

**F - Administration and Scheme Record Keeping  
Legal Requirements**

Scheme managers must keep records of information relating to:

TPR Code Ref 122

- member information
- transactions, and
- pension board meetings and decisions.

The legal requirements are set out in the Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014 ('the Record Keeping Regulations').

TPR Code Ref 123

The Data Protection Act 1998 and the data protection principles set out additional requirements for using, holding and handling personal information. Other requirements are set out in the:

- Pensions Act 1995 and 2004
- Pensions Act 2008 and the Employers' Duties (Registration and Compliance) Regulations 2010
- Occupational Pension Schemes (Scheme Administration) Regulations 1996 (SI 1996/1715)
- Registered Pension Schemes (Provision of Information) Regulations 2006 (SI 2006/567)

No.	TPR Requirement	TPR Code	London Borough of Havering Approach / Evidence	Frequency	Last	Check	Compliant	Notes	Action
F1	Do member records hold the information required as defined in the Record Keeping Regulations and is it accurate?	126	LBH/LPPA use Civia's Universal Pensions Management system (UPM) as their administration system. It records all member and beneficiary information set out in Record Keeping Regulations.	Ongoing		Fully completed	Fully compliant	Havering migrated from Heywood's Altair to UPM in November 2022. Relevant testing was undertaken by LPPA and assurances given to LBH of its suitability	
F2	Does the Fund have the appropriate processes in place so employers can provide timely and accurate information?	128/ 129	Prior to the beginning of the scheme year all employers are provided with an updated employee contribution table and the monthly pay and contribution spreadsheet including guidance for completion. New employers admitted to the pension fund, or anyone outsourcing their payroll services, are provided with all relevant information to meet their responsibilities as a scheme employer. LPPA have a secure portal for the submission of all member specific information, new starter forms, leaver forms, end of year data etc. All employers have an administration responsibility to ensure the correct users within their organisations have access to the portal. Effective October 2021, LBH introduced a Pensions Administration Strategy detailing the scheme employer and administering authority responsibilities	Ongoing		Fully completed	Fully compliant	Pensions Administration Strategy consulted on and agreed by pensions Committee became effective October 2021	Once migrated to UPM, processes to be initiated to monitor progress against the Pensions Administration Strategy
F3	Does the Fund keep records of and reconcile transactions as required by the Record Keeping Regulations?	131/ 132	The specific requirements of the record keeping regulations are adhered to except that employer contributions are not recorded to the member record as they have no impact on benefits. These are recorded at employer level by Pension Fund Accounts and the data can be obtained for all members if required. A record is kept of all overpayments written off during the financial year and the overpayment write off policy is agreed by Pensions Committee annually	Ongoing		Fully completed	Fully compliant	The overpayment write off policy was agreed by Pensions Committee in November 2020 and approved for a further 12 months in November 2021	Record keeping would benefit from an exercise to reconcile One Oracle payroll to UPM to check for discrepancies. Initial work has started to identify the scope of the project.

F4	Are records kept of pension board meetings as required by the Record Keeping Regulations?	133	This is the responsibility if the Clerk for Committee and all details are posted on LBH website.	Ongoing		Fully completed	Fully compliant		
F5	Are records kept of decisions made by the pension board, outside of meetings as required by the Record Keeping Regulations?	134	The LPB does not make decisions outside of normal meetings	Ongoing		Fully completed	Fully compliant		
F6	Are records retained for as long as they are needed?	135	GDPR allows pension records to be held indefinitely and no member records are archived or removed from the systems. There are no remaining paper files, historic files have been scanned onto an electronic system.	Ongoing		Fully completed	Fully compliant		
F7	Does the Administering Authority have policies and processes to monitor data on an ongoing basis?	136	There is no formal policy or documented procedure for the checks that are carried out, but there is confidence in the accuracy and completeness of the vast majority of data required. The Common and Conditional data scores are monitored and reported in the quarterly performance reports from LPPA. Other periodic checks include; - Triennial valuation exercise - Biannual National Fraud Initiative exercise carried out to identify deceased members. - Pensioner payslips sent in April/May and October. If a payslip is returned the team then investigates any possible address errors or sends life certificates. - Use of the DWP 'Tell Us Once' system.	Ongoing		In Progress	Partially compliant	Data improvement plan introduced during 2021.	Once migrated to UPM, processes to be initiated to monitor progress against the data improvement plan
F8	Does the Administering Authority carry out a data review at least annually?	138	A full data check is carried out each year end to ensure accurate record keeping.	Annual check	31/03/2020	Fully completed	Fully compliant		
F9	Is a data improvement plan in place which is being monitored with a defined end date?	141	A data improvement plan was introduced during 2021.	Annual check		In Progress	Partially compliant	Data scores have now been received and are very good. However a formal data improvement plan needs to be written.	Once migrated to UPM, processes to be initiated to monitor progress against the data improvement plan
F10	Are processes and policies in place to reconcile scheme data with employer data?	142	The year end process ensures that scheme data is reconciled against employer, although this does not currently include postal or email addresses.	Annual check	31/03/2020	Fully completed	Fully compliant		Investigate whether addresses can be reconciled with future year end data.
F11	Do the Administering Authority's member data processes meet the requirements of the Data Protection Act 1998 and the data protection principles?	143	The data processes meet the requirements with regard to what is held, how it is used and how long it can be held for. Information shared securely via encrypted email, password protected documents or secure online portals.	Ongoing		Fully completed	Fully compliant		