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## **LOCAL PENSION BOARD**

**Thursday, 24<sup>th</sup> March, 2016 at 2.00 pm in the Room 4, Civic Centre,  
Silver Street, Enfield, EN1 3XA**

### **Membership:**

Councillors : Dinah Barry, Andrew Stafford (Cabinet Member for Finance & Efficiency), Robert Hayward and Bishop

### **AGENDA – PART 1**

- 1. APOLOGIES AND DECLARATION OF INTERESTS & MINUTES: 2ND DECEMBER (Pages 1 - 6)**
- 2. SUMMARY OF PENSION POLICY & INVESTMENT COMMITTEE 2ND MARCH (Pages 7 - 14)**
- 3. FUND MANAGEMENT EXPENSES (Pages 15 - 16)**
- 4. KEY PERFORMANCE INDICATORS - UPDATE FROM INITIAL REVIEW AGAINST PENSION REGULATOR KPI'S (Pages 17 - 44)**
- 5. UPDATE ON CONSULTATION PAPERS ON POOLING & INVESTMENT REGULATIONS (Pages 45 - 52)**
- 6. BOARD TRAINING 2016/17 PROGRAMME**
- 7. WORK PLAN 2016/17**

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LONDON BOROUGH OF ENFIELD  
LOCAL PENSION BOARD  
1 DECEMBER 2015  
CIVIC CENTRE ENFIELD

MINUTES

Members

Cllr Dinah Barry (Chair) - Employer Representative  
*Cllr Robert Hayward – Employer Representative*  
 Cllr Andrew Stafford – Employer representative  
 Paul Bishop – Employee Representative  
 Pauline Kettless – Employee Representative  
 Robert Ayling – Employee Representative  
 Martin Keenan – Employee Representative  
*Eileen Carberry – Employee Representative*

Officers

Paul Reddaway – Head of Treasury and Pensions  
 Julie Barker - Head of Exchequer Services  
Also attending:

Cllr Toby Simon JP - Observer  
 Elaine Barber - Minute Clerk

*Italics denote absence*

1. APOLOGIES

**RECEIVED** an apology for absence from Eileen Carberry.

**NOTED** the absence of Councillor Hayward.

2. DECLARATION OF INTERESTS

None- other than those previously declared.

3. MINUTES 23 SEPTEMBER 2015 – PENSION BOARD

**RECEIVED** the Pension Board Minutes of the 23 September 2015, a copy of which is included in the Minute Book.

**NOTED** that the Minutes were agreed and signed by the Chair as a correct record, subject to the following amendment:

Accounts (Minute No 4(b))

A meeting with the Actuary was planned to take place in May 2016, with a report to

Members in October 2016.

4. UPDATE ON THE WORK OF THE PENSION POLICY AND INVESTMENT (PPI) COMMITTEE

**RECEIVED** the Minutes of the Pension, Policy and Investment Committee, dated 19 November 2015.

Paul Reddaway drew Members' attention to the relevant points of the Minutes.

**NOTED:**

(a) London CIV

The London CIV had been formed in response to Government's request for the LGPS to pool funds.

Baillie Gifford, a Global Equity Manager, had signed an agreement with the CIV and a number of London Boroughs were considering investing with them, thereby receiving a significant reduction in charges.

The PPI Committee had recently met with Lazard another Global Investment Manager and was unimpressed with their performance over the last 5 years. Following a meeting with Baillie Gifford Members unanimously agreed to withdraw the Funds invested in Lazard and reinvest in Baillie Gifford via the London CIV. It is anticipated funds will be invested in January/February 2016.

*Clerk's Note: Councillor Stafford left the meeting.*

(b) Passive Equity Holding

The transition of Passive Equity holdings into the London CIV would take place as soon as possible. The LBE Fund had invested in BlackRock, a Passive Global Equity, who was one of two managers who had signed up to the London CIV.

(c) Arcus

The PPI Committee would make a decision on the Arcus Liquidity offer by the end of January.

(d) Adams Street

The PPI Committee had met with Adams Street Partners, a Private Equity Manager and was impressed with their performance. Adams Street had 10 LGPS clients with 4, including the LBE Fund,, in the CIV. Fees had been lowered with effect from 2015 and LGPS subscriptions had been aggregated, resulting in a discount on investments.

Members resolved to continue with the annual \$10m subscription for 2016.

(e) Lazard

Due to the poor performance, the PPI Committee had agreed to dis-invest from Lazard, a Global Unconstrained Equity Fund. A portion of the investment, (c £60m) would be invested in Baillie Gifford. (see Minute 4(a))

5. PRESENTATION ON PENSION FUND MEMBERSHIP

**RECEIVED** “LGPS – Non Members“, a copy of which is included in the Minute Book and a verbal report from Rushil Sharma.

**REPORTED** that the report identified groups which made up the Non Members of the LGPS by analysing age, gender, workplace, part time or full time and income.

**NOTED** that

(a) currently the LBE pension scheme had:

- 7090 current members
- 4675 retired members
- 4850 deferred members
- 1420 frozen/undecided members
- 3928 non-members

(b) 2168 non- members were aged between 35 to 59 and made up 55% of the total non-members. Of this 55% - 1873 (86%) were female and 295 (14%) were male.

(c) 65% of non-members were from schools and 35% were from Corporate  
Of the 65% (2540) of School non-members 82.91% were female and 17.09% male.

(d) Corporate non- members - 68.1% (946) worked part time, 707 were female and 239 male.

(e) School non-members – 96.65% (2455) worked part time, 2058 were female and 397 male.

(f) 93.53% (3380) non-members were currently earning between £15,000 and £29,999 per annum. (no info on 269 non-members). 80% were female and 20% male.

(g) focusing on non- members who earned between £0 - £30,000 the LGPS could receive an estimated £4.3M if they opted into the pension scheme. If all non-members opted in the scheme would receive an additional £4,908,928 in contributions.

(h) Members discussed the data and ways to try and encourage non- members to join the scheme .It was agreed that the pension fund is one of the benefits of working for the council and that we would like our officers to take advantage of this if at all possible.

- (i) Members thanked Rushil Sharma and Julie Barker for the presentation.

6. INFORMATION UPDATE ON LGPS ISSUES AND CONSULTATIONS

**RECEIVED** “Administering Authority Briefing Paper”, a copy of which is included in the Minute Book and a verbal report from Julie Barker.

**REPORTED** that Julie Barker and Paul Reddaway were in the process of completing a compliance list for the pension’s regulator. Julie Barker had started the document following consultation with Aon Hewitt, Actuary, and would report back to Members at the next meeting.

**ACTION: JULIE BARKER**

**NOTED:**

(a) Code of Practice

The new framework covered 4 core areas:

- Governing Your Scheme
- Managing Risk
- Administration
- Resolving Issues

(b) Annual Benefits Statements

According to a survey, only 7 out of 73 administering authorities would meet the 31<sup>st</sup> August statutory deadline for issuing 2015 statements. Statements must be issued by 30 November 2015.

The LBE Fund has 3 membership groups requiring statements

- Deferred Members
- Active Members
- External Employers

Deferred Members’ statements had been sent.

Active Members would be sent at the end of the week

External Employers would be delayed due to insufficient evidence from Employers. The Pension Regulator would be advised of the non-compliance.

Members discussed the problem and agreed that, if the Fund was fined due to External Employers failure to provide information, the fine should be passed on to them.

(c) Guaranteed Minimum Pension Reconciliation

Due to a change in the Pensions Act 2014, LGPS employers and employees

would suffer an increase in National Insurance Contributions from April 2016.

HRMC would withdraw the current contracted out query service at the end of December 2018. Also, members receiving a statement from HRMC would hold the LBE Fund responsible for paying out contracted benefits and the Authority would be required to reconcile the contracted out membership and GMP records with those held by HRMC by December 2018. As this was a complex exercise it was expected to take a considerable time. Therefore, in the New Year, LBE would register with the Scheme Reconciliation Service (SRS) and start a procurement process to find a suitable third party to assist with this enormous task.

(d) Annual Allowance

The changes to the annual allowance for tax relief on pensions would affect 10 members this year. However, none would incur a tax liability. More members would be affected next year.

(e) Life Time Allowance

The lifetime allowance (LTA) was gradually being reduced from £1.8m in April 2011 to £1m in April 2016. The reduction of the LTA had caused a number of “high earners” to leave the scheme.

(f) New Pension Web Page

Julie Barker would provide an update at the next meeting.

**ACTION: JULIE BARKER**

(g) Members Self Service Update

Due to work demands, the project had been delayed. It was planned to resume the project in the New Year, when a pilot scheme would be launched.

(h) Enfield 2017

The Pension Team had responded to a large number of follow up queries from staff affected by the transformation and was currently meeting deadlines to calculate actual pension grants and capital costs. Staff had been notified and payments processed when leaving notices were received.

The board to asked for the cost and amount of officer time spent on providing advice for fund members.

**ACTION: JULIE BARKER**

7. WORK PROGRAMME FOR NEXT MEETING

- Manager Expenses

**ACTION: PAUL REDDAWAY**

8. DATE OF NEXT MEETING

Thursday 24 March 2016 @ 2:00pm – Enfield Civic Centre.

A training session on Pension Fund Administration and Benefits would be arranged in February 2016.

**ACTION: JULIE BARKER**

The meeting closed at 4:15pm.

Signed .....  
Chair of Pension Board

Date.....



**LONDON BOROUGH OF ENFIELD**  
**PENSION POLICY & INVESTMENT COMMITTEE**  
**2 MARCH 2016**  
**AON HEWITT – 10 DEVONSHIRE SQUARE @ 10.45 am**

**MINUTES**

**Members:**

Councillor T. Simon JP (Chairman)  
Councillor T. Neville OBE JP  
Councillor D. Levy  
Councillor D. Pearce  
Councillor D. Taylor  
Carolan Dobson – Independent Advisor

**Absent**

Councillor J. Jemal

**Officers**

Paul Reddaway – Head of Pensions

**Also attending:**

Daniel Carpenter – Aon Hewitt  
Rohan Meswani – Aon Hewitt

1. **APOLOGIES FOR ABSENCE, DECLARATION OF INTERESTS & MINUTES**

**NOTED** that

- (a) Carolan Dobson is a non-executive Director of a Blackrock investment fund.
- (b) The minutes of the meeting on 19<sup>th</sup> November 2015 were accepted as being a true record.
- (c) An apology for absence was received from Cllr Jemal.

2. **MANAGEMENT FEES**

**RECEIVED:** “Fund Management fees briefing note”, a copy of which is included in the Minute Book.

**REPORTED:** Paul Reddaway presented a briefing paper setting out the full cost of management fees for year ended 31<sup>st</sup> March 2015.

**NOTED** that

- (a) The IFRS accounting regulations require the year end accounts to only record management fees that were invoiced; this position understates the true cost of managers fees.

- (b) The fees schedule set the annual cost for each manager. The total cost for 2014/15 was £5.8m compared to £1.2m reported in the accounts. The costs however, excluded any dealing costs or in the case of Adams Street (a Fund of Fund manager), fees paid to other managers not directly appointed by Enfield. The total cost would be closer to £7m.
- (c) Members were content to pay fees where it contributed to outperformance, but recognised the disparity between active managers & passive managers' fees.
- (d) It was agreed the full cost of managers' fees would be shown as a disclosure note in the Pension Fund accounts & Annual report. This would increase the level of transparency and reflect the true costs of fund management.

3. **LONDON CIV PRESENTATION**

**RECEIVED:** "The London CIV an update", a copy of which is included in the Minute Book and a verbal presentation from Hugh Grover & Freddie Fuller.

The Chairman thanked Hugh Grover & Freddie Fuller for their informative presentation.

**NOTED** that

- (a) The CIV has received its first investments and has 32 London boroughs.
- (b) It hopes to open the Baillie Gifford Global Alpha fund within the next few weeks, slightly delayed due to issues over Irish stamp duty.
- (c) New funds will open over the coming year. They are currently looking at Fixed Income.

**RESOLVED**

- (i) The fund should invest £73m in the BG fund with proceeds from the Lazard mandate and part of the Trilogy mandate.
- (ii) Given that there is a £1bn cap on the BG fund for the CIV, officers should make a formal request at the earliest opportunity to reserve £73m for Enfield.

**ACTION:** PAUL REDDAWAY

4. **PRESENTATION BY BLACKROCK ON LONDON CIV & PROPERTY FUND**

**RECEIVED:** "The Blackrock – London CIV & Property Review ", a copy of which is included in the Minute Book, and a verbal presentation from Chris Head & John Harding.

**NOTED** that

- (a) Blackrock explained how Enfield's Blackrock passive funds could be transferred into the London CIV.
- (b) Blackrock is also submitting revised management fee charges to the CIV, but at this stage were unable to disclose them.
- (c) Blackrock explained that 4 London Boroughs had investments in their Property Fund (including Enfield) and would work with the boroughs regarding the transition of the Fund into the London CIV.
- (d) Blackrock explained why the Property Fund had under-performed. Main reasons revolved around too defensive a position (the doctors' surgeries offer a secure yield, but lower returns) at a time when capital values were increasing and because of the transition costs from the capital being deployed from the sales of the marinas. They expect to see most of the growth coming from increased rentals rather than capital growth. The vacant properties in the portfolio offer beneficial opportunities.

5. **BOND PORTFOLIO**

**RECEIVED:** "Bond Portfolio review", a copy of which is included in the Minute Book and a verbal presentation from Rohan Meswani.

**NOTED** that

- (a) Blackrock ILG's are held on a buy & hold basis. Maturity of an index-linked gilt in July means this an opportune time to consider re-visiting the ILG holdings.
- (b) One option is to move into a Blackrock pooled passive fund.
- (c) Consideration was given to moving the Western Index linked gilts to the pooled fund (index linked gilts form 10% of the Western portfolio).
- (d) Western Asset would be retained to run a purely Corporate Bond Portfolio.

**RESOLVED**

Transfer Blackrock segregated ILG holdings to a suitable passive pooled fund with Blackrock. Aon Hewitt to provide a view on an appropriate pooled fund(s) to offer a suitable duration spread

**ACTION: AON HEWITT**

6. **QUARTERLY INVESTMENT REPORT AND QUARTERLY INVESTMENT OUTLOOK**

**RECEIVED:** “Quarterly Investment Report Q4 2015”, a copy of which is included in the Minute Book.

**REPORTED**

**REPORTED:** The Fund had increased in value over the quarter by 4% against the benchmark of 3.3%. The Fund is ahead of the benchmark for the year by 2.3%. Over the year the fund has increased by 5.6%. This has been helped by the fund’s exposure to alternative investments and exposure to the dollar.

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**NOTED:**

- (a) Blackrock: Passive Global Equity

That, now the due diligence on the AQR Fund had been completed, the Emerging markets holding of £7m (approx.) in the Blackrock Aquila Emerging Markets Fund be disinvested and reinvested in AQR with the balance (required to bring the investment up to £15m) being sourced from the Trilogy mandate.

**ACTION: PAUL REDDAWAY**

- (b) Trilogy: Global Unconstrained Equity

The Fund had out-performed the benchmark by 0.5% this quarter. However, since inception they have been -0.1% below the benchmark.

**NOTED**

**NOTED:** That a ‘value’ manager should be in the portfolio; three growth style managers was not a good long term position in the portfolio and another style mandate, within the CIV, should be sought.

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**RESOLVED: RESOLVED:  
RESOLVED:**

The investment be reduced to allow £73m to be invested in the BG Global Alpha Fund (most of which would come from the Lazard mandate) and £27m in AQR. The aim would be to close the mandate when a suitable value-investment-style manager was available within the CIV.

In the light of Trilogy's benchmark-like performance since inception and the desire to compose a global equity portfolio which is diversified by manager and style, the Committee to consider a manager to replace Trilogy in the global equity portfolio later in the year in conjunction with options available on the London CIV platform.

**ACTION: AON HEWITT/PAUL REDDAWAY**

- (c) MFS: Global Unconstrained Equity

MFS Global Equity strategy underperformed the MSCI World Index by -1.1% over the quarter. However they are ahead of the benchmark since inception by 3.3%.

(d) Lazard: Global Unconstrained Equity

Lazard Global Unconstrained Equity strategy had underperformed the benchmark by -0.5% over the quarter and -3.3% behind the benchmark since inception. Funds will be moved away from Lazard once the BG Global fund is opened on the CIV.

**RESOLVED**

**RESOLVED:** To close the mandate once the BG Global Fund is opened on the CIV.

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**ACTION: AON HEWITT/PAUL REDDAWAY**

(e) Adams Street: Private Equity

Performance of the underlying ASP funds continues to be very strong over all major time periods.

(f) Lansdowne: Developed Markets Hedge Fund

The Fund continued to perform well, with a 2.2% return over the quarter, with performance over the year at 16.9%.

(g) York: Distressed Securities Hedge Fund

The Fund lost -5.4% in dollar terms over the quarter. However, GBP returns were greater given the appreciation of the dollar over the quarter. All strategies were a detractor this quarter. Distressed Credit & Equities made the biggest negative contributions during the quarter, mainly from commodities & oil.

(h) Brevan Howard: Global Macro Hedge Fund

The Fund had another disappointing quarter, and has now experienced losses in capital, which raises concern over the viability of this strategy. This has to be tempered by the fact that the Fund has recovered losses over January & February.

**RESOLVED**

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**RESOLVED** Aon Hewitt to complete their review of Brevan Howard and to report back to the Investment Committee.

~~Aon Hewitt to complete their review of Brevan Howard and to report back to the Investment Committee.~~

**ACTION AON HEWITT**

(i) Davidson Kempner- Event Driven Hedge Fund

During a difficult period for event-driven strategies & distressed debt investing, this multi-strategy fund continues to protect capital. The fund advanced 0.3% in dollar terms and 3.1% in GBP terms.

(j) Gross Global Investors – Event Driven Hedge Fund.

Appointed March 2015 and had slightly underperformed in the quarter.

(k) Blackrock: UK Property

Performance over the 4th quarter was 2.5%, which was 0.3% behind its benchmark. The underperformance was discussed in section 4.

(l) LGIM: UK Property

The Fund had returned 3.0% over the quarter which was ahead the benchmark of 2.8%, but are -0.6% behind the benchmark over the past 12 months. The underperformance has come from a long running void property on the Birmingham retail park. Over a 3 year period the Fund has returned 12.6%pa compared to a benchmark return of 12.2%. The cash holding has slightly increased over the quarter but is significantly lower than the cash holding at the end of June 2014 – 18.3%.

(m) Brockton – Opportunistic Property

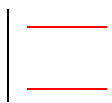
**REPORTED:** The Fund finally closed on 12<sup>th</sup> February. The business plans for purchases are on target. The Fund has now acquired 6 properties. Following the close of the fund Brockton returned £2.6m to the Fund as part of the equalisation payment. Therefore, the capital called to date is £6m and undrawn commitments are at £14m.

(n) Arcus: European Infrastructure

**REPORTED:** Following a meeting with Arcus in January the Fund had lost confidence in the manager and had therefore decided to give notice to liquidate its holding with Arcus subject to Arcus's ability to find a buyer for Enfield's complete holding. The outcome of this request will be known by the end of April.

(o) INPP: Listed PFI

**REPORTED:** INPP continue to perform above expectations and declared an interim dividend of 3.225%, with the final dividend expected to be 6.45%. INPP is currently trading at around a 7% premium to NAV (ex-dividend).



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(q) Western: Bonds

**REPORTED:** The quarter 4 performance was flat and long term performance continues to lag the benchmark.

**RESOLVED**

**RESOLVED** It was agreed to move the existing Western ILG holdings to a Blackrock pooled fund and amend the Western benchmark to be Investment Grade Credit only. Also to review the existing Western guidelines around the flexibility they have to invest in non-benchmark holdings. Aon Hewitt to work with Western to draft appropriate guidelines.

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**ACTION: AON HEWITT**

(r) M&G: Inflation Opportunities

The Inflation Opportunities Fund had returned 0.4% over the 4<sup>th</sup> quarter. Since inception the fund has returned 4% p.a. The Fund performs in line with expectations. The Fund still has 15.7% allocation to index linked gilts. The Manager has reported pricing pressures on the back of strong demand from Pension Schemes.

(s) Insight Absolute Return Bond Fund

The manager returned 0.6% over the quarter. Performance continues to be subdued but continues to protect capital.

7. ARCUS UPDATE

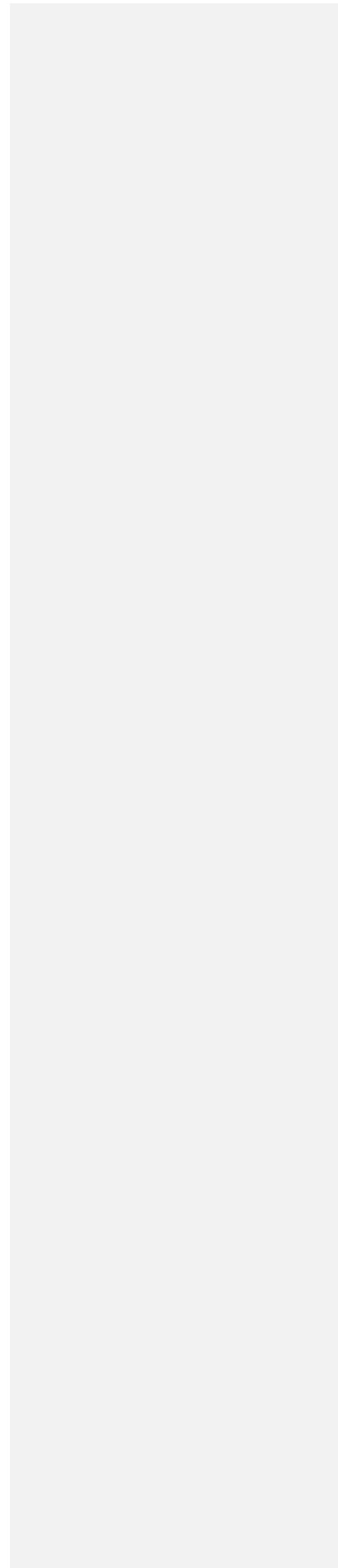
(a) As above.

**Meeting Closed at 2:45pm.**

Signed.....

Date.....

Chairman of Pension Policy & Investment Committee





London Borough of Enfield Pension Fund 2014-15: Analysis of Fund Managers Fees						
	AUM 31 March 2015	Management Fees	Tiered Fees	Performance Fee	2014/15	Notes/comments
	£	£		£	£	
<b>Equity</b>						
Blackrock passive	119,159,979.92	0.06%			105,377.93	Invoiced fees
Trilogy	119,930,927.12	0.50%			527,671.00	Invoiced fees
MFS	72,182,789.00	0.53%	Y		336,593.64	
Lazard	36,115,624.00	0.67%	Y		320,533.95	
INPP	24,189,081.93	0.00%				
Adam Street	45,124,491.66				482,826.23	
<b>Bonds</b>						
WAM	84,648,938.38				193,014.87	Invoiced fees
ILB	69,874,806.01					Invoiced fees
M&G	33,514,722.56	0.37%	Y		117,971.00	
Insight	30,812,340.95				140,626.82	Invoiced fees
<b>Property</b>						
Blackrock Property	36,581,090.36	1.00%			345,436.70	
L&G	25,669,830.58	0.59%	Y		149,491.26	Invoiced fees
Arcus	17,280,200.00	1.00%			215,412.00	
Brockton	12,518,686.00	1.40%			72,185.07	Funded from December 14
<b>Hedge Funds</b>						
York Capital	16,613,703.77	1.50%		20.0%	237,960.49	
Lansdowne	51,183,307.00	1.50%		20.0%	1,465,975.34	Estimated \performasnce fee
Brevan Howard	17,838,577.35	1.50%		20.0%	255,772.77	
Avenue		1.50%		20.0%	238,554.38	Liquidated Jan 15
Davidson Kempner	20,413,496.00	1.50%		20.0%	118,174.31	Funded January 15
Blue Crest	22,787,220.72	2.00%		20.0%	479,944.38	Notice given on Fund
Gruss	20,134,906.00	1.50%		15.0%	49,509.99	Funded February
Cash	11,015,926.00					
	<b>887,590,645.31</b>				<b>5,853,032.12</b>	
					<b>1,116,181.88</b>	Amount shown in a/c 14/15
<b>Not shown in accounts</b>					<b>4,736,850.24</b>	

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# The Pension Regulator's and Scheme Advisory Board Compliance Checklist

Date of Completion: 12/02/2016

## Contents

- Introduction
- Summary Results Dashboard
- A - Reporting Duties
- B - Knowledge and Understanding
- C - Conflicts of interest
- D - Publishing information about schemes
- E - Managing risk and internal controls
- F - Maintaining accurate member data
- G - Maintaining contributions
- H - Providing information to members and others
- I - Internal Dispute Resolution
- J - Reporting breaches of the law
- K - Scheme Advisory Board - Guidance on the creation and operation of Local Pension Boards in England and Wales

## Introduction

This document outlines how Enfield Council complies with the Pensions Regulator's (TPR) Code of Practice No 14 Governance and administration of public service pension schemes ('the TPR Code') in relation to the management of the London Borough of Enfield Pension Fund which is part of the Local Government Pension Scheme (LGPS). It will be updated regularly by officers of the Fund and reported annually to the Pensions Committee and Pension Board (generally in June/July each year).

This document highlights all the key elements of the TPR Code and then evidences whether Enfield Council meets these areas of best practice. As part of this evidence it shows when the element was last checked and whether, at that point, it was considered fully, partially or not compliant. Where they are partially or not compliant, it also highlights whether the Council have identified actions to be carried out to improve their current practices. Where an element is not yet active, the commentary will generally still highlight where advanced progress is being made.

Those reading this document should be mindful that the TPR Code applies equally to all public service pension schemes and therefore it is generic in nature. There may be a number of elements that are more specifically stipulated within LGPS legislation and it is not the purpose of this compliance checklist to consider that level of detail.

Further, Enfield Council may also incorporate key elements of national guidance from the LGPS Scheme Advisory Board into this compliance checklist. This version contains the checklists included as part of the Shadow Scheme Advisory Boards "Guidance on the creation and operation of Local Pension Boards in England and Wales".

## Key

**Frequency of review and last review date:** Where a process, policy or practice is officially reviewed at a set interval, the actual interval will be shown as well as the last interval date. However, in many circumstances processes and procedures are ongoing and part of the day – to - day operation of the Fund. In these circumstances, an annual check will be carried out to ensure that the ongoing process meets the TPR Code expectations and therefore the date shown will be the date that annual check was carried out and the frequency will be shown as "ongoing (annual check)".

Completed:	Compliant:	Where responsibility relates to employers:
Fully completed	Fully compliant	Employers - Fully compliant
In progress	Partially compliant	Employers - Partially compliant
Not started	Non-compliant	Employers - Non-compliant
Not yet relevant	Not yet relevant	Not yet relevant

### Definitions:

<i>PSPA13</i>	Public Service Pensions Act 2013
<i>LGPS</i>	Local Government Pension Scheme
<i>TPR</i>	The Pensions Regulator
<i>TPR Code</i>	The Pensions Regulator's Code of Practice No 14 Governance and administration of public service pension schemes
<i>Scheme Manager</i>	For the London Borough of Enfield Pension Fund, this is Enfield Council.
<i>Administering Authority</i>	The LGPS specific term for Scheme Manager. For the London Borough of Enfield Pension Fund, this is Enfield Council.
<i>IDRP</i>	Internal Dispute Resolution Procedure
<i>SAB</i>	The national LGPS Scheme Advisory Board
<i>PC</i>	Pensions Committee
<i>PB</i>	Pension Board

## Summary Dashboard

A dashboard showing the summary of the results of the latest compliance checklist is shown below:

No.	Completed	Compliant
<b>Reporting Duties</b>		
A1	In progress	Not yet relevant
A2	Not yet relevant	Not yet relevant
A3	Not yet relevant	Not yet relevant
A4	Not started	Non-compliant
<b>Knowledge and Understanding</b>		
B1	In progress	Non-compliant
B2	Fully completed	Fully compliant
B3	In progress	Partially compliant
B4	Fully completed	Fully compliant
B5	In progress	Partially compliant
B6	In progress	Partially compliant
B7	In progress	Partially compliant
B8	In progress	Partially compliant
B9	Fully completed	Fully compliant
B10	In progress	Non-compliant
B11	In progress	Partially compliant
B12	Not started	Non-compliant
<b>Conflicts of Interest</b>		
C1	Fully completed	Partially compliant
C2	Fully completed	Partially compliant
C3	In progress	Non-compliant
C4	In progress	Non-compliant
C5	Not started	Non-compliant
C6	In progress	Partially compliant
C7	In progress	Non-compliant
C8	In progress	Non-compliant
C9	Fully completed	Fully compliant
C10	Fully completed	Fully compliant
C11	Fully completed	Fully compliant
<b>Publishing Information</b>		
D1	In progress	Partially compliant
D2	Fully completed	Partially compliant
D3	Not yet relevant	Not yet relevant
D4	Fully completed	Partially compliant

No.	Completed	Compliant
<b>Risk and Internal Controls</b>		
E1	In progress	Non-compliant
E2	Fully completed	Fully compliant
E3	Fully completed	Fully compliant
E4	In progress	Fully compliant
E5	Fully completed	Fully compliant
E6	In progress	Non-compliant
E7	Fully completed	Partially compliant
E8	In progress	Partially compliant
<b>Maintaining Accurate Member Data</b>		
F1	Fully completed	Partially compliant
F2	Fully completed	Partially compliant
F3	Fully completed	Fully compliant
F4	Fully completed	Fully compliant
F5	Fully completed	Fully compliant
F6	Fully completed	Fully compliant
F7	Fully completed	Non-compliant
F8	Fully completed	Partially compliant
F9	Not started	Non-compliant
F10	Fully completed	Partially compliant
F11	Fully completed	Partially compliant
<b>Maintaining Contributions</b>		
G1	Fully completed	Partially compliant
G2	In progress	Partially compliant
G3	Fully completed	Partially compliant
G4	In progress	Non-compliant
G5	Fully completed	Partially compliant
G6	Fully completed	Fully compliant
G7	Fully completed	Employers - Fully compliant
G8	In progress	Non-compliant
G9	In progress	Non-compliant
<b>Providing Information to Members and Others</b>		
H1	In progress	Employers - Non-compliant
H2	Fully completed	Partially compliant
H3	Fully completed	Fully compliant
H4	Fully completed	Partially compliant
H5	Fully completed	Fully compliant
H6	Fully completed	Fully compliant

No.	Completed	Compliant
H7	Fully completed	Employers - Partially compliant
H8	Fully completed	Partially compliant
H9	Fully completed	Fully compliant
H10	Fully completed	Fully compliant
H11	Fully completed	Fully compliant
H12	Fully completed	Fully compliant
H13	Fully completed	Fully compliant
<b>Internal Dispute Resolution</b>		
I1	Fully completed	Fully compliant
I2	Fully completed	Non-compliant
I3	Fully completed	Fully compliant
I4	Fully completed	Fully compliant
I5	Fully completed	Partially compliant
I6	Fully completed	Fully compliant
I7	Fully completed	Fully compliant
I8	Fully completed	Partially compliant
I9	Fully completed	Fully compliant
<b>Reporting Breaches</b>		
J1	In progress	Non-compliant
J2	In progress	Non-compliant
J3	In progress	Partially compliant
<b>Scheme Advisory Board Requirements</b>		
K1	Fully completed	Fully compliant
K2	Fully completed	Fully compliant
K3	In progress	Non-compliant
K4	Fully completed	Fully compliant
K5	In progress	Partially compliant
K6	In progress	Partially compliant
K7	In progress	Non-compliant
K8	Fully completed	Fully compliant
K9	Fully completed	Fully compliant
K10	In progress	Partially compliant
K11	In progress	Partially compliant
K12	In progress	Non-compliant
K13	In progress	Non-compliant
K14	In progress	Partially compliant
K15	Fully completed	Fully compliant

## 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. In addition, all schemes must provide a regular scheme return to TPR, containing prescribed information. A return is required when the scheme receives a scheme return notice from the regulator. The scheme manager must also keep the regulator informed of any changes to registrable scheme details.

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

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
A1	Is your scheme registered with the Pension Regulator?	Head of Finance - Pension Investment (HoFPI - Paul Reddaway) believes the Fund must be registered as was sent the survey to complete, but will contact TPR to update confirm and update contact details.  HoFPI will review annually to see if updates required (TBC by HoFPI)	Annual	01/12/2015	In progress	Not yet relevant	New registration will only be required if a new LGPS is created that is deemed to be a separate scheme	HoFPI to contact TPR to confirm registration and update contact details so future correspondence comes to HoFPI
A2	Is the information held on the Pensions Regulator's website about the scheme up-to-date?	Intention will be, if possible, to update as employers join or leave the scheme and check annually for overall accuracy.	Ongoing (annual check)	Dec-15	Not yet relevant	Not yet relevant	Will commence when log in facility is made available to the public sector schemes.	
A3	Have you completed this latest Scheme Return in the required timescale?	Not yet been sent to funds to complete	As and when received	Dec-15	Not yet relevant	Not yet relevant		
A4	Have you responded to the latest TPR public service pension scheme survey/questionnaire?	Not responded to respond to the survey sent in summer 2015 (voluntary) - intention is to respond to each survey received, including on voluntary basis.	As and when received.	Dec-15	Not started	Non-compliant		Respond to future surveys

## 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.

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.

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.

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
B1	Are there policies and arrangements in place to support pension board members in acquiring and retaining knowledge and understanding?	Training approach not currently set out in a formal document. This is to be drafted before the next PB meeting in March 2016, and will be reviewed annually. Will include objectives and how training will be documented and monitored, alongside development of an interactive recording/monitoring spreadsheet.	Annual	n/a	In progress	Non-compliant	To be adopted by pension board formally once drafted.  A model is also being developed to capture individual training needs against CIPFA requirements/TPR toolkits, and to monitor against those specific requirements.	Meeting in March - aim to have draft Policy at meeting - Policy should cover PB and PPIC and officers
B2	Has a person been designated to take responsibility for ensuring the framework is developed and implemented?	HoFPI is responsible for training, and will have responsibility for the Training Policy and its implementation, including the maintenance of the monitoring spreadsheet tool - this responsibility will be set out in the training policy which is currently being drafted.	Ongoing (annual check)	n/a	Fully completed	Fully compliant		
B3	Is the Fund providing assistance to pension board members to determine the degree of knowledge and understanding required?	PB Members have had induction training based on CIPFA requirements, which has given an indication of the knowledge requirements.  Level of knowledge required will be set out in Training Policy and shared with PB members in March 2016 meeting.  Monitoring spreadsheet will identify gaps in required knowledge and feed into training plans for the year.  Policy will recommend use of the TPR toolkit which will help members obtain minimum levels of knowledge and understanding.	Ongoing (annual check)	01/12/2015	In progress	Partially compliant		
B4	Are the roles and responsibilities of pension boards and members of pension board clearly set out in scheme documentation?	Core functions of the board, terms of office and duties are included in the Board's Terms of Reference which has been formally agreed. The ToR is based on the SAB board draft TOR template, but has been tailored appropriately to Enfield's circumstances.  Requirements for training and knowledge will also be set out in the Training Policy being drafted.	TOR is reviewed at least every 4 years	Agreed by board at 31 July 2015 meeting	Fully completed	Fully compliant		
B5	Are pension board members aware of their legal responsibility in terms of Knowledge and Understanding?	Will be set out in training policy, but also mentioned in Terms of Reference, so PB members are already aware of their responsibilities - also responsibilities mentioned in initial meeting on 31 July 2015	Ongoing (annual check)	31/07/2015	In progress	Partially compliant		

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
B6	Have all pension board members got access to copies of the scheme rules and relevant Fund documentation?	<p>Each set of meeting minutes from the Pension Policy and Investment Committee is circulated to PB members, and they are read at PB meetings.</p> <p>The Fund Annual report and key documents were provided in PB initial meeting - and key documents are also available online for PB members.</p> <p>The Website is also being upgraded and as part of that the HoFPI will ensure all the key documents are available on the website. HoFPI mentioned to the Board the key items when he distributed the annual accounts in the meeting - and explained which bits of the accounts to focus on.</p>	Ongoing (annual check)	31/07/2015	In progress	Partially compliant		
B7	Is there an up-to-date list of the Fund specific documents with which pension board members need to be conversant in?	<p>The training policy being drafted will set out the requirements (and this will be given to existing PB members and new PB members when they join). There isn't a formal list of documents yet but will be included in training policy.</p> <p>The Website is also being upgraded and as part of that the HoFPI will ensure all the key documents are available on the website. HoFPI mentioned key items when he distributed the annual accounts in the meeting - and explained which bits of the accounts to focus on.</p>	Ongoing (annual check)	31/07/2015	In progress	Partially compliant		
B8	Are all pension board members investing sufficient time in their learning and development?	<p>Training is currently carried out at each PB meeting according to need and what is to be discussed in the meeting - main training provided so far has been on investments.</p> <p>All employee members have gone on Unison training and some sent on initial training course. Chairman has had significant training.</p> <p>Training on investments has been on hedge funds, private equity, and there is administration training planned for next meeting.</p> <p>Provided members attend the meetings, this is considered sufficient to meet requirements.</p>	Ongoing (annual check)	Ongoing	In progress	Partially compliant		<p>Suggest training plans are agreed when annual business planning exercise takes place.</p> <p>Suggest method of monitoring of training included in policy - training tool mentioned above can be used for this purpose and certificates used in annual reports or posted online.</p>
B9	Does the Fund offer pre-appointment training for new pension board members or mentoring by existing members?	<p>2 employee members had pre appointment training. From the Employer side, members were on the old pension board (now PPIC) so they are already familiar with pensions and the Fund.</p> <p>However, there is also induction training provided for new members upon joining.</p> <p>One employer PB member has not attended/completed as much training as would be desired and so the aim is to formally document a training plan for PB members and monitor attendance, as mentioned above.</p>	Ongoing (annual check)	31/07/2015	Fully completed	Fully compliant		



No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
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?	This will be developed in new spreadsheet tool (details in notes). Training will be an item on agenda at each meeting	Ongoing (annual check)	01/12/2015	In progress	Non-compliant	A model is being developed to capture individual training needs against CIPFA requirements/TPR toolkits, and to monitor against those specific requirements, including providing individual certificates.	Recommend that annual review of records kept from tool (in PB or PPIC meetings) will highlight any individuals with outstanding requirements (PPIC, PB and officers).
B11	Are records of learning activities being maintained?	HoPFI currently has a record of what courses people have been on (at individual level for past 3 years), but need to formalise it in spreadsheet tool being developed, and maintain this regularly. The tool can print certificates for knowledge covered in last 3 years' training.	Ongoing (annual check)	01/12/2015	In progress	Partially compliant		
B12	Have the pension board members completed the Pension Regulator's toolkit for training on the Code of Practice number 14?	It is the intention that all PB and PPIC members will undertake this online training. It may be incorporated into training as part of meetings. This will be included in training plans and policy.	Ongoing (annual check)	n/a	Not started	Non-compliant		Suggest a module is covered in each early PB meeting as a group and then individuals can complete in their own time for certification.

## 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:

- 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.

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

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
C1	Does the Fund have a conflict of interest policy and procedure, which include identifying, monitoring and managing potential conflicts of interest?	There is a Col policy which is detailed in the Fund's Code of Conduct which applies to PB and PPIC members - this covers identification/declaration requirements but not all points recommended by TPR guidance.	Annual	31/07/2015	Fully completed	Partially compliant		Include Code of Conduct on website when upgraded, and recommend reviewing to include all relevant areas of TPR guidance
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?	PB members were given training on this at first meeting on 31 July 2015.  HoFPI has agreed to have it as a standing agenda item at each meeting.  Declarations haven't formally been documented but are required in Code of Conduct.	Annual	31/07/2015	Fully completed	Partially compliant		Declarations to be formalised and reviewed on at least annual basis, and HoFPI to ensure this is included as a standing item.
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)?	No declarations have yet been done (though there have been opportunities to express any potential conflicts and some have done so informally).  Expressions of interest in relation of investments have been covered in meetings.  There is not currently a register of interests bu this is to be drafted and included in future meetings as a standing item - maintained by HoFPI	Annual	31/07/2015	In progress	Non-compliant		Suggest declarations completed at appointment and annually.  Keep register of interests as standing agenda item.
C4	Does the appointment process for pension board members require disclosure of interests and responsibilities which could become conflicts of interest?	No formal pre-appointment declaration of interest takes place currently.  Declarations are required in Code of Conduct and are to be completed in due course.	Ongoing (annual check)	n/a	In progress	Non-compliant		Suggest declarations are requested at appointment/interview phase for future PB and PPIC members.
C5	Is the conflicts policy regularly reviewed?	Conflicts policy (within Code of Conduct) was agreed before first PB meeting - there is no comment about how often it is reviewed.	Triennially	31/07/2015	Not started	Non-compliant		Recommend reviewing at least every 3 years (or when changes in regulations apply to mean some elements need updating).  Detail frequency of review within conflicts part of Code of Conduct
C6	Does the Fund have a conflicts register and it is circulated for ongoing review and published?	Any conflict declared at meetings would be formally recorded in the minutes so it is formally documented, but HoFPI has agreed to implement a register, and for this to be included in each meeting as standing agenda item.  Not currently reported in annual report and accounts.  Minutes are to be published online when website updated.	Ongoing and annual	01/12/2015	In progress	Partially compliant		Implement conflict register and consider reporting on this in annual report and accounts.
C7	Is appropriate information included in the register?	Register in progress - and is to include all recommended items	Ongoing (annual check)	01/12/2015	In progress	Non-compliant		

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
C8	Is there a standing item on the agenda for declaring conflicts of interest?	HoFPI has agreed to add this as an agenda item in all future meetings.	Ongoing (annual check)	01/12/2015	In progress	Non-compliant		
C9	Do those involved know how to report a conflict of interest?	Members have been told in first meeting and have been given Code of Conduct so are aware of responsibilities. Will be standing agenda item so will be fully covered.  Also members will be encouraged to complete Toolkit module as part of Training requirements.	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant		Include requirement to complete TPR toolkit modules in Training Policy and Plans
C10	Is the number of employer and member representatives on the board in line with legal requirements?	There are 4 of each representative - so fully compliant.  Set out as 4 employer and 4 member representatives in Board's Terms of Reference	Ongoing (annual check)	01/04/2015	Fully completed	Fully compliant		
C11	Is the board made up of the appropriate mix of representatives in order to minimise potential conflicts?	Representation includes councillors, a scheduled body representative, and employees. The vice-chair is an employee representative. Unions suggested employee names so that suitable candidates were selected.  HoFPI has meetings with the Chair and Vice-Chair before PB meetings to decide what will be included on the agenda.	Ongoing (annual check)	01/04/2015	Fully completed	Fully compliant		

## 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.

The information must include:

- 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	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
D1	Does the Administering Authority publish information about the pension board?	The Fund website details who the PB are and how they are represented. Responsibilities are not currently included - to be published once website updated.  <a href="https://governance.enfield.gov.uk/mgCommitteeMailingList.aspx?ID=235">https://governance.enfield.gov.uk/mgCommitteeMailingList.aspx?ID=235</a>	Ongoing (annual check)	01/12/2015	In progress	Partially compliant		Add responsibilities once website is updated
D2	Does the Administering Authority publish other useful related information about the pension board?	Terms of reference is going to be on the updated website, the other elements are not currently included.	Ongoing (annual check)	01/12/2015	Fully completed	Partially compliant		Consider adding additional information about PB members onto the website.
D3	Is all the information about the Pension Board kept up-to-date?	To date there have been no changes to make. It is HoFPI's responsibility to keep it up to date and he will make instructions to do so and as when required.  PB members have minimum required 4 year term so shouldn't need regular changes.	Ongoing (annual check)	01/04/2015	Not yet relevant	Not yet relevant		
D4	Does the Administering Authority public information about pension board business?	Minutes are published on website - agenda is also published beforehand and papers - though restricted.	Ongoing (annual check)	01/12/2015	Fully completed	Partially compliant	HoFPI to consider whether making full information publicly available.	

## 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.

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

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

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
E1	Is there an agreed process for identifying and recording scheme risks?	<p>There currently is a risk register, but no formal policy for risk management is in place. It has been agreed to put a formal policy in place so this is now in progress.</p> <p>HoFPI is responsible for maintaining the risk register, which goes to the PPIC once a year. It has been agreed that the risk register should also go to the pension board meetings at the same time as the business plan to help focus on what the PB should be doing in their roles.</p> <p>Risks are currently added as and when the HoFPI is preparing for PPIC meetings.</p>	Annual	01/12/2015	In progress	Non-compliant		Formal policy for risk management including identification and recording risks to be drafted.
E2	Does the Fund have an adequate process to evaluate risks and establish internal controls?	<p>The risk register includes a score/rating for each risk and this is awarded a red, amber, green status. This is carried out by the HoFPI based on judgement. Scores reflect a rating for both likelihood and impact of the risk events occurring.</p> <p>Register shows who has responsibility for each risk and the current control in place to manage it as well as new controls required - if new risks were to arise a new internal control (or development of existing controls) would take place to mitigate/manage the risk.</p> <p>It is recognised that the register could be updated to include more detail so that is currently in progress.</p>	Annual	01/12/2015	Fully completed	Fully compliant		Include more detail in risk register
E3	Does the Administering Authority have a risk register to record all risks identified and action taken?	<p>There is currently a risk register which includes scoring of risks based on judgement and red/amber/green approach. This is reviewed in PPIC meetings annually but the HoFPI adds to it when new risks arise e.g. following from an audit.</p> <p>It is noted the risk register does include the required items, but these could be in greater detail and include timescales for review.</p>	Annual	01/12/2015	Fully completed	Fully compliant	<p>TPR guidance: The risk register should contain:</p> <ul style="list-style-type: none"> <li>- details of the risks identified</li> <li>- the likelihood of the risk arising</li> <li>- the impact of the risk if it does arise</li> <li>- the actions taken to mitigate the risk</li> <li>- when mitigation action was taken</li> <li>- when the risk and mitigation should next be reviewed</li> <li>- who has responsibility for monitoring the risk, if it is not the scheme manager</li> </ul> <p>TPR also provides a sample risk register on the website.</p>	

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
E4	Does the Administering Authority review the effectiveness of the risk management and internal control systems of the Fund?	<p>The risk management and internal controls are reviewed regularly (albeit this does not follow a formal process and is not always documented) for effectiveness as part of a number of processes including:</p> <ul style="list-style-type: none"> <li>- Finance targets set and monitored by HoFPI on regular basis</li> <li>- The ongoing updating and annual review of the risk register which includes the control of those risks</li> <li>- Regular (twice yearly) internal and external audit reports, and fraud initiative checks.</li> <li>- Council have external audit of their accounts and fund accounts audit.</li> <li>- Reports sent to James Rolfe and any areas of concern or non-compliance are discussed at Chief Exec/MOM meetings.</li> <li>- Annual internal control reports from custodian and fund managers. [Paul to confirm this]</li> <li>- Annual update of TPR Code compliance checklist.</li> <li>- The external audit will require SAS70 reports so internal controls of external asset managers are covered.</li> <li>- A SWAT analysis has been carried out for the pensions team.</li> <li>- Heywoods also have a risk management policy for their systems which is reviewed regularly.</li> </ul> <p>The Council also has a risk policy where any disaster/emergency recovery risks and staff risks are covered.</p> <p>There are some possible areas where the effectiveness could be more easily monitored, e.g. having a formal risk management policy, including the methods by which to carry out such a review, formal breaches processes.</p> <p>Altair management system has ability to be reported against, but currently there is no monthly summary report for performance indicators - this is in progress.</p>	Annual	01/12/2015	In progress	Fully compliant		Issues could also be identified through regular monitoring reports such as performance monitoring for PPIC/PB, IDRPs updates, and breaches notifications.
E5	Does the Administering Authority regularly review the risk register?	Yes - the risk register is reviewed annually, and added to when required and as part of audit process and meetings or through discussions with advisors, if new risks come to light.	Annual	[Date of last review]	Fully completed	Fully compliant		
E6	Is there a standing item on the Pension Board agenda to review scheme risks?	This will be added to the PB agenda on an annual basis (following review by PPIC).	Annual	01/12/2015	In progress	Non-compliant		Standing item to be added to PB agenda

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
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 ?	<p>It is considered that there are adequate internal controls in place. Most are set out in the risk register, though it is recognised this could be more comprehensive and better documented. There is an informal administration strategy but this needs to be updated for current processes and formalised to set out requirements which can be monitored against.</p> <ul style="list-style-type: none"> <li>- Altair task management system - every morning, tasks on task list are allocated, and can monitor all tasks on the team to prioritise and allocate to other members on team if task overdue. Each task has a priority response time on system and has a guideline workflow to follow - cipfa timescales are followed.</li> <li>- There is currently a do/check procedure which depends on tasks i.e. estimates are not always checked due to time restrictions. Final benefit calculations are reallocated to a checker after calculation is done - and the job can't be sent to the "doer" , has to go someone else and can't go further until checked. All members of team can check calcs - but payment is only authorised by a senior member of staff. This process is not formally documented but staff know the systems - it has been suggested that an improvement would be to have the duties allocated as the system can be altered to set levels of checking.</li> <li>- All correspondence is scanned and recorded on member file, new post that arrives is allocated to member files and tasks allocated to suitable member of staff by post team - they have had training on this.</li> <li>- A senior member of staff monitors the workflow for team members.</li> <li>- There is a calculation/query backlog so workflow can be difficult - the team have a priority for deaths and redundancy exercise retirements. There is a plan to come back to overdue tasks afterwards.</li> <li>- Task procedures are written already and can be followed - auditors see these</li> <li>- Decisions on investments are made by the PPIC and fully documented.</li> <li>- Contributions are monitored throughout the year - minor breaches in payments are recorded by HoFPI and reported in the annual report.</li> <li>- There is currently no formal breaches procedure despite having adequate processes, and this is currently being drafted.</li> <li>- Payments to investment managers can be authorised only by HoFPI (other than tax and non financial issues).</li> </ul>	Annual	01/12/2015	Fully completed	Partially compliant	<p>Also as an extra control - staff can't access their own pension records.</p> <p>The Head of Exchequer Services can access and make changes in the payroll system which is a potential risk.</p> <p>Employee and employer contributions are provided on an annual basis split by each member and this feeds into the data and administration checks that are carried out.</p> <p>For death overpayment cases, the authority makes a payment to fund for the amount and then they try to recover it - they then make decision to write off if necessary. This is outside of the pension Fund.</p>	<p>Ensure risk register explicitly sets out each internal control in place.</p> <p>Administration policy to be updated and formalised.</p> <p>Breaches procedure to be drafted.</p> <p>Consider whether internal processes need to be documented or whether current practices are sufficient</p>
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?	<p>The only outsourced process relates to AVCs.</p> <p>The Head of Exchequer Services has planned to meet with the contact from Prudential to discuss information to be provided to members and to the administering authority (subject to DPA requirements), and any required checks to be carried out (e.g vs payroll information).</p> <p>Payroll are completely separate and they arrange the payroll for AVCs. In future I-Connect will be used to gather monthly returns for contributions, which includes AVCs, so it will be possible to check against Prudential records.</p> <p>Member records only show there is an AVC and at retirement the administrators will ask Prudential to do a quote etc. There is a risk of errors occurring that would be impossible for the Enfield administration team to detect under the current process.</p>	Annual	01/12/2015	In progress	Partially compliant	No payments to employer future contributions etc adjusted.	Aon to provide a list of requirements from Prudential as AVC provider to provide comfort of their internal controls.

## F - Maintaining accurate member data

### Legal Requirements

Scheme managers must keep records of information relating to:

- 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').

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)
- Occupational Pension Schemes (Scheme Administration) Regulations (Northern Ireland) 1997 (SR 1997 No 94)
- Registered Pension Schemes (Provision of Information) Regulations 2006 (SI 2006/567)

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
F1	Do member records record the information required as defined in the Record Keeping Regulations and is it accurate?	<p>Checks were carried out in relation to each of the requirements in the Record Keeping Regulations and all were considered compliant except for in relation to clause 4(3) which relates to information for members who pay AVCs.</p> <ul style="list-style-type: none"> <li>- Altair system won't allow a new member entry without key details</li> <li>- Benefits won't be paid until a birth certificate is provided - this is a useful extra check as if there are any issues with the birth certificate, fraud investigation is commenced.</li> <li>- Most members are identified by NINO, and some Capel Manor employees have a different unique number as are on a different payroll system.</li> <li>- ICONNECT will upload data on an ongoing basis so easier to manage once implemented - this system will create new starters on altair (and flag new starter to team) and update pay onto each members record. Any changes to hours etc will also automatically update so records will be kept up to date.</li> <li>- Admin team confirmed both CARE and old 2008 pay data are recorded for each member - this is just called something different (i.e. "pensionable" for 2008 pay)</li> <li>- Pension increases are included on member records (via original and increased pension - the actual rate isn't on the record but is easily derived), and benefit calculations are automatically saved onto the member record.</li> <li>- Enfield will need to check with Prudential that members' AVC choices are recorded i.e. forms they originally completed when they signed up to AVCs.</li> <li>- Data accuracy and completeness reports are also received via the triennial valuation, which cover some of these elements.</li> </ul>	<p>Annually or if change provider.</p> <p>Part of actuarial valuation (triennial)</p>	01/12/2015	Fully completed	Partially compliant		Set out what is required from Prudential in upcoming meeting with representative (in terms of member records and annual return information to Enfield).



No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
F2	Does the Fund have the appropriate processes in place so employers can provide timely and accurate information?	<p>Enfield is considering drafting a formal administration policy to update the current draft and set out explicit requirements for employers. There is room for improvement in this area, particularly in terms of gathering contributions (and associated information).</p> <p>IConnect, when in place, will automatically create new records so will flag when a new joiner needs actioning. The team will then contact employers to request any information that has not been provided, and (as the team will need to know asap from employers if there are new joiners or leavers) they will ask by email at same time as obtaining the monthly returns. All employers who use the standard payroll will have IConnect.</p> <p>A check is carried out to see if the employee rate and payroll amounts give the expected contribution amounts - it is then escalated if suspected that the contribution is not right. However the team is 5 months behind on notifying contribution splits to HoFPI.</p> <p>It has been agreed it is necessary to put in a procedure for any staff to pick up the checks that are carried out and the process for requesting additional information from employers.</p> <p>Breaches policy to be drafted which will give instruction for reporting if employers not complying and for recording non compliance which is not reportable.</p>	Will be set out in Administration Policy	01/12/2015	Fully completed	Partially compliant	The Head of Exchequer Services is considering carrying out a LGPS audit by auditors at the same time as they carry out the Teachers scheme audit.	<p>Administration policy to set out employer requirements.</p> <p>Breaches procedure to set out how to report non-compliance</p>
F3	Does the Fund keep records of and reconcile transactions as required by the Record Keeping Regulations?	<p>Checks were carried out in relation to each of the requirements in the Record Keeping Regulations and all were considered compliant except for in relation to AVCs, where compliance is likely but can't be confirmed without Prudential confirmation.</p> <p>Annual reconciliation is required and audited as part of annual report and accounts process.</p> <p>For death overpayment cases, the authority makes a payment to fund for the amount and then they try to recover the cost - they then make decision to write off if necessary. This is outside of the pension Fund so the Fund should have minimal write-offs.</p>	Ongoing (annual check)	01/06/2015	Fully completed	Fully compliant	As additional evidence Paul could mention what monitoring against budget takes place?	Obtain confirmation from Prudential re records of transactions.
F4	Are records kept of pension board meetings as required by the Record Keeping Regulations?	Full minutes are maintained by the HoFPI. These are not currently published on the Council website but the intention is to do so once the website is updated.	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant		Publish PB minutes on website
F5	Are records kept of decisions made by the pension board, outside of meetings as required by the Record Keeping Regulations?	We do not expect there to be decisions outside of PB meetings. The HoFPI will monitor the situation.	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant		
F6	Are records retained for as long as they are needed?	<p>Enfield considers it necessary to retain records indefinitely due to the number of enquiries from employees relating to periods many decades ago. Accordingly personal records are maintained in addition to other data such as contribution lists, spreadsheets of old cases and pensions increases reports.</p> <p>Anything on Altair won't be removed - all paper records or microfiche have been put on the systems.</p>	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant		

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
F7	Does the Administering Authority have policies and processes to monitor data on an ongoing basis?	<p>There are no formally documented processes in place though the team is carrying out monitoring where possible.</p> <p>There are a number of separate processes in place to monitor data on an ongoing basis including:</p> <ul style="list-style-type: none"> <li>- Year-end annual returns provide an opportunity to highlight any data discrepancies</li> <li>- All data entry is checked for input accuracy</li> <li>- Various tolerance checks such as changes in pay (admin team to confirm if this check is done, and if so if it is automatic)</li> <li>- Processes if pensioner payslips are returned (see below), using only BACs payments for pensioners (admin team to confirm) and national fraud initiative.</li> <li>- Triennial valuation highlights data issues.</li> </ul> <p>Will consider setting process for warning and charging levies to employers if incomplete monthly data is provided or if provided late</p>	Ongoing (annual check)	01/12/2015	Fully completed	Non-compliant		Formally document processes (eg in admin policy/strategy)
F8	Does the Administering Authority carry out a data review at least annually?	<p>National fraud initiative checks are carried out annually to check for any deaths which have not been notified.</p> <p>If any payslip is returned the admin team will freeze the pay record pending confirmation of death or change of address.</p> <p>Grant Thornton (auditors) are currently carrying out an audit on the data and will come back with queries which will then be resolved.</p> <p>There are not currently any checks on the pension payroll vs the Altair records, which is an area for possible improvement.</p> <p>When triennial valuation data queries are sent the issues resolved are updated on member records.</p> <p>Annually when checks are done the issues such as NINOs are flagged if they do not exist on the record, but there is no official "common data check".</p>	Ongoing (annual check)	01/12/2015	Fully completed	Partially compliant		Consider checks on pension payroll vs Altair records
F9	Is a data improvement plan in place which is being monitored with a defined end date?	<p>Not currently. When IConnect is implemented many of the "gaps" in data checking will be improved as will highlight where there are issues in data quality.</p> <p>Considering inclusion of service standards and planned improvements in administration strategy which is currently under review.</p>	Monthly	01/12/2015	Not started	Non-compliant		Consider inclusion of plan in formal administration strategy.
F10	Are processes and policies in place to reconcile scheme data with employer data?	<p>Monthly and year end spreadsheets assist with reconciling data (though there is a backlog on the monthly spreadsheet splits).</p> <p>If issues are spotted, request member addresses before sending the benefit statements out. Problem employers are approached for certain information. Again, IConnect will help improve consistency of records.</p> <p>Email addresses will be requested when self-service system is in place. Any changes to member data from this new system will automatically update altair (note - there are only some things member can change eg address).</p>	Ongoing (annual check)	01/12/2015	Fully completed	Partially compliant		

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
F11	Do the Administering Authority's member data processes meet the requirements of the Data Protection Act 1998 and the data protection principles?	<p>There is a DPA officer in the IT team at the Council.  Staff receive online training once a year, and the pension manager (Enfield to confirm) is informed when a member of staff has not completed it.  There is a DPA Policy for the administering authority, particularly explaining how only data which is needed should be kept on record, and sets out how information is kept on the server.</p> <p>Spreadsheets providing data from employers are password protected - except one employer who sends one members' spreadsheet unencrypted. IConnect will be secure and that is to be implemented soon.  Aon Hewitt as actuarial advisers only send encrypted files to AA (Aon's firewalls prevent sending member data unencrypted).  Egress is used to send data to other parties from the Council i.e. to the actuaries.  Benefit estimates can be emailed to members' personal email addresses - these are sent via egress if possible - but some replies are not encrypted if a member emails and it is responded to and the original email included member data.</p>	Ongoing (annual check)	01/12/2015	Fully completed	Partially compliant		There are a small number of areas where the processes could be "tightened up" to ensure member data is only transmitted securely.

## 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.

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

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
G1	Does the Fund have procedures and processes in place to identify payment failures?	<p>HoFPI will identify payments if outside of 19 day statutory period. If it a minor breach which is subsequently quickly paid it is not reported (just recorded), but if persistent will raise with employer to try to resolve.</p> <p>The administration team send a split of the contributions by member and employer to HoFPI each month (there is currently a 5 month backlog to this which suggests potential breaches that, though unlikely, may not have been identified). The amounts are compared to previous months' contribution levels to check for reasonableness but there is limited checking that the actual amounts are correct. It has been agreed that this could be improved upon and will be set out in the administration strategy/policy and monitored.</p>	Ongoing (annual check)	01/12/2015	Fully completed	Partially compliant		Set out method for more effective checking of contributions in administration policy.
G2	Do those processes and procedures include a contributions monitoring record to determine whether contributions are paid on time and in full?	<p>Processes are not documented so should be recorded in administration policy. See above notes re checks carried out and possible improvements to ensure that errors do not get overlooked in 'gaps' between teams.</p> <p>It has been a few years since an employer has not paid so this is not considered a significant risk - sometimes a payment arrives only a couple of days late, there has therefore been no interest charged on late payments to date.</p> <p>Late payments are shown in annual report.</p> <p>It has been agreed to record conversations with employers more formally and report to the Pensions Board if any communications with employers are needed in relation to payment of contributions.</p>	Ongoing (annual check)	01/12/2015	In progress	Partially compliant		See above
G3	Do those processes and procedures include monitoring payments against the contributions monitoring record on an ongoing basis?	<p>HoFPI compares the financial records / bank statements to the split of contributions provided by the administration team.</p> <p>No process is currently in place in relation to reconciling AVC payments with contributions record. This is to be discussed with Prudential representative to ensure required information is provided.</p>	Ongoing (annual check)	01/12/2015	Fully completed	Partially compliant		Process being implemented to monitor date of payment of AVCs.

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
G4	Are these procedures regularly reviewed to ensure they are effective?	Processed are not formally documented. Administration policy/strategy to be drafted which will be subject to regular review, as well as the reporting under the requirements set out within the policy.	Ongoing (annual check)	01/12/2015	In progress	Non-compliant		Administration Strategy to be drafted as per above
G5	Do the Administering Authority's processes include managing overdue contributions in line with TPR's suggested approach?	The processes followed are in line with TPR's suggested processes (other than for AVCs where this can't be confirmed at this stage), but are not currently formally documented. This is underway currently.	Ongoing (annual check)	01/12/2015	Fully completed	Partially compliant		Process being implemented to monitor date of payment of AVCs.
G6	Does the Fund maintain a record of any investigations and communications with employers?	Records of emails are retained by pensions team, but not formally recorded in a central place - to be formalised in administration policy.	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant		Include in Administration Strategy
G7	Do employers provide sufficient information to monitor contributions and is this in accordance with the LGPS regulations?	Currently this is available on an annual basis, however monthly iconnect returns which are due to be implemented in 2016 will improve the process for information passing between employer and administering authority. Missing information will be raised with employers immediately following the return as Altair will require it.  Employer requirements to be formally set out in new administration policy, including how performance of employers will be reported upon and remedial action taken.	Ongoing (annual check)	01/12/2015	Fully completed	Employers - Fully compliant		Ongoing work with employers following update to admin strategy to ensure data is received in accordance with requirements.
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?	This process will be set out in breaches policy, and administration strategy will set out how to monitor the effectiveness of the process.  There is currently a backlog so there has been a delay to the monthly contribution split information being passed to HoFPI. This has been over 5 months and so this may breach the "reasonable period" if there have been any issues in this time. However, payment failures are rare for the Fund and so the associated risk is not significant.	Ongoing (annual check)	01/12/2015	In progress	Non-compliant		Procedure being designed to formalise escalation process including materiality and whether to report to TPR.
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?	N/A Except for AVCs, where contribution information is passed directly to Prudential from employers and admin team do not reconcile payroll with AVCs paid. This is something to be considered to increase confidence in the contributions paid and ultimate benefits settled via AVCs. Prudential do provide an annual spreadsheet with contributions for each member so this could be checked against expectations and finance systems to ensure correct.	Ongoing (annual check)	01/12/2015	In progress	Non-compliant		Discuss requirements with Prudential in upcoming meeting.

## 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.

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
H1	Has an annual benefit statement been provided to all active members within the required timescales?	Did not meet 31 August deadline (or subsequent 30 November deadline). Deferred statements have been sent and actives statements will be sent by 4th Dec ( <b>Enfield to confirm this happened?</b> ) and other external employers (covering approx 500 employees) with different payroll will be done when data provided. To be agreed whether to report as material breach or simply to record.	Annual	01/12/2015	In progress	Employers - Non-compliant		Complete ABS process and issue to all members.  Decide on whether to report to TPR as material breach
H2	Do these meet the legal requirements in relation to format?	The statements have been checked against the HMT directions and are compliant except in the following areas in Part 1 and 2 of Schedule 5 of the Disclosure Regulations: A summary of the method for calculating the members' benefits and survivor's benefits. This could be made clearer.	Annual	01/12/2015	Fully completed	Partially compliant		Consider amending in future
H3	Has a benefit statement been provided to all active, deferred and pension credit members who have requested one within the required timescales?	Pension credit members are included in deferred statement exercise. If a member asks for a statement within 12 months of their last statement, we send a copy of that one.  Last year the Council issued a one page document asking for confirmation of details, and sent a statement to those who replied. Those who didn't reply have the "gone away" box ticked on their record so they don't get a statement. Some still have a blank address, and will be traced using debtor software that the Head of Exchequer Services has access to.	Annual	01/12/2015	Fully completed	Fully compliant		
H4	Does this meet the legal requirements in relation to format?	The statements have been checked against the HMT directions and are compliant except in the following areas in Part 1 and 2 of Schedule 5 of the Disclosure Regulations: - For deferred members, the date pensionable service started is not included. - Also for deferred members, the pensionable pay on the date of ending service is not included. - Also the amount of benefits from the date benefits are payable (i.e. retirement date) are not provided. - A summary of the method for calculating the members' benefits and survivor's benefits. This could be made clearer.	Ongoing (annual check)	01/12/2015	Fully completed	Partially compliant		Amend to include the relevant information to make this fully compliant
H5	Has an annual benefit statement been provided to all members with AVCs within the required timescales?	Prudential confirmed these were sent in June 2015.	Annual	01/06/2015	Fully completed	Fully compliant		
H6	Do these meet the legal requirements in relation to format?	Example statement provided by Prudential (this had Hampshire Pension Fund in title but we have assumed format and contents are the same). This has been checked against the requirements and is compliant.	Annual	01/12/2015	Fully completed	Fully compliant	It is not clear whether there is the option for lifestyling in the Prudential funds offered and if so, there should be checks to ensure the required communications relating to lifestyling are also provided to members.	Suggest check the situation re lifestyling with Prudential, and if it takes place how Disclosure Reg 18 is met.

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
H7	Is basic scheme information provided to all new and prospective members within the required timescales?	<p>HR provide an information pack for new starters - this includes brief pension fund information. The brief guide to the LGPS is provided, as well as a form to complete with basic information and previous LGPS service and an expression of wish form.</p> <p>Once a new starter is in the fund the Employer is meant to send member information to the Council. If the Fund doesn't receive the required information Enfield then sends a pack to members once SAP identifies that there is a new joiner with no information received. This pack includes a form to complete, with an expression of wish form, and mentions that a pensions/LGPS guide is available on request.</p> <p>It is recognised that the process needs improvement to ensure members are fully informed within the required timescales, and to prevent duplication.</p> <p>The timescales of sending information to members is not formally monitored, but the workflow system does record dates of tasks so can identify late responses. This means responses within required timescales could be reported on if required - the team can prioritise cases by deadlines.</p> <p>Unless the member is sent information by email there is currently no records kept on what is sent to them if there's no new member record. It is recognised that there are too many new members each month to follow up with each employer to ask if information has been sent.</p>	Ongoing (annual check)	01/12/2015	Fully completed	Employers - Partially compliant	We cannot confirm that the information is provided within the required timescales under Regulation 6 (5-7) of the Disclosure Regulations.	<p>Consider process for new starters (although it is acknowledged that there may not be a perfect solution available).</p> <p>Consider process for monitoring timescales and reporting</p>
H8	Does this meet the legal requirements in relation to format?	<p>The information provided to new members (mainly the LGPS guide) meets the requirements except for the following areas where improvements/additions could be made:</p> <ul style="list-style-type: none"> <li>- Fuller details re transfers into the Fund as per Regulation 6 i.e. Part 1.6 of Schedule 2.</li> <li>- Relating to Part 1.4 of Schedule 2, a statement as to whether charges apply on transfers out</li> <li>- In relation to Part 1.16 of Schedule 2, a statement relating to AVCs - this may already be provided by Prudential once a member opts to pay AVCs but it should be set out at this early stage.</li> <li>- In relation to Part 1.18, the postal address of the person to contact in relation to IDRPs (this is in the IDRPs leaflet but to ensure compliance it could be included in the guide).</li> </ul>	Ongoing (annual check)	01/12/2015	Fully completed	Partially compliant		Consider amendments to ensure full compliance
H9	Is all other information provided in accordance with the legal timescales?	Yes the legal timescale requirements are met. However, there is often no monitoring of this to be able to report relevant statistics	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant		Consider monitoring timescales met
H10	Is all other information provided in the format and methods required by law?	<p>Prudential (the AVC provider) to be asked to provide an annual statement confirming they have met the requirements in relation to lifestyling.</p> <p>In other cases the requirements are met.</p>	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant		Prudential (the AVC provider) to be asked to provide an annual statement confirming they have met the requirements in relation to lifestyling.
H11	Where any information is only provided electronically (i.e. instead of any hard copy) does it comply with the legal requirements?	Only the newsletter is provided solely via the intranet, but this is also made available to those who don't have access, and hard copy booklets are sent to employer such as schools. Therefore the additional requirements are not applicable.	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant		
H12	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?	<p>A form is issued with the ABS and newsletters including questions such as "was this useful, easy to read etc".</p> <p>Feedback is generally positive, however this is not regularly reviewed or updated.</p>	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant	A Communications policy/strategy could set out the objectives and how to measure against these.	

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
H13	Does the Administering Authority use a tracing service?	Council has recently used a tracing service to find missing members - Eqifax were used for tracing.  The National Fraud Initiative is used on an annual basis to identify deaths which have not been notified.	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant		



## I - Internal Dispute Resolution

### Legal requirements

The Pensions Act 1995 requires scheme managers to set up and implement an Internal Dispute Resolution Procedure (IDRP) to help resolve disputes between the scheme manager and people with an interest in the scheme.

The act states that a person has an interest in the scheme if they:

- are a member or beneficiary
- are a prospective member
- have ceased to be a member, beneficiary or prospective member
- claim to be any of the above and the dispute relates to this claim.

The Act also states that the procedure must include:

- how an application is to be made
- what must be included in an application
- how decisions are to be reached and notified
- a specified period (which is reasonable) within which applications must be made.

The procedure may require people with an interest in the scheme to first refer matters in dispute to a 'specified person' in order for that person to consider and give their decision on those matters. This decision may then be confirmed or replaced by the decision taken by the scheme manager after reconsideration of the matters. However, legislation provides flexibility for scheme managers to decide the details of these.

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
I1	Has the Administering Authority put in place an internal dispute resolution procedure?	Yes - IDRP procedure is on the intranet. It is not currently on the Fund website, however it will be on the new website which is currently being updated.	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant		Include procedure on updated website
I2	Does the Administering Authority's process highlight or consider whether a dispute is exempt?	IDRP Employee guide does not state explicitly who is eligible nor who is exempt - suggest setting out in list form to be clearer.	Ongoing (annual check)	01/12/2015	Fully completed	Non-compliant		Suggest updating policy/procedure to set out eligibility and exemption criteria
I3	Does the information made available to applicants about the procedure clearly state the procedure and process to apply for a dispute to be resolved including: - who it applies to - who the specified person (stage 1) is - the timescales for making applications - who to contact with a dispute - the information that an applicant must include - the process by which decisions are reached?	The IDRP leaflet includes the details of the process to be followed and the information required by way of a form to complete. The procedure references a "specified person" but does not set out who this is (although a generic contact address setting out who to send disputes to is provided). Time limits for when applications must be made are set out at the end of the document.	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant		
I4	Has the Administering Authority ensured that employers who make first stage decisions also have IDRP in place?	All employers have it documented where they follow the Administering Authority's policy.  Employers have their own appointed person. The HR representative will review at first, then James Rolfe. If the Administering Authority has made the decision - the pensions team deal with the case and then pass to Head of Exchequer Services to review.	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant		
I5	Are the timescales in the procedure adhered to including sending an acknowledgment on receipt of an application?	The member is advised on the timescales and these are adhered to, though there is no formal monitoring or reporting to PB (or otherwise) on IDRP processes/performance.	Ongoing (annual check)	01/12/2015	Fully completed	Partially compliant	Note - it has not currently been possible to confirm the timescales are notified to members, as have not seen evidence of IDRP correspondence including an acknowledgement, and these response timescales are not set out in the IDRP leaflet.	Consider formally monitoring adherence to timescales and reporting on this as part of effectiveness review.

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
16	Does the Administering Authority notify and advertise the procedure appropriately?	IDRP Guide will be posted on internet when new website updated, as mentioned above.  IDRP process and leaflet is mentioned in new joiner information - in the brief guide to the LGPS from the Enfield Fund. This is available on the website. <a href="http://www.enfield.gov.uk/download/downloads/id/.../lgps_employee_guide">www.enfield.gov.uk/download/downloads/id/.../lgps_employee_guide</a>  This is to be included in the formal administration strategy which is currently being drafted	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant	It has not been possible to check if it is mentioned in letters to members giving notification of benefit payment/settlement as have not seen evidence of these. It is advised the IDRP process is mentioned in each notification letter.	
17	Are the notification requirements in relation to TPAS and the Pensions Ombudsman being adhered to?	Included in letters in initial stages and in decision letter.  Notifications always include information about TPAS/PO in the decision letter.  Information on TPAS and PO are also given in the IDRP leaflet.	Ongoing (annual check)	01/12/2015	Fully completed	Fully compliant	Please note we have not been able to confirm that this information is included in required communications as we have not seen evidence of these.	
18	Does the Administering Authority regularly assess the effectiveness of its arrangements?	There is currently no formal reporting on this.  Significant cases have been taken to the PPIC where they reviewed the decision and ratified it.  A barrister reviewed how Head of Exchequer Services at stage 2 and pension team member at stage 1 made the decisions for a particular case and confirmed they followed good practice.	n/a	01/12/2015	Fully completed	Partially compliant		Consider formally monitoring adherence to timescales and reporting on this as part of effectiveness review.
19	Does the Administering Authority regularly assess the effectiveness where employers carry out a stage one process?	Administering Authority doesn't look at stage 1 cases which don't make it to stage 2. Mainly relevant to ill-health cases where only review would be to see if they met requirements.	Ongoing (annual check)	01/06/2015	Fully completed	Fully compliant		

## J - Reporting breaches of the law

### Legal Requirements

Certain people are required to report breaches of the law to the regulator where they have reasonable cause to believe that:

- a legal duty which is relevant to the administration of the scheme has not been, or is not being, complied with
- the failure to comply is likely to be of material significance to the regulator in the exercise of any of its functions.

People who are subject to the reporting requirement ('reporters') for public service pension schemes are:

- scheme managers
- members of pension boards
- any person who is otherwise involved in the administration of a public service pension scheme
- employers: in the case of a multi-employer scheme, any participating employer who becomes aware of a breach should consider their statutory duty to report, regardless of whether the breach relates to, or affects, members who are its employees or those of other employers
- professional advisers including auditors, actuaries, legal advisers and fund managers: not all public service pension schemes are subject to the same legal requirements to appoint professional advisers, but nonetheless the regulator expects that all schemes will have professional advisers, either resulting from other legal requirements or simply as a matter of practice
- any person who is otherwise involved in advising the managers of the scheme in relation to the scheme.

The report must be made in writing as soon as reasonably practicable.

No.	TPR Requirement	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
J1	Is the Administering Authority satisfied that those responsible for reporting reaches under the legal requirements and TPR guidance understand the requirements?	It is expected that those responsible are aware of their responsibilities. However it has been agreed to document a formal process for reporting breaches, which will be shared with all those responsible.	Ongoing (annual check)	01/12/2015	In progress	Non-compliant		Formal breaches procedure to be put in place and distributed.
J2	Does the Administering Authority have appropriate procedures in place to meet their legal obligations for identifying and assessing breaches?	Processes for monitoring contributions are in place (though could be more formally documented) and there are also processes in place for checking member benefit calculations and completing benefit statements, and staff are aware of how to raise and escalate any issues that arise. Advice is sought from legal and actuarial advisers where required.  However it is recognised that it would be preferable if the procedures were formalised and a formal breaches procedure is being drafted.	Annual	01/12/2015	In progress	Non-compliant		As above
J3	Are breaches being recorded in accordance with the agreed procedures?	HoFPI keeps a record of contribution breaches which is included in the annual report. All other breaches need to be formally recorded in agreed place - to be set out in procedure currently being drafted.	Ongoing (annual check)	01/12/2015	In progress	Partially compliant		As above - recording process will be detailed as part of procedure.

## K - Scheme Advisory Board - Guidance on the creation and operation of Local Pension Boards in England and Wales

### Legal Requirements

Clause 7 of the Public Service Pensions Act provides that the national Scheme Advisory Board (SAB) may provide advice to scheme managers or pension boards in relation to the effective and efficient administration and management of the scheme.

It also provides that a person to whom advice is given by virtue of subsection (1) or (2) must have regard to the advice.

The Scheme Advisory Board has published guidance on the creation and operation of Local Pension Boards in England and Wales which incorporates a number of action point check lists at the end of some of the sections. The following are the items in those checklists.

No.	SAB Requirement	SAB Section	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
K1	Administering Authority to have approved the establishment (including Terms of Reference) of the Local Pension Board by 1 April 2015.	5	Approved March 2015 by full council	Ongoing (annual check)	n/a	Fully completed	Fully compliant		
K2	The Local Pension Board must be operational (i.e. had its first meeting no later than 4 months after the 1 April 2015).	5	The first meeting was held on 31 July 2015 (with 2 subsequent meetings since then)	Ongoing (annual check)	n/a	Fully completed	Fully compliant		
K3	Once established a Local Pension Board should adopt a knowledge and understanding policy and framework (possibly in conjunction with the Pensions Committee if appropriate).	6	Formal policy in progress	Annual	01/12/2015	In progress	Non-compliant		Create Knowledge and Understanding Policy
K4	A Local Pension Board should designate a person to take responsibility for ensuring that the knowledge and understanding policy and framework is developed and implemented.	6	HoFPI has responsibility. This will be formalised in policy which is being drafted.	Ongoing (annual check)	31/07/2015	Fully completed	Fully compliant		
K5	The Administering Authority should offer access to high quality induction training and provide relevant ongoing training to the appointed members of the Local Pension Board.	6	In progress more formally but induction training has been carried out.	Ongoing (annual check)	31/07/2015	In progress	Partially compliant		To be included in formal policy
K6	A Local Pension Board should prepare (and keep updated) a list of the core documents recording policy about the administration of the Fund and make the list and documents (as well as the rules of the LGPS) accessible to its members.	6	Currently such a list doesn't exist - this will be in the new policy once drafted, but in the interim the HoFPI has gone through with the PB members at meeting and explained the key documents (main focus was on the accounts which includes many key documents within it).	Ongoing (annual check)	31/07/2015	In progress	Partially compliant		To be included in formal policy
K7	Members of a Local Pension Board should undertake a personal training needs analysis and put in place a personalised training plan.	6	In progress - see previous sections.	Ongoing (annual check)	01/12/2015	In progress	Non-compliant		A model is being developed to capture individual training needs against CIPFA requirements/TPR toolkits and to monitor against those specific requirements.  Any individuals with outstanding requirements will be highlighted regularly (i.e. annually).

No.	SAB Requirement	SAB Section	London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Completed	Compliant	Notes	Action
K8	An Administering Authority should prepare a code of conduct and a conflicts policy for its Local Pension Board for approval in accordance with the Administering Authority's constitution and at the first meeting of the Local Pension Board. The Local Pension Board should keep these under regular review.	7	Council Code of Conduct includes reference to conflicts - however, this is currently not linked to the PB Terms of Reference consider linking them.	Annual	31/07/2015	Fully completed	Fully compliant		Consider linking to PB Terms of Reference
K9	Training should be arranged for officers and members of a Local Pension Board on conduct and conflicts.	7	Provided at first meeting - see previous sections - will update in future meetings (register and regular refresh).	Ongoing (annual check)	31/07/2015	Fully completed	Fully compliant		
K10	A Local Pension Board should establish and maintain a register of interests for its members.	7	Currently is recorded but formal register to be provided.	Ongoing (annual check)	01/12/2015	In progress	Partially compliant		Formal register of interests to be created
K11	An Administering Authority should agree the ongoing reporting arrangements between the Local Pension Board and the Administering Authority.	8	Not formally set up currently. HoFPI will draft the report annually, PB chair to finalise and this will then go in report and accounts. TOR only states that an annual report on the work of the Board will be included in the Fund's annual report.	Ongoing (annual check)	31/07/2015	In progress	Partially compliant		Annual report to be produced
K12	A Local Pension Board should understand the Administering Authority's requirements, controls and policies for FOIA compliance so that the Local Pension Board is aware of them and can comply with them.	8	Responsibility of the FOI Officer - not yet reported to PB, but will be reporting in future meetings and will provide the policy to the PB members.	Ongoing (annual check)	01/12/2015	In progress	Non-compliant		Report to PB on FOI compliance
K13	A Local Pension Board should put in place arrangements to meet the duty of its members to report breaches of law.	8	In progress	Ongoing (annual check)	01/12/2015	In progress	Non-compliant		A breaches procedure is being prepared for approval
K14	A Local Pension Board should consider (with its Administering Authority) the need to publish an annual report of its activities.	8	See above response to K11	Annual	01/12/2015	In progress	Partially compliant		Annual report to be produced
K15	An Administering Authority should consult on, revise and publish its governance compliance statement to include details of the terms, structure and operational procedures relating to its Local Pension Board.	8	2014/15 annual report and accounts includes details of the individuals. Additional details as required need to be included in 2015/16	Annual	31/03/2015	Fully completed	Fully compliant		Note to include additional PB detail in 2015/16 statement.

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**London Borough of Enfield Pension Fund response to the consultation on:****“Revoking & Replacing LGPS (Management & Investment of Funds) Regulations 2009”.**

**Consultation Question 1:** *Does the proposed deregulation achieve the intended policy aim of removing any unnecessary regulation while still ensuring that authorities' investments are made prudently and having taken advice?*

a) The regulations allow a fund to develop its own control limits which have to be set out in the fund's Investment's. Therefore, greater freedoms should be counter balanced by enhanced accountability through the Investment strategy (IS).

b) As currently specified in the new Regulation 7 it is not possible to identify how the establishment of that greater accountability might work in practice because of the lack of detail in the regulation clauses.

c) It will be very important to ensure the new regulations need some definition because of their potential for wide interpretation, which could lead to a lack of accountability and therefore increased risk where fund governance may be weak. It will be important for funds to demonstrate clear investment restrictions.

d) In view of the importance of the IS and the need for enhanced accountability following the new freedoms, it would be reasonable to require a fund to include it's Annual Report & Accounts. This will be subject to the fund's appointed auditor with a requirement for the auditor to report to the S of S any concerns, reviewed by the fund's Local Pension Board, published on the fund website and presented at the fund annual meeting.

e) Given the issues arising from the MIFID II Directive, the IS can be used to demonstrated that LGPS can be regarded as a Professional Investor.

f) Proposed regulation 7 (e) refers to a fund having a policy on how social, environmental and governance matters are taken into account in the investment process. This unfortunately gives a fund the option of not identifying such matters as part of its investment strategy which is against the principles of good stewardship and protection of fund assets. The regulations should be amended to:

1. Require funds to have a policy concerning RI factors and publish how this policy is applied to their investment processes.
2. Require funds to understand and monitor the RI impacts arising from their investment activity.
3. Demonstrate how they have been appropriately advised by relevant RI expertise.
4. Require that all funds adhere to the principles of the UK Stewardship Code.

h) The training of Pension Committee should be made compulsory with auditable attainment levels based on the CIPFA Knowledge & Skills framework or in association with the Pensions Regulator.

**Consultation Question 2:** *Are there any specific issues that should be reinstated? Please explain why.*

No

**Consultation Question 3:** *Is six months the appropriate period for the transitional arrangements to remain in place?*

Yes

**Consultation Question 4:** *Should the regulation be explicit that derivatives should only be used as a risk management tool? Are there any other circumstances in which the use of derivatives would be appropriate?*

The regulations should specify that derivatives and other complex financial products should only be used where pension committee members have received appropriate technical training to be able to understand the derivative product, has taken independent expert advice and has received a report that indicates the worst case position for the fund.

**Consultation Question 5:** *Are there any other sources of evidence that the Secretary of State might draw on to establish whether an intervention is required?*

In respect of governance and administrative failings, regulation 8(4) should be clear that the trigger for intervention is based upon evidence of failings as indicated by one or more of the following :

- Adverse auditors report;
- Adverse report from Pension Regulator;
- Adverse report by actuary;
- Adverse reports from pension ombudsman or exceptionally high number of cases where the fund has failed;
- Report from Pensions Board;
- Indication the pension committee members and supporting officers and advisors do not have the relevant skills and knowledge;
- Substantially poorer returns relative to other funds over a rolling three year period;
- Employer contributions substantial higher than other funds; and
- Complaints from whistle blowers.
- A funds fails to respond to the S of S concerns around under-performance or administration failings.

**Consultation Question 6:** *Does the intervention allow authorities sufficient scope and time to present evidence in favour of their existing arrangements when either*



*determining an intervention in the first place, or reviewing whether one should remain in place?*

Yes

**Consultation Question 7:** Does the proposed approach allow the Secretary of State sufficient flexibility to ensure that he is able to introduce a proportionate intervention?

Yes

**Consultation Question 8:** *Do the proposals meet the objectives of the policy, which are to allow the Secretary of State to make a proportionate intervention in the investment function of an administering authority if it has not had regard to best practice, guidance or regulation?*

This should be linked to the response made in question 5.

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**Bob Holloway**  
**Department for Communities and**  
**Local Government**  
*By email to*  
[LGPSReform@communities.gsi.gov.uk](mailto:LGPSReform@communities.gsi.gov.uk)

From : **Cllr Toby Simon**  
 (Labour, Turkey Street Ward)  
 E-mail : [Toby.Simon@Enfield.gov.uk](mailto:Toby.Simon@Enfield.gov.uk)  
 Phone : **020 8379 2834**  
 Date : **21 March 2016**

Dear Bob

**LOCAL GOVERNMENT PENSION SCHEME:  
 INVESTMENT REFORM CRITERIA AND GUIDANCE**

The Enfield Pension Fund is an active member of the London CIV and is fully committed to its success. We are in the process of moving assets into the newly opened equity funds; we have agreed a change of manager so as to take advantage of one of these. I attach a copy of the London CIV response to your consultation which Enfield fully endorses.

In addition, we would like to address some specific issues relating to the Enfield Pension Fund arising from the creation of the London CIV, which we would ask the Government to consider as part of this consultation process.

**Introduction**

Enfield Pension Fund has a distinctive investment strategy which has been developed over years and does not fit easily into the proposals arising from the consultation. Our current asset allocation is shown below.

<b>Asset Class</b>	<b>Target Weighting %</b>	<b>Control Range</b>
<b><i>Option A</i></b>		
<b>Equities (including Private Equity)</b>	40.0	±10%
<b>Bonds</b>	29.0	±10%
<b>Hedge Funds</b>	15.0	±5%
<b>Property (UK)</b>	10.0	±5%
<b>Infrastructure/PFI</b>	6.0	±3%
<b>Cash</b>	-	-

**Members Room**

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The Enfield Pension Fund has historically been well funded with above-average long-term performance on investments. Through a close working relationship with Council members, officers and investment professionals, a clear direction and clarity of purpose has been created and embedded into the decision making process of our Pension Policy & Investment Committee.

The basic approach was adopted about a decade ago, following an asset liability modelling exercise. We quantified the risks in the then current portfolio and looked at appropriate risks and required returns for the future. We agreed to design a portfolio that produced similar returns to one with high exposure to equities, but with better protection to falls in financial markets.

The key objective has been to control the risk of increases and volatility in the Council's funding rate, and the effect such movements would have on the Council Tax. Our consultants modelled a range of asset allocation strategies using historical market movement correlations and returns. The Committee decided to continue to generate the portfolio's current level of return, but with investment in assets whose movements were far less correlated than previously. This would help reduce expected volatility and the risk of increased contribution rates.

The Fund was keen to pursue diversification of investments and the key change was to reduce our exposure to equities from 70% to under 50% (currently 43% including a 5% exposure to private equity) and to move into alternative allocations. This included a number of strategies which protected the Fund from downturns in equity markets and would give absolute returns. This strategy has been particularly helpful in the current economic climate of falling world equity markets falling by 6% since March 2015.

Over the past decade to March 2015 we have slightly underperformed those funds with a heavy equity exposure but have experienced a much low level of volatility and risk. We expect that figures as the March 2016 will demonstrate the value of this approach.

We accept that hedge funds and other alternative investments have high fees, but looking at the performance figures net of fees we believe they have delivered our strategic objectives and are thus justified.

Our investments have included infrastructure both through a direct equity shareholding (INPP) and a private equity type fund (Arcus).

INPP directly invests into infrastructure – such as off shore wind turbines, Liverpool library and the Thames Tideway Tunnel. This has been a very stable investment which has yielded a bond like return with capital appreciation.

Arcus has been less satisfactory - though has achieved a positive return after some years of losses. However we have lost confidence in the manager and have given notice to seek to sell our holding, along with Newham and West Midlands PFs. We will therefore be seeking to reinvest in this asset class if the buy-out goes through.

**Phase 1 response to the consultation**

It seems unlikely that hedge funds will be an investment asset class available in the London CIV. This is because, as we understand the asset allocation of our colleagues, few if any London boroughs have adopted such a strategy, though it is used by some of the larger LGPS funds.

On the other hand, given the possible issues arising from the MiFID II directive's classification of local authorities, it may prove difficult to hold these investments outside of a pool.

Consequently, we would recommend the government allow funds to invest in more than one pool, so that the Enfield fund could invest in a pool that contains a hedge fund portfolio. This would give greater freedom for the fund to continue with this successful investment strategy.

Alternatively, we would like to have permission to hold these types of investments outside of the Authorised Contractual Scheme (ACS), though possibly using other structures administered by the London CIV.

We would wish to invest in property and infrastructure through the CIV, but it should be recognised that the CIV is fully occupied with setting up arrangements for other asset classes and that this may take some time.

We would like to continue to hold the INPP equity position, so would ask the Government to allow the Fund to hold this type of investment, possibly also within the London CIV, but outside of the ACS.

The Fund would be very happy to discuss and expand on these options with DCLG officials. We can then respond in more technical detail by July.

Yours sincerely

Cllr Toby Simon  
Chair, Pension Policy & Investment Committee