications policy is vital for any organisation which strives to provide a high quality and consistent service to their stakeholders.

Havering Council, as the administering authority for the Havering Pension Fund (the Fund), must maintain a communications policy as required by the Local Government Pension Scheme Regulation 2013.

The provision of timely, relevant information in a suitable format is key to ensuring efficient and effective communications. It is important that we consider the costs in terms of resource and staff time for all communications and work with the LPPA to ensure there are appropriate systems and processes in place to facilitate these communications with our stakeholders.

This policy identifies our key stakeholders and details the different forms and methods of communications required to maintain the successful governance and administration of the Fund.

Every effort is made to ensure all our communications are accessible to all. Documents can be re-produced in different fonts, formats and languages where required by the recipient.

### Strategy Review, Ownership and Authorisation

The Havering Pension Fund Communications Policy is effective from November 2024.

The administering authority will review this policy as required to reflect changes in regulations, governance or working practices with a full review every three years.

The policy lead is the Pension Projects and Contracts Manager. The document has been reviewed and approved by the Pensions Committee in November 2024.

If you have any questions or comments regarding the Communications Policy, please contact Caroline Guyon, Pensions Projects and Contracts Manager.

Telephone: 01708 432185 or via email [caroline.guyon@haverling.gov.uk](mailto:caroline.guyon@haverling.gov.uk)

### Pensions Administration

From 1 November 2017, 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. The Local Pensions Partnership was formed in 2016 through a collaboration between Lancashire County Council and the London Pensions Fund Authority and provides pension services to the Local Government Pension Scheme, Police and Firefighter Schemes.

LPPA can be contacted via telephone on 0300 323 0260 or via the contact form on the [website](#).

## 2. Legislative Framework

The Fund is required by regulation 61 of the Local Government Pension Scheme Regulations 2013 to maintain and publish a communications policy statement. Regulation 61 is reproduced below:

**61.** (1) An administering authority must prepare, maintain and publish a written statement setting out its policy concerning communications with-

- a) Members
- b) Representatives of members
- c) Prospective members
- d) Scheme employers

(2) In particular the statement must set out its policy on-

- a) The provision of information and publicity about the scheme to members, representatives of members and Scheme employers
- b) The format, frequency and method of distributing such information or publicity
- c) The promotion of the Scheme to prospective members and their employers

(3) The statement must be revised and published by the administering authority following a material change in their policy on any of the matters referred to in paragraph (2).

In accordance with the Public Sector Pensions Act 2015, the LGPS is regulated by the Pensions Regulator who has provided guidance in Code of Practice 14 on providing good quality communications to Scheme members and other stakeholders.

## 3. Key Objectives

The key objectives of the communications policy are:

- To improve the understanding of members, their representatives and prospective members of the benefits of the Local Government Pension Scheme
- Assist Scheme employers in understanding their roles and responsibilities within the LGPS and to provide guidance and support
- To improve the service that Pension Fund Members receive
- Use plain English for all communications
- Identify and use the most appropriate communication method to take account of stakeholders' different needs
- To communicate in the most effective and cost efficient way
- To communicate using accessible methods and formats.

## 4. Communications with Scheme Members

Our aims for communicating with our scheme members are:

- to better educate members of the benefits of the scheme to reduce the general queries being directed to the LPPA help desk
- to encourage the use of the pension scheme website and registration to PensionPoint, the member self-service webpage.

The Key actions will be:

- continual review of employee communication methods to ensure they are effective and efficient
- on-going promotion of the pension websites and PensionPoint
- working with LPPA to ensure communications are relevant and timely
- raising awareness of the 50/50 scheme

Action	Audience	Media	End of Year Review 2024/5
Review and update the pension websites and intranet site	All	Web	
Promote the pension websites and intranet	All	Web	
Promote PensionPoint – Member Self Service	Active, Deferred and Pensioner	Web	
Ensure relevant, accurate and timely communications are sent to all members	All	Paper or electronic	
Raise awareness of the 50/50 section of the LGPS	All	Paper or electronic	

The Administering Authority will ensure the following communications are provided as required, in addition to day to day individual communications with members.

Communication	Media	Frequency of Issue	Distribution	Audience
Pension Websites	Web	Continually available. Updated as required	Advertised on all communications	All
Havering staff intranet site	Web	Continually available. Updated as required	Advertised regularly via internal communications	Havering Corporate staff

Havering Pension Fund Communication Policy 2024-2027

Scheme booklet	Web	Continually available.	For viewing as required	All
Factsheets and guides	Web	Continually available. Updated and replaced as required	For viewing as required	All
Newsletters and scheme updates	Web or paper	As required	For viewing as required. Post to home address for targeted communication	All
Forms	Web or paper	As required	Available to download or post to home address	All
Annual Benefit Statements	Web or paper if opted out of online statements	Continually available. Updated annually	For viewing as required. Members are informed of availability via personal email, email to employers or internal Global News	Active and Deferred
Retirement Workshops	Web	Periodically	LPPA run retirement workshops for members nearing retirement. These are advertised via employer communications	
Road shows/ Workshops	Face to face in person or virtually	When required	Advertised via email, Global News, Posters and employers	Active
Pensioner payslips	Paper	1 <sup>st</sup> pension payment and every April, May and October	Post to home address	Pensioner
Notice of Pensions Increase	Paper	Annually in April	Post to home address with April payslip	Pensioner
Internal Disputes Resolution Procedure	Paper or Web	Continually available. Updated as required	Post to home address or available to download	All
Annual Report and Accounts	Web	Continually available. Replaced annually	For viewing as required.	All

For a further explanation of communications, see Glossary in Section 8.

## 5. Communications with Prospective Scheme Members

Our aims for communicating with our prospective scheme members are:

- to increase the take up of the LGPS
- to better educate members of the benefits of the scheme to reduce the general queries being directed to the LPPA help desk

The Key actions will be:

- review of communication methods to ensure they are effective and efficient
- ensuring automatic enrolment and re-enrolment is well communicated
- raising awareness of the 50/50 scheme

Action	Audience	Media	End of Year Review 2024/5
Ensure pension website is included with new employee contracts and information packs	New employees	Paper or electronic	
Review and update the pension websites	All	Web	
Work with employer to ensure automatic enrolment is correctly communicated	Existing employee	Paper or electronic	
Raise awareness of the benefits of the LGPS, in particular the 50/50 section.	All	Paper or electronic	

The pension scheme will work with LPPA and employers to provide the following communication as required.

Communication	Media	Frequency of Issue	Distribution	Audience
New Joiner Option Form	Paper or electronic	On commencing employment	Via LPPA with new starter information	New employees
Pension Websites	Web	Continually available. Updated as required	Advertised on all communications	All
Scheme booklet	Web	Continually available. Updated as required	For viewing as required	All
Education Sessions	Face to Face or virtually	As required	Part of induction workshops	New Employees

Annual Report and Accounts	Web	Continually available. Replaced annually	For viewing as required.	All
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For a further explanation of communications, see Glossary in Section 8.

## 6. Communications with Scheme Employers

Our aims for communicating with our scheme employers are:

- to improve relationships
- to assist them in understanding their role as a scheme employer
- to assist them in understanding funding/cost requirements
- to work together to achieve accurate scheme actuary data submissions
- to ensure smooth staff transfers
- to improve the service our pension fund members receive

The Key actions will be:

- offer induction meetings for all new scheme employers
- support employers with training and technical guidance
- on-going promotion of the employer section of the LPPA pension website and use of the UPM secure portal
- working with relevant parties to admit new employers to the fund

Action	Audience	Media	End of Year Review 2024/5
Meet with all new scheme employers to discuss responsibilities and requirements	Employers	Face to face or virtually	
Review and update the employer sections of the pension websites	Employer	Web	
Work with LPPA to promote employer training sessions	Employer	Web	
Work with LPPA to ensure accurate and timely data submissions	Employer	Email, phone, face to face or virtually	
Provide regular updates to employers on key aspects of the scheme	Employer	Web or email	

The pension scheme will provide the following communication to employers as required.

<b>Communication</b>	<b>Media</b>	<b>Frequency of Issue</b>	<b>Distribution</b>	<b>Audience</b>
Induction meeting	Face to Face or virtually	On becoming a scheme employer	By email	New scheme employers
New employer information pack	Electronic	On becoming a scheme employer	By email	New scheme employers
Employer Responsibility Guide	Electronic	On becoming a scheme employer. Continually available	By email and for viewing as required	New scheme employers – Existing Scheme Employers when required
Pensions Administration Strategy	Electronic and Web	On becoming a scheme employer. Continually available	By email and for viewing as required	
Pension Websites	Web	Continually available. Updated as required	Advertised on all communications	All
Tupe - Outsourcing Guide and Admissions Policy	Web	Continually available. Updated as required	For viewing as required	Scheme employers and potential admitted bodies
Employer roadshows	Face to Face or virtually	When required following scheme changes	Advertised via email to employer	All
Annual Report and Accounts	Web	Continually available. Replaced annually	For viewing as required.	All
Pension Fund Valuation reports	Electronic	Every three years	By email	All
Funding Strategy Statement	Web	Continually available. Replaced every three years and updated as required	For viewing as required.	All
Employer Newsletters	Electronic and Web	Periodically	By email or for viewing as required	Scheme employers

For a further explanation of communications, see Glossary in Section 8.

## 7. Communications with Representatives of Members

### A. Pensions Committee

Our aims for communicating with Pensions Committee are:

- to provide information to enable the Committee to make decisions delegated under the Council’s constitution
- to provide information to ensure the Committee are kept informed of pension related matters
- to ensure the Committee are aware of their responsibilities in relation to the Scheme
- to provide training with regards to investment and administration matters

The Key actions will be:

- to submit Committee reports, which have been reviewed by the relevant Council business partners and senior manager
- To arrange training sessions with Fund officers, advisors and external experts when required

Action	Audience	Media	End of Year Review 2024/5
To submit Committee reports in line with the annual plan and as and when required	Pensions Committee Members	Paper and web	
To arrange required training as and when required	Pensions Committee Members	Face to Face, online or virtually	

The pension scheme will provide the following communication to Pensions Committee Members as required.

Communication	Media	Frequency of Issue	Distribution	Audience
Pensions Committee Reports	Paper and Web	Quarterly and as and when required	By email and available on the Havering.Gov website	Pension Committee Members and Trade Union representatives
Pensions Committee Briefings	Face to face or Hybrid	Quarterly and as and when required		Pensions Committee Members and Trade Union representatives
Training sessions	Face to face or virtually	When there is a new Pensions Committee and as and when required	By email	Pensions Committee Members and Trade Union representatives

For a further explanation of communications, see Glossary in Section 8.



## B. Local Pensions Board

Our aims for communicating with the Local Pensions Board are:

- to provide information to enable the board to assist the Scheme Manager in executing their duties
- to provide information to ensure the board are kept informed of pension related matters
- to ensure the board are aware of their responsibilities in relation to the Scheme
- to provide training with regards to investment and administration matters

The Key actions will be:

- to submit reports on areas identified for review by the Board.
- To arrange training sessions with Fund officers, advisors and external experts when required

Action	Audience	Media	End of Year Review 2024/5
To submit reports in line with the Board work plan and any additional areas identified at meetings	Local Pension Board	Paper and web	
To arrange required training as and when required	Local Pension Board	Face to Face, online or virtually	

The pension scheme will provide the following communication to the Local Pension Board as required.

Communication	Media	Frequency of Issue	Distribution	Audience
Local Pension Board Reports	Paper and Web	Quarterly and as and when required	By email and available on the Havering.Gov websites	Local Pension Board
Local Pension Board Briefings	Face to face or virtually	Quarterly and as and when required	Fund officers attend each meeting	Local Pension Board
Training sessions	Face to face and online	When a new member is appointed. Continual self- development is also required	Face to face, web based or virtually	Local Pension Board

For a further explanation of communications, see Glossary in Section 8.

### C. Havering and oneSource Managers

Our aims for communicating with the Havering and oneSource managers are:

- to provide information to be able to make decisions delegated under the Council’s constitution
- to provide accurate, timely and relevant information on request
- to ensure managers are aware of any pension related employer costs

The Key actions will be:

- to submit executive decision reports on areas identified as requiring management approval.
- to ensure that employer requests for pension estimates are monitored against the contractual key performance indicator and include employer costs.

Action	Audience	Media	End of Year Review 2024/5
To write key or non-key executive decision reports as required in line with the Council’s constitution	Senior or oneSource Management	Paper or email	
To ensure the provision of employer estimates is in line with the contractual agreement	HR and Heads of Service	Paper or email	

The pension scheme will provide the following communication to managers as required.

Communication	Media	Frequency of Issue	Distribution	Audience
Key and non-key executive decision reports and background papers where required	Paper or electronic	As and when required	By email	Officer delegated responsibility under the Council’s constitution
Employer requested pension estimates, usually for redundancy, flexible retirement or ill health retirement	Paper or electronic	As requested	By email	HR or Head of Service

For a further explanation of communications, see Glossary in Section 8.

## **D. Other Stakeholders**

### **Pension Fund Manager (Finance)**

The Pension Fund Manager (Finance) responds to staff, employer and other enquiries. Skills and knowledge are kept up to date through participation in seminars and conferences.

### **Pension Projects and Contracts Manager**

The Pensions Projects and Contracts Manager is responsible for monitoring the administration contract with the Local Pensions Partnership Administration. Quarterly client reviews take place to monitor the contract and check the service level agreements are being met. They are also responsible for maintaining relationships with scheme employers, trade unions and other relevant stakeholders.

### **Investment Fund Managers**

Day to day contact between the Pension Fund Manager (Finance) and the investment fund managers is maintained. Each fund manager is required to present their performance reports to the Pensions Committee on a cyclical basis, unless performance concerns override this.

### **Trade Unions**

Trade unions in the London Borough of Havering are valuable ambassadors for the Pension Scheme. They ensure that details of the Local Government Pension Scheme's availability are brought to their members' attention and assist in negotiations under TUPE transfers in order to ensure, whenever possible, continued access to the Scheme.

## 8. Glossary of Communications

**Annual Benefit Statements** – For active members these include the current value of benefits and projected benefits to normal retirement date. The associated death benefits are also shown. For deferred members these show the current value of the pension benefits and associated death benefits. These are released by the end of August and are available on PensionPoint – Member Self Service. Members can opt out of the online service and elect to receive a paper copy sent to their home address.

**Annual Report and Accounts** – Detailed document providing information regarding the value of the Pension Fund during the financial year, income, expenditure and other scheme based information such as the number of scheme members and scheme employers. This is published and available on the Havering pension website.

**Education sessions** – A presentation providing an overview of the benefits of the pension scheme and an opportunity to ask questions.

**Employee Roadshows** – These are available, when required, providing staff with the opportunity to have a face to face conversation about their pension rights. These can also be held virtually.

**Employer requested pension estimates** – A detailed statement of the scheme member's pension benefits and any cost to the employer due to the payment of the pension to the member.

**Employer Responsibility Guide** – A detailed guide to assist Employers realise and meet their responsibilities outlined in the Pensions Administration Strategy document.

**Employer Roadshows** – Provided by LPPA/LB Havering as required following a significant change in the scheme, or upon request.

**Factsheets** – Leaflets that provide information in relation to specific topics for example automatic enrolment, retirement.

**Forms** – LGPS forms are available on the pension website such as opt out form, 50:50 or Main Scheme election form and nomination form.

**Funding Strategy Statement** – A summary of the Fund's approach to funding its liabilities, including reference to the Fund's other policies although it is not an exhaustive statement of policy on all issues.

**Induction Meeting** – A meeting offered to all new academies and admitted bodies to discuss roles and responsibilities.

**Internal Disputes Resolution Procedure** – A formal notification of the procedure to follow in the event that a dispute cannot be resolved by the LPPA or the Havering Pensions Projects and Contracts Manager

**Key and non-key executive decision report** - Formal reports written by Pension Fund officers and reviewed by Business Partners and agreed by a Senior Leadership Team member in accordance with the Council's constitution.

**Local Pension Board reports** – Written by Pension Fund officers to provide a formal update to a particular area of work

**Local Pension Board briefings** – Pension Fund officers attend each Board meeting to provide a verbal overview of written reports and to provide updates on any on-going work

**Newsletters** – General newsletters are issued annually and additionally as required, usually when a significant change to the scheme occurs. Pensions Increase newsletters are sent annually to advise pensioner members of the increase to their pension.

**New Employer Information Pack** – Email sent to welcome an employer to the Havering LGPS, including all information relevant to being a scheme employer, e.g. paying contributions and the pensions administration strategy detailing their role and responsibilities.

**New Joiner Option Form** – Form provided to all new employees which provides the details of the pension scheme website and allows them to advise of any previous pension entitlements.

**Pensions Administration Strategy** – Guide that details the key responsibilities for Scheme employers and the Administering Authority and sets out the deadlines and expectations.

**Pensioner payslips** – The payslips are sent when a member receives their first pension payment, if the monthly amount varies by more than £5, each April and May. They are posted to the pensioner's home address.

**Pension Committee Briefings** – Pension Fund officers attend each Committee meeting and provide a verbal briefing on each Committee report

**Pensions Committee Reports** – Formal reports written by Pension Fund officers and reviewed by Business Partners and a Senior Leadership Team member. Published on the [havering.gov.uk](http://havering.gov.uk) website

**Pension Fund Valuation Reports** – A report issued every three years setting out estimates assets and liabilities of the Fund as a whole and setting individual employer contribution rates for the next three-year period

**Pension Websites** - The LPPA website ([www.lppapensions.co.uk](http://www.lppapensions.co.uk)) provides LGPS information for all of their clients, including forms, guides, newsletters, links to related sites including PensionPoint Member Self Service and contact information. The Havering Pension website [LGPS Pension Administration | London Borough of Havering](#) provides information specific to Havering Fund members such as our

retirement process factsheet and planning guide, IDR policy, Annual report and accounts and information about the Local Pensions Board.

**Retirement workshops** – LPPA run a programme of retirement workshops held virtually throughout the year. We advertise these via employer and internal communications

**Scheme booklet** - A booklet providing detailed overview of the LGPS, including who can join, how much it costs, the retirement and death benefits and how to purchase additional pension.

**Training sessions** – Provided by Pension Fund officers, advisors or external experts on investment or administration related matters. Targeted training is also available for Local Pension Board members online via the Pensions Regulator website. Training is shared with the Pensions Committee members and Local Board Pension Board members where applicable

**TUPE - Outsourcing Guide and Admissions Policy** – These documents are relevant to Letting Authorities that are looking to outsource a service to a third party supplier



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

## **HAVING PENSION FUND**

**Policy regarding the overpayment of  
pension following the death of a  
pensioner or dependant member**

**2024 to 2027**

## Havering Pension Fund

### Policy regarding the overpayment of pension following the death of a pensioner or dependant member

#### Purpose

It is good practice to ensure the Council has a policy in place regarding the treatment of overpaid pensions following the death of a pensioner or dependant member. This will ensure that any overpayments are treated in a fair and equitable manner and will prevent the administration team seeking individual write off approvals from the Head of Pensions and Treasury.

The policy is designed to ensure that any overpayments are treated in a fair and equitable manner.

#### Policy Detail

Notification of the death of a pensioner or dependant member does not always happen immediately. Whenever possible, the payroll team will stop or recall the last monthly pension payment to prevent a potential overpayment of pension benefits.

If this is unsuccessful, the London Borough of Havering agree to automatically write off an overpayment of less than £250 net, where there is no ongoing dependant pension to be paid.

A value of less than £250.00 net in the instance of the death of a pensioner or dependant member has been deemed by the Fund as uneconomical to pursue when taking into account the cost of the administration involved in additional correspondence and raising and chasing an invoice. However, where there is an ongoing dependant pension benefit due this can be used to recover any overpaid pension, regardless of the value of that overpayment.

An invoice will be raised by the Fund to recover an overpayment which is £250.00 net or more following the death of a pensioner or dependant member.

#### Ownership and authorisation

The policy lead is the Pension Projects and Contracts Manager, who will be responsible for the review of the policy as and when there are regulatory, audit or legislative changes. The Head of Pensions and Treasury will approve the policy and any future revisions as allowed under the OneSource Scheme of Delegation.

The policy is effective from 20<sup>th</sup> March 2019 and will be reviewed every three years.





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

**HAVERING PENSION FUND**

**POLICY FOR REPORTING BREACHES**  
**OF THE LAW**

**Effective from December 2024**

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## 1. Introduction

This is the Whistleblowing Policy of the London Borough of Havering Pension Fund in relation to the administration Local Government Pension Scheme (LGPS).

The policy provides guidance on the procedure for identifying, monitoring and where appropriate, reporting breached of the law.

### Policy Review, Ownership and Authorisation

The Whistleblowing Policy is effective from 01 December 2024.

The administering authority will review this policy as required to reflect changes in Regulations, Governance or working practices with a full review every three years.

The policy lead is the Pension Projects and Contracts Manager. The document has been developed in consultation with the Local Pensions Board and with approval from the Pensions Committee.

If you have any questions or comments regarding the charging policy, please contact: Caroline Guyon, Pensions Projects and Contracts Manager.  
Telephone: 01708 432185 or via email [caroline.guyon@havering.gov.uk](mailto:caroline.guyon@havering.gov.uk)

### Pensions Administration

From 1 November 2017, 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. The Local Pensions Partnership was formed in 2016 through a collaboration between Lancashire County Council and the London Pensions Fund Authority and provides pension services to the Local Government Pension Scheme, Police and Firefighter Schemes.

## 2. Legislative Framework

Breaches can fall into 2 categories:

- a breach of pensions law in accordance with the Pensions Act 2004 or as detailed in the Pensions Regulators General Code of Practice
- non-compliance under the Local Government Pension Scheme (LGPS) Regulations.

## 3. Key Objective

The key objective of the Policy for reporting breaches of the law is to document the procedure for the identification, monitoring and potential reporting of material breaches.

## 4. Policy Detail

### What is a breach

A breach of the law is when a legal duty which is relevant to the administration of the scheme has not been, or is not being, complied with.

It can encompass many aspects of the management or administration of the scheme including a failure to:

- perform tasks under legislation or code of practice
- maintain accurate records
- act on any breach identified
- pay relevant sums to the pension fund on time
- pay member benefits accurately
- issue annual benefits statements in line with statutory guidance

Non compliance with the LGPS regulations can encompass many aspects of the management or administration of the scheme including a failure to:

- adhere to the LGPS Regulations
- comply with the Funds policies and procedures

### Responsibilities to report a breach

Responsibility to report a breach falls on the following (known as reporters):

- Elected members of the Pensions Committee
- Members of the Local Pensions Board
- Fund Officers and Senior Council Officers
- Scheme Employers
- Professional Advisers (including Fund Actuary, Investment Advisers, Legal Advisers)
- Third Party Provides (including the Local Pensions Partnership)

### Requirement to report a breach of law

Breaches of the law which affect the pension fund should be considered for reporting to the Pensions Regulator.

The decision whether to report will depend on whether:

- There is reasonable cause to suspect a breach of the law
- If so, is that breach likely to be of material significant to the Regulator

It is important to recognise not every breach needs to be reported to the Regulator. For example, where it can be demonstrated that appropriate action has been taken to rectify a breach, it may not be necessary to report this to the Regulator.

All breaches, however minor and regardless of whether it is considered reportable, should be recorded in a breach log. This log will be maintained by the Pensions Projects and Contracts Manager and cases will be reported to the Local Pensions Board and Pensions Committee on an annual basis

Any potential breaches identified in connection with the Havering Pension Fund should be reported immediately. Breaches can initially be reported to either:

- The Pensions Projects and Contracts Manager
- The Assistant Director of Transactional People Services
- The Pension Fund (Finance Manager)

**Any breaches identified as being of material significance to the Pensions Regulator should be reported to the Strategic Director of Resources (nominated responsible person) without delay..**

#### Breaches reportable to the Pensions Regulator

The General Code of Practice requires that a breach should be notified to the Regulator as soon as reasonably practicable (and no later than one month after becoming aware of the breach) once there is reasonable cause to believe a breach that may be considered significant to the Regulator may have occurred.

A breach is likely to be of concern and material significance to the Regulator where a breach has been identified and those involved:

- Do not take prompt action to remedy the breach and identify and tackle its cause to minimise the risk of reoccurrence
- Are not pursuing corrective action
- Fail to notify affected scheme members where it would be appropriate to do so

It is important that the Fund and nominated responsible person are satisfied a breach has actually occurred, rather than acting upon suspicion of such an event, and robust checks should be made.

When assessing the materiality of any breach the following should be considered:

- Cause – eg dishonesty, poor governance or failing to act within the law or regulations
- Effect – eg ineffective internal controls and procedures, lack of knowledge or understanding or inaccurate data
- Reaction – eg taking prompt corrective action and notifying scheme members if applicable
- Wider implications – eg where the breach is as a result of lack of knowledge or poor processes, what steps are to be put in place to prevent a reoccurrence

It should be noted that a failure to report a material breach is in itself likely to be considered a significant breach.

Guidance within the Pensions Regulators General Code of Practice will be used to determine any identified breaches materiality and whether it must be reported.

## Role of the Responsible Officer

The Responsible Officer will oversee the management and execution of this breaches policy.

The Responsible Officer will ensure:

- All identified breaches are recorded in a log, maintained by the Pensions Projects and Contracts Manager
- Investigate the circumstances of breaches of the law and ensure breaches to non compliance are reviewed by the Pensions Projects and Contracts Manager
- Where appropriate an action plan is in place to enable corrective action
- Breaches are reported to the Pensions Committee and Local Pensions Board
- All materially significant breaches are reported to the Regulator in writing either by post or electronically via the online Exchange service.

The Responsible Officer will determine whether any breach or likely breach is materially significant, having regard to the guidance set out in the Code of Practice and after consultation with parties they deem appropriate. Such parties might include Legal Services, the Pension Fund Committee, Pension Board or professional advisers.

## Whistleblowing

It is a statutory duty to report breaches of the law. In rare cases this may involve a duty to whistle blow on the part of an officer of the Fund or a member of the Local Pension Board or Pensions Committee. The duty to report does not override any other duties a “reporter” may have, such as confidentiality. Any such duty is not breached by reporting to the Regulator. Given the statutory duty that exists in exercising this breaches policy, the Fund will ensure it adheres to the requirements of the Employment Rights Act 1996 in protecting an employee making a whistleblowing disclosure to the Regulator.

The duty to report, however, does not override ‘legal privilege’, so oral and written communications between the Fund, its representatives and a professional legal adviser do not have to be disclosed if they meet the principles of legal privilege.



**LOCAL PENSIONS BOARD**

**17 September 2024**

**Subject Heading:**

**Board Member Training**

**SLT Lead:**

**Kathy Freeman Strategic director of Resources**

**Report Author and contact details:**

*Debbie Ford*  
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**Policy context:**

**Financial summary:**

None directly

**SUMMARY**

This report addresses the training requirements of the Local Pension Board and progress.

**RECOMMENDATIONS**

The Board is asked to:

1. Note the training progress as set out in paragraph 13
2. Determine and address skills and knowledge gaps

**REPORT DETAIL**

**1. Background**

1. The Pensions Regulator (TPR) new General Code of Practice ('the Code') was laid in Parliament on 10 January 2024 and came into force on 27<sup>th</sup> March 2024. It replaces Code of Practice 14 for Public Sector Pension Schemes and brings together 10 previous TPR Codes into one single code.
2. TPR General Code of Practice states that it is a regulatory requirement, in accordance with section 248A of the Pension Act 2004 that:
  - a) Every individual of the Pension Board must be conversant with
    - The rules of the scheme, and
    - Any document recording policy about the administration of the scheme which is for the time being adopted in relation to the scheme.
  - b) And have knowledge and understanding of—
    - The law relating to pensions, and
    - Such other matters as may be prescribed.
  - c) The degree of knowledge and understanding required by subsection (b) is that appropriate for the purposes of enabling the individual properly to exercise the functions of a member of the pension board.
3. As set out in the Local Pension Board (LPB) terms of Reference and in line with the above requirements Board members are:
  - a) required to be able to demonstrate their knowledge and understanding and to refresh and keep their knowledge up to date,
  - b) required to maintain a written record of relevant training and development.
  - c) undertake a personal training needs analysis and regularly review their skills, competencies and knowledge to identify gaps or weaknesses, and
  - d) will comply with the Scheme Manager's training policy.
4. The LPB will be expected to accept ongoing training on relevant issues and developments that meet the Boards needs to ensure that the Board is able to perform its duties effectively.
5. It is for individual Board members to be satisfied that they have the appropriate degree of knowledge and understanding to enable them to properly exercise their functions as a member of the Board.



6. To assist the Board in monitoring its knowledge and skills requirement the Fund uses guidance as issued by The Chartered Institute of Public Finance and Accountancy (CIPFA) “A Technical Knowledge and Skills Framework” for Local Pension Boards to benchmark their training requirements.
7. This Knowledge and Skills Framework (KSF) was first issued in 2015. A revised version was issued in 2021, which applied to the Pensions Committee and Senior Officers.
8. Whilst the 2021 framework targets the Committee and does not directly apply to the LPB, it is broadly similar to the 2015 Framework for the Local Pension Board.
9. CIPFA has identified eight core technical areas where appropriate knowledge and skills should be achieved and maintained. They are:
  - a) pensions legislation and guidance
  - b) pensions governance
  - c) funding strategy and actuarial methods
  - d) pensions administration and communications
  - e) pensions financial strategy, management, accounting, reporting and audit standards
  - f) investment strategy, asset allocation, pooling, performance and risk management
  - g) financial markets and products
  - h) pension services procurement, contract management and relationship management.
10. To evidence knowledge and skills acquired or to identify knowledge gaps the Board has been issued with CIPFA KSF questionnaire, sent via email on the 20 June 2024 with a completion deadline of **17 July 2024**. At the time of writing this report **two completed questionnaire has been returned**.
11. Once all questionnaires are completed they will be used to identify the knowledge and skills gap and enable a training plan to be developed to target specific areas.
12. To support Board member training, since 15 August 2022, the Fund has also been subscribing to the LGPS Online Learning Academy (LOLA) launched by our Actuaries (Hymans Robertson). This is an online platform designed to support the training needs of Pensions Committees, Local Pension Boards and Officers. On the 1 October 2023 the Fund transitioned to LOLA v2.0, which brings the learning modules more in line with the CIPFA KSF shown in paragraph 9 above and The Pensions Regulator General Code of Practice.
13. The Fund will receive regular progress reports from LOLA allowing it to easily evidence member’s development and progress, as shown below:

**Table 1 –LOLA v1**

	LOLA v1.0					
	Module 1	Module 2	Module 3	Module 4	Module 5	Module 6 <sup>(1)</sup>
	An introduction to the LGPS	LGPS Governance & Oversight Bodies	Administration & Fund Management	Funding and Actuarial Matters	Investments	Current Issues
<b>Local Pension Board</b>						
Denise Broom	in Progress	enrolled	enrolled	enrolled	enrolled	enrolled
Andrew Frater	completed	completed	completed	completed	completed	completed
Mark Holder	completed	completed	completed	completed	completed	completed
Yasmin Ramjohn	completed	completed	completed	completed	completed	in Progress
Joanne Sladden	completed	completed	completed	in Progress	enrolled	enrolled
Dionne Weekes	completed	in Progress	enrolled	enrolled	enrolled	enrolled

(1) Given the nature of Module 6, we expect it to be refreshed regularly with hot topics relating to the LGPS. This section is not part of the mandatory learning required under the CIPFA Knowledge and Skills Framework. As such, we have removed the Module 6 Knowledge Check and reconfigured the learning plan so that certification is awarded after completion of Modules 1 - 5. This means that Module 6 will always show as 'In Progress'.  
Some colleagues may show as 'Completed' on Module 6, this is just dependant on when they were onboarded to the platform as we changed the knowledge check after some users had been onboarded.

**Table 2 – LOLAv2**

Aug-24											
Name	Role	An introduction to LGPS Online Learning Academy	Module 1 Committee Role and Pensions Legislation	Module 2 Pensions Governance	Module 3 Pensions Administration	Module 4 Pensions Accounting and Audit Standards	Module 5 Procurement and Relationship Management	Module 6 Investment Performance and Risk Management	Module 7 Financial Markets and Product Knowledge	Module 8 Actuarial methods, Standards and Practices	Current Issues
Jonathan Bunt <sup>(1)</sup>	Local Pension Board										
Denise Broom	Local Pension Board	completed	completed	In progress	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	completed
Clea Holmes	Local Pension Board	completed	In progress	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled
Andrew Frater	Local Pension Board	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled
Mark Holder	Local Pension Board	completed	completed	In progress	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	completed
Yasmin Ramjohn	Local Pension Board	completed	completed	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	completed
Joanne Sladden	Local Pension Board	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled
Dionne Weekes	Local Pension Board	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled	enrolled

<sup>(1)</sup> enrolled on Sussex LOLA v2.0 platform - certificates to be sent to evidence completion

14. In addition to the LOLA training the TPR also provides a free online training resource to assist those members involved with public service pension

schemes, which is accessed via a “Trustee Toolkit” link on its website. The toolkit provides a set of 12 learning modules although not all are applicable for Local Government Pension Scheme (LGPS).

15. Of the 12 modules (10 of which are applicable to the LGPS) there are five core modules for all pension schemes, plus four for Defined Benefit Scheme (LGPS) and plus one for all scheme types.
16. Board Members are encouraged to visit the site and assess whether this will enhance their learning & development.
17. The fund provides board members with a list of items that the Board should be familiar with and made available as part of Board member inductions.
18. It is a statutory requirement for the Fund to report and include within its Annual report, training undertaken by the LPB. To facilitate this the Fund maintains a training register to record appropriate board member training and development.

## IMPLICATIONS AND RISKS

### **Financial implications and risks:**

TPR will assess non-compliance with any code when considering if a statutory requirement has been met. There is a risk to the Fund that penalties may be imposed if the TPR, upon assessment, determines that legal requirements are not met.

It is a statutory requirement for the Fund to report and include within its Annual report, training undertaken by the LPB. To facilitate this the Fund maintains a training register to record appropriate board member training and development. There is a risk that this may not be complete if members do not notify officers of any external training undertaken.

Based on number of licences currently active, there is a cost of c£5,000 to access the LOLA training.

Costs are met from the Pension Fund

### **Legal implications and risks:**

Codes of practice are not statements of the law and there is not usually a direct penalty for failing to comply with them, but it does set out expectations of how governing bodies should comply with their legal duties.

It is not necessary for all the provisions of a code of practice to be followed in every circumstance. Any alternative approach to that appearing in the code of practice will need to meet the underlying legal requirements, and a penalty may be imposed if these requirements are not met.

Those legal requirements are set out in the body of the report.

**Human Resources implications and risks:**

No direct implications

**Equalities implications and risks:**

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to:

- (i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- (iii) Foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are: age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment/identity.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

An EqHIA is not considered necessary regarding this matter as the protected groups are not directly or indirectly affected

**BACKGROUND PAPERS**

Background Papers List  
None



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