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

Area of Focus - Internal Controls			
Risk Register	A comprehensive risk register which captures operational activities to mitigate risks with deadlines and owners - delegated individuals by senior managers - is an effective tool to monitor progress adressing risks and their impact on scheme manager's onjectives. It also forms a solid base at the pensions board meetings which may help its members to have useful debates. We recommend that the scheme manager aligns the various risk registers and will include all risks related to pensions (directly or indirectly) within the pension risk register.	Risk register is reviewed annually and is now a standing agenda item at pension board meetings.	Risk Register has been amended in line with tpr recommendations
Breaches	We recommend that the scheme manager keeps a breach log with details such as actions taken to assess materiality, individuals involved in the assessment,		Breach log is now in place
Decision Making and escalations	Set out decision making authority and escalation points and develop a decision log or similar. We would view it as good practice for the decision making authority of more junior staff members and escalation points are also recorded.	Scheme of Delegation in place for senior members of staff.	To be considered keeping in mind the small number of staff that this will apply to

Area of Focus - Communication			
Member communications	It is often helpful for scheme managers to measure the effectiveness of their communication with savers, eg measuring website traffic and running surveys	Since the move to the LPP contact centre, members are asked to complete a survey following telephone or email communication.	Survey Results are included in the quarterly performance reports
Annual Benefit Statements	We encourage the scheme manager to look into ways of further promoting the take up rate of the online portal.	Member self service is promoted by LPP through various standard letters, including all new starters.	Included in communications strategy for both Havering and LPPA

IDRP	Complaints and compliments could be analysed to identify changes that can be made to improve the operation of the fund. You may wish to consider capturing all complaints in one single complaints log to assist with monitoring.		Log to be established

Area of Focus - Cyber Security

Cyber Security - Third Party	Scheme managers should be aware of the cyber security processes used by third party providers, such as the administrator or custodian, that handle fund assets or data	LPP has provided accreditation and assurance that policies are in place	LPP to supply client facing documents to provide details of all policies and controls in place for data security.
	Scheme manager to monitor spam and quarantine reports from LPP as a minimum and ensure that any tests or accreditations cover all relevant aspects of pension administration	Cyber Security is now a standing agenda item for client review meetings	To discuss with LPP how this can be implemented and monitored.

Area of Focus - Scams

Due Dilligence	Please discuss due dilligence activities LPP carries out in relation to receiving schemes; ask for their procedures and feedback after reviewing them to ensure all appropriate steps are covered and they are followed in practice.		To be raised at a future client review meeting.