

The Pension Regulator's and Scheme Advisory Board Compliance Checklist

Date of Completion: 20/07/2021

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Introduction

This document outlines how the London Borough of Enfield complies with the Pensions Regulator's (TPR) Code of Practice No 14 Governance and administration of public service pension schemes ('the TPR Code') in relation to the management of the London Borough of Enfield 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 the London Borough of Enfield 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, the London Borough of Enfield may also incorporate key elements of national guidance from the LGPS Scheme Advisory Board into this compliance checklist. This version contains the checklists included as part of the Shadow Scheme Advisory Boards "Guidance on the creation and operation of Local Pension Boards in England and Wales".

Key

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

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

Definitions:

<i>PSPA13</i>	Public Service Pensions Act 2013
<i>LGPS</i>	Local Government Pension Scheme
<i>TPR</i>	The Pensions Regulator
<i>TPR Code</i>	The Pensions Regulator's Code of Practice No 14 Governance and administration of public service pension schemes
<i>Scheme Manager</i>	For the London Borough of Enfield Pension Fund, this is Enfield Council
<i>Administering Authority</i>	The LGPS specific term for Scheme Manager. For the London Borough of Enfield Pension Fund, this is 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	Fully compliant
Knowledge and Understanding		
B1	Fully completed	Fully compliant
B2	Fully completed	Fully compliant
B3	Fully completed	Fully compliant
B4	Fully completed	Fully compliant
B5	Fully completed	Fully compliant
B6	Fully completed	Fully compliant
B7	Fully completed	Fully compliant
B8	Fully completed	Fully compliant
B9	Fully completed	Fully compliant
B10	Fully completed	Fully compliant
B11	Fully completed	Fully compliant
B12	Fully completed	Fully compliant
Conflicts of Interest		
C1	Fully completed	Fully compliant
C2	Fully completed	Fully compliant
C3	Fully completed	Fully compliant
C4	Fully completed	Fully compliant
C5	Fully completed	Fully compliant
C6	Fully completed	Fully compliant
C7	Fully completed	Fully 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	Fully 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	Fully compliant
E5	Fully completed	Fully compliant
E6	Fully completed	Fully compliant
E7	Fully completed	Fully 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	Fully 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	Fully 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
Internal Dispute Resolution		
H7	Fully completed	Fully compliant
H8	Fully completed	Partially 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
Reporting Breaches		
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
Scheme Advisory Board Requirements		
J1	Fully completed	Fully compliant
J2	Fully completed	Fully compliant
J3	Fully completed	Fully compliant
K1	Fully completed	Fully compliant
K2	Fully completed	Fully compliant
K3	Fully completed	Fully compliant
K4	Fully completed	Fully compliant
K5	Fully completed	Fully compliant
K6	Fully completed	Fully compliant
K7	Fully completed	Fully compliant
K8	Fully completed	Fully compliant
K9	Fully completed	Fully compliant
K10	Fully completed	Fully compliant
K11	Fully completed	Partially compliant
K12	Fully completed	Partially compliant
K13	Fully completed	Fully compliant
K14	Fully completed	Partially compliant
K15	Fully completed	Fully compliant

A - Reporting Duties

Note the requirements in this section are not included in the TPR Code but they are a fundamental to the relationship with TPR.

Legal Requirements

All public service pension schemes have to be registered with TPR. In addition, all schemes must provide a regular scheme return to TPR, containing prescribed information. A return is re

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

No.	TPR Requirement	Notes from TPR Code
A1	Is your scheme registered with the Pension Regulator?	<p>Managers of public service pension schemes that are 'registrable schemes' must register their scheme with the Pensions Regulator (TPR). A 'registrable scheme' is an occupational or personal pension scheme which is registered with HMRC and has more than one member.</p> <p>HMRC have indicated that the new arrangements for the 2014 LGPS in England and Wales and the 2015 LGPS in Northern Ireland will not be treated by them as new pension schemes, but as part of the schemes that were already in place. Where a scheme doesn't need to be registered further with HMRC, no further registration of that scheme with TPR is required, as existing schemes should already be registered with TPR.</p> <p>However, the managers of these schemes (which may be the local administering authorities) should ensure that their scheme (or part of the scheme for which they are responsible) is properly registered with us. They must also let us know of any changes to their scheme's (or part of the scheme's) 'registrable information' and provide up-to-date information as soon as possible.</p> <p>Managers must provide 'registrable information' when they register with TPR. 'Registrable information' includes details about:</p> <ul style="list-style-type: none"> - the scheme - the managers of the scheme - employers.
A2	Is the information held on the Pensions Regulator's website about the scheme up-to-date?	<p>It is a legal requirement for managers of a scheme to notify TPR of changes to their scheme's registrable information as soon as possible, and they can be fined if they don't do so.</p> <p>The TPR's Exchange online service is available to view and update schemes' registrable information online.</p>
A3	Have you completed this latest Scheme Return in the required timescale?	<p>TPR issues bespoke scheme returns for public service schemes to complete. These will ask for registrable and other information on an annual basis. This is in addition to the ongoing duty for managers to notify TPR of changes to registrable information as soon as possible.</p> <p>These typically include membership, employer, administration and governance details, and fund contact details. These are issued for completion in around September/October of each year.</p>
A4	Have you responded to the latest TPR public service pension scheme survey/questionnaire?	<p>TPR issues annual surveys to gather information in relation to how schemes demonstrate best practice in administration and governance. Surveys are currently still voluntary, but Funds are expected to complete them as the completion itself is an indicator of good governance and compliance with Regulator requirements.</p>

quired 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.

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<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.
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	07/07/2021	Fully completed	Fully compliant		
The 2020 scheme return was submitted	Annual	07/07/2021	Fully completed	Fully compliant		
The last survey completed was December 2020	Annual	07/07/2021	Fully completed	Fully 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	Notes from TPR Code
B1	Are there policies and arrangements in place to support pension board members in acquiring and retaining knowledge and understanding?	38 - Schemes should establish and maintain policies and arrangements for acquiring and retaining knowledge and understanding to support their pension board members.
B2	Has a person been designated to take responsibility for ensuring the framework is developed and implemented?	38 - Schemes should designate a person to take responsibility for ensuring that a framework is developed and implemented

No.	TPR Requirement	Notes from TPR Code
B3	Is the Fund providing assistance to pension board members to determine the degree of knowledge and understanding required?	<p>48 - Schemes should assist individual pension board members to determine the degree of knowledge and understanding that is sufficient for them to effectively carry out their role, responsibilities and duties as a pension board member</p> <p>40 - Being 'conversant' means having a working knowledge of the scheme regulations and policies, so that pension board members can use them effectively when carrying out their duties</p> <p>49 - Pension board members must have a working knowledge of their scheme regulations and documented administration policies. They should understand their scheme regulations and policies in enough detail to know where they are relevant to an issue and where a particular provision or policy may apply</p> <p>50 - Pension board members must have knowledge and understanding of the law relating to pensions (and any other prescribed matters) sufficient for them to exercise the functions of their role. Pension board members should be aware of the range and extent of the law relating to pensions which applies to their scheme, and have sufficient understanding of the content and effect of that law to recognise when and how it impacts on their responsibilities and duties.</p> <p>52 - Pension board members' breadth of knowledge and understanding should be sufficient to allow them to understand fully and challenge any information or advice they are given. They should understand how that information or advice impacts on any issue or decision relevant to their responsibilities and duties.</p> <p>53 - Pension board members should ensure that they have the appropriate degree of knowledge and understanding of funding and investment matters relating to their scheme to enable them to effectively carry out their role. This includes having a working knowledge of provisions in their scheme regulations and administration policies that relate to funding and investment, as well as knowledge and understanding of relevant law relating to pensions.</p> <p>54 - All board members should attain appropriate knowledge so that they are able to understand the relevant law in relation to their scheme and role. The degree of knowledge and understanding required of pension board members may vary according to the role of the board member, as well as the expertise of the board member. For example, a board member who is also a pensions law expert (for instance, as a result of their day job) should have a greater level of knowledge than that considered appropriate for board members without this background.</p>
B4	Are the roles and responsibilities of pension boards and members of pension board clearly set out in scheme documentation?	<p>47 - The roles, responsibilities and duties of pension boards and their individual members will vary between pension schemes. Matters for which the pension board is responsible will be set out in scheme regulations. Clear guidance on the roles, responsibilities and duties of pension boards and the members of those boards should be set out in scheme documentation.</p> <p>48 - Schemes should assist individual pension board members to determine the degree of knowledge and understanding that is sufficient for them to effectively carry out their role, responsibilities and duties as a pension board member.</p>
B5	Are pension board members aware of their legal responsibility in terms of Knowledge and Understanding?	<p>39 - It is the responsibility of individual pension board members to ensure that they have the appropriate degree of knowledge and understanding to enable them to properly exercise their functions as a member of the pension board.</p>

No.	TPR Requirement	Notes from TPR Code
B6	Have all pension board members got access to copies of the scheme rules and relevant Fund documentation?	<p>40 - Pension board members must be conversant with their scheme rules, which are primarily found in the scheme regulations, and documented administration policies currently in force for their pension scheme.</p> <p>42 - The following are examples of administration policies which the regulator considers to be particularly pertinent and would expect to be documented where relevant to a pension scheme, and with which pension board members must therefore be conversant where applicable. This list is not exhaustive:</p> <ul style="list-style-type: none"> - any scheme-approved policies relating to: <ul style="list-style-type: none"> A) conflicts of interest and the register of interests B) record-keeping C) internal dispute resolution D) reporting breaches E) maintaining contributions to the scheme F) the appointment of pension board members - risk assessments/management and risk register policies for the scheme - scheme booklets, announcements and other key member and employer communications, which describe scheme policies and procedures - the roles, responsibilities and duties of the scheme manager, pension board and individual pension board members - terms of reference, structure and operational policies of the pension board and/or any sub-committee - statements of policy about the exercise of discretionary functions - statements of policy about communications with members and scheme employers - the pension administration strategy, or equivalent, and - any admission body (or equivalent) policies. <p>43 - Documents which record policy about the administration of the scheme include those relating to funding and investment matters. For example, where relevant they must be conversant with the statement of investment principles and the funding strategy statement.</p> <p>44 - Pension board members must also be conversant with any other documented policies relating to the administration of the scheme. For example, where applicable, they must be conversant with policies relating to:</p> <ul style="list-style-type: none"> - the contribution rate or amount (or the range/variability where there is no one single rate or amount) payable by employers participating in the scheme - statements of assurance (for example, assurance reports from administrators) - third party contracts and service level agreements - stewardship reports from outsourced service providers (for example, those performing outsourced activities such as scheme
B7	Is there an up-to-date list of the Fund specific documents with which pension board members need to be conversant in?	<p>46 - Schemes should prepare and keep an updated list of the documents with which they consider pension board members need to be conversant. This will enable them to effectively carry out their role. They should make sure that both the list and the documents are available in accessible formats.</p>
B8	Are all pension board members investing sufficient time in their learning and development?	<p>55 - Pension board members should invest sufficient time in their learning and development alongside their other responsibilities and duties. Schemes should provide pension board members with the relevant training and support that they require. Training is an important part of the individual's role and will help to ensure that they have the necessary knowledge and understanding to effectively meet their legal obligations.</p>

No.	TPR Requirement	Notes from TPR Code
B9	Does the Fund offer pre-appointment training for new pension board members or mentoring by existing members?	<p>56 - Newly appointed pension board members should be aware that their responsibilities and duties as a pension board member begin from the date they take up their post. Therefore, they should immediately start to familiarise themselves with the scheme regulations, documents recording policy about the administration of the scheme and relevant pensions law. Schemes should offer pre-appointment training or arrange for mentoring by existing pension board members.</p> <p>This can also ensure that historical and scheme-specific knowledge is retained when pension board members change.</p>
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>57 - Pension board members should undertake a personal training needs analysis and regularly review their skills, competencies and knowledge to identify gaps or weaknesses. They should use a personalised training plan to document and address these promptly.</p> <p>58 - Learning programmes should be flexible, allowing pension board members to update particular areas of learning where required and to acquire new areas of knowledge in the event of any change.</p>
B11	Are records of learning activities being maintained?	<p>60 - Schemes should keep appropriate records of the learning activities of individual pension board members and the board as a whole.</p> <p>This will help pension board members to demonstrate steps they have taken to comply with legal requirements and how they have mitigated risks associated with knowledge gaps. A good external learning programme will maintain records of the learning activities of individuals on the programme or of group activities, if these have taken place.</p>
B12	Have the pension board members completed the Pension Regulator's toolkit for training on the Code of Practice number 14?	<p>59 - The regulator has provided an e-learning programme to help meet the needs of pension board members, whether or not they have access to other learning.</p> <p>If schemes choose alternative learning programmes they should be confident that those programmes:</p> <ul style="list-style-type: none"> - cover the type and degree of knowledge and understanding required - reflect the legal requirements, and - are delivered within an appropriate timescale.

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<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 include training objectives, details of how training will be documented and how attendance at events will be recorded and monitored. With self assessments on an annual basis to identify needs.</p> <p>There are various processes in place 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 FMPT 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 PB attends the PPIC meetings to give updates on their monitoring activities and work in progress.</p>	Annually.	07/07/2021	Fully completed	Fully 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>
<p>FMPT 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.</p>	Annually.	07/07/2021	Fully completed	Fully compliant		<p>Include responsibility in policy.</p>

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<p>The Training Policy says the members should do the TPR online training toolkit -this is a requirement in first year - the FMPT will review if this has been completed by new members by the end of the year (2021). Other requirements are set out in the Training Policy which indicates 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	07/07/2021	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.	
<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.</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>	Anually	07/07/2021	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.
<p>Enfield confirmed members are told about this on appointment</p> <p>These responsibilities are mentioned in Terms of Reference, so PB members are aware of their responsibilities</p>	Each time new member appointed, and TPR Compliance review carried out	07/07/2021	Fully completed	Fully compliant		Add legal requirements (for PB) and consider extending to PC in formal policy.

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<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	07/07/2021	Fully completed	Fully compliant		
<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.	07/07/2021	Fully completed	Fully compliant		
<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	07/07/2021	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>

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<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 FMPT 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	07/07/2021	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
<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	07/07/2021	Fully completed	Fully compliant		
<p>The FMPT 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.</p>	Annual	07/07/2021	Fully completed	Fully compliant		
<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 FMPT when completed.</p> <p>The FMPT is considering completing modules in group training sessions as a "bitesize" approach.</p>	Twice-yearly	07/07/2021	Fully completed	Fully 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.

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

No.	TPR Requirement	Notes from TPR Code
C1	Does the Fund have a conflict of interest policy and procedure, which include identifying, monitoring and managing potential conflicts of interest?	<p>76 - Schemes should ensure that there is an agreed and documented conflicts policy and procedure, which includes identifying, monitoring and managing potential conflicts of interest. They should keep this under regular review. Policies and procedures should include examples of scenarios giving rise to conflicts of interest, how a conflict might arise specifically in relation to a pension board member and the process that pension board members and scheme managers should follow to address a situation where board members are subject to a potential or actual conflict of interest.</p> <p>86 - Schemes should establish and operate procedures which ensure that pension boards are not compromised by potentially conflicted members. They should consider and determine the roles and responsibilities of pension boards and individual board members carefully to ensure that conflicts of interest do not arise, nor are perceived to have arisen.</p> <p>Toolkit module - The policy should:</p> <ul style="list-style-type: none"> - outline the steps to be followed by pension board members and scheme managers to address a situation where board members have a potential or actual conflict of interest - include a three-stage process to identify, monitor and manage potential conflicts of interest - include examples of scenarios giving rise to conflicts
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>78 - Schemes should cultivate a culture of openness and transparency. They should recognise the need for continual consideration of potential conflicts. Disclosure of interests which have the potential to become conflicts of interest should not be ignored. Pension board members should have a clear understanding of their role and the circumstances in which they may find themselves in a position of conflict of interest. They should know how to manage potential conflicts.</p>
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>79 - Pension board members, and people who are proposed to be appointed to a pension board, must provide scheme managers with information that they reasonably require to be satisfied that pension board members and proposed members do not have a conflict of interest.</p>
C4	Does the appointment process for pension board members require disclosure of interests and responsibilities which could become conflicts of interest?	<p>80 - Schemes should ensure that pension board members are appointed under procedures that require them to disclose any interests, including other responsibilities, which could become conflicts of interest and which may adversely affect their suitability for the role, before they are appointed.</p> <p>81 - All terms of engagement, for example appointment letters, should include a clause requiring disclosure of all interests, including any other responsibilities, which have the potential to become conflicts of interest, as soon as they arise. All interests disclosed should be recorded. See the section of this code on 'Monitoring potential conflicts'.</p> <p>82 - Schemes should take time to consider what important matters or decisions are likely to be considered during, for example, the year ahead and identify and consider any potential or actual conflicts of interest that may arise in the future. Pension board members should be notified as soon as practically possible and mitigations should be put in place to prevent these conflicts from materialising.</p>

No.	TPR Requirement	Notes from TPR Code
C5	Is the conflicts policy regularly reviewed?	76 - The conflicts policy and procedure should be regularly reviewed.
C6	Does the Fund have a conflicts register and it is circulated for ongoing review and published?	<p>83 - As part of their risk assessment process, schemes should identify, evaluate and manage dual interests which have the potential to become conflicts of interest and pose a risk to the scheme and possibly members, if they are not mitigated. Schemes should evaluate the nature of any dual interests and assess the likely consequences were a conflict of interest to materialise.</p> <p>84 - A register of interests should provide a simple and effective means of recording and monitoring dual interests and responsibilities. Schemes should also capture decisions about how to manage potential conflicts of interest in their risk registers or elsewhere. The register of interests and other relevant documents should be circulated to the pension board for ongoing review and published, for example on a scheme's website.</p> <p>Toolkit module - When managing conflicts of interest, it is essential that all conflicts of interest are recorded and the action taken is documented. The scheme should be able to demonstrate that records of conflicts are kept and that the register is monitored and reviewed regularly.</p>
C7	Is appropriate information included in the register?	<p>Toolkit module - The register should outline areas where potential conflicts may arise and include details of:</p> <ul style="list-style-type: none"> - all obligations owed by pension boards - all corporate hospitality offered (whether or not it has been accepted) - personal financial interests (such as significant investments in particular organisations) - other employment (for example where a pension board works with more than one scheme or where the spouse/family member of a pension board member works for an organisation which is bidding to provide services to the scheme) - actions or mitigations taken.
C8	Is there a standing item on the agenda for declaring conflicts of interest?	<p>85 - Conflicts of interest should be included as an opening agenda item at board meetings and revisited during the meeting, where necessary. This provides an opportunity for those present to declare any interests, including other responsibilities, which have the potential to become conflicts of interest, and to minute discussions about how they will be managed to prevent an actual conflict arising.</p> <p>Toolkit module - At the start of all pension board meetings it is good practice for pension board members to declare whether they have any new conflicts of interest, either due to a change in circumstances, or because of a particular item that is to be considered at the meeting.</p>
C9	Do those involved know how to report a conflict of interest?	Toolkit module - The policy should set this out.
C10	Is the number of employer and member representatives on the board in line with legal requirements?	90 - While scheme regulations must require pension boards to have an equal number of employer and member representatives, there is flexibility to design arrangements which best suit each scheme.
C11	Is the board made up of the appropriate mix of representatives in order to minimise potential conflicts?	91 - Arrangements should be designed with regard to the principles of proportionality, fairness and transparency, and with the aim of ensuring that a pension board has the right balance of skills, experience and representation (for example, of membership categories and categories of employers participating in the scheme). Those responsible for appointing members to a pension board should also consider the mix of skills and experience needed on the pension board in order for the board to operate effectively in light of its particular role, responsibilities and duties.

res for the purposes of meeting the requirements referred to above.

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<p>There is a Col 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>	Annually	30/11/2020	Fully completed	Fully compliant		
<p>Yes - this was covered at PB meeting in November.</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	07/07/2021	Fully completed	Fully compliant		
<p>Standing item on each PPIC and PB meeting.</p> <p>FMPT 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	07/07/2021	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)
<p>No formal pre-appointment declaration of interest takes place currently.</p> <p>However the FMPT checks declarations of interests when member appointed, to make sure can carry out the role without conflict.</p>	Each time new member appointed	07/07/2021	Fully completed	Fully compliant		Suggest declarations are requested at appointment/interview phase for future PB and PPIC members.

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
Conflicts policy review annually	annually	07/07/2021	Fully completed	Fully compliant		
<p>The Council website has a space for declarations of interest on the committee meetings pages, but there aren't any recorded declarations published.</p> <p>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.</p> <p>Conflicts are reported in the annual report and accounts.</p>	annually	07/07/2021	Fully completed	Fully compliant		
The PPIC and PB declarations in meetings are just shown on each meeting minutes.	At each meeting, i.e. quarterly	07/07/2021	Fully completed	Fully compliant		
Yes - for both PPIC and PB.	At each meeting, i.e. quarterly	07/07/2021	Fully completed	Fully compliant		
<p>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.</p> <p>Also members will be encouraged to complete Toolkit module as part of Training requirements which is additional training on how this can be done.</p>	At each meeting, i.e. quarterly	07/07/2021	Fully completed	Fully compliant		
<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	07/07/2021	Fully completed	Fully compliant		
<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	07/07/2021	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	Notes from TPR Code
D1	Does the Administering Authority publish information about the pension board?	95 - Scheme managers must publish the information required about the pension board and keep that information up-to-date. This will ensure that scheme members can easily access information about who the pension board members are, how pension scheme members are represented on the pension board and the responsibilities of the board as a whole.
D2	Does the Administering Authority publish other useful related information about the pension board?	96 - When publishing information about the identity of pension board members, the representation of scheme members and matters for which the board is responsible, schemes should also publish useful related information about the pension board such as: <ul style="list-style-type: none"> - the employment and job title (where relevant) and any other relevant position held by each board member - the pension board appointment process - who each pension board member represents - the full terms of reference for the pension board, including details of how it will operate, and - any specific roles and responsibilities of individual pension board members.
D3	Is all the information about the Pension Board kept up-to-date?	98 - Scheme managers must ensure that information published about the pension board is kept up-to-date. Schemes should have policies and processes to monitor all published data on an ongoing basis to ensure it is accurate and complete.
D4	Does the Administering Authority public information about pension board business?	97 - Schemes should also consider publishing information about pension board business, for example board papers, agendas and minutes of meetings (redacted to the extent that they contain confidential information and/or data covered by the Data Protection Act 2018). They should consider any requests for additional information to be published, to encourage scheme member engagement and promote a culture of transparency.

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
The Council website include the full details of the pension board representation, and the Terms of Reference also the Fund website to be in line with TPR requirements/best practice.	Ongoing and at end of specific terms (i.e. as LPB members change)	07/07/2021	Fully completed	Fully compliant		
<p>The Council website, if you click on links for the Councillor members, will show the job information and other positons held. There is no further information on the Council website and no information about PPIC or PB members on the fund website.</p> <p>The FMPT has noted that he will escalate this with the Head of Democratic Services to ensure the information is updated.</p>	Ongoing and at end of specific terms (i.e. as LPB members change)	07/07/2021	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.
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)	07/07/2021	Fully completed	Fully compliant		Consider adding to pension fund website, even if just a link back to Council site.
The Council website shows meeting dates, agendas and meeting minutes, and is up to date	Quarterly	07/07/2021	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 law.

Internal controls are defined in the legislation as:

- arrangements and procedures to be followed in the administration and management of the scheme
- systems and arrangements for monitoring that administration and management
- arrangements and procedures to be followed for the safe custody and security of the assets of the scheme

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

No.	TPR Requirement	Notes from TPR Code	London Borough of Enfield Approach / Evidence
E1	Is there an agreed process for identifying and recording scheme risks?	<p>106 - Before implementing an internal controls framework, schemes should carry out a risk assessment. They should begin by:</p> <ul style="list-style-type: none"> - setting the objectives of the scheme - determining the various functions and activities carried out in the running of the scheme, and - identifying the main risks associated with those objectives, functions and activities. <p>107 - An effective risk assessment process will help schemes to identify a wide range of internal and external risks, which are critical to the scheme and members. When identifying risks, schemes should refer to relevant sources of information, such as records of internal disputes and legislative breaches, the register of interests, internal and external audit reports and service contracts.</p> <p>108 - Once schemes have identified risks, they should record them in a risk register and review them regularly. Schemes should keep appropriate records to help scheme managers demonstrate steps they have taken to comply, if necessary, with legal requirements.</p>	<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>
E2	Does the Fund have an adequate process to evaluate risks and establish internal controls?	<p>109 - Not all risks will have the same potential impact on scheme operations and members or the same likelihood of materialising. Schemes should consider both these areas when determining the order of priority for managing risks and focus on those areas where the impact and likelihood of a risk materialising is high.</p> <p>110 - Many pension schemes will already have adequate internal controls in place, some of which may apply to a variety of the functions of the administering authority. Schemes should review their existing arrangements and procedures to determine whether they can prevent and detect errors in scheme operations and help mitigate pension scheme-related risks. For example, schemes could obtain assurance about their existing controls through direct testing or by obtaining reports on controls. Any such review should be appropriate to the outcome of the risk evaluation.</p> <p>111 - Schemes should consider what internal controls are appropriate to mitigate the main risks they have identified and how best to monitor them. For example, the scheme manager(s) for a funded scheme should establish and operate internal controls that regularly assess the effectiveness of investment-related decision making. Scheme managers for all pension schemes should establish and operate internal controls that regularly assess the effectiveness of data management and record-keeping.</p>	<p>Register shows who has responsibility for each risk and the current control in place to manage it as well as new controls required - if new risks were to arise a new internal control (or development of existing controls) would take place to mitigate/manage the risk.</p> <p>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 is being used from April 2020, 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>
E3	Does the Administering Authority have a risk register to record all risks identified and action taken?	<p>Schemes should use a risk register to record all risks.</p> <p>The risk register should contain:</p> <ul style="list-style-type: none"> - details of the risks identified - the likelihood of the risk arising - the impact of the risk if it does arise - the actions taken to mitigate the risk - when mitigation action was taken - when the risk and mitigation should next be reviewed - who has responsibility for monitoring the risk, if it is not the scheme manager 	<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>

E - Managing risk and internal

Legal Requirements

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No.	TPR Requirement	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
E1	Is there an agreed process for identifying and recording scheme risks?	Quarterly i.e. at each meeting	07/07/2021	Fully completed	Fully compliant		
E2	Does the Fund have an adequate process to evaluate risks and establish internal controls?	Quarterly i.e. at each meeting	07/07/2021	Fully completed	Fully compliant		
E3	Does the Administering Authority have a risk register to record all risks identified and action taken?	Each time TPR compliance reviewed	07/07/2021	Fully completed	Fully compliant		

No.	TPR Requirement	Notes from TPR Code	London Borough of Enfield Approach / Evidence
E4	Does the Administering Authority review the effectiveness of the risk management and internal control systems of the Fund?	<p>101 - The scheme manager must establish and operate internal controls. These must be adequate for the purpose of securing that the scheme is administered and managed in accordance with the scheme rules and in accordance with the requirements of the law.</p> <p>A failure to have adequate internal controls may cause an administrative breach of the law.</p> <p>102 - For these purposes 'internal controls' means:</p> <ul style="list-style-type: none"> - 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 <p>103 - Internal controls should include:</p> <ul style="list-style-type: none"> - a clear separation of duties - processes for escalation and /decision making - documented procedures for assessing and managing risks, reviewing breaches of law and managing contributions <p>105 - The scheme's internal controls should address significant risks which are likely to have a material impact on the scheme. Scheme managers should employ a risk-based approach and ensure that sufficient time and attention is spent on identifying, evaluating and managing risks and developing and monitoring appropriate controls. They should seek advice, as necessary.</p>	<p>The risk management and internal controls are reviewed regularly (albeit this does not follow a formal process and is not always documented) for effectiveness as part of a number of processes including:</p> <ul style="list-style-type: none"> - 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
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>
E6	Is there a standing item on the Pension Board agenda to review scheme risks?	<p>Establishing effective internal controls is not a one-off exercise and must take into account a changing environment as well as new and emerging risks.</p> <p>Procedures need to be in place to:</p> <ul style="list-style-type: none"> - regularly monitor the effectiveness of internal control systems - ensure controls are kept up to date - ensure controls are capable of mitigating new and emerging risks 	<p>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.</p>

No.	TPR Requirement	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
E4	Does the Administering Authority review the effectiveness of the risk management and internal control systems of the Fund?	Annual	07/07/2021	Fully completed	Fully compliant		
E5	Does the Administering Authority regularly review the risk register?	Quarterly i.e. at each meeting	07/07/2021	Fully completed	Fully compliant		
E6	Is there a standing item on the Pension Board agenda to review scheme risks?	Quarterly i.e. at each meeting	07/07/2021	Fully completed	Fully compliant		

No.	TPR Requirement	Notes from TPR Code	London Borough of Enfield Approach / Evidence
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>101 - The scheme manager must establish and operate internal controls. These must be adequate for the purpose of securing that the scheme is administered and managed in accordance with the scheme rules and in accordance with the requirements of the law.</p> <p>A failure to have adequate internal controls may cause an administrative breach of the law.</p> <p>102 - For these purposes 'internal controls' means:</p> <ul style="list-style-type: none"> - 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 <p>103 - Internal controls should include:</p> <ul style="list-style-type: none"> - a clear separation of duties - processes for escalation and /decision making - documented procedures for assessing and managing risks, reviewing breaches of law and managing contributions <p>105 - The scheme's internal controls should address significant risks which are likely to have a material impact on the scheme. Scheme managers should employ a risk-based approach and ensure that sufficient time and attention is spent on identifying, evaluating and managing risks and developing and monitoring appropriate controls. They should seek advice, as necessary.</p>	<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.
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>119 - The legal requirements apply equally where a scheme outsources services connected with the running of the scheme. Providers should be required to demonstrate that they will have adequate internal controls in their tenders for delivering services. The requirements should be incorporated in the terms of engagement and contract between the scheme and service provider. Outsourced services may include, for example, the maintenance of records and data, calculation of benefits and investment management services. Where services are outsourced, scheme managers should be satisfied that internal controls associated with those services are adequate and effective.</p> <p>120 - An increasing number of service providers are obtaining independent assurance reports to help demonstrate their ability to deliver quality administration services. Schemes should ask their service providers to demonstrate that they have adequate internal controls relating to the services they provide. It is vital that schemes ensure they receive sufficient assurance from service providers. For example, the information from providers should be sufficiently detailed and comprehensive and the service level agreements should cover all services that are outsourced. Schemes should also consider including provisions in contracts for outsourced services requiring compliance with appropriate standards. This should help to ensure effective administration.</p>	<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>

No.	TPR Requirement	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
E7	Does the Administering Authority have adequate systems, arrangements and procedures (internal controls) in place for the administration and management of the Fund and are they documented ?	Annual audits and tri-yearly TPR Compliance checks, and quarterly risk register review.	07/07/2021	Fully completed	Fully compliant	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.	
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?	n/a	n/a	Fully completed	Partially compliant		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).

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	Notes from TPR Code
F1	Do member records record the information required as defined in the Record Keeping Regulations and is it accurate?	126 - Scheme managers must ensure that member data across all membership categories specified in the Record Keeping Regulations is complete and accurate. Member data should be subject to regular data evaluation. 127 - Scheme managers must keep specific member data, which will enable them to uniquely identify a scheme member and calculate benefits correctly. This is particularly important with the establishment of career average revalued earnings (CARE) schemes. Scheme managers must be able to provide members with accurate information regarding their pension benefits (accrued benefits to date and their future projected entitlements) in accordance with legislative requirements, as well as pay the right benefits to the right person (including all beneficiaries) at the right time.

No.	TPR Requirement	Notes from TPR Code
F2	Does the Fund have the appropriate processes in place so employers can provide timely and accurate information?	<p>128 - Schemes should require participating employers to provide them with timely and accurate data in order for the scheme manager to be able to fulfil their legal obligations. Schemes should seek to ensure that processes are established by employers which enable the transmission of complete and accurate data from the outset. Processes will vary from employer to employer, depending on factors such as employee turnover, pay periods, number of employees who are members and the timing and number of payroll processing systems.</p> <p>129 - Schemes should seek to ensure that employers understand the main events which require information about members to be passed from the employer to the scheme and/or another employer, such as when an employee:</p> <ul style="list-style-type: none"> - joins or leaves the scheme - changes their rate of contributions - changes their name, address or salary - changes their member status, and - transfers employment between scheme employers. <p>130 - Schemes should ensure that appropriate procedures and timescales are in place for scheme employers to provide updated information when member data changes, for checking scheme data against employer data and for receiving information which may affect the profile of the scheme. If an employer fails to act according to the procedures set out above, meaning that they and/or scheme managers may not be complying with legal requirements, those under a statutory duty to report breaches of the law to the regulator under section 70 of the Pensions Act 2004 should assess whether there has been a relevant breach and take action as necessary.</p>
F3	Does the Fund keep records of and reconcile transactions as required by the Record Keeping Regulations?	<p>131 - Schemes should be able to trace the flow of funds into and out of the scheme and reconcile these against expected contributions and scheme costs. In doing so, they will have clear oversight of the core scheme transactions and should be able to mitigate risks swiftly.</p> <p>132 - Scheme managers must keep records of transactions made to and from the scheme and any amount due to the scheme which has been written off. They should be able to demonstrate that they do so.</p>
F4	Are records kept of pension board meetings as required by the Record Keeping Regulations?	<p>133 - Schemes must keep records of all pension board meetings. Schemes should also keep records of decisions made and key discussions, which may include topics such as compliance with policies in relation to the administration of the scheme. This will ensure there is a clear and transparent audit trail.</p>
F5	Are records kept of decisions made by the pension board, outside of meetings as required by the Record Keeping Regulations?	<p>134 - Schemes must also record any decisions taken by members of the pension board other than at a pension board meeting, or by a committee/sub-committee of a pension board, including the date, time, and place of the decision and the names of board members participating in that decision.</p> <p>This will ensure that there is a clear and transparent audit trail of the decisions made in relation to the scheme.</p>

No.	TPR Requirement	Notes from TPR Code
F6	Are records retained for as long as they are needed?	135 - Schemes should retain records for as long as is relevant for the purposes for which they are needed. It is likely data will need to be held for long periods of time. Schemes will need to keep some records for a member even after they have retired, ensuring that pension benefits can be settled for as long as they need to be paid. It is also important that schemes have in place systems and processes so they can keep records for the necessary amount of time.
F7	Does the Administering Authority have policies and processes to monitor data on an ongoing basis?	136 - Schemes should have policies and processes that monitor data on an ongoing basis to ensure it is accurate and complete, regardless of the volume of scheme transactions. This should be in relation to all membership categories, including pensioner member data where queries may arise once the pension is being paid. 137 - Schemes should adopt a proportionate and risk-based approach to monitoring, based on any known or historical issues that may have occurred in relation to the scheme's administration. This is particularly important for the effective administration of CARE pension schemes, which requires schemes to hold significantly more data than needed for final salary schemes.
F8	Does the Administering Authority carry out a data review at least annually?	138 - Schemes should continually review their data and carry out a data review exercise at least annually. This should include an assessment of the accuracy and completeness of the member information data held. Schemes should decide the frequency and nature of the review in light of factors such as the level of data quality, any issues identified and key scheme events.

No.	TPR Requirement	Notes from TPR Code
F9	Is a data improvement plan in place which is being monitored with a defined end date?	141 - Where schemes identify poor quality or missing data, they should put a data improvement plan in place to address these issues. The plan should have specific data improvement measures which schemes can monitor and a defined end date within a reasonable timeframe when the scheme will have complete and accurate data.
F10	Are processes and policies in place to reconcile scheme data with employer data?	142 - Schemes should ensure that member records are reconciled with information held by the employer, for example postal address or electronic address (email address) changes and new starters. Schemes should also ensure that the numbers of scheme members is as expected based on the number of leavers and joiners since the last reconciliation. Schemes should be able to determine those members who are approaching retirement, those who are active members and those who are deferred members.

No.	TPR Requirement	Notes from TPR Code
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>143 - Schemes must ensure that member data processes meet the requirements of the Data Protection Act 2018 and the data protection principles, and from 25 May 2018, the new General Data Protection Regulation (GDPR).</p> <p>144 - In relation to data management, schemes should understand:</p> <ul style="list-style-type: none"> - the obligations of data controllers - the difference between personal data and sensitive personal data - how data is held and how responses to data requests from different parties are handled - the systems required to store, move and destroy data

3:

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<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	07/07/2021	Fully completed	Fully compliant		

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
Monthly information submission via I-connect has been implemented	Ongoing	07/07/2021	Fully completed	Fully compliant		
<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.</p>	Ongoing	07/07/2021	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>
These are stored on the Council website and are up to date	Ongoing (4 meetings a year)	07/07/2021	Fully completed	Fully compliant		
<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	07/07/2021	Fully completed	Fully compliant		

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<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	07/07/2021	Fully completed	Fully compliant		
<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). 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	07/07/2021	Fully completed	Fully compliant		
<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)	07/07/2021	Fully completed	Fully compliant		

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<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	07/07/2021	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>
<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	07/07/2021	Fully completed	Fully compliant		<p>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.</p>

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
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.	Ongoing	07/07/2021	Fully completed	Fully compliant		

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

Contribution Type
Employer
Employee

No.	TPR Requirement	Notes from TPR Code
G1	Does the Fund have procedures and processes in place to identify payment failures?	<p>150 - The scheme manager should ensure that there are effective procedures and processes in place to identify payment failures that are – and are not – of material significance to the regulator. A 'payment failure' is where contribution payments are not paid to the scheme by the due date(s), or within the prescribed period and a 'materially significant payment failure' refers to a payment failure which is likely to be of material significance to the regulator in the exercise of its functions.</p> <p>151 - Schemes should monitor pension contributions, resolve payment issues and report payment failures, as appropriate, so that the scheme is administered and managed in accordance with the scheme regulations and other legal requirements.</p>
G2	Do those processes and procedures include a contributions monitoring record to determine whether contributions are paid on time and in full?	<p>152 - Adequate procedures and processes are likely to involve:</p> <ul style="list-style-type: none"> - developing a record to monitor the payment of contributions - monitoring the payment of contributions - managing overdue contributions, and - reporting materially significant payment failures. <p>156 - A contributions monitoring record will enable schemes to check whether contributions have been paid on time and in full, and, if they have not, provide a trigger for escalation for schemes to investigate the payment failure and consideration of whether scheme managers need to report to the regulator and, where relevant, members.</p> <p>157 - A contributions monitoring record should include the following information:</p> <ul style="list-style-type: none"> - contribution rates - the date(s) on or before which employer contributions are to be paid to the scheme - the date by when, or period within which, the employee contributions are to be paid to the scheme - the rate or amount of interest payable where the payment of contributions is late.

No.	TPR Requirement	Notes from TPR Code
G3	Do these processes and procedures include monitoring payments against the contributions monitoring record on an ongoing basis?	<p>161 - Schemes should monitor contributions on an ongoing basis for all the membership categories within the scheme. Schemes should regularly check payments due against the contributions monitoring record.</p> <p>162 - Schemes should apply a risk-based and proportionate approach to help identify employers and situations which present a higher risk of payment failures occurring and which are likely to be of material significance and require the scheme manager to intervene.</p> <p>163 - Schemes should be aware of what is to be paid in accordance with the contributions monitoring record or other scheme documentation, which may be used by the pension scheme. Schemes should also have a process in place to identify where payments are late or have been underpaid, overpaid or not paid at all.</p> <p>164 - For schemes to effectively monitor contributions they will require access to certain information. Employers will often provide the payment information that schemes need to monitor contributions at the same time as they send the contributions to the scheme.</p> <p>165 - Schemes should have adequate internal controls in place to monitor the sharing of payment information between the employer, pension scheme and member. Where the necessary payment information is not automatically available or provided by employers, schemes should request the additional information they need. Schemes may not need to obtain payment information as a matter of course, only where it is required for effective monitoring.</p> <p>165 - Scheme managers must record and retain information on transactions, including any employer and employee contributions received and payments of pensions and benefits, which will support them in their administration and monitoring responsibilities.</p> <p>166 - Where the administration of scheme contributions is outsourced to a service provider, schemes should ensure that there is a process in place to obtain regular information on the payment of contributions to the scheme and a clear procedure in place to enable them to identify and resolve payment failures which may occur.</p>
G4	Are these procedures regularly reviewed to ensure they are effective?	<p>171 - The regulator recognises that a monitoring process based on information provided by employers may not be able to confirm deliberate underpayment or non-payment, or fraudulent behaviour by an employer. Schemes should review current processes or develop a new process which is able to detect situations where fraud may be more likely to occur and where additional checks may be appropriate.</p>
G5	Do the Administering Authority's processes include managing overdue contributions in line with TPR's suggested approach?	<p>168 - When schemes identify or are notified of a problem, they should assess whether a payment failure has occurred before taking steps to resolve and, if necessary, report it. During their assessment, schemes should take into account:</p> <ul style="list-style-type: none"> - legitimate agreed payments made directly by an employer for scheme purposes, i.e. where the scheme has agreed that a contributions payment can be made late due to exceptional circumstances - legitimate agreed payment arrangements made between an employee and employer, i.e. where the employer has agreed that a contribution payment can be made late due to exceptional circumstances - contributions paid directly to a pension provider, scheme administrator or investment manager - any AVCs included with an employer's overall payment. <p>169 - Where schemes identify a payment failure, they should follow a process to resolve issues quickly. This should normally involve the following steps:</p> <ol style="list-style-type: none"> a. Investigate any apparent employer failure to pay contributions in accordance with the contributions monitoring record or legal requirements. b. Contact the employer promptly to alert them to the payment failure and to seek to resolve the overdue payment. c. Discuss it further with the employer as soon as practicable to find out the cause and circumstances of the payment failure. d. Ask the employer to resolve the payment failure and take steps to avoid a recurrence in the future.

No.	TPR Requirement	Notes from TPR Code
G6	Does the Fund maintain a record of any investigations and communications with employers?	170 - Schemes should maintain a record of their investigation and communications between themselves and the employer. Recording this information will help to provide evidence of schemes' effective monitoring processes and could help to demonstrate that the scheme manager has met the legal requirement to establish and operate adequate internal controls. It will also form part of the decision of whether or not to report a payment failure to the regulator and, where relevant, members.
G7	Do employers provide sufficient information to monitor contributions and is this in accordance with the LGPS regulations?	164 - Employers will often provide the payment information that schemes need to monitor contributions at the same time as they send the contributions to the scheme, which may be required under the scheme regulations. Payment information may include: <ul style="list-style-type: none"> • the employer and employee contributions due to be paid, which should be specified in the scheme regulations and/or other scheme documentation • the pensionable pay that contributions are based upon (where required), and • due date(s) on or before which payment of contributions and other amounts are to be made.
G8	Is there a satisfactory process in place to assess the materiality of any payment failures and ensure that those which are material are reported to the Regulator within a reasonable period?	173 - Scheme managers must report payment failures which are likely to be of material significance to the regulator within a reasonable period, in the case of employee contributions; and as soon as reasonably practicable in the case of employer contributions 174 - Where schemes identify a payment failure, they should attempt to recover contributions within 90 days from the due date or prescribed period having passed without full payment of the contribution. 175 - While schemes are not expected to undertake a full investigation to establish materiality or investigate whether an employer has behaved fraudulently, schemes should ask the employer: <ul style="list-style-type: none"> - the cause and circumstances of the payment failure - what action the employer has taken as a result of the payment failure, and - the wider implications or impact of the payment failure. 176 - When reaching a decision about whether to report, schemes should consider these points together and establish whether they have reasonable cause to report. 177 - Having reasonable cause means more than merely having a suspicion that cannot be substantiated. Schemes should investigate the payment failure and use their judgement when deciding whether to report to the regulator. 178 - Schemes may choose to take an employer's response to their enquiries at face value if they have no reason to believe it to be untrue or where their risk-based process indicates that there is a low risk of continuing payment failure. Where they receive no response, schemes may infer that an employer is unwilling to pay the contributions due. 181 - Schemes should identify and report to the regulator, as appropriate, any payment failures that may not be of material significance taken individually, but which could indicate a systemic problem. For example, an employer consistently failing to pay contributions by the due date or within the prescribed period, but paying within 90 days, may be due to inefficient scheme systems and processes. Schemes may also need to report payment failures that occur repeatedly and are likely to be materially significant to the regulator, depending on the circumstances. 182 - Reporting payment failures of employer contributions as soon as 'reasonably practicable' means within a reasonable period from the scheme manager having reasonable cause to believe that the payment failure is likely to be of material significance to the regulator. Schemes should also consider whether it may be appropriate to report a payment failure of employer contributions to scheme members. 183 - A reasonable period for reporting would be within ten working days from having reasonable cause to believe that the payment
G9	If the administration of contributions outsourced to a service provider, is there a process in place to obtain regular information on the payment of contributions to the scheme?	167 - Where the administration of scheme contributions is outsourced to a service provider, schemes should ensure that there is a process in place to obtain regular information on the payment of contributions to the scheme and a clear procedure in place to enable them to identify and resolve payment failures which may occur.

a 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.

Contributions must be paid	When a failure should be
On or before the due date as defined by the scheme regulations	To The Regulator: As soon as reasonably practicable
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

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<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	07/07/2021	Fully completed	Fully compliant		
<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.</p> <p>The processes are all documented in a comprehensive procedure note with screenshots.</p>	Annual	07/07/2021	Fully completed	Fully compliant	Late payments are shown in annual report.	

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<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	07/07/2021	Fully completed	Fully compliant		Consider how AVC contributions could be checked and monitored.
Audited at end of year and mid year audit last year.	Annual	07/07/2021	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.
<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	07/07/2021	Fully completed	Fully compliant		

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
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	07/07/2021	Fully completed	Fully compliant		
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 has been 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	07/07/2021	Fully completed	Fully compliant		
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, 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	07/07/2021	Fully completed	Fully compliant		
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 an 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 legislati

No.	TPR Requirement	Notes from TPR Code
H1	Has an annual benefit statement been provided to all active members within the required timescales?	188 - Scheme regulations must require scheme managers to provide an annual benefit information statement to each active member of a DB scheme established under the 2013 Act or new public body scheme. The statement must include a description of the benefits earned by a member in respect of their pensionable service. 189 - The first statement was required to be provided no later than 17 months after the scheme regulations establishing the scheme come into force (i.e. 31st August 2015). Subsequent statements must be provided at least annually after that date, so by 31 August following the previous 31 March of each year.
H2	Do these meet the legal requirements in relation to format?	190 - Statements must also comply with HM Treasury directions in terms of any other information which must be included and the manner in which they must be provided to members.
H3	Has a benefit statement been provided to all active, deferred and pension credit members who have requested one within the required timescales?	191 - Managers of a scheme must also provide a benefit statement following a request by an active, deferred or pension credit member of a DB scheme if the information has not been provided to that member in the previous 12 months before that request. 193 - The information must be given as soon as practicable but no more than two months after the date the request is made

No.	TPR Requirement	Notes from TPR Code
H4	Does this meet the legal requirements in relation to format?	192 - These benefit statements must include information about the amount of benefits by reference to a particular date and how they are calculated. The full details depend on the type of member making the request.
H5	Has an annual benefit statement been provided to all members with AVCs within the required timescales?	194 - Managers of a scheme must provide a benefit statement to a member of a DC public service pension scheme, who is not an 'excluded person', within 12 months of the end of the scheme year. An 'excluded person' is a member or beneficiary whose present postal address and email address is not known to the scheme because the correspondence has been returned (in the case of postal correspondence) or has not been delivered (in the case of electronic correspondence).
H6	Do these meet the legal requirements in relation to format?	195 - The information which must be provided includes the amount of contributions (before any deductions are made) credited to the member during the immediately preceding scheme year, the value of the member's accrued rights under the scheme at a date specified by the managers of the scheme and a statutory money purchase illustration. The full detail of the information that must be provided is set out in the Disclosure Regulations 2013.

No.	TPR Requirement	Notes from TPR Code
H7	Is basic scheme information provided to all new and prospective members within the required timescales?	<p>200 - Managers must disclose certain basic information about the scheme and the benefits it provides to a prospective member (if practicable to do so) or a new member. Where the manager has received jobholder information for the member or prospective member they must provide the information within a month of the jobholder information being received. Where they have not received jobholder information, they must provide the information within two months of the date the person became an active member of the scheme.</p> <p>201 - Managers must also provide the information on request to a relevant person within two months of the request being made, except where the same information was provided to the same person or trade union in the 12 months before the request.</p>
H8	Does this meet the legal requirements in relation to format?	200 - As per Regulation 6 of the Disclosure Regulations 2013.
H9	Is all other information provided in accordance with the legal timescales?	<p>196 - Under the Disclosure Regulations 2013, managers of a scheme must provide other information to members and others in certain circumstances (for example, on request). The Regulations set out the information which must be given, the timescales for providing such information and the methods that may be used. Not all information must be provided in respect of all public service pension schemes (there are some exemptions for specified public service schemes or according to the type of benefit offered), but information which scheme managers may need to provide includes:</p> <ul style="list-style-type: none"> - information about the scheme that has materially altered - information about the constitution of the scheme - information about transfer credits - information about lifestyling (this requirement will not apply in respect of DB benefits in public service pension schemes) - information about accessing benefits, and - information about benefits in payment. <p>197 - The detail of the information that must be provided to scheme members and others and any exemptions are set out in the Disclosure Regulations 2013. Managers must provide the required information, along with confirmation that members may request further information and the postal and email addresses to which a person should send those requests and enquiries</p>

No.	TPR Requirement	Notes from TPR Code
H10	Is all other information provided in the format and methods required by law?	See above.
H11	Where any information is only provided electronically (i.e. instead of any hard copy) does it comply with the legal requirements?	<p>203 - Generally, schemes may choose how they provide information to scheme members, including by post, electronically (by email or by making it available on a website) or by any other means permitted by the law. For benefit statements issued under the 2013 Act, HM Treasury directions may specify how the information must be provided. Where schemes wish to provide information required under the Disclosure Regulations 2013 by electronic means there are important steps and safeguards that must first be met. These include:</p> <ul style="list-style-type: none"> - scheme members and beneficiaries being provided with the option to opt out of receiving information electronically by giving written notice to the scheme - managers being satisfied that the electronic communications have been designed: <ul style="list-style-type: none"> A) so that the person will be able to access and either store or print the relevant information and B) taking into account the requirements of disabled people - ensuring that members and beneficiaries who were members or beneficiaries of the public service pension scheme on 1 December 2010 (where the scheme had not provided information electronically prior to that date) has been sent a written notice (other than via email or website), informing them that: <ul style="list-style-type: none"> A) it is proposed to provide information electronically in the future and B) scheme members and beneficiaries may opt out of receiving information electronically by sending written notice. <p>204 - Where schemes make information or a document available on a website for the first time, they must give notice (other than via a website) to the recipient. They must ensure that the notice includes:</p> <ul style="list-style-type: none"> - a statement advising that the information is available on the website - the website address - details of where on the website the information or document can be read, and - an explanation of how the information or document may be read on the website. <p>205 - When any subsequent information is made available on a website, managers of a scheme must give a notice (other than via a website) to recipients informing them that the information is available on the website. This notice will not be required where:</p> <ul style="list-style-type: none"> - at least two documents have been given to the recipient by hand or sent to the recipient's last known postal address - each of those letters asks the recipient to give their electronic (email) address to the scheme and informs the recipient of their right to request (in writing) that information or documents are not to be provided electronically - a third letter has been given to the recipient by hand or sent to the recipient's last known postal address and includes a statement that further information will be available to read on the website and that no further notifications will be sent to the recipient and - the managers of the scheme do not know the recipient's email address and have not received a written request that information or documents are not to be provided to the recipient electronically.
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?	207 - Schemes should design and deliver communications to scheme members in a way that ensures they are able to engage with their pension provision. Information should be clear and simple to understand as well as being accurate and easily accessible. It is important that members are able to understand their pension arrangements and make informed decisions where required.
H13	Does the Administering Authority use a tracing service?	208 - Schemes should attempt to make contact with their scheme members and, where contact is not possible, schemes should carry out a tracing exercise to locate the member and ensure that their member data are up-to-date.

d 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 on.

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
97.5% of ABS were issued for Actives were sent by the deadline of 31 August.	Annual	Jul-21	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.	
<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	Oct-18	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.
<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>	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.

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<p>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:</p> <ul style="list-style-type: none"> - 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.	<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. - 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.
Prudential issued statements in May. These are sent directly to the member by the Prudential.	Annual	01/05/2018	Fully completed	Fully compliant		
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	<p>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.</p> <p>It is known that Prudential are reducing the level of communications for members relating to AVCs.</p>	In future years make sure that appropriate levels of member information is provided to those who have AVCs.

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<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	<p>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>	<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>
<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>	annual	Around 2014/2015 based on contribution table.	Fully completed	Partially compliant		Update the guide provided to members.
<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>	

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<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		
<p>Only pensioner payslips are provided electronically, and only for members who have not opted out. The requirements set out have been complied with.</p>	Each time TPR compliance reviewed	01/10/2018	Fully completed	Fully compliant		
<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.
<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

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 the details of these.

No.	TPR Requirement	Notes from TPR Code
I1	Has the Administering Authority put in place an internal dispute resolution procedure?	213 - Scheme managers must make and implement dispute resolution arrangements that comply with the requirements of the law and help resolve pensions disputes between the scheme manager and a person with an interest in the scheme.
I2	Does the Administering Authority's process highlight or consider whether a dispute is exempt?	214 - Section 50(9) of the 1995 Pensions Act states that a dispute is exempt if: <ul style="list-style-type: none"> - proceedings have commenced in a court or tribunal - the Pensions Ombudsman has started an investigation - it is prescribed by regulations made by the Secretary of State.
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: <ul style="list-style-type: none"> - 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? 	<p>215 - A person has an interest in the scheme if they:</p> <ul style="list-style-type: none"> - are a member or surviving non-dependant beneficiary of a deceased member of the scheme - are a widow, widower, surviving civil partner or surviving dependant of a deceased member of the scheme - are a prospective member of the scheme - have ceased to be a member, beneficiary or prospective member or - claim to be in one of the categories mentioned above and the dispute relates to whether they are such a person. <p>216 - Dispute resolution arrangements 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. The specified person's decision may then be confirmed or replaced by the decision taken by the scheme manager after reconsideration of the matters.</p> <p>225 - If schemes decide to specify time limits, they should publish and make those time limits readily available to ensure that those with an interest in the scheme are aware that they must submit an application within a prescribed time limit.</p> <p>237 - Scheme managers must also provide the postal or email address and job title of the person to contact in order to make use of the internal dispute arrangements.</p> <p>239 - Schemes can decide what information they need from applicants to reach a decision on a disputed matter and how applications should be submitted. Schemes should ensure they make this information available to applicants.</p>
I4	Has the Administering Authority ensured that employers who make first stage decisions also have IDRP in place?	

No.	TPR Requirement	Notes from TPR Code
15	Are the timescales in the procedure adhered to including sending an acknowledgment on receipt of an application?	<p>Note - For the LGPS, the timescales must be in accordance with the LGPS regulations.</p> <p>231 - Applicants must be notified of the decision made by a scheme manager and specified person (where applicable) within a reasonable time period after the decision has been made.</p> <p>230 - The regulator recognises that the circumstances of each dispute are different and decision times may vary. Schemes should be satisfied that the time taken to reach a decision is appropriate to the situation and be able to demonstrate this, if necessary.</p> <p>232 - Schemes should provide the applicant with regular updates on the progress of their investigation. They should notify the applicant where the time period for a decision is expected to be shorter or longer than the reasonable time period and let them know when they are likely to receive an outcome.</p> <p>239 - Schemes should send an acknowledgement once an application has been received.</p>
16	Does the Administering Authority notify and advertise the procedure appropriately?	<p>236 - Information about the IDRPs must be communicated to:</p> <ul style="list-style-type: none"> - prospective members (if practicable) - scheme members who haven't already been given the information - members, or prospective members, when schemes receive jobholder information, or when a jobholder becomes an active member, in connection with automatic enrolment - certain people who request the information and haven't been given it in the previous 12 months <p>233 & 235 - The procedure should be:</p> <ul style="list-style-type: none"> - communicated in scheme documentation, e.g. a joining booklet - easily accessible, e.g. on the scheme website - within documents recording policy about the administration of the scheme.
17	Are the notification requirements in relation to TPAS and the Pensions Ombudsman being adhered to?	<p>238 - In addition, scheme managers must provide information about TPAS and the Pensions Ombudsman at certain stages. Upon receiving an application for the resolution of a pension dispute, scheme managers (or the specified person) must make the applicant aware as soon as reasonably practicable that TPAS is available to assist members and beneficiaries of the scheme and provide contact details for TPAS. When notifying the applicant of the decision, scheme managers must also inform the applicant that the Pensions Ombudsman is available to investigate and determine complaints or disputes of fact or law relating to a public service pension scheme and provide the Pension Ombudsman's contact details.</p>
18	Does the Administering Authority regularly assess the effectiveness of its arrangements?	<p>234 - Schemes should ensure that the effectiveness of the arrangements is assessed regularly and be satisfied that those following the process are complying with the requirements set, which includes effective decision making.</p>
19	Does the Administering Authority regularly assess the effectiveness where employers carry out a stage one process?	<p>234 - See above - this is particularly important where the arrangements require employers participating in the pension scheme to carry out duties as part of the process, for example where schemes have implemented the two-stage procedure and employers are acting as the specified person for the first stage.</p>

people with an interest in the scheme.

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

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
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		
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.
<p>The IDRP leaflet includes the details of the process to be followed and the information required by way of a form to complete.</p> <p>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.</p> <p>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.</p>	Not specified in IDRP	01/10/2018	Fully completed	Partially compliant		<p>Consider including details of who the "nominated person" for stage 1 is.</p> <p>Consider also adding more details on the process for how stage 1 and stage 2 decisions are made.</p>
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		

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
<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.
<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
<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.
<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.
<p>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.</p>	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
- 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
- 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	Notes from TPR Code
J1	Is the Administering Authority satisfied that those responsible for reporting breaches under the legal requirements and TPR guidance understand the requirements?	244 - Schemes should be satisfied that those responsible for reporting breaches are made aware of the legal requirements and this guidance. Schemes should provide training for scheme managers and pension board members. All others under the statutory duty to report should ensure they have a sufficient level of knowledge and understanding to fulfil that duty. This means having sufficient familiarity with the legal requirements and procedures and processes for reporting.
J2	Does the Administering Authority have appropriate procedures in place to meet their legal obligations for identifying and assessing breaches?	245 - Identifying and assessing a breach of the law is important in reducing risk and providing an early warning of possible malpractice in public service pension schemes. Those people with a responsibility to report breaches, including scheme managers and pension board members, should establish and operate appropriate and effective procedures to ensure that they are able to meet their legal obligations. Procedures should enable people to raise concerns and facilitate the objective consideration of those matters. It is important that procedures allow reporters to decide within an appropriate timescale whether they must report a breach. Reporters should not rely on waiting for others to report. 246 - Procedures should include the following features: <ul style="list-style-type: none"> - a process for obtaining clarification of the law around the suspected breach where needed - a process for clarifying the facts around the suspected breach where they are not known - a process for consideration of the material significance of the breach by taking into account its cause, effect, the reaction to it, and its wider implications, including (where appropriate) dialogue with the scheme manager or pension board - a clear process for referral to the appropriate level of seniority at which decisions can be made on whether to report to the regulator - an established procedure for dealing with difficult cases - a timeframe for the procedure to take place that is appropriate to the breach and allows the report to be made as soon as reasonably practicable - a system to record breaches even if they are not reported to the regulator (the record of past breaches may be relevant in deciding whether to report future breaches, for example it may reveal a systemic issue), and - a process for identifying promptly any breaches that are so serious they must always be reported.
J3	Are breaches being recorded in accordance with the agreed procedures?	246 - Procedures should include a system to record breaches even if they are not reported to the regulator (the record of past breaches may be relevant in deciding whether to report future breaches, for example it may reveal a systemic issue).

r the breach relates to, or affects, members who are its employees or those of other employers

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

London Borough of Enfield Approach / Evidence	Frequency of Review	Last Review Date	Check Completed	Compliant	Notes	Action
It is expected that those responsible are aware of their responsibilities as training has been provided in induction sessions members have attended.	When new members are appointed.	07/07/2021	Fully completed	Fully compliant		
<p>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.</p> <p>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.</p> <p>The procedures have been formalised in a procedure policy.</p>	Annual	07/07/2021	Fully completed	Fully compliant		
There is a formal procedure and log for recording breaches of the law.	Annual	07/07/2021	Fully completed	Fully 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 FMPT has responsibility, this sets out knowledge and understanding requirements in line with TPR requirements and is based on CIPFA requirements	Not specified	07/07/2021	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	FMPT has responsibility	Annual	07/07/2021	Fully completed	Fully compliant		
K5	The Administering Authority should offer access to high quality induction training and provide relevant ongoing training to the appointed members of the Local Pension Board.	6	This is in place - see section B for details	Ongoing - in each meeting and business planning.	07/07/2021	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 HoFPI 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	07/07/2021	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 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. FMPT meets with new Chair and Deputy to explain requirements and can establish if any knowledge needed.	When new PB members join	07/07/2021	Fully completed	Fully 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	There is policy in place	Annual	07/07/2021	Fully completed	Fully compliant		
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	07/07/2021	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	07/07/2021	Fully completed	Fully compliant		
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. FMPT will draft the report annually, PB chair to finalise and this will then go in report and accounts. TOR states that an annual report on the work of the Board will be included in the Fund's annual report.	annual	n/a	Fully completed	Partially compliant		Annual report to be produced
K12	A Local Pension Board should understand the Administering Authority's requirements, controls and policies for FOIA compliance so that the Local Pension Board is aware of them and can comply with them.	8	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	Partially 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	There are formal policies or procedures, specifically for PB or PPIC.	Annual	07/07/2021	Fully completed	Fully compliant		
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 to be implemented. See K11	n/a	n/a	Fully completed	Partially 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 includes the details required in relation to the LPB.	Annual	31/03/2018	Fully completed	Fully compliant		