LPP
Local Pensions Partnership
Administration

Annual Internal Control Assurance Report 2022/23

for the year ending 31st March 2023

September 2023

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EXECUTIVE SUMMARY

LPPA, part of the LPP Group, provides pension administration services to over 660,000 members across over 1,300 active employers for its 18 LGPS and blue light clients.

EXECUTIVE SUMMARY

LPPA's aim is to make pensions simple at a time when our members need us the most. Our vision, is to be the provider of choice for public sector pensions administration.

To help LPPA achieve its vision, we are investing in our people by providing training and opportunities for professional qualifications. LPPA's values set the foundation for the services we provide and the member experience we stive to deliver.

This report outlines the specific control objectives to support the evolution of LPPA as we move forward into the future.

During 2022/23 LPPA has delivered its flagship programme, Project PACE, to deliver one single core pensions administration system for LPPA by the end of 2022. Civica's Universal Pensions Management system (UPM) replaces the multitude of disparate non-integrated systems previously in place. Key deliverables include:

- Strengthen the LPPA control framework to support the path to AAF 01/20 by April 2024 with automated bank validation and laying the foundations for digital identity verification.

- To deliver a scalable, stable solution built on industry standard platforms that will meet Cyber Essentials, Cyber Essentials Plus, ISO-27001 and UK GDPR/DPA 2018 requirements.

- To provide improved member and employer experience by introducing greater self-service functionality.

At the end of this reporting period, 31st March 2023, LPPA has successfully migrated all 17 of its existing clients, and in addition, has onboarded a new LG client onto UPM.

EXECUTIVE SUMMARY

During the year 2022/23 we have maintained the strong, effective and collaborative working relationships we have with our clients, and we sincerely thank them all for their support during a very challenging period of change. Our focus is now on returning to business as usual and driving continuous improvement in member experience and the services we provide.

1 OFFICE

PRESTON

18 CLIENTS

OVER **1,300** ACTIVE EMPLOYERS

OVER **660,000** MEMBERS

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REPORT BY THE HEAD OF RISK & COMPLIANCE

This Report relates to the pension administration services provided by Local Pensions Partnership Administration Limited (LPPA).

REPORT BY THE HEAD OF RISK & COMPLIANCE

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Janet Morville-Smith
Head of Risk & Compliance LPPA

The reporting year, 2022/23, has seen a lot of change in LPPA. All of the live pension scheme data relating to the 18 pension schemes administered by LPPA has been successfully migrated across from various legacy systems into the Universal Pensions Management system (UPM). Historic data is still in the process of being fully migrated. This migration has been managed in a phased approach, with the last of our 18 clients migrating across in December 2022. This has been a significant transformation project that LPPA have carried out, with aggressive timescales, completing this work in just 12 months. However, with the hard work and support of everyone at LPPA, from the LPPA Board down, the migration was successfully completed with the security and integrity of all the data maintained.

The scale and complexity of the migration has created challenges with the loss of some experience and short term business disruption. LPPA acknowledge this and we are working hard to address the challenges as we return to business as usual. LPPA has enhanced its training programmes to achieve this, whilst at the same time driving continuous improvement in member experience and the services we provide for our clients.

The reporting period has been challenging, not only because of the amount of change, but from a risk & compliance perspective too. I have had to balance the risks to the business with the impact the change program has had on the business, whilst being pragmatic about the delivery of the risk management framework so as not to adversely affect the provision of the services to our clients and their members. At the same time, ensuring that those services are being provided in a compliant manner.

My technical and compliance teams have been working tirelessly on the myriad of regulatory consultations that have been published by the Home Office, Department of Levelling Up, Housing and Communities, HMRC and others, mostly in regard to the McCloud remedy implementation for Local Government, Police and Firefighters pension schemes. We responded to no fewer than 6 separate consultations.

From this reporting period, LPPA brought Internal Audit in-house. I have recruited a fully qualified, CMIIA Internal Auditor. The key benefit of LPPA providing its own Internal Audit is that the auditor has a full knowledge and understanding of LGPS and Public Sector Pensions, as well as quickly developing their knowledge of LPPA processes and practices. The auditor has the benefit of insight of LPPA's goals and future plans and is able to measure against these as well as LPPA's values when conducting an audit, ensuring the Executive Leadership Team have the relevant information when making key decisions.

To date, this report has provided assurances to our Clients that the services provided by LPPA are in compliance with the Pension Regulator's Code of Practice 14 and local government and public sector pensions legislation. This assurance has come from me as the Head of Risk & Compliance for LPPA and does so again for this reporting period.

REPORT BY THE HEAD OF RISK & COMPLIANCE

During 2022/23 a lot of work has been ongoing with an external party to set the foundations for LPPA to be able to provide its clients with an independent assurance opinion in the form of an AAF 01/20 Report. AAF 01/20 is the 'de facto' market standard. A number of award-winning pensions administrators use the AAF control framework including Mercer/JLT, Barnett Waddingham, Trafalgar House, and XPS. LPPA is keen to establish robust and effective independent assurance reporting. AAF 01/20 will deliver the following:

- It is the "de facto" standard for pensions administration assurance reporting and adopted by many pensions administrators of similar or larger size and scale

- AAF will provide a list of pre-determined controls and is recognised across the industry

- It will give clients and their various oversight bodies (Committees and Boards) the independent assurance they require

- Ensures LPPA meets shared service contractual obligations

- Reduces the number of Client audits currently carried out on LPPA

During 2023/24 LPPA will be working closely with our third party provider with the aim of providing the first AAF 01/20 Report in 2024.

This report will not omit or distort information relevant to the scope of the services being described in the Control Objectives, whilst acknowledging that it has been prepared to meet the common needs of a broad range of clients and may not therefore include every aspect of the services that each individual client may consider important in its own particular environment.

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LPPA
STRUCTURE

LPPA STRUCTURE

Organisational Structure

LPPA is a subsidiary of Local Pensions Partnership Limited. LPPA's head office is in Preston, Lancashire.

LPPA

LPPA provides pension administration services for Local Government Pension Schemes, Fire Fighter Pension Schemes and a Police Pension Scheme. We look after the needs of over 660,000 pension scheme members, across 18 pension schemes.

As a leading third party pensions administrator, we are responsible for the pension administration services, including calculation and payment of pension benefits, data quality and member and employer engagement.

Internal Controls

The system of internal controls is based upon an ongoing process designed to identify the risks to the achievement of policies, aims and objectives; to evaluate the nature and extent of those risks; and to manage them efficiently, effectively and economically.

A key element of this structure includes formally agreed, clear definitions of the responsibilities and authority delegated to individual managers across all major activities, supported by LPPA's Executive Leadership Team, LPPA's Audit, Risk & Compliance Committee and the LPPA Board.

The LPPA Risk Management Framework includes the Risk Register, which maps and monitors the risks that threaten achievement of the Control Objectives and regularly reviews and tests the Controls to ensure they remain effective in managing those risks.

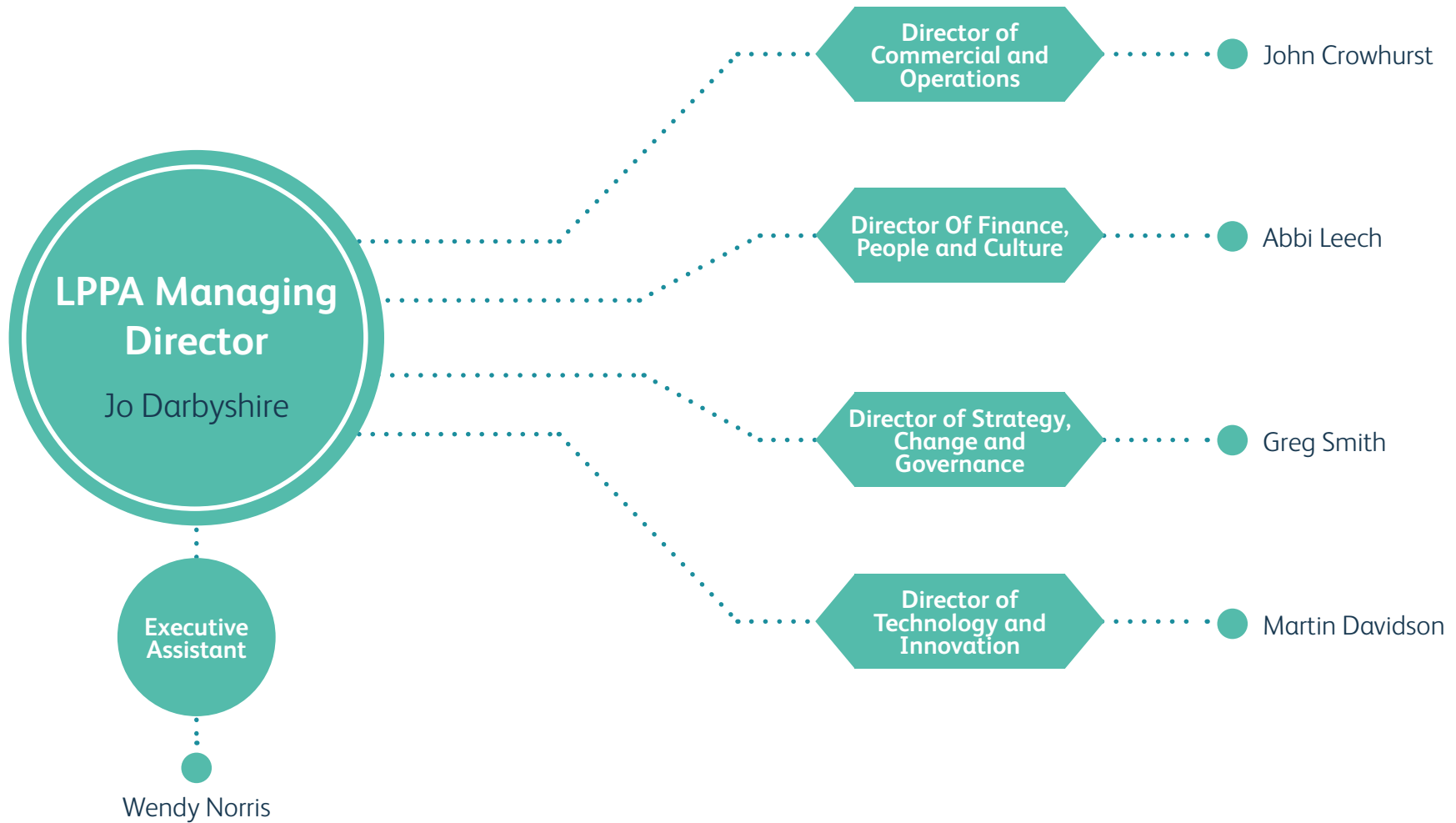## Governance Structure

The LPPA Board has an independent Chair and includes 2 Non-Executive Directors and representatives of LPP's shareholders.

The LPPA Executive Leadership Team is led by Jo Darbyshire, LPPA Managing Director, and includes Senior Executives with the appropriate skills, knowledge and expertise to achieve the strategic objectives of LPPA.

Jo Darbyshire
LPPA Managing Director

LPPA STRUCTURE

LPPA EXECUTIVE LEADERSHIP

Director of Commercial and Operations — John Crowhurst

LPPA Managing Director
Jo Darbyshire

Director Of Finance, People and Culture — Abbi Leech

Director of Strategy, Change and Governance — Greg Smith

Director of Technology and Innovation — Martin Davidson

Executive Assistant

Wendy Norris

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CONTROL ENVIRONMENT

The executive leadership team of LPPA are committed to deploying a strong control environment for pension administration services through the following measures.

CONTROL ENVIRONMENT

Risk Management Framework

LPPA operates within a risk management framework. This framework uses a "three lines of defence" model with the administration business supported by a dedicated risk function who provide oversight and co-ordinated reporting to the Executive Leadership Team, the Audit, Risk & Compliance Committee and the LPPA Board. The Risk Management Framework is responsible for ensuring that business level risks are managed effectively and that mandated policies and controls are in place and operating effectively. This covers the following areas relating to administration:

- ✓ Risk management and reporting
- ✓ Internal and external audits
- ✓ Internal control framework
- ✓ Fraud prevention
- ✓ Business continuity
- ✓ Complaints and errors
- ✓ Data Protection, Information Security and Cyber Security

LPPA maintains a comprehensive Risk Register which covers:

- ✓ Strategic risks
- ✓ Financial risks
- ✓ Business Delivery risks
- ✓ Legal/Regulatory risks
- ✓ Technology risks

These risks are reviewed on a regular basis by Risk & Compliance with the relevant business areas. We work with clients to identify and understand the key risks which apply to their schemes and how they interact with our own Risk Register so that we can identify and implement measures to effectively mitigate these risks.

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Quality Assurance & Compliance Monitoring

We recognise our responsibilities to ensure that the activities of LPPA and our people are carried out properly and with the utmost propriety, and that our managers conduct their activity properly and in accordance with statutory and regulatory requirements.

To ensure administration activities are carried out competently, LPPA has a dedicated Risk & Compliance function. Integral to this function is maintaining an awareness of the external environment to ensure regulatory and legislative changes which impact us are adequately dealt with in our operations. In support of this objective, we issue a number of corporate procedural and policy documents to our staff, including: Code of Conduct; Confidentiality; Gifts and Hospitality Policy; Financial Crime Policy; Data Protection Policy, Vulnerable Member Policy.

The Quality Assurance & Compliance Monitoring team has implemented a programme of regular quality assurance and compliance monitoring reviews to ensure that our policies, processes and procedures are operating effectively, and they report the results of these to the Executive Leadership Team and the Audit, Risk & Compliance Committee.

Internal Audit

The purpose of LPPA Internal Audit is to provide independent, objective assurance to the LPPA Audit, Risk & Compliance Committee, the LPPA Board and the LPPA Executive Leadership Team that the pension administration services being provided to its clients is compliant and the oversight of those services has robust systems and controls in place.

LPPA Internal Audit's mission is to add value to LPPA by seeking to continuously improve governance, risk management and operational processes and drive LPPA values and behaviours throughout the business to enhance client and their member experience.

LPPA Internal Audit will also offer assurance to clients on the integrity of LPPA administrative services in order to reduce the requirement for external client audit activity.

Compliance & Technical

Our compliance and technical teams work together to assess the impact of legislative and/or regulatory change which may impact our clients and administration processes. Changes are communicated to staff via technical updates and face-to-face discussions and/or training sessions. LPPA's intranet site is accessible to all administrators and provides a central reference point for technical materials, policies, procedural guidance, standard letter templates and checklists.

Where Government and/or industry bodies publish consultations on proposed legislative change, the compliance and technical teams will carry out an impact assessment and draft responses to the consultation. Where appropriate, the draft responses are shared with our clients and a round-table session is facilitated to discuss the subject matter and share thoughts so that the final response submitted by LPPA is representative of all the relevant stakeholders.

CONTROL ENVIRONMENT

Information Security

LPPA understands the importance of keeping member data secure. To ensure that the data under our control is kept secure, LPPA has implemented a number of controls and technologies. Whilst technology is important in cyber security, the investment in training of staff is also a key factor in our defence against malicious acts.

LPPA is ISO 27001 accredited and has Cyber Essential Plus accreditation. This accreditation shows that it has processes and procedures in place that keep information and systems secure, which is independently verified.

All of LPPA's systems are protected at the network perimeter by firewalls, using Palo Alto firewalls. The firewalls are automatically updated to protect against emerging threats. Firewalls have a "default deny" policy, with changes to rules completed after a change control process is followed, with a business need and security review carried out. External penetration tests are carried out annually by CREST accredited organisations to verify the perimeter protection and identify any new issues.

Servers and end-user devices are patched monthly, with critical patches installed within 14 days of release. All devices are covered by antivirus, which is centrally managed and updates are automatically downloaded to devices.

To protect against the loss of data, system corruption or ransomware, LPPA backs up data daily to an immutable online backup repository and to tape, which are removed from site and stored securely.

Disaster recovery tests are carried out annually to test the restoration process and to confirm the validity of backups.

LPPA's systems are monitored 24 x 7 x 365 by a Security Operations Centre service, which checks for suspicious activity and Indications of Compromise, reporting any suspicious activity to LPPA IT and taking preventative action if deemed a critical incident.

Access rights for users must be authorised by line managers and specialised technical privileges must be authorised by IT. Access to client databases is further segregated via security groups. Quarterly access reviews of user and privileged access are carried out with the relevant manager / system owner required to review and confirm they are correct.

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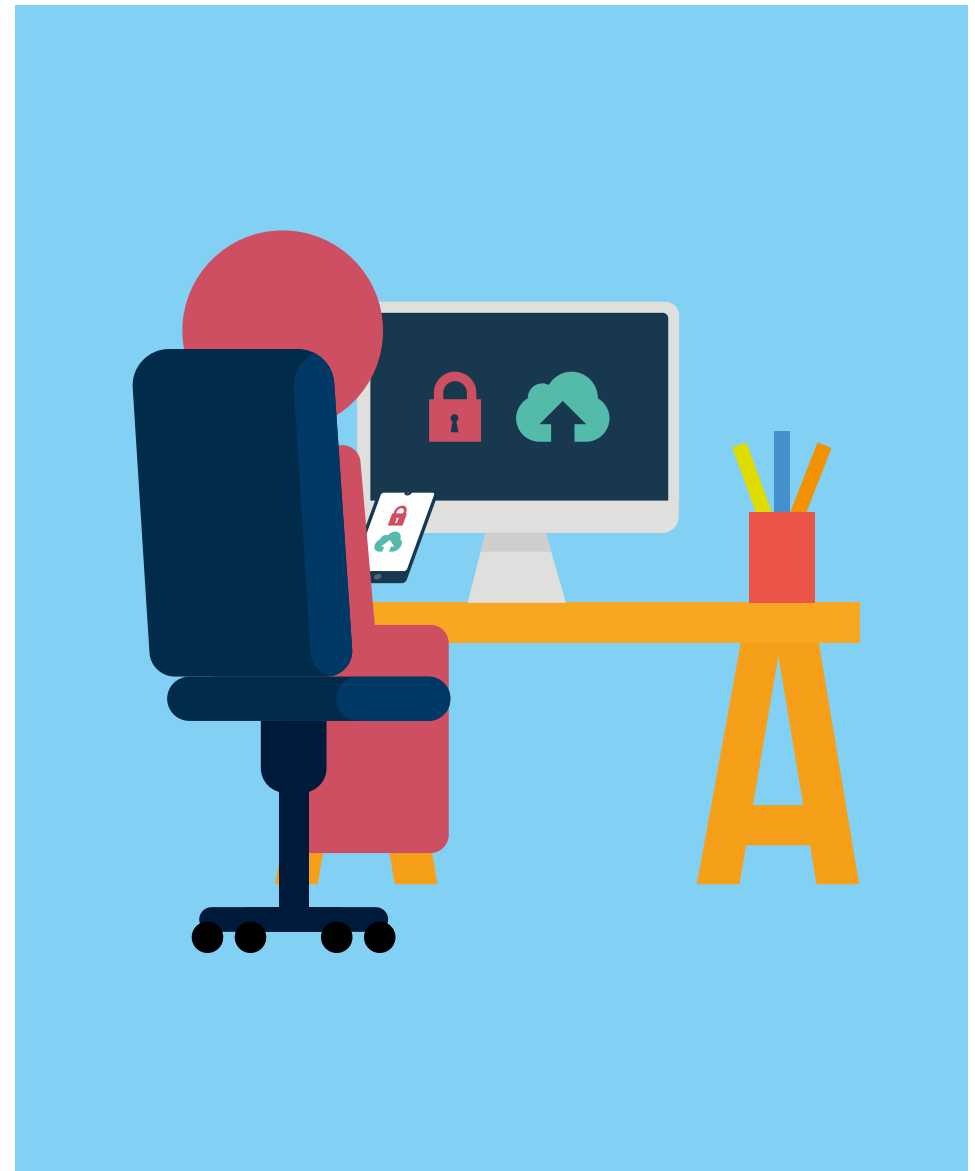
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CONTROL
OBJECTIVES

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PENSION ADMINISTRATION

1. Accepting clients

- Accounts are set up and administered in accordance with client agreements and applicable regulations.

- Complete and authorised client agreements are operative prior to initiating administration activity.

- Pension schemes taken on are properly established in the system in accordance with the scheme rules and individual elections.

2. Authorising and processing transactions

- Benefits payable and transfer values are calculated in accordance with scheme rules and relevant legislation and are paid on a timely basis.

3. Maintaining financial and other records

- Member records consist of up-to-date and accurate information and are updated and reconciled regularly.

- Contributions and benefit payments are completely and accurately recorded in the proper period.

- Scheme documents (deeds, policies, contracts, booklets) are complete, up to date and securely held.

4. Safeguarding Assets

- Member and scheme data is appropriately stored to ensure security and protection from unauthorised use.

- Funds are safeguarded and payments are suitably authorised and controlled.

5. Monitoring compliance

- Services provided to pension schemes are in line with service level agreements.

- Transaction errors are rectified promptly and Members treated fairly.

6. Reporting to clients

- Periodic reports to participants and scheme sponsors are accurate and complete and provided within required timescales.

- Annual reports and accounts are prepared in accordance with applicable law and regulations.

- Regulatory reports are made if necessary.

7. Restricting access to systems and data

- Physical access to computer networks, equipment, storage media and program documentation is restricted to authorised individuals.

- Logical access to computer systems, programs, master data, transaction data and parameters, including access by administrators to applications, databases, systems and networks, is restricted to authorised individuals via information security tools and techniques.

- Segregation of duties is defined, implemented and enforced by logical security controls in accordance with job roles.

CONTROL OBJECTIVES

INFORMATION TECHNOLOGY

8. Providing integrity and resilience to the information processing environment, commensurate with the value of the information held, information processing performed and external threats

- IT processing is authorised and scheduled appropriately and exceptions are identified and resolved in a timely manner.

- Data transmissions between the service organisation and its counterparties are complete, accurate, timely and secure.

- Appropriate measures are implemented to counter the threat from malicious electronic attack (for example firewalls and anti-virus software).

- The physical IT equipment is maintained in a controlled environment.

9. Maintaining and developing systems hardware and software

- Development and implementation of new systems, applications and software, and changes to existing systems, applications and software, are authorised, tested, approved and implemented.

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

10. Recovering from processing interruptions

- Data and systems are backed up regularly, retained offsite and regularly tested for recoverability.

- IT hardware and software issues are monitored and resolved in a timely manner.

- Business and information systems recovery plans are documented, approved, tested and maintained.

11. Monitoring compliance

- Outsourced activities are properly managed and monitored.

DATA PROTECTION / GDPR

12. Data Security

- Processing, storing and transmission of personal data is defined, implemented and enforced by security controls in accordance with job roles.

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CONTROL
TESTING

**The number of control objectives that
have been tested during 2022/23 via
the following methods are:**

CONTROL TESTING

No. of controls tested

Category	Internal Audit
Accepting Clients	1
Authorising and Processing Transactions	3
Maintaining Records	5
Safeguarding Assets	4
Monitoring Compliance	6
Reporting to Clients	0
Restricting Access	5
Integrity & Resilience	4
Maintainig Systems & Hardware	1
Recovering Processing	0
Monitoring IT Compliance	0
Data Security	3

■ Internal Audit

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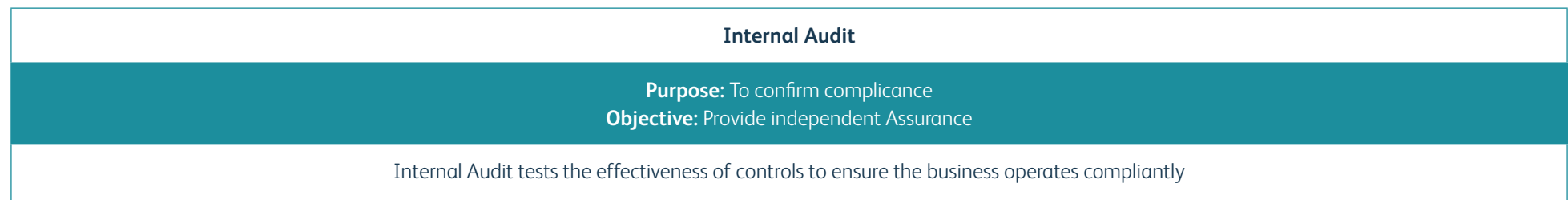# OVERVIEW OF INTERNAL AUDIT ACTIVITY 2022/23

The internal audit activity to assess the control objectives for the financial year ended 31 March 2023 was set out in the Internal Audit Plan 2022/23

OVERVIEW OF INTERNAL AUDIT ACTIVITY 2022/23

For the FY2022/23, 4 Internal Audits have been carried out in line with LPPA's Internal Audit Plan.

The audit remits were to ensure the appropriate controls are in place to mitigate risks to both LPPA and to the Client, as well as ensuring the LPPA values are being met which together drive a good customer experience.

The definition of Internal Audit is:

Internal Audit
Purpose: To confirm complicance **Objective:** Provide independent Assurance
Internal Audit tests the effectiveness of controls to ensure the business operates compliantly

1

Control Objective 1
Accepting Clients

2

Control Objective 2
Authorising and
Processing Transactions

3

Control Objective 3
Maintaining Financial
and Other Records

4

Control Objective 4
Safeguarding Assets

5

Control Objective 5
Monitoring Compliance

6

Control Objective 6
Reporting to Clients

7

Control Objective 7
Restricting Access to
Systems and Data

8

Control Objective 8
Providing integrity and resilience to the
information processing environment,
commensurate with the value of the
information held, information processing
performed and external threats

9

Control Objective 9
Maintaining and
developing systems
hardware and software

12

Control Objective 12
Data Security

OVERVIEW OF INTERNAL AUDIT ACTIVITY 2022/23

CONTROL OBJECTIVES ③ ④ ⑤ ⑦

Review

Operational Quality

Controls

Scheme documents (deeds, policies, contracts, booklets) are complete, up to date and securely held.

Member and scheme data is appropriately   stored to ensure security and protection from unauthorised use.

Services provided to pension schemes are in line with service level agreements.

Transaction errors are rectified promptly and Members treated fairly.

Segregation of duties is defined, implemented and enforced by logical security controls in accordance with job roles.

Controls

A consultative piece of work commissioned by LPPA's Executive Leadership Team. The intention being to flush out areas of concern and to identify the need for change or improvements. Immediate action has already been taken, including a new management structure, enhanced staff training and a strategic business plan 2023-26 seeking to address findings.

CONTROL OBJECTIVES ⑤ ⑥ ⑨

Review

Contractual SLA's

Controls

Services provided to pension schemes are in line with service level agreements.

Periodic reports to participants and scheme sponsors are accurate and complete and provided within required timescales.

Development and implementation of new systems, applications and software, and changes to existing systems, applications and software, are authorised, tested, approved and implemented.

Controls

A consultative piece of work to provide assurance to LPPA's ELT that UPM had been correctly configured to measure SLA's and the reporting was accurate.

Internal audit identified areas where the internal management information could be enhanced.

[n.b. following this initial piece of work, further work is ongoing around the SLAs]

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CONTROL OBJECTIVES 1 3 7 8

Review

Procurement & Vendor Management

Controls

Accounts are set up and administered in accordance with client agreements and applicable regulations.

Scheme documents (deeds, policies, contracts, booklets) are complete, up to date and securely held.

Physical access to computer networks, equipment, storage media and program documentation is restricted to authorised individuals.

IT processing is authorised and scheduled appropriately and exceptions are identified and resolved in a timely manner.

Controls

Procurement previously sat at LPP Group level and the Group undertook the process for the UPM administration system. There was no focus at the subsidiary level and no one point of ownership which was a known weakness for LPPA ELT. This audit provided focus and a dedicated LPPA point of ownership has been provided.

CONTROL OBJECTIVES 5

Review

Operational Capacity Planning

Controls

Services provided to pension schemes are in line with service level agreements.

Transaction errors are rectified promptly and Members treated fairly.

Controls

To consider the resourcing of LPPA and the effectiveness of resource planning to meet operational requirements.

Operational capacity is expected to improve as spikes in work, a consequence of Project PACE, are envisaged to be eliminated by the end of Q2 2023/24. This should then create the capacity to undertake further developmental activity.

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OVERVIEW OF LPPA RISK & COMPLIANCE ACTIVITY 2022/23

This section contains details of the quality assurance and compliance monitoring activity for the financial year ended 31 March 2023 in regard to the pension administration business

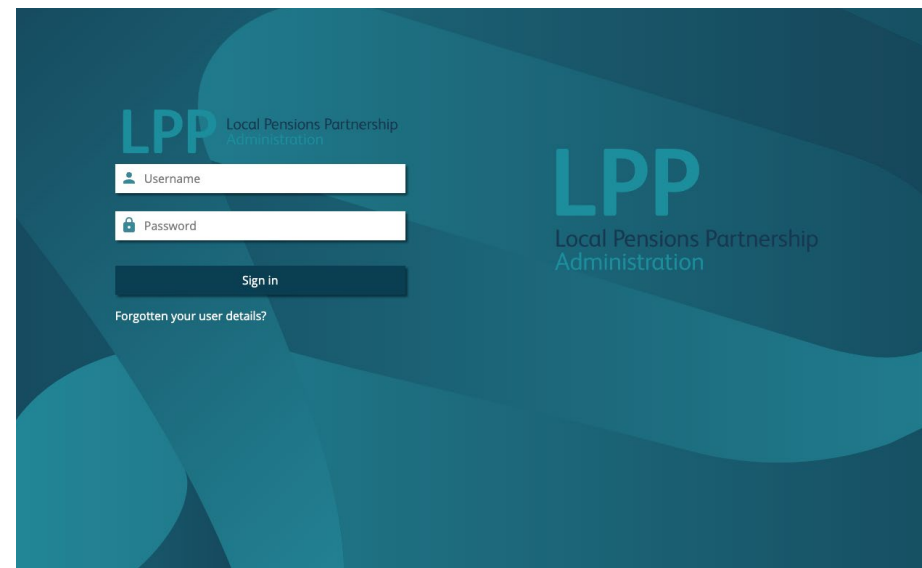## Reviews Conducted by LPPA's Quality Assurance & Compliance Monitoring Team:

The Quality Assurance & Compliance Monitoring Plan was suspended in October 2022 for the remainder of this reporting period, in order to support the delivery of Project PACE

The remit of the Quality Assurance & Compliance Monitoring team is to ensure that LPPA administers pensions on behalf of it's Clients to the highest standards and in compliance with all rules and regulations that apply to a pension administration business, which includes the pensions legislation, the Pensions Regulator's Code of Practice 14 and Data Security to name but a few. The assessment of this tests the processes and procedures to ensure the appropriate controls are in place to mitigate risks to both LPPA and to the Client, as well as ensuring the LPPA values are being met which together drive a good customer experience.

For the FY22022/23 LPPA's Quality Assurance & Compliance Monitoring Team have performed 3 reviews to compare processes in Altair to the same processes in UPM, to provide assurances that the controls in place within UPM are at least as robust as those previously in Altair.

The definition of Quality Assurance and Compliance Monitoring is:

Quality Assurance	Compliance Monitoring
Purpose: To drive business/process improvements **Objective:** An internal Management Tool	
Quality Assurance provides an early warning of any procedural/skills/ training gaps	Compliance Monitoring focuses on a process or business area to identify any inefficiencies or drive continuous improvement

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Compliance Monitoring

CONTROL OBJECTIVES ② ③ ④ ⑤ ⑦ ⑧ ⑫

Review	Controls	Controls
Bereavements Process	Benefits payable are calculated in accordance with scheme rules and relevant legislation and are paid on a timely basis.	Process improvements were identified.
	Member records consist of up-to-date and accurate information and are updated and reconciled regularly.	
	Benefit payments are completely and accurately recorded in the proper period.	
	Member and scheme data is appropriately stored to ensure security and protection from unauthorised use.	
	Funds are safeguarded and payments are suitably authorised and controlled.	
	Services provided to pension schemes are in line with service level agreements.	
	Transaction errors are rectified promptly and clients treated fairly.	
	Physical access to computer networks, equipment, storage media and program documentation is restricted to authorised individuals.	
	Segregation of incompatible duties is defined, implemented and enforced by logical security controls in accordance with job roles.	
	Data transmissions between the service organisation and its counterparties are complete, accurate, timely and secure.	
	Processing, storing and transmission of personal data is defined, implemented and enforced by security controls in accordance with job roles.	

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Compliance Monitoring

CONTROL OBJECTIVES   2   3   4   5   7   8   12

Review	Controls	Controls
Retirements Process	Benefits payable are calculated in accordance with scheme rules and relevant legislation and are paid on a timely basis. Member records consist of up-to-date and accurate information and are updated and reconciled regularly. Benefit payments are completely and accurately recorded in the proper period. Member and scheme data is appropriately stored to ensure security and protection from unauthorised use. Funds are safeguarded and payments are suitably authorised and controlled. Services provided to pension schemes are in line with service level agreements. Transaction errors are rectified promptly and clients treated fairly. Physical access to computer networks, equipment, storage media and program documentation is restricted to authorised individuals. Segregation of incompatible duties is defined, implemented and enforced by logical security controls in accordance with job roles. Data transmissions between the service organisation and its counterparties are complete, accurate, timely and secure. Processing, storing and transmission of personal data is defined, implemented and enforced by security controls in accordance with job roles.	Process improvements were identified.

Compliance Monitoring

CONTROL OBJECTIVES ② ③ ④ ⑤ ⑦ ⑧ ⑫

Review	Controls	Controls
Transfer & Aggregation Process	Benefits payable are calculated in accordance with scheme rules and relevant legislation and are paid on a timely basis. Member records consist of up-to-date and accurate information and are updated and reconciled regularly. Benefit payments are completely and accurately recorded in the proper period. Member and scheme data is appropriately stored to ensure security and protection from unauthorised use. Funds are safeguarded and payments are suitably authorised and controlled. Services provided to pension schemes are in line with service level agreements. Transaction errors are rectified promptly and clients treated fairly. Physical access to computer networks, equipment, storage media and program documentation is restricted to authorised individuals. Segregation of incompatible duties is defined, implemented and enforced by logical security controls in accordance with job roles. Data transmissions between the service organisation and its counterparties are complete, accurate, timely and secure. Processing, storing and transmission of personal data is defined, implemented and enforced by security controls in accordance with job roles.	Process improvements were identified.

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ACCREDITATIONS

ACCREDITATIONS

LPPA will continue to maintain the following accreditations in support of its control assurance framework.

Title	Expiry
ISO 27001	LPPA accreditation achieved in December 2022
Cyber Essentials	LPPA accreditation achieved in July 2022
PASA Membership	LPPA renewed membership in September 2022
Cyber Essentials Plus	LPPA accreditation achieved in September 2022
Pension Scams Industry Forum Membership	Ongoing since 2020
The Pensions Regulator's Pledge to Combat Pension Scams	Ongoing since 2020

In addition to the above accreditations, LPPA is proud to have participated in several industry body working groups in collaboration with DWP, LGA, NPCC.

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This Internal Control Assurance Report will be issued annually covering the previous financial year.