

## G - Maintaining contributions

### Legal requirements

Contributions must be paid as detailed below, and where not done, they should be reported to TPR in circumstances where the scheme manager has reasonable cause to believe that the failure is likely to be of material significance to TPR in the exercise of any of its functions. Reporting must be carried out as detailed below.

TPR Code Ref 147-149

Contribution Type	Contributions must be paid	Reporting a failure
Employer	On or before the due date as defined by the scheme regulations	To TPR: As soon as reasonably
Employee	Paid within the prescribed period (19 th day of the month, or 22nd day if paid electronically) or earlier date if required by the scheme regulations	To TPR: Within a reasonable period – 10 working days

No.	TPR Requirement	TPR Code	London Borough of Havering Approach / Evidence	Frequency	Last	Check	Compliant	Notes	Action
G1	Does the Fund have procedures and processes in place to identify payment failures?	150	A comprehensive monitoring spreadsheet is maintained for each employer with an external payroll to identify late payments. LBH does not currently have any problems with late payments.	Ongoing		Fully completed	Fully compliant		
G2	Do those processes and procedures include a contributions monitoring record to determine whether contributions are paid on time and in full?	156/ 157	This is incorporated into the monitoring spreadsheet. Dates payments are received are recorded based on the information supplied by the Cashiers Team on a weekly basis. The spreadsheet would therefore indicate if an employer was a continual/regular late payment offender. In relation to payments being made in full, there are checks carried on both employer and employee contribution amount. These are generally carried out at total level per month, i.e. no individual spot checks unless there appears to be a bigger problem. In addition, at the start of the financial year, the employer contribution rates are checked against those being deducted to ensure they match the Valuation Rates and Adjustments Certificate. The revised employee contribution bands are circulated to all employers once they have been confirmed by the LGA.	Ongoing		Fully completed	Fully compliant		
G3	Do those processes and procedures include monitoring payments against the contributions monitoring record on an ongoing basis?	161	For employers with an external payroll, the money paid in and verified by the bank statement is compared to the totals on the monthly data submissions. The Pension Fund Accounts Team reconcile the data and money received into the pension fund against the Fusion payroll system on a monthly basis.	Ongoing		Fully completed	Fully compliant		
G4	Are these procedures regularly reviewed to ensure they are effective?		Other than via internal and external audit (which should identify areas for concern), the processes are not regularly reviewed. There are relatively few employers in the Fund and a good relationship exists with them, so the risk of deliberate underpayment or fraudulent behaviour is considered to be minor.	As and when required	31/12/2022	Fully completed	Fully compliant		
G5	Do the Administering Authority's processes include managing overdue contributions in line with TPR's suggested approach?	163	A formal procedure is in place and the Charging Policy has been updated to cover this. The Charging Policy was presented to Committee for noting in December 2018 with approval being given by the Section 151 officer.	As and when required		Fully completed	Fully compliant		

G6	Does the Fund maintain a record of any investigations and communications with employers?	170	Although there are currently no identified concerns or investigations a register has been created and is stored with the monthly monitoring spreadsheet	Ongoing		Fully completed	Fully compliant		
G7	Do employers provide sufficient information to monitor contributions and is this in accordance with the LGPS regulations?	164	The monthly pay and contribution return, provided by employers with external payrolls, has all required information, including splits for 50:50 scheme members, and guidance for the accurate completion of the return. Monthly reports are supplied to the Pension Fund Accounts Team regarding the LBH paid employers.	Ongoing		Fully completed	Fully compliant		
G8	Is there a satisfactory process in place to assess the materiality of any payment failures and ensure that those which are material are reported to the Regulator within a reasonable period?	173	Payments which are paid within 2-5 days of their due date are not considered material. A procedure note is in place and the Chargin Policy has been updated to cover this.	As and when required		Fully completed	Fully compliant		
G9	If the administration of contributions outsourced to a service provider, is there a process in place to obtain regular information on the payment of contributions to the scheme?	167	Contribution monitoring is performed internally by the LBH Pensions Team and Pension Fund Finance.	As and when required		Fully completed	Fully compliant		

## H - Providing information to members and others

### Legal requirements

The law requires schemes to disclose information about benefits and scheme administration to scheme members and others. This includes requirements relating to benefit statements and certain other information which must be provided under the requirements of the 2013 Act, HM Treasury directions and the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 ('the Disclosure Regulations 2013'). In addition to these duties, there are other legal requirements relating to the provision of information to members and others under other legislation.

TPR Code Ref 187

No.	TPR Requirement	TPR Code Ref	London Borough of Havering Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
H1	Has an annual benefit statement been provided to all active members within the required timescales?	188	Active and deferred benefit statements were issued before 31st August 2022. All statements were issued online with statements posted to anyone that has opted out of e-coms.	Annual check	31/08/2022	Fully completed	Fully compliant		
H2	Do these meet the legal requirements in relation to format?	188	The statements provide all the required information.	Annual check	31/08/2022	Fully completed	Fully compliant		
H3	Has a benefit statement been provided to all active, deferred and pension credit members who have requested one within the required timescales?	191	All pension fund members, including active, deferred and pension credit members, receive an annual statement (ie members do not need to request a statement). Where a statement is requested outside of the annual benefit statement process, these are actioned in line with the SLA..	Annual check	31/08/2022	Fully completed	Fully compliant		

H4	Does this meet the legal requirements in relation to format?	192	The statements currently include all information required under the Disclosure Regulations	Annual check	31/08/2022	Fully completed	Fully compliant		
H5	Has an annual benefit statement been provided to all members with AVCs within the required timescales?	194	The statements are sent directly to the members by the AVC providers.		31/08/2020	Fully completed	Fully compliant	Providers have confirmed that they are compliant with this point.	
H6	Do these meet the legal requirements in relation to format?	195	Providers have confirmed that they are compliant with this point.		30/11/2018	Fully completed	Fully compliant		
H7	Is basic scheme information provided to all new and prospective members within the required timescales?	200	All relevant scheme information is available on the LPPA Pension Website for all new and prospective members to view at any time. LPPA write to all new scheme members within 10 working days of receiving the joiner information from an employer. There are a few instances when the Disclosure Regulation timeframes are not met due to late notification by an employer.	Ongoing		Fully completed	Fully compliant		
H8	Does this meet the legal requirements in relation to format?	200	All scheme information is available on either the LPPA or Havering pensions website. There is a guide to the scheme which provides the required information other than: - The statement regarding whether a charge may be made - although no charges are applied to LGPS benefits	Ongoing	31/12/2022	Fully completed	Fully compliant	Both the LPPA and LB Havering pensions websites are regularly reviewed	
H9	Is all other information provided in accordance with the legal timescales?	201	It is not possible to confirm whether disclosure timescales are being met in all cases as the reporting is not available. Disclosure timescales are reviewed by the Pensions Projects and Contracts Manager as part of the monthly monitoring of cases.	Ongoing		In Progress	partially compliant		A query has been raised with LPPA to see whether
H10	Where any information is only provided electronically (i.e. instead of any hard copy) does it comply with the legal requirements?	203	Annual Benefit Statements are provided online. Disclosure requirements were met and members have the opportunity to elect to receive a paper copy. Initial contact with new members is via mail and recommends signing up to the Member Self Service (MSS) facility to be able to access future statements. Hard copies of documents can be provided of intranet material if required. Correspondence with members via email is carried out at member request.	Ongoing		Fully completed	Fully compliant		
H11	Does the Administering Authority aim to design and deliver communications in a way that ensures scheme members are able to engage with their pension provision?	207	Both Havering as the Administrating Authority and LPPA have robust communication strategies to ensure sound engagement with members and other stakeholders. The use of MSS is actively promoted by both Havering and LPPA. Communications are kept as clear as possible and always include contact details for further clarification.	Ongoing		Fully completed	Fully compliant		
H12	Does the Administering Authority use a tracing service?	208	LPPA have engaged Target Professional Services to provide address tracing and mortality screening for all clients	Ongoing		Fully completed	Fully compliant		