

The Pension Regulator's and Scheme Advisory Board Compliance Checklist

Date of Completion: 09/11/2018

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Introduction

This document outlines how Northumberland County 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 Northumberland County Council LGPS 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 Pension Panel and LGPS Local Pension Board.

This document highlights all the key elements of the TPR Code and then evidences whether Northumberland County 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, Northumberland County 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 | Net 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 the London Borough of Enfield, also referred to as Enfield Council. |
| <i>IDRP</i> | Internal Dispute Resolution Procedure |
| <i>SAB</i> | The national LGPS Scheme Advisory Board |
| <i>Panel</i> | Enfield Pensions Policy and Investment Panel |
| <i>PB</i> | London Borough of Enfield Local Pension Board |
| <i>HoPFI</i> | Head of Pension Fund Investment |

Summary Dashboard

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

| No. | Completed | Compliant |
|------------------------------------|-----------------|---------------------|
| Reporting Duties | | |
| A1 | Fully completed | Fully compliant |
| A2 | Fully completed | Fully compliant |
| A3 | Fully completed | Fully compliant |
| A4 | Fully completed | Non-compliant |
| Knowledge and Understanding | | |
| B1 | Fully completed | Partially compliant |
| B2 | Fully completed | Partially compliant |
| B3 | Fully completed | Fully compliant |
| B4 | Fully completed | Fully compliant |
| B5 | Fully completed | Partially compliant |
| B6 | Fully completed | Fully compliant |
| B7 | Fully completed | Fully compliant |
| B8 | Fully completed | Fully compliant |
| B9 | Fully completed | Fully compliant |
| B10 | Fully completed | Partially compliant |
| B11 | Fully completed | Partially compliant |
| B12 | Fully completed | Partially compliant |
| Conflicts of Interest | | |
| C1 | Fully completed | Partially compliant |
| C2 | Fully completed | Fully compliant |
| C3 | Fully completed | Fully compliant |
| C4 | Fully completed | Fully compliant |
| C5 | Fully completed | Partially compliant |
| C6 | Fully completed | Non-compliant |
| C7 | Fully completed | Partially compliant |
| C8 | Fully completed | Fully compliant |
| C9 | Fully completed | Fully compliant |
| C10 | Fully completed | Fully compliant |
| C11 | Fully completed | Fully compliant |
| Publishing Information | | |
| D1 | Fully completed | Partially compliant |
| D2 | Fully completed | Partially compliant |
| D3 | Fully completed | Fully compliant |
| D4 | Fully completed | Fully compliant |

| No. | Completed | Compliant |
|--|-----------------|---------------------|
| Risk and Internal Controls | | |
| E1 | Fully completed | Fully compliant |
| E2 | Fully completed | Fully compliant |
| E3 | Fully completed | Fully compliant |
| E4 | Fully completed | Partially compliant |
| E5 | Fully completed | Fully compliant |
| E6 | Fully completed | Fully compliant |
| E7 | Fully completed | Partially compliant |
| E8 | Fully completed | Partially compliant |
| Maintaining Accurate Member Data | | |
| F1 | Fully completed | Fully compliant |
| F2 | Fully completed | Fully compliant |
| F3 | Fully completed | Partially compliant |
| F4 | Fully completed | Fully compliant |
| F5 | Fully completed | Fully compliant |
| F6 | Fully completed | Fully compliant |
| F7 | Fully completed | Fully compliant |
| F8 | Fully completed | Fully compliant |
| F9 | Fully completed | Partially compliant |
| F10 | Fully completed | Fully compliant |
| F11 | Fully completed | Partially compliant |
| Maintaining Contributions | | |
| G1 | Fully completed | Fully compliant |
| G2 | Fully completed | Fully compliant |
| G3 | Fully completed | Fully compliant |
| G4 | Fully completed | Fully compliant |
| G5 | Fully completed | Fully compliant |
| G6 | Fully completed | Partially compliant |
| G7 | Fully completed | Fully compliant |
| G8 | Fully completed | Fully compliant |
| G9 | Fully completed | Partially compliant |
| Providing Information to Members and Others | | |
| H1 | Fully completed | Partially compliant |
| H2 | Fully completed | Partially compliant |
| H3 | Fully completed | Fully compliant |
| H4 | Fully completed | Partially compliant |
| H5 | Fully completed | Fully compliant |
| H6 | In progress | Fully compliant |

| No. | Completed | Compliant |
|---|-----------------|---------------------|
| H7 | Fully completed | Fully compliant |
| H8 | Fully completed | Non-compliant |
| H9 | Fully completed | Partially compliant |
| H10 | Fully completed | Fully compliant |
| H11 | Fully completed | Fully compliant |
| H12 | Fully completed | Partially compliant |
| H13 | Fully completed | Fully compliant |
| Internal Dispute Resolution | | |
| I1 | Fully completed | Fully compliant |
| I2 | Fully completed | Non-compliant |
| I3 | Fully completed | Partially compliant |
| I4 | Fully completed | Fully compliant |
| I5 | Fully completed | Fully compliant |
| I6 | Fully completed | Partially compliant |
| I7 | Fully completed | Fully compliant |
| I8 | Fully completed | Non-compliant |
| I9 | Fully completed | Fully compliant |
| Reporting Breaches | | |
| J1 | Fully completed | Partially compliant |
| J2 | Fully completed | Partially compliant |
| J3 | Fully completed | Partially compliant |
| Scheme Advisory Board Requirements | | |
| K1 | Fully completed | Fully compliant |
| K2 | Fully completed | Fully compliant |
| K3 | Fully completed | Fully compliant |
| K4 | Fully completed | Partially compliant |
| K5 | Fully completed | Fully compliant |
| K6 | Fully completed | Fully compliant |
| K7 | Fully completed | Partially compliant |
| K8 | Fully completed | Partially compliant |
| K9 | Fully completed | Fully compliant |
| K10 | Fully completed | Fully compliant |
| K11 | Fully completed | Non-compliant |
| K12 | Fully completed | Non-compliant |
| K13 | Fully completed | Non-compliant |
| K14 | Fully completed | Non-compliant |
| K15 | Fully completed | Partially 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 | Check Completed | Compliant | Notes | Action |
|-----|--|---|------------------------------|------------------|-----------------|-----------------|---|--|
| A1 | Is your scheme registered with the Pension Regulator? | <p>Aon has checked with the Regulator and the Enfield Fund is registered - further evidence is that scheme returns and surveys are sent to be completed.</p> <p>The contact for such surveys/returns is zpensions@enfield.gov.uk. It may be possible that important information is not seen or dealt with using a generic mailbox so the fund could consider having a specific individual as the key contact on the Regulator's exchange system.</p> <p>The Head of Exchequer Services, Head of Pension Fund Investment (HoPFI) and the Principal Exchequer Officer have their own log in to the Exchange site to make changes.</p> | One off - i.e. is registered | n/a | Fully completed | Fully compliant | | Consider having a specific individual rather than the generic pensions mailbox as the key contact on the Regulator's exchange system. |
| A2 | Is the information held on the Pensions Regulator's website about the scheme up-to-date? | The number of Employers does not change significantly (there are usually a very small number, if any, exiting employers each year) and so it is considered that an annual update for the scheme return is a reasonable approach. We therefore consider this to be fully compliant. | Annual | 08/10/2018 | Fully completed | Fully compliant | | |
| A3 | Have you completed this latest Scheme Return in the required timescale? | The 2018 scheme return was sent to Enfield on 25 September and was submitted on 1st November. It should be noted that there is a new requirement to test the common and conditional/scheme-specific and report a score in the 2018 scheme return. There is no central agreed list of scheme-specific items for the LGPS in this first year so Funds have to use their own judgement. It is possible to not enter a score, but this may attract attention from the Regulator as may indicate that annual data testing doesn't take place which is an expectation. Enfield have submitted data scores based on information provided by Heywoods supplemented by their own approach. | Annual | 08/10/2018 | Fully completed | Fully compliant | | |
| A4 | Have you responded to the latest TPR public service pension scheme survey/questionnaire? | The last survey completed was December 2016 so the 2017/18 survey was not completed. While this is best practice rather than a requirement, the Regulator is likely to focus case work on Funds who do not complete the annual surveys. | Annual | 08/10/2018 | Fully completed | Non-compliant | The Regulator is likely to pay particular attention in their case work in coming years to those Funds who do not carry out basic governance and administration activities, including the annual survey. | Suggest that the 2018/19 survey is completed (issued 5 November 2018) - the results of this TPR compliance review should help with the responses to the survey |

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 | Check Completed | Compliant | Notes | Action |
|-----|---|--|--|------------------|-----------------|---------------------|-------|--|
| B1 | Are there policies and arrangements in place to support pension board members in acquiring and retaining knowledge and understanding? | <p>The Fund has a training policy for Pension Policy and Investment Committee (PPIC) and Pension Board (PB) members - though this is not on the Fund or the Council website. This policy does not include training objectives, details of how training will be documented nor how attendance at events will be recorded and monitored. It does mention self assessments on an annual basis to identify needs.</p> <p>There are various processes carried out to ensure members can obtain relevant knowledge and understanding. This involves offering attendance to induction training events, attendance of PB members at PPIC meetings (as observers), and identifying training needs in business planning so that relevant training is provided before PPIC and PB meetings.</p> <p>The HoPFI and Head of Exchequer Services meet with new Chairs of the PPIC/PB to help them understand their role and about the Fund before their first meeting. The Chair of the PPIC attends the PB meetings to give updates on the decisions made and work in progress.</p> | Not specified in policy. Suggest annually. | 01/09/2017 | Fully completed | Partially compliant | | <p>The policy should be reviewed every three years at least, specify this in the policy.</p> <p>The policy should ideally include the objectives of the policy, and specify how training will be recorded and monitored.</p> |
| B2 | Has a person been designated to take responsibility for ensuring the framework is developed and implemented? | HoFPI is responsible for training, the Training Policy and its implementation, including the maintenance of the monitoring - however this responsibility is not set out in the training policy. | Not specified in policy. Suggest annually. | 01/09/2017 | Fully completed | Partially compliant | | Include responsibility in policy. |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|--|---|---|------------------|-----------------|---------------------|---|---|
| B3 | Is the Fund providing assistance to pension board members to determine the degree of knowledge and understanding required? | <p>The Training Policy says the members should do the TPR online training toolkit -this is a requirement in first year - the HoPFI will review if this has been completed by new members by the end of the year (2018). Other requirements are set out in the Training Policy which should indicate the level of knowledge required. The policy specified that an annual training needs assessment will be carried out which will feed into training plans.</p> <p>The PPIC training is based on what's coming up in meetings, and similar approach is take for the PB, but focused on governance - training is carried out at every meeting which helps indicate the level of knowledge required. All future activities and therefore what knowledge is needed is set out in the 3 year business plan, eg ABS.</p> <p>New members attend induction training (e.g. provided by Aon or LGA), which gives indication of knowledge requirements.</p> | Annual | 01/09/2017 | Fully completed | Fully compliant | We haven't seen evidence of the Business Plan but if this is in place and regularly updated it provides a useful tool for identifying knowledge requirements. | |
| B4 | Are the roles and responsibilities of pension boards and members of pension board clearly set out in scheme documentation? | <p>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. The TOR is not available on the Fund website.</p> <p>Requirements for training and knowledge are also set out in the Training Policy. This is more focused on new members than existing members (existing members are encouraged but not required to attend general awareness events).</p> | Not specified in policy. Suggest annually. | 01/09/2017 | Fully completed | Fully compliant | | Consider adding more detail on requirements for existing members into policy e.g. to attend at least a certain number of training events each year. |
| B5 | Are pension board members aware of their legal responsibility in terms of Knowledge and Understanding? | <p>Enfield confirmed members are told about this on appointment, it is included in Aon's induction training, and Unison have done some training for employee members as well.</p> <p>However this is not set out in the formal training policy.</p> <p>These responsibilities are mentioned in Terms of Reference, so PB members are already aware of their responsibilities - also responsibilities mentioned in initial PB meeting on 31 July 2015</p> | Each time new member appointed, and TPR Compliance review carried out | 01/10/2018 | Fully completed | Partially compliant | | Add legal requirements (for PB) and consider extending to PC in formal policy. |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|---|---|--|------------------|-----------------|-----------------|-------|---|
| B6 | Have all pension board members got access to copies of the scheme rules and relevant Fund documentation? | <p>New members are given the terms of reference and Fund policies etc, lots of these are in one place in the annual report.</p> <p>Fund documents such as Funding Strategy Statement and Investment Strategy Statement are also on the Fund website: https://new.enfield.gov.uk/pensions/forms/ which also has useful links to LGPS member website, LGPS Regulations etc. However the Terms of Reference for the PB are not on the website.</p> <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 list of key documents is set out in the training policy.</p> | Each time TPR Compliance reviewed | 01/10/2018 | Fully completed | Fully 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 drafted sets out the requirements (and this is given to existing PB members and new PB members when they join). A formal list of documents is included in the training policy.</p> <p>The key documents such as annual report and funding and investment strategies are available on the website (the annual report includes strategies and policy statements but the annual report on the website is more than a year out of date. HoFPI mentions the key items when he distributes the annual accounts in the meeting with new members - and explains which bits of the accounts to focus on.</p> | Not specified in policy. Suggest annually. | 01/09/2017 | Fully completed | Fully compliant | | |
| B8 | Are all pension board members investing sufficient time in their learning and development? | <p>Bite-sized training is currently carried out at each PB meeting according to need and what is to be discussed in the course of the meeting.</p> <p>Employee members have gone on Unison training and new members attended Aon induction course. Chair has had significant training.</p> <p>Provided members attend the meetings, this is considered sufficient to meet requirements.</p> | Annual | 01/10/2018 | Fully completed | Fully compliant | | <p>Suggest training plans are agreed when annual business planning exercise takes place.</p> <p>Suggest method of monitoring of training and documenting the level of investment of time in training is included in formal training policy.</p> |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|--|--|--------------------------------|------------------|-----------------|---------------------|--|---|
| B9 | Does the Fund offer pre-appointment training for new pension board members or mentoring by existing members? | <p>Pre-appointment training is not currently provided, and nor is mentoring as this is difficult to arrange and the commencement of the role is very soon after selection/appointment. However newly appointed board members are invited to attend Committee and Board meetings and training events taking place before their first meeting to develop their knowledge of the Fund. Board members can now remain in meeting even if not open to the public.</p> <p>When appointed, members have a meeting with the PB Chair as soon as possible in order to explain the PB member's responsibilities.</p> <p>In addition, the Chair of the PB did attend the CIPFA / Barnet Waddingham training before taking the Chair position, and attended induction training provided by Aon before first PB meeting.</p> <p>The HoPFI will also visit the new school representative to explain how the PB works before their first meeting. The PPIC Chair presents information on the last PPIC to every PB to inform what the PB will look at. The Chair of PB also attends PPIC as an observer.</p> | Each time new member appointed | 01/10/2018 | Fully completed | Fully compliant | An individual approach is taken to new appointments which ensures the members are as well-informed as possible which we believe to be compliant. | Ensure approach is documented in formal training policy |
| 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? | <p>A Training log is maintained - PPIC and PB members email the HoPFI about training attended, who keeps these on record and puts it in in annual report. The draft report on training attended is provided to members before the accounts are produced give members time to attend training to increase knowledge if required.</p> <p>Formal regular assessment of knowledge and understanding against required competencies (e.g. CIPFA) does not appear to be taking place.</p> | Annual | 01/03/2018 | Fully completed | Partially compliant | | Recommend that annual review of records kept (in PB or PPIC meetings) will highlight any individuals with outstanding requirements (PPIC, PB and officers). This should be against CIPFA and other required competencies. |
| B11 | Are records of learning activities being maintained? | The HoPFI collects the information about attendance in emails from the PPIC and PB members and collates this into the annual report and accounts on an annual basis. Members are given the information before the report is published to give them time to complete further training if felt necessary. | Annual | 31/03/2018 | Fully completed | Partially compliant | | Consider keeping an ongoing record of training carried out, for example in a spreadsheet and consider this at each PB meeting or on annual basis. |
| B12 | Have the pension board members completed the Pension Regulator's toolkit for training on the Code of Practice number 14? | <p>The PB have been advised to carry out these modules and this is included in the training policy. Members have a year to complete the modules after being appointed, and will inform HoPFI when completed.</p> <p>The HoPFI is considering completing modules in group training sessions as a "bitesize" approach.</p> | Twice-yearly | 08/10/2018 | Fully completed | Partially compliant | Partially compliant as it's not been confirmed that all members have completed this. | |

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 | Check 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? | <p>There is a CoI policy which is detailed in the Council Code of Conduct which applies to PB and PPIC members - this covers identification/declaration requirements but not all points recommended by TPR guidance. This is not on the Fund website and is not a Fund document.</p> <p>Council sends register of interests to members to complete.</p> <p>Standing item on PPIC and PB meetings to identify conflicts.</p> | TBC | TBC | Fully completed | Partially compliant | | <p>Ideally the Fund would have it's own COI Policy.</p> <p>Include Code of Conduct on website when upgraded, and recommend reviewing to include all relevant areas of TPR guidance</p> |
| 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? | <p>Yes - this was covered in recent training in October.</p> <p>Their role is set out in the TOR which all members have been provided with, and responsibilities also set out in the COI policy.</p> <p>Inclusion of conflicts as standing item in meetings ensures members understand the requirements.</p> | Whenever new members appointed | 01/10/2018 | Fully completed | Fully compliant | | |
| 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)? | <p>Standing item on each PPIC and PB meeting.</p> <p>HoPFI checks declarations of interests when member appointed, to make sure can carry out the role without conflict.</p> <p>Declarations are completed annually for Council staff via an annual questionnaire, and any hospitality or gifts are declared at the time of offer.</p> | Quarterly i.e. each PB meeting | 01/10/2018 | Fully completed | Fully compliant | | It would be useful if the Fund ensured annual declarations were on the Fund website for all members (not just Council staff) |
| C4 | Does the appointment process for pension board members require disclosure of interests and responsibilities which could become conflicts of interest? | <p>No formal pre-appointment declaration of interest takes place currently.</p> <p>However the HoPFI checks declarations of interests when member appointed, to make sure can carry out the role without conflict.</p> | Each time new member appointed | 01/10/2018 | Fully completed | Fully compliant | | Suggest declarations are requested at appointment/interview phase for future PB and PPIC members. |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|--|--|---------------------------------|------------------|-----------------|---------------------|-------|--|
| C5 | Is the conflicts policy regularly reviewed? | The gift list in the Code of Conduct is reviewed annually but it is not clear how often the policy itself is reviewed. Conflicts policy (within Code of Conduct) was agreed before first PB meeting - there is no comment about how often it is reviewed. This is a Council document so review is outside Fund control. | Unknown - not stated in policy. | Unknown | Fully completed | Partially 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 - may be a challenge as not a Fund document. |
| C6 | Does the Fund have a conflicts register and it is circulated for ongoing review and published? | The Council website has a space for declarations of interest on the committee meetings pages, but there aren't any recorded declarations published. Conflicts is discussed at each meeting as a standing item so minutes would provide record of any identified conflicts. However this is no formal register for the Fund. Conflicts are not reported on in the annual report and accounts. | n/a | n/a | Fully completed | Non-compliant | | Implement conflict register and consider reporting on this in annual report and accounts. |
| C7 | Is appropriate information included in the register? | The PPIC and PB declarations in meetings are just shown on each meeting minutes. The Council has a register of interests but it won't include non-Council staff. | At each meeting, i.e. quarterly | 01/10/2018 | Fully completed | Partially compliant | | Implement a fund register which includes all the recommended information. |
| C8 | Is there a standing item on the agenda for declaring conflicts of interest? | Yes - for both PPIC and PB. | At each meeting, i.e. quarterly | 01/10/2018 | Fully completed | Fully 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. Is also standing agenda item for PPIC and PB meetings, so fully covered. Also members will be encouraged to complete Toolkit module as part of Training requirements which is additional training on how this can be done. | At each meeting, i.e. quarterly | 01/10/2018 | Fully completed | Fully compliant | | |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|--|--|--|------------------|-----------------|-----------------|-------|--------|
| C10 | Is the number of employer and member representatives on the board in line with legal requirements? | <p>There are four representatives on each side, so this is compliant, and set out in the Terms of Reference. The Chair and Deputy Chair are appointed by PB at the first meeting, and where the Chair is an employee rep the Deputy is then a employer rep, and vice versa.</p> <p>An Independent adviser is being considered to help the Chair formulate an agenda independently.</p> | Each time members leave or new members appointed | 01/10/2018 | Fully completed | Fully compliant | | |
| C11 | Is the board made up of the appropriate mix of representatives in order to minimise potential conflicts? | <p>Yes - see details above in C10.</p> <p>There is 1 Academy representative, and 3 council representatives which is in a suitable proportion for the make-up of the Fund. There is 1 pensioner representative and 3 employee representatives. Unions suggested employee names so that suitable candidates were selected.</p> | Each time members leave or new members appointed | 01/10/2018 | 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 | Check Completed | Compliant | Notes | Action |
|-----|--|---|---|------------------|-----------------|---------------------|-------|---|
| D1 | Does the Administering Authority publish information about the pension board? | At the previous review the Fund website had basic details of who the PB members were, but there is no information about the PB or the PPIC on the new fund website. The Council website has a link to the PPIC and the PB: https://governance.enfield.gov.uk/mgCommitteeDetails.aspx?ID=707 . However this only shows the names of the members and whether they are an employee/employer representative, but not the additional information on responsibilities. The data on the Council website is up to date. | Ongoing and at end of specific terms (i.e. as LPB members change) | 08/10/2018 | Fully completed | Partially compliant | | Update/expand Council website information to include the full details of the pension board representation, and the Terms of Reference, and add PB and PPIC information to Fund website in line with TPR requirements/best practice. |
| D2 | Does the Administering Authority publish other useful related information about the pension board? | The Council website, if you click on links for the Councillor members, will show the job information and other positions held. There is no further information on the Council website and no information about PPIC or PB members on the fund website. The HoPFI has noted that he will escalate this with the Head of Democratic Services to ensure the information is updated. | Ongoing and at end of specific terms (i.e. as LPB members change) | 08/10/2018 | Fully completed | Partially compliant | | Consider adding additional information from Code of Practice paragraph 96 about the PB and PC members onto the Fund website. Ask Head of Democratic Services to update the Council website. |
| D3 | Is all the information about the Pension Board kept up-to-date? | The information on the Council website is up to date, but is not complete and there is no information on the Fund website. Given we marked the above as partially compliant relating to what is actually published, we are comfortable that this information will be kept up to date once published, as it currently is up to date on the Council website - therefore this is marked as compliant. | Ongoing and at end of specific terms (i.e. as LPB members change) | 08/10/2018 | Fully completed | Fully compliant | | Consider adding to pension fund website, even if just a link back to Council site. |
| D4 | Does the Administering Authority public information about pension board business? | The Council website shows meeting dates, agendas and meeting minutes, and is up to date to the last meeting on 4 October 2018. Some meetings in 2016/17 have no details and papers aren't published. | Quarterly | 08/10/2018 | Fully completed | Fully compliant | | Consider adding to pension fund website, even if just a link back to Council site. |

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 la

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 | Check Completed | Compliant |
|-----|---|---|--------------------------------|------------------|-----------------|-----------------|
| E1 | Is there an agreed process for identifying and recording scheme risks? | <p>There is a formal risk policy which sets out how risks are identified and recorded, which is soon to be approved by the Pension Board, and there is a risk register to help identify and record risks, and this has a covering note which is produced for each PPIC meeting. The PB also see the register every quarter. The risks on the risk register are clearly related to key fund objectives such as paying member benefits on time and achieving good returns for limited risk.</p> <p>The HoPFI has commented that it is currently being updated for MIFID II etc, ongoing news from the regulator etc. 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>HoPFI has mentioned this is currently being updated it to use a Red, Amber, Green approach, the current approach isn't that clear on how they are "scored" or prioritised - it's currently using a E or D and number "score" format based on high, low or medium. Risks are currently added as and when the HoFPI is preparing for PPIC meetings. Typically it is HoPFI's judgement on how to rate the likelihood and impact of each risk.</p> <p>It's not clear if any other party feeds into the main risk register but the Pensions Manager also has a risk register for administration items under development, which is much more detailed.</p> | Quarterly i.e. at each meeting | 01/10/2018 | Fully completed | Fully compliant |
| E2 | Does the Fund have an adequate process to evaluate risks and establish internal controls? | <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>Risk ratings and controls are considered by PPIC at each meeting where the risk status has changed, or if new risks are included on the register. The PB has also requested to see the full register at each PB meeting.</p> <p>The Pensions Manager is also developing a separate administration risk register which will be used from April 2019, as the main Fund risk register only includes a few key administration risks. This will be updated on an ongoing basis and will help inform what risks should be included on the wider fund register.</p> <p>The administration risks are identified through ongoing projects such as undecided members, transfers, GMP reconciliation as well as through ongoing day to day tasks. Monitoring of progress on these projects is carried out. The register identifies current controls and additional actions, but it is not yet fully complete in these sections. The Pensions Manager agrees it would be ideal to document these activities in a formal data improvement plan and risk policy.</p> | Quarterly i.e. at each meeting | 01/10/2018 | Fully completed | Fully compliant |

E - Managing risk and internal controls

Legal Requirements

The scheme manager must establish and operate:

Internal controls are defined in the legislation as:

- arrangements and procedures to be followed
- systems and arrangements for monitoring
- arrangements and procedures to be followed

The legal requirements apply equally where a scheme is

| No. | TPR Requirement | Notes | Action |
|-----|---|-------|--|
| E1 | Is there an agreed process for identifying and recording scheme risks? | | |
| E2 | Does the Fund have an adequate process to evaluate risks and establish internal controls? | | Complete the administration risk register and consider sharing with PB on, say, annual basis. Capture high level process to establishing controls and monitoring in the formal risk policy. |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant |
|-----|--|---|-----------------------------------|------------------|-----------------|---------------------|
| 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 7 key high-level strategic fund risks. The scoring of risks is based on judgement and the risks are categorised as either D or E with a number which rates them in terms of priority - this is based on high/medium or low likelihood and impact. This is reviewed in PPIC meetings quarterly 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 including actions to manage risk and current progress against those actions, but these could be in greater detail and include timescales for review.</p> | Each time TPR compliance reviewed | 01/10/2018 | Fully completed | Fully compliant |
| E4 | Does the Administering Authority review the effectiveness of the risk management and internal control systems of the Fund? | <p>There is an external audit once a year - reported to council, Committee and PB. There have been 6 or 7 internal and external audits carried out in the last few years, last one had got best result for the last few years. Audit reports are passed to the PB for consideration.</p> <p>However it has been noted that the auditors weren't experienced in pension matters so couldn't necessarily ask the right questions, and so perhaps the control systems have not been fully tested. This concern has resulted in the TPR Compliance and wider governance review.</p> <p>There is no formal review of risk management (other than review of the risk register). The risk policy sets out a lot of detail on the aims and objectives and principles of risk management, and how risks are identified and recorded, but could be developed in the setting up of controls and management of risks.</p> <p>There is also no formal processes for reporting of breaches of the law.</p> <p>In addition to the above, 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"> - Finance targets set and monitored by HoFPI on regular basis - The ongoing updating and annual review of the risk register which includes the control of those risks | Annual | 01/03/2018 | Fully completed | Partially compliant |
| E5 | Does the Administering Authority regularly review the risk register? | <p>The PPIC and PB see the register at each meeting. It is added to when required and as part of audit process and meetings or through discussions with advisors, if new risks come to light.</p> <p>There is a formal risk policy but it does not specify when the format of the register should be reviewed and there are limited details on the process for managing risks.</p> | Quarterly i.e. at each meeting | 01/10/2018 | Fully completed | Fully compliant |
| E6 | Is there a standing item on the Pension Board agenda to review scheme risks? | Yes - So are conflicts of interest, breaches, minutes, business plan for Committee, report from Committee Chair for PB. All of which may help identify further risks. | Quarterly i.e. at each meeting | 01/10/2018 | Fully completed | Fully compliant |

| No. | TPR Requirement | Notes | Action |
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| E3 | Does the Administering Authority have a risk register to record all risks identified and action taken? | | The register could include details on what the impact of the risk event occurring would be on the Fund. |
| E4 | Does the Administering Authority review the effectiveness of the risk management and internal control systems of the Fund? | <ul style="list-style-type: none"> - Fraud initiative checks. - Council have external audit of their accounts and fund accounts audit. - Any areas of concern or non-compliance are discussed at Chief Exec/MOM meetings. - For investment - annual internal control reports from custodian and fund managers. - Update of TPR Code compliance checklist approximately every 3 years. - The external audit will require SAS70 reports so internal controls of external asset managers are covered. - Heywoods also have a risk management policy for their systems which is reviewed regularly. - Disaster recovery tests have been carried out included where staff would be located. <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, and the Pensions Manager has a dashboard spreadsheet which includes the statistics on various administration projects and ongoing work (items completed and outstanding, and those not meet required timescales) so that areas for improvement can be identified. These don't report on whether legal timescales are met.</p> | <p>Suggest implementing the following to document how and when additional reviews will be carried out:</p> <ul style="list-style-type: none"> - Breaches procedure and register - Risk management policy - Administration strategy - Monitoring against legal administration requirements e.g disclosure requirements <p>Ensure audits carried out by those with sufficient expertise.</p> |
| E5 | Does the Administering Authority regularly review the risk register? | | Add detail on regularity of review of the register and how it is used in the risk management policy. |
| E6 | Is there a standing item on the Pension Board agenda to review scheme risks? | | |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant |
|-----|--|---|---|------------------|-----------------|---------------------|
| E7 | Does the Administering Authority have adequate systems, arrangements and procedures (internal controls) in place for the administration and management of the Fund and are they documented ? | <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. The Pensions Manager is developing a more detailed administration risk register which includes more details on the internal controls.</p> <ul style="list-style-type: none"> - Enfield Council use the Altair task management system - every day, 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 (e.g. 7 would be death) and has a guideline workflow to follow - cipfa timescales are followed. - The system provides individual reports on what staff members have done, and the first appraisals have just been carried out using this information which drive training, and the next one is in March. Each person only see smaller number of tasks allocated to them to give them focus. - 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 - was Pensions Manager, now Principal Exchequer Officer can as well. 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. The workflow system shows who has checked calculations. <p>More details are provided in the notes column as there is limited space.</p> | Annual audits and tri-yearly TPR Compliance checks, and quarterly risk register review. | 01/10/2018 | Fully completed | Partially compliant |
| 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. A contract review has not been done for some time, and now Prudential have reduced the amount of member communications i.e. not doing presentations.</p> <p>No regular updates are provided in relation to AVC services. There have been some issues about the admin of AVCs when members near retirement, in terms of getting information from/to Prudential using secure systems, but they are now resolved. Members are told the retirement process can take longer if AVCs are involved as sometimes takes a bit longer.</p> <p>Pru have in the past done a transfer to Enfield when a member didn't want to. But these incidents are rare - but do show that controls could be improved.</p> <p>Payroll are completely separate and they arrange the payroll for AVCs. I-Connect is now used to gather monthly returns for contributions, which includes AVCs, so it will be possible to check against Prudential records. It's not clear this is taking place.</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> | n/a | n/a | Fully completed | Partially compliant |

| No. | TPR Requirement | Notes | Action |
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| 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 ? | <ul style="list-style-type: none"> - Jobs of different types are spread around the team so people can learn to do more different things, other than where small numbers of cases where there will be a small number of specialists who deal with them e.g. divorce cases. - 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 who have had training on this. - A senior member of staff monitors the workflow for team members. - 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. - Task procedures are written already and can be followed - auditors see these as part of the audits carried out. - There is currently no formal breaches procedure despite having adequate processes. - Decisions on investments are made by the PPIC and fully documented. - Contributions are monitored throughout the year - minor breaches in payments are recorded by HoFPI and reported in the annual report. - There is currently no formal breaches procedure despite having adequate processes. - Payments to investment managers can be authorised only by HoFPI (other than tax and non financial issues). | <p>The risk policy could add more detail to document approaches to establishing internal controls once risks are identified.</p> <p>The Pensions Manager is considering reporting on cases having to be redone so can identify training needs - rets are OK - other things, eg GMP.</p> <p>Ensure all calculations are checked by another member of staff to the "doer" including quotations.</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 specific administration services provided and responsibilities delegated to the administrator should be documented in the terms of engagement and contract between the Fund and any third party which carries out any outsourced admin service (such as AVC providers and tracing agencies).</p> |

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 | Check 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"> - Altair system won't allow a new member entry without key details - 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. - Members are identified by NINO - ICONNECT uploads data on a monthly basis so easier to manage - this system creates new starters on Altair (and flags a new starter to the team) and updates the pay onto each members record. Any changes to hours etc will also automatically update so records will be kept up to date. - 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) - 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. - 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. - Data accuracy and completeness reports are also received via the triennial valuation, which cover some of these elements. <p>Common and conditional data scores as at 31 March 2018 were both 95%. It is not clear how the conditional (scheme specific) data score was obtained but it is much higher than has been observed at other pension Funds to date. It is unusual for it to be at a similar level to the common data score.</p> | Ongoing | 01/10/2018 | Fully completed | Fully compliant | | <p>Further investigation into conditional data score to determine if testing adequate to identify any data issues which need to be resolved.</p> <p>The 2018 data validation carried out by the Fund actuaries will also give a useful indication of the data quality.</p> |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|---|--|-----------------------------|------------------|-----------------|---------------------|---|--|
| F2 | Does the Fund have the appropriate processes in place so employers can provide timely and accurate information? | <p>Monthly information submission via I-connect is being implemented - all Enfield Council payrolls are already implemented, which is a large majority of the Fund. This process reduces automation and manual entry and has built-in checks to help ensure the employer's submission is as accurate as possible. The data is tested when submitted but the i-connect system and it produces a validation report showing cases which are fine, and warnings/error reports. Error reports from I-connect are checked and resolved, and if required the employer is contacted to provide further information. If people have multiple posts this I-connect system can generate new starters/leavers when that is not the case, which is a challenge.</p> <p>Then next to be implemented are Capel Manor (155 actives) and Oasis Enfield Academy (c400 actives) are next to be implemented (November deadline). Then employers that have more difficulty with providing what's required will be supported through the process (e.g. ELT and Cuckoo). Then smaller employers will be picked up.</p> <p>IConnect will be offered to all new employers. It is recognised that this can be difficult when staff TUPE out and the new employer has a new payroll provider.</p> <p>The Iconnect run is on the 30th of the month. If employers aren't using i-connect yet, they send returns via email to the Senior Finance Officer, who checks the contributions amounts paid is same as what employer has put on the return spreadsheet. She also checks they are paying the right rate (member and employer). If there are any discrepancies it suggests the data may not be correct and this is investigated with the employer, and where changes are needed these are made manually.</p> <p>See notes for more information as limited space.</p> | Ongoing | 01/10/2018 | Fully completed | Fully compliant | <p>For new employers - The admin team give forms to employers (bit there is no employer section of the Fund website - this may be added on future). Leaver forms etc are provided at commencement, and the team have given the employers notes on how to fill in the return spreadsheet - though as time goes on i connect will reduce need for this. The Pensions Manager also plans to visit the new employer as well to tell the employer exactly what's needed, though this has not been carried out to date - the employers will be invited to a meeting for the 2019 valuation and arrangements to visit them will take place then.</p> | <p>Continue to implement i-connect for all employers and work on employer engagement as planned. This will reduce risk of inaccurate information being submitted.</p> <p>Formalise approach in administration strategy.</p> <p>Formalise breaches policy and procedure and inform employers of this when it is in place so they understand their obligations and the possible consequences of not providing required data.</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. We have not seen evidence of the checking of benefit outgo cashflows and reconciling by employer, but in the 2016 valuation there were some discrepancies with the membership data which were quickly resolved. This did not impact the majority of employers.</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 | | Fully completed | Partially compliant | | <p>Agree with Prudential a way of ensuring this is carried out in in with Regulations for AVCs</p> <p>Ensure robust processes for checking employer cashflows in relation to benefit payments as required for triennial valuations.</p> |
| F4 | Are records kept of pension board meetings as required by the Record Keeping Regulations? | <p>These are stored on the Council website and are up to date - the papers are not on the site but the agendas and minutes are. Ideally there would be a link from the Fund page to allow scheme members to easily find this information.</p> | Ongoing (3 meetings a year) | 04/10/2018 | Fully completed | Fully compliant | | <p>Consider adding a link to the minutes/agendas etc on the fund website.</p> |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|---|---|--------------------------------|------------------|-----------------|-----------------|-------|---|
| F5 | Are records kept of decisions made by the pension board, outside of meetings as required by the Record Keeping Regulations? | <p>The PB are not a decision making body so it is not expected that there will be any decisions outside of meetings (or even in meetings other than decisions within the PB to make recommendations or to request information for oversight purposes).</p> <p>For the PPIC, members are emailed by HoPFI if something needs to be done between meetings, with a note that unless there is objection they will proceed with the stated action, and then there is an update at next meeting for discussion.</p> | Ongoing | 08/10/2018 | Fully completed | Fully compliant | | |
| F6 | Are records retained for as long as they are needed? | <p>Records are retained indefinitely as part of the members records set up on Altair.</p> <p>A number of old record cards had recently been discovered in archiving so are being scanned into the system to make records easier to find (though to link them to individual member records would be significantly time consuming so that is not being carried out). All paper records and microfiche had previously been added to the systems at the time of the last review.</p> <p>Cashflow records (contributions and benefit payments) are also kept indefinitely (on Altair for individual member cashflows and on the payroll/cashflow systems).</p> <p>Given the long term nature of pensions and the possibility for queries arising many years after a member has left or died, this is considered a suitable approach.</p> | Ongoing | 08/10/2018 | Fully completed | Fully compliant | | |
| F7 | Does the Administering Authority have policies and processes to monitor data on an ongoing basis? | <p>NFI is completed each year and workflows established for any work produced via this route.</p> <p>Member information is also checked at the year-end when benefit statements are being produced i.e. CARE pay compared to previous years, and contributions are checked to see if paid in line with the CARE pay. Anything unreasonable in terms of data or data changes since last year are queried with the employer. If corrections are required, these are put onto member records immediately (it is done and checked by different staff).</p> <p>Reporting is carried out on quality under various categories on an ad hoc basis. The Pension Manager will add data review to the pensions dashboard which is produced by Altair then updated by the Pensions Manager. This dashboard is not given to PB but has been offered - this is a record of projects eg unprocessed leavers i.e. how much completed per month.</p> <p>Common and conditional data scroing has been carried out as at 31 March 2018 (scores of 95% each).</p> <p>The fund actuary is due to carry out pre-valuation data testing and is waiting for the administering authority to provide the data extracts.</p> | Annual | 01/03/2018 | Fully completed | Fully compliant | | Provide data to Fund Actuary Aon to carry out early valuation data testing. |
| F8 | Does the Administering Authority carry out a data review at least annually? | <p>Active member data is reviewed for the benefit statements but other than that there is no annual check.</p> <p>The Fund will carry out common and conditional data scores on an annual basis now this is a requirement of the pensions regulator scheme return.</p> <p>Actuaries Aon carry out data validation at each triennial valuation, and are carrying out a validation exercise on March 2018 data to attempt to resolve queries before the 2019 valuation date.</p> | Triennial (annual for actives) | 01/03/2018 | Fully completed | Fully compliant | | |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|---|--|---------------------|------------------|-----------------|---------------------|--|--|
| F9 | Is a data improvement plan in place which is being monitored with a defined end date? | <p>There are various data improvement activities in place. There is a pensions dashboard which shows the progress of each administration - related project such as tracking all transfers in and out, (will be a delay for factors after November), In terms of dealing with employers. the team was moving towards a more interventionist approach for one employer to ensure better data, however, they have over the summer replaced many of their staff and there has been a noticeable improvement, although Enfield are keeping a close watch on this area.</p> <p>In terms of general improvements to data collection processes, -iconnect is also due to be rolled out to more employers as explained above.</p> <p>MSS is in place to help - actives can update some of their own addresses etc. MSS will be opened up to deferred and pensioners as well in due course. The Pensions Manager will be looking at usage statistics to inform where improvements could be made. There is comprehensive help online for members who are using this - benefit statements will be on here as well.</p> <p>The Pensions Manager is also monitoring statistics produced by Altair on work being carried out. There were lots of workflows which weren't being assigned to staff, but that has been sorted now and the system is more transparent. There isn't any improvement activities to improve data scores (common and conditional) or act on queries from valuation data testing.</p> <p>It is recognised the PB should be keeping annual eye on this dashboard/statistics and progress against agreed activities but the PB are quite new so this has not yet been requested. A short report to summarise work being done can be produced. See notes section for more detail.</p> | Ongoing | 01/10/2018 | Fully completed | Partially compliant | <p>A formal documented data improvement plan is not in place but the work carried out by the Pension Manager and the spreadsheets are useful documentation of the activities underway. It would be useful for a data improvement plan with a defined end date which also looks at wider improvements which can be made to improve likelihood of Fund meeting it's objectives to be created. A formal administration strategy should be in place in order to support this.</p> <p>SLAS are all different days and HR expectations different - The Pensions Manager will be improving them as part of data improvement activities and will be discussing with Board.</p> | <p>Formal administration strategy to set out objectives.</p> <p>Formal data improvement plan to document activities in dashboard and with a target timescale, so that progress can be easily monitored.</p> <p>Inclusion of wider range of improvement activities in plan - dashboard mainly focuses on completion of day to day admin tasks (albeit there are backlogs being resolved).</p> |
| F10 | Are processes and policies in place to reconcile scheme data with employer data? | <p>Reconciliations are on a continual process until the team is satisfied they have reached a level that the Pensions Manager is happy with.</p> <p>The Senior Finance Officer highlights where there are unusual changes month on month and where information doesn't tie up to contributions paid, and this is passed to the team to investigate with the employer on a monthly basis.</p> <p>Employers who submit returns in excel sheet include details like changes to membership (and addresses etc) which are automatically updated using I-connect or manually changed if I-connect not used. A small number of employers still send in paper records - and these are manual entries by the team e.g. for change of address or hours - these changes are not checked.</p> <p>Some examples of upcoming areas to be looked at in more detail include -</p> <ul style="list-style-type: none"> a) Marital status review - any missing b) CARE reconciliation - that every active member has CARE upto 30/09/2018 c) currently working on frozen refunds review to ensure none have missed the automatic linking to active records <p>A report can be run in Altair to give the people upcoming for retirement - the team keep an eye on unprocessed leavers as they come through as well.</p> <p>There is a new systems team to carry out things like projects, running reports like this. Altair recent upgrades make it easy to identify those nearing retirement. This report is carried out 2 times a year. Heywoods came to deliver training for Enfield staff a few weeks ago on the upgrades.</p> | Ongoing | 01/10/2018 | Fully completed | Fully compliant | | Ensure any manual entry into member records is checked by another member of staff, where incorrect entries could affect the amount of member's benefits or ability to pay benefits on time. |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check 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, and the new requirements of GDPR (from 25 May 2018)? | <p>All Enfield Council staff undertook a very comprehensive online training session that required the staff member to pass to ensure they were signed off as GDPR compliant. Egress system is compliant with data protection requirements.</p> <p>Benefit statements are all sent in paper form where an address exists, and will be added to member records online and staff payroll and pension payslips moving to electronic where requested. Only if £5 plus difference and after pension increase.</p> <p>MSS is secure - members get their activation code when they log on and the information goes to the admin team and on the member record. Members have to use work email address.</p> <p>Staff do work from home using a remote server which works the same as if in office.</p> <p>Passwords are required to get into staff laptops which changes, regularly. Heywoods requested staff change log ins more often now, ie. every month. This has 2 levels, one has to be resent by heywoods.</p> <p>There is not currently a privacy notice on the member website, and members should be informed by data controllers how their data will be used.</p> | Ongoing | 01/10/2018 | Fully completed | Partially compliant | | Privacy notice on website |

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 |
|-------------------|---|---|
| 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 th day of the month, or 22 nd 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 | Check Completed | Compliant | Notes | Action |
|-----|--|--|---------------------|------------------|-----------------|-----------------|---|---|
| G1 | Does the Fund have procedures and processes in place to identify payment failures? | <p>There are processes which are followed on a monthly and annual basis, based on a spreadsheet. This is explained below.</p> <p>The key person involved with this process has minimised the risk involved as they have produced a comprehensive guide and instructions for this checking proces, and the spreadsheet formulae etc from previous months would serve as a useful guide if someone were spreadsheet-proficient.</p> | Annual | 01/10/2018 | Fully completed | Fully compliant | We are confident that the process will identify payment failures in terms of timing and amount. | |
| G2 | Do those processes and procedures include a contributions monitoring record to determine whether contributions are paid on time and in full? | <p>The Senior Finance Officer's spreadsheet sets out what payments are expected for each employer each month based on rates in R&A certificate and previous month's payment. The Senior Finance Officer will compare month on month to see if they are paying what they are expected to. In doing this, she will check member numbers and if there has been a big jump it can justify a big contribution difference. She also looks at the average per member per month to see if this looks reasonable.</p> <p>Discrepancies are investigated. This is broken down by Scheduled Bodies, Admitted Bodies, and both employee and employer contributions are split out.</p> <p>The Senior Finance Officer also checks the dates of payment - late payments are identified and put into a separate sheet for following up. If payments are late, it's usually because the employer is new or they have technology issues, The Senior Finance Officer emails them, and has never then had to escalate to the HoPFI. Sometimes the information provided is correct.</p> <p>The processes are all documented in a comprehensive procedure note with screenshots.</p> | Annual | 01/10/2018 | Fully completed | Fully compliant | Late payments are shown in annual report. | Processes could also briefly be recorded in a formal administration policy. |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|--|--|---------------------|------------------|-----------------|-----------------|-------|---|
| G3 | Do those processes and procedures include monitoring payments against the contributions monitoring record on an ongoing basis? | <p>The payroll (SAP) information on what has been received is held in separate tab, and matched to each employer for comparison. This is broken down by Scheduled Bodies, Admitted Bodies (which helps as size and materiality differs between these groups, and both employee and employer contributions are split out.</p> <p>Discrepancies are investigated by looking at member numbers, employer submissions, and by contacting employers if a reason can't be found.</p> <p>No process is currently in place in relation to reconciling AVC payments with contributions record. This should be discussed with Prudential representative to ensure required information is provided.</p> | Ongoing | 01/10/2018 | Fully completed | Fully compliant | | Consider how AVC contributions could be checked and monitored. |
| G4 | Are these procedures regularly reviewed to ensure they are effective? | Audited at end of year and mid year audit last year. | Annual | 01/03/2018 | Fully completed | Fully compliant | | Processes are not formally documented. Administration policy/strategy should be drafted which will be subject to regular review, as well as the reporting under the requirements set out within the policy. |
| G5 | Do the Administering Authority's processes include managing overdue contributions in line with TPR's suggested approach? | <p>There are no employers who are continual offenders where any significant action would be required.</p> <p>The Senior Finance Officer/HoFPI will identify payments if outside of 19 day statutory period. When a payment issue is identified they are split out in a separate spreadsheet and the employer contacted promptly to alert them to the payment failure, find the cause and circumstances and to seek to resolve the overdue payment. Any late payments are typically due to new staff or technology changes at the employer.</p> <p>If it a minor breach which is subsequently quickly paid it is not reported to TPR (just recorded), but if persistent will raise with employer to try to resolve.</p> <p>Any late payments are reported in the report and accounts.</p> | Ongoing | 01/10/2018 | Fully completed | Fully compliant | | |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|---|---|---------------------|------------------|-----------------|---------------------|-------|--|
| G6 | Does the Fund maintain a record of any investigations and communications with employers? | The Senior Finance Officer provided evidence of all email communications filed, which includes monthly/annual submissions of member and contributions information, as well as any investigation correspondence. | Ongoing | 01/10/2018 | Fully completed | Partially compliant | | Conversations with employers could be recorded more formally e.g. in a log so that doesn't rely on a person's inbox, and this could be a report to the Pensions Board if any communications with employers are needed in relation to payment of contributions. |
| G7 | Do employers provide sufficient information to monitor contributions and is this in accordance with the LGPS regulations? | Generally the employers do provide what's needed unless one-off occasions e.g due to personnel changes at employers - all current employer payroll providers can do this. I-connect is being implemented which means monthly submissions for the majority of employers. Missing information will be raised with employers immediately following the return as Altair will require it. | Ongoing | 01/10/2018 | Fully completed | Fully compliant | | Set out employer requirements in formal Administration Strategy, including how performance of employers will be reported upon and remedial action taken. |
| 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? | Yes - The Senior Finance Officer bears in mind the size of the employer and the payment (see above) - some employers are very small. So far no failures have been material to the Regulator, and have been resolved by the next month's payment so not a cause for concern. Processes should be documented so that it can be evidenced to the Regulator if ever required. Breaches are shown in the spreadsheet records kept, but there is not a separate breaches log. Failures are reported in the annual report and accounts. Since none have been considered serious/material employers have not been named. | Ongoing | 01/10/2018 | Fully completed | Fully compliant | | Formalise reporting and monitoring requirements in formal process notes and in administration strategy. |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|---|---|---------------------|------------------|-----------------|---------------------|--------------------------------|---|
| 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. | n/a | n/a | Fully completed | Partially compliant | Not outsourced other than AVCs | Put in place improved monitoring for AVCs |

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 | Check Completed | Compliant | Notes | Action |
|-----|---|---|---|------------------|-----------------|---------------------|--|--|
| H1 | Has an annual benefit statement been provided to all active members within the required timescales? | <p>97.5% of ABS were issued for Actives were sent by the deadline of 31 August.</p> <p>The statements for one Academy Trust didn't go in time as there was a change in personnel and the timescales made it difficult to obtain the required information, but those statements have now been sent.</p> <p>This is not seen as a material breach for reporting to the regulator.</p> | Annual | Oct-18 | Fully completed | Partially compliant | Only partially compliant as was not 100%, but this was largely out of the control of the Administering Authority. No cause for concern. | |
| H2 | Do these meet the legal requirements in relation to format? | <p>The active benefit statements have been provided and compared with the HMT Directions (i.e. the Disclosure Regulations) and they are compliant other than the following pieces of information which are not included:</p> <ul style="list-style-type: none"> - Date of starting pensionable service - Summary of the method used for calculating member and survivor benefits (there is a breakdown of the annual CARE calculation but this is missing for any final salary elements). This was also noted as being omitted at the last TPR Compliance review. - It's not clear how any deductions e.g. for pension debits or scheme pays debits would be shown on the statement if they were to apply. | TBC - At least each time TPR Compliance is reviewed | 01/10/2018 | Fully completed | Partially compliant | | <p>We recommend including the following information to make the statements compliant:</p> <ul style="list-style-type: none"> - Date of starting pensionable service - Summary of the method used for calculating member and survivor benefits (e.g. including the member's final salary and the pre 08 and pre 14 accrual rates). The explanation could be in additional explanatory notes to support the statement figures if the desire is to keep the statement simple. - Any deductions e.g. for pension debits or scheme pays debits would be shown on the statement if they were to apply. It may be necessary to use a different statement for those with any deductions as would need more explanation. |
| H3 | Has a benefit statement been provided to all active, deferred and pension credit members who have requested one within the required timescales? | <p>For deferred members where an address was held, 100% were issued by end of June 2018 (i.e. by LGPS deadline).</p> <p>Enfield have confirmed that they are compliant in this area for other membership categories where there has been a request. There are no KPI statistics as evidence to confirm this is the case.</p> | Ongoing | 01/06/2018 | Fully completed | Fully compliant | <p>Enfield Council to confirm these statements include the required information about the amount of benefits by reference to a particular date and how they are calculated.</p> <p>Alternatively, example statements for these cases can be provided for evidence.</p> | <p>We suggest that KPI/SLA statistics are held on whether benefit statements following a request by an active, deferred or pension credit member are provided no more than two months after the date the request is made.</p> |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|--|--|---|------------------|-----------------|---------------------|--|---|
| H4 | Does this meet the legal requirements in relation to format? | The deferred benefit statements have been provided and compared with the HMT Directions (i.e. the Disclosure Regulations) and they are compliant other than the following pieces of information which are not included: - Date of starting pensionable service - Summary of the method used for calculating member and survivor benefits. This was also noted as being omitted at the last TPR Compliance review. - It's not clear how any deductions e.g. for pension debits or scheme pays debits would be shown on the statement if they were to apply. - The amount of the member's pensionable remuneration on the date pensionable service ended (CARE and Final Salary definition). | TBC - At least each time TPR Compliance is reviewed | 01/10/2018 | Fully completed | Partially compliant | We have not seen evidence of a statement for a pension credit member. | We recommend including the following information to make the statements compliant: - Date of starting pensionable service - Summary of the method used for calculating member and survivor benefits (e.g. including the member's final salary and the pre 08 and pre 14 accrual rates). The explanation could be in additional explanatory notes to support the statement figures if the desire is to keep the statement simple. - Amount of pensionable remuneration on date of leaving (CARE and final salary) - Any deductions e.g. for pension debits or scheme pays debits would be shown on the statement if they were to apply. It may be necessary to use a different statement for those with any deductions as would need more explanation. |
| H5 | Has an annual benefit statement been provided to all members with AVCs within the required timescales? | Prudential issued statements in May. These are sent directly to the member by the Prudential. | Annual | 01/05/2018 | Fully completed | Fully compliant | | |
| H6 | Do these meet the legal requirements in relation to format? | Aon has not seen statements from the Enfield Fund for 2018, but has seen example statements from Prudential for other LGPS Funds from previous years (the format is the same across LGPS Clients for Prudential) and they were complaint, so we are confident that these are likely to still be compliant. | Annual | 01/05/2018 | In progress | Fully compliant | While Prudential manage the AVCs in terms of administration, it is important for the Administering Authority to recognise that it is still their responsibility to ensure the AVCs are managed in line with the LGPS Regulations and other legal requirements. It is known that Prudential are reducing the level of communications for members relating to AVCs. | In future years make sure that appropriate levels of member information is provided to those who have AVCs. |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|---|--|---|---|-----------------|-----------------|---|---|
| H7 | Is basic scheme information provided to all new and prospective members within the required timescales? | <p>For Enfield staff, scheme information is issued by HR as part of their new joiner pack, which includes a new starter form, nomination form. Member can ask for various forms, and will be directed to the website for these. Other individual employers have been instructed to provide same info as HR to new staff.</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. This matter has recently discussed at a HR/Pensions meeting at Enfield Council, as part of a full review of processes between departments. Sometimes info is passed to the pensions team that isn't needed which causes GDPR issues.</p> <p>The timescales of sending information to members and setting them up is monitored using the Heywoods task management system (the example provided shown none outside of required timescales), - the workflow system records dates of tasks so can identify late responses, and use of automation via I-connect is ensuring new members are identified quickly. This means responses within required timescales could be reported on if required - the team can prioritise cases by deadlines.</p> | Annual | 01/10/2018 | Fully completed | Fully compliant | Enfield Council has limited control over what employers send prospective members but they are all provided with the new starter information to provide and there is sufficient information on the Fund website. | <p>The Pension Manager also wants to send Heywoods statutory notice to new joiners which gives more information e.g. if someone transfers in. In addition he has said that some documents are out of date so need updating.</p> <p>Ensure requirements met as action of the current review of processes with HR.</p> <p>Monitor legal disclosure timescales as part of formal KPI/SLA monitoring.</p> |
| H8 | Does this meet the legal requirements in relation to format? | <p>We have been provided with a sample document which is a guide to the LGPS and some attached forms, which is provided to members on joining.</p> <p>This is compliant in all areas except that:</p> <ul style="list-style-type: none"> - the member contribution rate table is out of date and refers to the 2014/15 table. - Fuller details re transfers into the Fund as per Regulation 6 i.e. Part 1.6 of Schedule 2. - Relating to Part 1.4 of Schedule 2, a statement as to whether charges apply on transfers out - 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. - 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). <p>In addition the guide still refers to being contracted out of the S2P which is no longer applicable from 2016.</p> <p>These comments are largely unchanged from the previous TPR compliance review. Given the information is now so out of date, we consider this to be non-compliant.</p> | Doesn't appear to be reviewed/updated regularly | Around 2014/2015 based on contribution table. | Fully completed | Non-compliant | | Update the guide provided to members. |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|--|--|---------------------|------------------|-----------------|---------------------|---|--------|
| H9 | Is all other information provided in accordance with the legal timescales? | <p>We have not been able to gather the full evidence to guarantee the Fund is fully compliant in this area.</p> <p>There is monitoring of internal SLAs on timescales but these may not be the same as the legal timescales. The dashboard shows that target timescales are missed in some cases (transfers, retirements, and a significant amount of leavers) although this may often be out of the Administering Authority's control.</p> <p>Changes to the scheme are set out in communications which accompany the ABS as this is the best way of targeting members.</p> | Ongoing | 01/10/2018 | Fully completed | Partially compliant | <p>Enfield Council to confirm that when information is provided to members/beneficiaries on death, receipt of transfer credits, and in relation to AVCs etc., the requirements of the Disclosure Regulations 2013 are complied with. These requirements are set out in a separate tab as a checklist to complete.</p> <p>Enfield Council to confirm how compliance is monitored on a regular basis. Please provide details of how this is reported, e.g. to the PPIC and/or pensions board.</p> | |
| H10 | Is all other information provided in the format and methods required by law? | <p>We haven't seen evidence of the information Prudential provide but based on previous experience we are confident they are meeting the requirements.</p> <p>While we haven't been able to gather evidence of all possible communications we are confident the requirements are being met.</p> | Ongoing | 01/10/2018 | Fully completed | Fully compliant | | |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|---|--|---|------------------|-----------------|---------------------|-------|--|
| H11 | Where any information is only provided electronically (i.e. instead of any hard copy) does it comply with the legal requirements? | Only pensioner payslips are provided electronically, and only for members who have not opted out. The requirements set out have been complied with. | Each time TPR compliance reviewed | 01/10/2018 | 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>This work will be for the newly created systems team but there has not been much focus on this to date in the existing pensions team. There are no statistics gathered on the use of the member website but staff do act on ABS feedback received. Nomination forms and MSS has driven a lot of the feedback. Spikes in email communications are investigated and acted upon.</p> <p>Also, the Enfield design team haven't been involved in the ABS design. A planned rebranding to match the investment information is going to be undertaken by the Head of Exchequer Services.</p> | Annual based on ABS feedback | 01/10/2018 | Fully completed | Partially compliant | | Carry out review and updating of communications including ABS. |
| H13 | Does the Administering Authority use a tracing service? | <p>NFI is completed each year for all scheme members, but differences arise with abatements across London Funds.</p> <p>Individual DWP tracing has been used for pensioners when a "gone away" notification is received. This is more difficult to monitor for emails, but if no reply is received, it's marked as a gone away.</p> <p>A tender exercise is planned for a one off tracing exercise. Assuming this goes ahead we have marked this as compliant.</p> | Ongoing for gone-always and one off tracing at intervals i.e. every 3 years | 01/10/2018 | Fully completed | Fully compliant | | Ensure tracing exercise is carried out as planned |

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 | Check Completed | Compliant | Notes | Action |
|-----|--|--|-----------------------|------------------|-----------------|---------------------|-------|--|
| I1 | Has the Administering Authority put in place an internal dispute resolution procedure? | The IDRP policy is in place and is available to Enfield Council staff through the staff intranet. However it is not available on the fund website for members who are employees of other employers. | Not specified in IDRP | 01/10/2018 | Fully completed | Fully compliant | | |
| 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. | Not specified in IDRP | 01/10/2018 | Fully completed | Non-compliant | | Update to include details on what is exempt next time IDRP is reviewed and updated. |
| 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 "nominated person" for stage 1, 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. A brief explanation that discretionary decisions will be reconsidered and what happens if the nominated person disagrees with the initial decision in stage 1 is included, but no details on stage 2 process is included other than it will be considered by an independent person to stage 1. | Not specified in IDRP | 01/10/2018 | Fully completed | Partially compliant | | Consider including details of who the "nominated person" for stage 1 is. Consider also adding more details on the process for how stage 1 and stage 2 decisions are made. |
| I4 | Has the Administering Authority ensured that employers who make first stage decisions also have IDRP in place? | Employers do not have their own appointed person - this is all carried out by Enfield Council. The pensions team deal with the case and then pass to Head of Exchequer Services to review. All employers have it documented where they follow the Administering Authority's policy. | Not specified in IDRP | 01/10/2018 | Fully completed | Fully compliant | | |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|--|---|-----------------------|------------------|-----------------|---------------------|-------|--|
| 15 | Are the timescales in the procedure adhered to including sending an acknowledgment on receipt of an application? | <p>The timescales for response are not included in the IDRP.</p> <p>The Fund does not have many complaints, so it is easy to monitor the timescales taken for each case. The Head of Exchequer Services and Pensions Manager monitor the timescales for cases and get in touch with the members if investigations or decisions take longer than expected.</p> <p>There is also a central complaints team at Enfield Council who keep a log of complaint cases, and they will also follow up when it is getting close to deadlines to ensure requirements met where possible.</p> <p>An acknowledgement is sent upon receipt of an application and members are told of the timescales in these communications (though not in IDRP document).</p> | Not specified in IDRP | 01/10/2018 | Fully completed | Fully compliant | | Suggest formal monitoring or reporting to PB (or PPIC) on IDRP processes/performance including whether timescales met. |
| 16 | Does the Administering Authority notify and advertise the procedure appropriately? | <p>IDRP guide and form is provided when a decision is taken about a member's benefits and they are written to set out the decision, and when a member complaint is received, with a covering letter.</p> <p>However the IDRP is not held separately on the member website where the other useful forms and guides are held.</p> <p>It is explained in the new member guide which is on the website: https://new.enfield.gov.uk/pensions/wp-content/uploads/2017/02/LGPS-guide.pdf</p> | Not specified in IDRP | 01/10/2018 | Fully completed | Partially compliant | | Include IDRP as separate document on member website |
| 17 | Are the notification requirements in relation to TPAS and the Pensions Ombudsman being adhered to? | <p>Included in letters in initial stages and in decision letter. Notifications always include information about TPAS/PO in the decision letter.</p> <p>Information on TPAS and PO are also given in the IDRP leaflet.</p> <p>However, the wording should have changed slightly as the disputes team at TPAS is now at the Ombudsman - the IDRP and example letters we have seen have not been updated to reflect this.</p> | Not specified in IDRP | 01/10/2018 | Fully completed | Fully compliant | | Update the wording to reflect the fact that the TPAS disputes team is now (from April 18) at the Ombudsman. |
| 18 | Does the Administering Authority regularly assess the effectiveness of its arrangements? | <p>The processes are not formally reviewed. Sometimes cases arise where they haven't been through the proper employer process and that is usually resolved quickly.</p> <p>The Council do make sure they don't get involved in the detail of the ill health decisions based on previous experience.</p> <p>It has been noted that the freeze of transfers due to the change in the factors/SCAPE discount rate may result in some IDRP cases as there is a backlog.</p> | Not reviewed | n/a | Fully completed | Non-compliant | | Processes for IDRP should be formally reviewed e.g. check treating the cases consistently, and reporting on whether response timescales met. |
| 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. | n/a | n/a | 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 | Check Completed | Compliant | Notes | Action |
|-----|---|---|---------------------------------|------------------|-----------------|---------------------|-------|--|
| J1 | Is the Administering Authority satisfied that those responsible for reporting breaches under the legal requirements and TPR guidance understand the requirements? | It is expected that those responsible are aware of their responsibilities as training has been provided in induction sessions members have attended. However there is not a formal documented process for reporting breaches for the Fund. | When new members are appointed. | 01/10/2018 | Fully completed | Partially compliant | | |
| J2 | Does the Administering Authority have appropriate procedures in place to meet their legal obligations for identifying and assessing breaches? | The Pensions Manager escalates any issues to Head of Exchequer Services. The administration team raises any areas of concern (e.g. at checker level) with the Pensions Manager. Where things are raised at checking level that typically means a breach is avoided. 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 in a procedure note and/or policy. | Not currently carried out | 01/10/2018 | Fully completed | Partially compliant | | Formal documentation of processes and policy |

| No. | TPR Requirement | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check Completed | Compliant | Notes | Action |
|-----|---|---|---------------------------|------------------|-----------------|---------------------|-------|--------|
| J3 | Are breaches being recorded in accordance with the agreed procedures? | <p>There is no formal procedure or log for recording breaches of the law.</p> <p>There is evidence that the employer contributions process is well managed and rare cases of any late payment is resolved without issue. These aren't reportable to the Regulator and aren't on a breaches log but are recorded in the contributions monitoring process where it is clear these aren't material, and the contribution failures are reported in the annual report and accounts.</p> <p>However the regulatory requirements in relation to breaches cover more than the contribution payment breaches and there should also be records kept of the administration and disclosure/timescale related breaches, regardless of how minor they appear to be individually, as an accumulation of minor breaches can be indicative of an underlying issue.</p> | Not currently carried out | 01/10/2018 | Fully completed | Partially compliant | | |

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 | Check 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 | One - off at commencement | 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 3 subsequent meetings per annum since then) | One - off at commencement | 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 | There is a training policy which covers PB and PPIC, for which HoPFI has responsibility, this sets out knowledge and understanding requirements in line with TPR requirements and is based on CIPFA requirements | Not specified | 01/09/2017 | Fully completed | Fully compliant | | |
| 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 | HoPFI has responsibility but this isn't specified in the policy. | Not specified | 01/09/2017 | Fully completed | Partially compliant | | Update policy to include this information. |
| 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 | This is in place - see section B for details | Ongoing - in each meeting and business planning. | 04/10/2018 | Fully completed | Fully compliant | | |
| 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 | This is set out in the policy. In addition, the HoPFI has gone through with the PB members at their meeting and explained the key documents (main focus was on the accounts which includes many key documents within it). | Not specified | 01/09/2017 | Fully completed | Fully compliant | | |
| K7 | Members of a Local Pension Board should undertake a personal training needs analysis and put in place a personalised training plan. | 6 | There currently are not individual needs assessments but the training needs of the Group are identified in Business Planning so that the training is delivered before the item is in consideration by PPIC or PB. HoPFI meets with new Chair and Deputy to explain requirements and can establish if any knowledge needed. | When new PB members join | 01/10/2018 | Fully completed | Partially compliant | | |

| No. | SAB Requirement | SAB Section | London Borough of Enfield Approach / Evidence | Frequency of Review | Last Review Date | Check 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. | Unknown | Unknown | Fully completed | Partially 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 | Yes - see sections B and C | When new PB members join | 01/10/2018 | Fully completed | Fully compliant | | |
| K10 | A Local Pension Board should establish and maintain a register of interests for its members. | 7 | The interests are held on the Council website (there are no declarations on the site for the PB but there is a site location for them). The meeting minutes are a formal record of interests which are declared at each meeting and a register is kept. | Quarterly | 01/10/2018 | Fully completed | Fully compliant | | Consider adding link to this on fund website. |
| 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, but no formal Annual report prepared – HoPFI mentioned reference included in Pension Annual Report but not clear this is in 2018 accounts. An Annual report for Pension Board is included in the Council's Forward Plan to go Full Council in May 2019. | Not in place | n/a | Fully completed | Non-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 | Not completed. All FOI's go through the Council's Complaints team and all over due answers are reviewed. | n/a | 01/10/2018 | Fully completed | 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 | While administering authority staff know the right procedures and need for escalation where breaches occur, there are no formal policies or procedures and this has not been covered specifically for PB or PPIC. | Not currently carried out | n/a | Fully completed | Non-compliant | | A breaches procedure and log should be in place and all should be aware of responsibilities under the policy. Beaches could be a standing item for PPIC and/or PB. |
| K14 | A Local Pension Board should consider (with its Administering Authority) the need to publish an annual report of its activities. | 8 | Not in place but being implemented. See K11 | n/a | n/a | Fully completed | Non-compliant | | |
| 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 | The published governance compliance statement does not include the details required in relation to the LPB. This was identified as an action to include in the 2015 TPR Compliance review. | Annual | 31/03/2018 | Fully completed | Partially compliant | | Include additional PB terms, structure and operational procedures detail in 2018/19 and all future statements. |