

A - Reporting Duties

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

Legal Requirements

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

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

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
A1	Is your scheme registered with the Pension Regulator?	n/a	Yes - the Pensions Projects and Contracts Manager is the contact on the registration.	n/a already registered		Fully completed	Fully compliant		
A2	Is the information held on the Pensions Regulator's website about the scheme up-to-date?	n/a	The scheme return was submitted to TPR with details of all scheme employers.	Annual check	03/11/2021	Fully completed	Fully compliant		
A3	Have you completed this latest Scheme Return in the required timescale?	n/a	The scheme return was submitted on 03/11/2021 prior to the deadline of 10/11/2021	Annual check	03/11/2021	Fully completed	Fully compliant		

B - Knowledge and Understanding

Legal Requirements

A member of the pension board of a public service pension scheme must be conversant with:

- the rules of the scheme, and
- any document recording policy about the administration of the scheme which is for the time being adopted in relation to the scheme.

TPR Code Ref 34

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

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

TPR Code Ref 35

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

TPR Code Ref 36

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
B1	Are there policies and arrangements in place to support pension board members in acquiring and retaining knowledge and understanding?	38	A joint training strategy has been developed and was agreed by the Pensions Committee on the 24 November 2015 and presented to the Local Pension Board (LPB) at its meeting on the 6 January 2016. The Training Strategy covers both committee and board members. To assist in achieving the training strategy objectives the fund will aim for full compliance with the CIPFA Knowledge and Skills Framework. Training register is maintained throughout the year detailed in the annual report.	Annual check	31/03/2021	Fully completed	Fully compliant		Once the Good Governance Guide has been finalised and formally adopted, the training strategy will be revised to cover all areas within the recommendations. The timetable will depend on the capacity within MHCLG and other LGPS stakeholders to progress to implementation of the proposals and consult on formal guidance given their other current priorities.
B2	Has a person been designated to take responsibility for ensuring the framework is developed and implemented?	38	On a day to day basis the Pension Fund Manager (Onesource Pensions and Treasury) maintains compliance with the policy and annual reporting. Training is also arranged by Pensions Administration as applicable.	As and when required		Fully completed	Fully compliant		

B3	Is the Fund providing assistance to pension board members to determine the degree of knowledge and understanding required?	48	The CIPFA Knowledge and Skills self assessment was undertaken when the LPB was first set up. The LPB also undertook induction training held by Hymans (generic to the LGPS) and followed up by officers (Havering Pension Fund focus). Ongoing training is provided and attendance published in the Pension fund Annual report.	Ongoing		Fully completed	Fully compliant	Induction training has been carried out for all existing board members.	Training will be reviewed following the May 2022 elections as the training budget is shared with Pensions Committee.
B4	Are the roles and responsibilities of pension boards and members of pension board clearly set out in scheme documentation?	47	The roles and responsibilities are set out in the Board Members Terms of Reference and are provided to new members on appointment.	Annual check	31/01/2022	Fully completed	Fully compliant	Documentation is included in the induction pack and is also available on the pensions webpage: https://www.havering.gov.uk/info/20044/council_data_and_spending/222/pension_fund	
B5	Are pension board members aware of their legal responsibility in terms of Knowledge and Understanding?	50	This is detailed in Terms of Reference which is provided to each member on appointment to the Board. The Training Strategy also outlines the legal requirements relating to knowledge and skills.	Ongoing		Fully completed	Fully compliant		
B6	Have all pension board members got access to copies of the scheme rules and relevant Fund documentation?	40	Scheme Regulations are available on the lgpsregs.org website. All key fund documentation is also available to view on the havering.gov pensions web pages	Ongoing		Fully completed	Fully compliant	Key documents, policies and guidance are on the Havering Pensions Website: https://www.havering.gov.uk/info/20044/council_data_and_spending/222/pension_fund	
B7	Is there an up-to-date list of the Fund specific documents with which pension board members need to be conversant in?	46	LBH has created and will maintain a list of documents that the Board members will need to be conversant with.	As and when required but at least annually	31/01/2022	Fully completed	Fully compliant	Now included as part of the induction pack. The reading list will be re-circulated as and when it is revised	
B8	Are all pension board members investing sufficient time in their learning and development?	55	A number of training sessions have been arranged and attendance to date is good. A log is maintained of who has attended training and this is published in the annual report. The CIPFA Knowledge and Skills Framework self-assessment form will also become a personalised training plan for each member and will be used to document areas of learning and continued development.	Ongoing		Fully completed	Fully compliant		
B9	Does the Fund offer pre-appointment training for new pension board members or mentoring by existing members?	56	Pre-appointment training and mentoring has not been offered, but potential members are invited to discuss the roles and referred to the website where the roles and responsibilities are set out. Induction courses are designed to meet the needs of new members	As and when required		Fully completed	Fully compliant	An Induction Pack has been introduced to accompany the induction training provided by officers	
B10	Is there a process in place for regularly assessing the pension board members' level of knowledge and understanding is sufficient for their role, responsibilities and duties?	57	See comments in B3 - the knowledge and skills analysis will be carried out annually.	Annual check	30/11/2017	Fully completed	Fully compliant		Training will be reviewed following the May 2022 elections as the training budget is shared with Pensions Committee.
B11	Are records of learning activities being maintained?	60	A log is maintained of who has attended training and this is published in the annual report.	Annual check	31/03/2021	Fully completed	Fully compliant		

B12	Have the pension board members completed the Pension Regulator's toolkit for training on the Code of Practice number 14?	59	The modules within the Pensions Regulator online toolkit are available to Board Members and completed courses have been recorded in the training log. In addition, to the COP14 training, general online training is also available via the Pensions Regulator	Annual check	31/03/2021	In progress	Partially compliant		There is generic training available for trustees plus additional training specific to public service schemes and the COP14. New members to complete training
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C - Conflicts of interest

Legal Requirements

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

TPR Code Ref 62

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

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

TPR Code Ref 63

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

TPR Code Ref 64

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
C1	Does the Fund have a conflict of interest policy and procedure, which includes identifying, monitoring and managing potential conflicts of interest?	76	A conflicts of interest Policy for the Local Pension Board (LPB) was adopted at a Council meeting held on the 25 March 2015. This is available to view on Havering.gov pensions web pages.	Annual	31/12/2021	Fully completed	Fully compliant	published on the Havering Pensions Website: https://www.havering.gov.uk/info/20044/council_data_and_spending/222/pension_fund	
C2	Do pension board members have a clear understanding of their role, the circumstances in which they may have a conflict of interest and how to manage potential conflicts?	78	The LPB are aware of their roles and responsibilities and some of the LPB members have completed the TPR online toolkit module covering conflicts of interest.	Ongoing		In progress	Partially compliant		New members to complete training
C3	Have all Pension Board members provided appropriate information for the Administering Authority to determine whether a conflict exists (on appointment and from time to time)?	79	The Council maintain appropriate records of declared conflicts of interest and manage any potential conflicts to ensure they do not become actual or perceived conflicts of interest. Records will be lodged in advance of the Board Member's appointment and will be maintained by the Council's Monitoring Officer.	Ongoing		In progress	Partially compliant		New members to submit declaration of interests form
C4	Does the appointment process for pension board members require disclosure of interests and responsibilities which could become conflicts of interest?	80	There is a duty on all prospective Local Pension Board members to declare interests prior to their appointment to the Board. No declarations to have been received to date in the appointment process under any pension Fund requirement (this is looked at once appointed by way of the Council Code of Conduct declaration). Conflicts of interest is a standing item on all Board agendas	Ongoing		In progress	Partially compliant		New members to submit declaration of interests form
C5	Is the conflicts policy regularly reviewed?	76	There is an agreed and documented conflicts policy and procedure which includes identifying monitoring and managing potential conflicts of interest and keep under review from time to time.	As and when required		Fully completed	Fully compliant		

C6	Does the Fund have a conflicts register and it is circulated for ongoing review and published?	84	There is a conflicts register that covers all Councillors that is reviewed annually and published on the Havering Website. Declaration of interest is a standing item on the LPB agenda and when a conflict arises, this will be disclosed and recorded in a Pension Board conflicts register. There is no requirement for Board Members to publish their declarations of interest on the Council website			Fully completed	Fully compliant		
C7	Is appropriate information included in the register?	84	The Local Pension Board register is based on the Pensions Regulator template and has all required information	Annual	31/12/2021	Fully completed	Fully compliant		
C8	Is there a standing item on the agenda for declaring conflicts of interest?	85	There is a standing item on each LPB agenda	Ongoing		Fully completed	Fully compliant		
C9	Do those involved know how to report a conflict of interest?	78	There is an agreed and documented conflicts policy and procedure which includes identifying monitoring and managing potential conflicts of interest.	Ongoing		Fully completed	Fully compliant		
C10	Is the number of employer and member representatives on the board in line with legal requirements?	90	The board is made up of 3 member representatives and 3 employer representatives which meets the minimum legal requirements. As at January 2022 there is a vacancy for a scheme employer representative	Ongoing		Fully completed	Fully compliant	Positions are advertised as they become available.	Membership recently increased to 6 work will be underway shortly to recruit to the vacant positions
C11	Is the board made up of the appropriate mix of representatives in order to minimise potential conflicts?	91	The Board is made up of a suitable scheme representation and is lead by an independent Chairperson (as at January 2022 this position is vacant)	Ongoing		Fully completed	Fully compliant		Role of Independent Chair to be advertised

D - Publishing information about schemes

Legal Requirements

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

TPR Code Ref 92

The information must include:

TPR Code Ref 93

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

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
D1	Does the Administering Authority publish information about the pension board?	95	The havering.gov website provides information relating the LPB Members	As and when required but at least annually	31/01/2022	Fully completed	Fully compliant	Information is published on either the Havering pension page or the democracy page of the havering.gov.uk website	
D2	Does the Administering Authority publish other useful related information about the pension board?	96	The Havering website provides the names, contact details and biographies of the LPB Members. The website includes information regarding the roles and responsibilities of both scheme member and scheme employer roles and the terms of reference. The appointment process is not currently on the website, however adverts for new representatives are uploaded onto the site when applicable which give the required information.	As and when required but at least annually	31/01/2022	In progress	Partially compliant	Information is published on either the Havering pension page or the democracy page of the havering.gov.uk website	What contact information would members like to be published here? Biographies required for new Board members

D3	Is all the information about the Pension Board kept up to date?	98	All the information currently held on the website is up to date.	As and when required but at least annually	31/01/2022	Fully completed	Fully compliant	Information is published on either the Havering pension page or the democracy page of the havering.gov.uk website	
D4	Does the Administering Authority publish information about pension board business?	97	All papers are pubic and published on the democracy pages of the Havering website, however some items may be restricted.	As and when required		Fully completed	Fully compliant		

E - Managing risk and internal controls

Legal Requirements

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

TPR Code Ref 101

Internal controls are defined in the legislation as:

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

TPR Code Ref 102

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

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach/ Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
E1	Is there an agreed process for identifying and recording scheme risks?	105	The Administering Authority's overall policy on risk is to identify all risks to the Fund and to consider the position both in aggregate and at an individual risk level. The Administering Authority monitors the potential risks to the Fund, and will take appropriate action to mitigate the impact of these on the fund wherever possible. Risks are identified and assessed in line with the Authority's risk management process, with risks being identified within Service Plans. Internal Controls operate in the day to day activities that fall under the administration and management of the scheme. Internal controls of the scheme assets include monitoring these quarterly and presenting formal reports to the Pensions Committee and risk is addressed as part of the quarterly monitoring processes. Risk implications are a standard inclusion in reports to the Pensions Committee and the Local Pension Board. LPPA have recruited a Head of Risk and Compliance and provide a monthly risk and compliance report wick is presented to the Board	Ongoing		Fully completed	Fully compliant	LPPAs Annual Internal Control Assurance report received November 2021	

E2	Does the Fund have an adequate process to evaluate risks and establish internal controls?	107	The Pension Fund Manager (Onesource Pensions and Treasury) has produced a risk register to include, initially, 7 areas of risk. Risks have been identified based on failure to comply, manage, govern, sign up new employers and to detect fraud within the LB Havering pension fund. A traffic light system is used to highlight areas of high, medium and low risk. In order to place reliance on the Pension Fund processes, internal controls are continually reconciled and reviewed. New risks may be detected and the traffic light system be updated where action has been taken to reduce a risk. The Risk Register is a living document and a standing item on the Local Pension Board agenda.	Ongoing		In Progress	Partially compliant	It is recognised that there are good internal controls in place in many areas but there is no formal identification/documentation of these. There is a Risk Register for the purpose of monitoring risk.	Consider documenting internal controls.
E3	Does the Administering Authority have a risk register to record all risks identified and action taken?	108	A Risk Register was adopted in June 2015 to record identified risks and required action. It is included in the Annual Report.	Annual check	09/11/2021	Fully completed	Fully compliant	Risk register reviewed and agreed by Pensions Committee November 2021	
E4	Does the Administering Authority review the effectiveness of the risk management and internal control systems of the Fund?	111	There is no formal process for the review of the effectiveness of the internal controls we have identified. However as identified below (E7) there are substantial internal controls in place including a number of ongoing monitoring areas that are reported to Pensions Committee (investment matters and administration).	Annual check	09/11/2021	In Progress	Partially compliant		To consider having a documented process to meet the requirement of this part of the code
E5	Does the Administering Authority regularly review the risk register?	115	A Risk Register was adopted in June 2015 to record identified risks and required action. Additions to the register are presented to the Board and the Committee are asked to agree the risk register annually	Annual check	09/11/2021	Fully completed	Fully compliant	Risk register reviewed and agreed by Pensions Committee November 2021	
E6	Is there a standing item on the Pension Board agenda to review scheme risks?		The review of the risk register is a standing item on the Local Pension Board agenda	Ongoing		Fully completed	Fully compliant		
E7	Does the Administering Authority have adequate systems, arrangements and procedures (internal controls) in place for the administration and management of the Fund and are they documented?	116	There are a large range of internal controls in place. Some examples are: - Restricted access to the building - Altair (pension admin system) is tested at a national level and has a 2 tier login - Calculations are independently checked - National Fraud Initiative checks - Annual benefit statements request members check their details. - Payments made via BACS - Triennial valuation identifies data issues which are resolved. - Quarterly reconciliation of payments in and out and pension fund strain costs. Not all procedures are documented	Ongoing		In Progress	Partially compliant		To ensure documented procedures are in place where required and ensure that the LPPA Annual Assurance Report provides the evidence required to satisfy this point
E8	Do these procedures apply equally to outsourced services, are internal controls reflected in contracts with third party providers and is there adequate reporting in relation to those controls?	119	LBH and LPPA work together to ensure that all internal controls are reflected in the work that LPPA undertake although it is recognised that there are good controls in place	Ongoing		In Progress	Partially compliant		To ensure that the LPPA Annual Assurance Report provides the evidence required to have confidence in their approach to this area