

**Scorecard summary**  
**Isle of Wight Council Pension Fund**

last updated on: 05 October 2017

The following gives an at-a-glance summary of the current compliance position against the PSPA2013, tPR CoP14 and LGPS Regulations

Current compliance as at  
 Previous compliance as at

12 September 2017  
 n/a (first version)

General Requirement				
GCS ref		Current compliance	Previous compliance	Responsibility
e1	Local pension board to be established by 1 April 2015 and to have had its first meeting within 4 months of that date	Full	Not applicable	Administering Authority
n/a	Determine the manner and terms by which members of the local pension board are appointed and removed.	Full	Not applicable	Administering Authority
n/a	Local Pension Board to have equal number of scheme member representatives and employer representatives which is no fewer than 4 in total.	Full	Not applicable	Administering Authority
n/a	To ensure the representation of the pension board has the right balance of skills, experience and representation	Partial	Not applicable	Administering Authority
n/a	To ensure the pension board is appropriately covered in any code of conduct, conflicts of interest or breaches of the law policies prepared by the administering authority	Partial	Not applicable	Administering Authority
n/a	Pension board members to receive training in respect of these policies	Non	Not applicable	Administering Authority
n/a	Pension board to have its own policy on knowledge and understanding requirements	Non	Not applicable	Local Pension Board
n/a	A nominated person to be in place and responsible for ensuring the knowledge and understanding policy is implemented and necessary training delivered	Non	Not applicable	Local Pension Board
e2	The administering authority to provide access to the required training (including induction training) for pension board members	Partial	Not applicable	Administering Authority
n/a	The administering authority to be satisfied that persons appointed to the local pension board do not have a conflict of interest.	Full	Not applicable	Administering Authority
n/a	All pension board members to have a personalised training plan in place that is regularly monitored and updated	Non	Not applicable	Local Pension Board
n/a	The administering authority to have regard to guidance issued by the Secretary of State	Full	Not applicable	Administering Authority

Knowledge & Understanding				
GCS ref		Current compliance	Previous compliance	Responsibility
p1.1	A member of the local pension board must be conversant with the scheme rules and any document recording policy about the administration of the scheme adopted by the administering authority	Non	Not applicable	Local Pension Board
p1.2	A process should be in place to ensure a member of the local pension board has the knowledge and understanding required of the law relating to pensions and other matters which are prescribed in the Regulations which is sufficient to enable them to perform their duties	Non	Not applicable	Administering Authority
p1.3	The administering authority should establish and maintain policies and arrangements for acquiring and retaining knowledge and understanding	Non	Not applicable	Administering Authority
p1.4	The administering authority should designate a person to take responsibility for ensuring that a framework is developed and implemented.	Non	Not applicable	Administering Authority
p1.6	The administering authority should prepare and keep an updated list of the documents with which they consider pension board members need to be conversant, including the scheme rules and relevant Fund specific documentation.	Partial	Not applicable	Administering Authority
p1.7	The roles and responsibilities of pension board members should be clearly documented	Partial	Not applicable	Administering Authority
p1.8	Local pension board members are aware of their personal legal responsibilities in terms of knowledge and understanding.	Partial	Not applicable	Local Pension Board
p1.9	The administering authority should assist individual local 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	Non	Not applicable	Administering Authority
n/a	Administering authorities should offer pre-appointment training or mentoring if appropriate	Non	Not applicable	Administering Authority
p1.10	The administering authority should maintain individual training plans for local pension board members, together with records of learning activities required	Non	Not applicable	Administering Authority
p1.11	Local pension board members should invest sufficient time in their learning and development alongside their other responsibilities.	Partial	Not applicable	Local Pension Board
p1.5	The members of the pension board should be familiar with the AVC options offered by the Fund, including the choice of investments offered to members and the relative performance of those investment options	Non	Not applicable	Local Pension Board
p1.12	Have pension board members completed tPR's e-learning programme, which is provided to help meet the needs of local pension board members	Partial	Not applicable	Local Pension Board

Conflicts of Interest				
GCS ref		Current compliance	Previous compliance	Responsibility
p2.1	The administering authority should have in place an appropriate conflicts of interest policy, clearly identifying to whom any potential conflict should be reported	Partial	Not applicable	Administering Authority
p2.2	The conflicts of interest policy should have a regular review date incorporated in to it	Partial	Not applicable	Administering Authority
n/a	All those with a responsibility for managing and administering the scheme should understand their own roles in identifying and reporting potential conflicts of interest and the steps involved in reporting any conflicts (or potential conflicts) that might arise	Partial	Not applicable	Administering Authority
p2.3	The administering authority should maintain a register of all conflicts (and potential conflicts) that are raised , reviewing them appropriately	Full	Not applicable	Administering Authority
p2.4	Declaration of conflicts (or potential conflicts) of interest should be disclosed on appointment and at regular intervals	Full	Not applicable	Local Pension Board
n/a	Declaration of conflicts (or potential conflicts) of interest should be a standing item on all Fund related meetings and agendas	Full	Not applicable	Monitoring Officer

Publishing Information About the Scheme				
GCS ref		Current compliance	Previous compliance	Responsibility
p3.1	The administering authority must publish information about the local pension board and keep that information up to date	Partial	Not applicable	Administering Authority
n/a	The published information must include who the members of the local pension board are, their representative role and the matters falling within the local pension boards responsibility	Partial	Not applicable	Administering Authority
n/a	The published information should include the local pension board appointment process	Partial	Not applicable	Administering Authority
p3.2	The administering authority should publish information about the local pension board's business	Full	Not applicable	Local Pension Board
p3.3	The administering authority should consider any requests for additional information to be published to encourage scheme member engagement and promote a culture of transparency	Partial	Not applicable	Administering Authority
n/a	The administering authority should publish information on the pension board business	Full	Not applicable	Administering Authority

Managing Risks and Internal Controls				
GCS ref		Current compliance	Previous compliance	Responsibility
p4.1	The administering authority is required to have in place internal controls that include adequate systems, arrangements and procedures for the administration and management of the Fund (including external service providers and third parties)	Partial	Not applicable	Administering Authority
n/a	The administering authority should have in place a process to identify and evaluate risks and establish appropriate internal controls	Partial	Not applicable	Administering Authority
p4.2	The administering authority should have in place a risk register to record all risks and actions taken, which is reviewed regularly	Full	Not applicable	Administering Authority
p4.3	The administering authority should regularly review the effectiveness of its risk management and internal control processes	Partial	Not applicable	Administering Authority
p4.4	Risk management and internal controls should be a standing item on the Pension Committee and pension board agendas	Full	Not applicable	Administering Authority

Scheme Record Keeping				
GCS ref		Current compliance	Previous compliance	Responsibility
p5.1	The administering authority must be able to demonstrate that they keep accurate, up to date and enduring records to be able to govern and administer the LGPS effectively	Partial	Not applicable	Administering Authority
p5.2	The administering authority must ensure that scheme member data across all membership categories specified in the Record Keeping Regulations is complete and accurate and the data is subject to regular data evaluation	Partial	Not applicable	Administering Authority
p5.3	The administering authority must keep specific data which will enable it to uniquely identify a scheme member and calculate pension benefits correctly	Full	Not applicable	Administering Authority
p5.4	The administering authority should require participating employers to provide them with timely and accurate data	Partial	Not applicable	Administering Authority
p5.5	The administering authority should seek to ensure that employers understand the main events which require information about members to be communicated	Partial	Not applicable	Administering Authority
p5.6	The administering authority should have policies and procedures in place for the regular monitoring of data	Partial	Not applicable	Administering Authority
p5.7	The administering authority should carry out regular (at least annually) data reviews	Partial	Not applicable	Administering Authority
p5.8	The administering authority should ensure that appropriate procedures and timescales are in place for scheme employers to provide updated information when member data changes	Partial	Not applicable	Administering Authority
p5.9	The administering authority should be able to trace the flow of funds into and out of the scheme, reconcile these and keep records of transactions	Full	Not applicable	Administering Authority
p5.10	The administering authority must keep records of pension board meetings and discussions and records of decisions made other than at a local pension board meeting that is later ratified.	Full	Not applicable	Administering Authority
p5.11	The administering authority should retain records for as long as they are needed and have in place an adequate system and process for record retention	Partial	Not applicable	Administering Authority
p5.12	Where the administering authority has identified poor quality or missing data there should be a data improvement plan in place	Partial	Not applicable	Administering Authority
p5.13	The administering authority should reconcile member records with the relevant employers and be able to identify those scheme members who are approaching retirement, those who are active members and those that are deferred members	Partial	Not applicable	Administering Authority
p5.14	The administering authority must ensure that processes created to manage scheme member data are compliant with the Data Protection Act 1998 and data protection principles.	Partial	Not applicable	Administering Authority
p5.15	The administering authority should be able to demonstrate that records are kept in accordance with other relevant legislation	Full	Not applicable	Administering Authority

Maintaining Contributions				
GCS ref		Current compliance	Previous compliance	Responsibility
p6.1	The administering authority should ensure there are effective policies and procedures in place to identify payment failures and assess the materiality of any failures identified	Partial	Not applicable	Administering Authority
p6.2	Employers should be provided with the necessary guidance to ensure they provide the required information to enable contributions to be monitored	Partial	Not applicable	Administering Authority
p6.3	Where the administering authority identify a payment failure they should follow a process to resolve issues quickly (e.g. monthly monitoring of employer payments to ensure contributions paid on time and in full)	Partial	Not applicable	Administering Authority
n/a	The administering authority should maintain a record of investigations and communications in relation to payment failures	Partial	Not applicable	Administering Authority
p6.4	The administering authority should review 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.	full	Not applicable	Administering Authority
p6.5	The administering authority must report payment failures which are likely to be of material significance to tPR	Partial	Not applicable	Administering Authority

Member Communication				
GCS ref		Current compliance	Previous compliance	Responsibility
p7.1	Scheme regulations require the administering authority to provide an annual benefit statement to all active, deferred and pension credit members containing certain legal information	Full	Not applicable	Administering Authority
n/a	The administering authority should ensure that all members with AVCs are provided an annual benefit statement from their AVC provider within the required timescales and that it contains the required legal information	Full	Not applicable	Administering Authority
p7.2	The administering authority must provide scheme members with basic scheme information, meeting minimum legal requirements	Partial	Not applicable	Administering Authority
p7.3	Disclosure regulations make provision for scheme members and others to receive information that is relevant to their pension rights and scheme entitlements and provided within certain legal timescales	Partial	Not applicable	Administering Authority
p7.4	Where information is provided electronically it should comply with legal requirements	Full	Not applicable	Administering Authority
p7.5	The administering authority should attempt to make contact with their scheme members and where contact is not possible carry out a tracing exercise to locate scheme members.	Partial	Not applicable	Administering Authority
p7.6	Requests for information should be acknowledged if information requested cannot be immediately provided.	Partial	Not applicable	Administering Authority

Internal Dispute Resolution Procedure				
GCS ref		Current compliance	Previous compliance	Responsibility
p8.1	The administering authority has in place an Internal Dispute Resolution Procedure	Partial	Not applicable	Administering Authority
n/a	The procedure clearly sets out: - who it applies to; - who the adjudicator is; - the information the applicant must include; - how the final decision is reached - escalation procedures (tepas, Pensions Ombudsman); - appropriate timescales	Partial	Not applicable	Administering Authority
p8.2	The administering authority has ensured all scheme employers have appropriate arrangements in place for dealing with stage 1 disputes	Non	Not applicable	Administering Authority
p8.3	The administering authority should regularly review its dispute process to ensure its effectiveness and that the necessary timescales are being met (inc. the employer processes at stage 1)	Partial	Not applicable	Administering Authority
n/a	The administering authority should ensure it appropriately draws attention to the pension dispute process in any correspondence or other Fund material where appropriate	Non	Not applicable	Administering Authority

Breaches of the Law				
GCS ref		Current compliance	Previous compliance	Responsibility
p9.1	The administering authority should be satisfied that those responsible for reporting breaches of the law are made aware of their legal requirements and the Pensions Regulator's guidance. This includes: - Officers; - members of the pension board; - any person involved in the administration of the scheme; - scheme employers; - professional advisers; - any other person otherwise involved in advising the Fund	Partial	Not applicable	Administering Authority
p9.2	The administering authority should have a breaches of the law policy in place	Partial	Not applicable	Administering Authority
p9.3	The administering authority should have identified a person responsible for maintaining the breaches of the law policy, reporting and recording processes	Partial	Not applicable	Administering Authority
p9.3	The administering authority should maintain a breaches log, setting out all breaches, whether or not reported to taper	Partial	Not applicable	Administering Authority

## Establishment of the local pension board

Ref	Principle	Detail of best practice principle	Compliance (Full/Partial/Non)	Statement of Compliance
E1	<b>Local pension board to be established by 1 April 2015</b>	Local Pension Board terms of reference agreed and approved by the Council	Full compliance	<p><i>Enter here the committee and date the terms of reference were agreed and link or reference to where this can be found</i></p> <p>The LGPS Pension Board was approved and constituted at the meeting of the Isle of Wight Council on 21 January 2015  <a href="https://www.iwight.com/Meetings/committees/mod-council/21-1-15/minutes.pdf">https://www.iwight.com/Meetings/committees/mod-council/21-1-15/minutes.pdf</a> (minute 41)                      The terms of reference form Article 12 to the council's Constitution</p>
E2	<b>All pension board members to have a personalised training plan in place that is regularly monitored and updated</b>	The administering authority should have a person designated to take responsibility for ensuring training plans are followed and regularly review the members training requirements and keep appropriate records of their learning activities and the board as a whole	Non compliance	<p><i>Enter here whether individual training plans have been completed and where it can be found</i></p> <p>Individual training plans have not been completed for the pension board members. Members have been referred to the Pensions Regulator's online toolkit to assist with developing their knowledge and skills.                      A training programme for both pension committee and board members will be developed during the summer of 2017, with a view to delivery over the next 12-18 months.</p>
E3	<b>Expenses of the local pension board to be part of the expenses of administration of the pension fund</b>	Provision has been made in the accounting procedures to identify the costs incurred in the establishment and operational costs of the local pension board	Partial compliance	<p><i>Enter here how the costs are being identified</i></p> <p>All costs incurred in respect of the administration of the pension fund are coded to an administration cost centre within the council's financial hierarchy. These costs are recharged to the pension fund accounts on a quarterly basis                      Costs incurred directly by the pension fund (for example adviser fees, fund manager costs) are presented to the Pension Fund and Treasury Management Accountant, for direct payment from the fund bank account, and coding to the pension fund accounts.                      There is no specific budget set for the costs incurred by the pension fund (other than the staffing budget within the council's accounts which is subsequently recharged), or for expenses of the pension board, although reasonable costs agreed with the Director of Finance and section 151 officer are borne by the fund.</p>

Ref	Principle	Detail of best practice principle	Compliance (Full/Partial/Non)	Statement of Compliance
E4	<b>Local Pension Board to have equal number of scheme member representatives and employer representatives which is no fewer than 4 in total.</b>	The terms of reference will provide for an equal number of scheme member representatives and employer representatives which is no less than 4 in total	Full compliance	<i>Enter here the number of scheme member and employer representatives</i> There are two employer representatives and two scheme member representatives on the pension board.
E5	<b>Determine the manner and terms by which members of the local pension board are appointed.</b>	The manner and terms by which members of the local pension board are clearly set out.	Full compliance	<i>Enter here where the manner and terms by which members of the local pension board are clearly set out.</i> The terms of reference for the pension board specify the method of appointment of board members. One of the employer representatives shall be an officer of the Isle of Wight Council. The other will be selected by the other employers of the fund, following nominations. The scheme member representatives shall be appointed by UNISON, who will be responsible for arranging their own election of suitable candidates and advise the Isle of Wight Council of this so that it can be assured that it is open and transparent. <i>Area for improvement: the terms of reference for the board should be updated to include the process for appointment of scheme member representatives should UNISON be unable, or fail, to make suitable nominations.</i>
E6	<b>The administering authority to be satisfied that persons appointed to the local pension board do not have a conflict of interest.</b>	The administering authority will have a conflict of interest policy and procedure in order to identify and manage actual and potential conflicts of interest	Partial compliance	<i>Enter here whether a conflicts of interest policy has been adopted, where it can be found and the review procedure.</i> <i>Is it to be a regular feature on the local pension board agenda?</i> <i>Is there a register of interests? Who is responsible for maintaining it?</i> <i>Are local pension board members aware of what could be considered a conflict of interest? (i.e. included in induction training)</i> Pension Board members are subject to a conflict of interest policy based upon the Council's Code of Conduct contained within the constitution. A specific policy for the pension fund, incorporating guidance for the Pensions Regulator is being prepared for approval. Board members are required to complete a declaration of interests at the start of their term of appointment. This is maintained by the council's democratic services team. Members are invited to declare any interests they may have on agenda items at



Ref	Principle	Detail of best practice principle	Compliance (Full/Partial/Non)	Statement of Compliance
				the start of each meeting. Board members have been directed towards the Pensions Regulators training toolkit module on conflicts of interest as a starting point for understanding what might constitute a conflict.
E7	<b>The administering authority to have regard to guidance issued by the Secretary of State</b>	The administering authority will have knowledge and access of the LGPS Advisory Board website ( <a href="http://www.lgpsboard.org">http://www.lgpsboard.org</a> ) and regularly check for updates and alerts.	Full compliance	<i>Enter here the post title of the officer(s) responsible for regularly checking the LGPS Advisory Board website and any other methods by which the Fund is kept informed of any guidance issued.</i> The task of regularly checking the LGPS Advisory Board website is not specifically allocated to a role, but falls within the remit of the Technical Finance Manager. Other methods of update include CIPFA and LGA bulletins, emails and networking events

### The Pensions Regulator's Code of Practice

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
<b>P1</b>	<b>Knowledge and Understanding</b>			
P1.1	<b>A member of the local pension board must be conversant with the scheme rules and any document recording policy about the administration of the scheme adopted by the administering authority</b>	A training strategy has been adopted and a training plan drafted in which there is provision for informing local pension board members of the LGPS rules, regulations and the Fund's documents and recording policy.	Non compliance	<i>Enter here whether a training strategy and plan have been adopted, where it can be found and the review process.</i> A formal training strategy has yet to be developed, to be supported by a training plan. Board members have been sign-posted to the Pension Regulators' online training toolkit in the first instance, to identify basic knowledge and understanding requirements. Members of the board completed the online toolkit during the year, and have undertaken specific reading relevant to their role. This has not been recorded on a training log. A training programme for both pension committee and board members will be developed during the summer of 2017, with a view to delivery over the next 12-18 months. This will include a log of training undertaken, including background reading and attendance at events.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P1.2	<b>A process should be in place to ensure a member of the local pension board has the knowledge and understanding required of the law relating to pensions and other matters which are prescribed in the Regulations which is sufficient to enable them to perform their duties</b>	A training strategy has been adopted and a training plan drafted in which there is provision for informing local pension board members of the law relating to pensions and matters prescribed in regulations.	Non compliance	<i>Enter here whether a training strategy and plan have been adopted, where it can be found and the review process.</i> A formal training strategy has yet to be developed, to be supported by a training plan. Board members have been sign-posted to the Pension Regulators' online training toolkit in the first instance, to identify basic knowledge and understanding requirements. A training programme for both pension committee and board members will be developed during the summer of 2017, with a view to delivery over the next 12-18 months.
P1.3	<b>The administering authority should establish and maintain policies and arrangements for acquiring and retaining knowledge and understanding</b>	A training strategy has been adopted and a training plan drafted to establish the arrangements for local pension board members to acquire and retain knowledge and understanding.	Non compliance	<i>Enter here whether a training strategy and plan have been adopted, where it can be found and the review process.</i> A formal training strategy has yet to be developed, to be supported by a training plan. Board members have been sign-posted to the Pension Regulators' online training toolkit in the first instance, to identify basic knowledge and understanding requirements. A training programme for both pension committee and board members will be developed during the summer of 2017, with a view to delivery over the next 12-18 months.
P1.4	<b>The administering authority should designate a person to take responsibility for ensuring that a training framework is developed and implemented.</b>	A training strategy has been adopted that contains details of the person designated to take responsibility for ensuring that a framework is developed and implemented	Non compliance	<i>Enter here whether a training strategy and plan have been adopted, where it can be found and the review process.</i> <i>Also state the post title or name of the person designated to take responsibility for ensuring that a framework is developed and implemented</i> A formal training strategy has yet to be developed, to be supported by a training plan. Board members have been sign-posted to the Pension Regulators' online training toolkit in the first instance, to identify basic knowledge and understanding requirements. A training programme for both pension committee and board members will be developed during the summer of 2017, with a view to delivery over the next 12-18 months. It has been suggested that one of the board members be nominated to take a

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
				lead on monitoring the training plan. This has not yet been taken forward.
P1.5	<b>The members of the pension board should be familiar with the AVC options offered by the Fund, including the choice of investments offered to members and the relative performance of those</b>	Information of the AVC options are provided to the local pension board members	Non compliance	<i>Enter here how information of the AVC options are provided to the local pension board members (e.g. induction training, contained in the training plan, provided with an information pack)</i> There is currently not any method for providing this information to board members. However a training programme for both pension committee and board members will be developed during the summer of 2017, with a view to delivery over the next 12-18 months.
P1.6	<b>The administering authority to prepare and keep an updated list of the documents with which they consider pension board members need to be conversant, including the scheme rules and relevant Fund specific documentation.</b>	An updated list of documents is maintained	Partial compliance	<i>Enter here whether a list is in existence, where it is available and the post title(s) of the person(s) responsible for maintaining it and notifying local pension board members of updates.</i> There is a list of policies and documents with which the administering authority considers pension board members need to be conversant. All policies are being reviewed and updated and will be presented to the board and committee for approval over the next 12 months. A governance compliance checklist has been acquired and is being completed. This will be monitored regularly by the board as part of their work programme.
P1.7	<b>The roles and responsibilities of pension board members to be clearly documented</b>	The terms of reference of the pension board should clearly set out the role, responsibility and duties of the pension board members	Partial compliance	<i>Enter here whether a policy has been adopted, where it is available and the post title(s) of the person(s) responsible for maintaining it</i> The role of the board is fully explained in the terms of reference, which form part of the council's constitution, but which need to be revised to reflect the developing work plan of the board.
P1.8	<b>Local pension board members to be aware of their</b>	Local pension board members should have personalised training plans in place, making	Partial compliance	<i>Enter here how this awareness is communicated (e.g. at induction training, contained within the training strategy, personal training plans, regular agenda item, monitoring by person designated to take responsibility for ensuring that a</i>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
	<b>personal responsibilities in terms of knowledge and understanding</b>	them aware of their personal responsibilities in terms of knowledge and understanding		<i>framework is developed and implemented)</i> The pension board terms of reference set out the personal responsibilities of board members to obtain the necessary levels of knowledge and understanding. Board members have been sign-posted to the Pension Regulators' online training toolkit in the first instance, to identify basic knowledge and understanding requirements. A training programme for both pension committee and board members will be developed during the summer of 2017, with a view to delivery over the next 12-18 months.
P1.9	<b>The administering authority to assist individual local pension board members to determine the degree of knowledge and understanding to effectively carry out their role as a pension board member (including pre-appointment training and mentoring if appropriate)</b>	A monitoring system / procedure should be contained in the training strategy and in place in order to assist the local pension board member to attain the level of knowledge and understanding that is sufficient for them to effectively carry out their role, responsibilities and duties as a pension board member	Non compliance	<i>Enter here whether a training strategy and plan have been adopted, where it can be found and the review process.</i> <i>Also state the post title or name of the person designated to take responsibility for ensuring that a framework is developed and implemented and how this is achieved</i> A formal training strategy has yet to be developed, to be supported by a training plan. Board members have been sign-posted to the Pension Regulators' online training toolkit in the first instance, to identify basic knowledge and understanding requirements. A training programme for both pension committee and board members will be developed during the summer of 2017, with a view to delivery over the next 12-18 months. It has been suggested that one of the board members be nominated to take a lead on monitoring the training plan. This has not yet been taken forward.
P1.10	<b>The administering authority to maintain individual training plans for local pension board members</b>	Individual training records are kept and maintained of the learning activities of the local pension board members.	Non compliance	<i>Enter here the post title or name of the person designated to take responsibility for maintaining the individual training records of the local pension board members.</i> <i>Are these regularly reported to the board / individual?</i> A formal training strategy has yet to be developed, to be supported by individual training plans. Board members have been sign-posted to the Pension Regulators' online training toolkit in the first instance, to identify basic knowledge and understanding requirements. A training programme for both pension committee and board members will be developed during the summer of 2017, with a view to delivery over the next 12-18 months.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
				It has been suggested that one of the board members be nominated to take a lead on monitoring the training plan. This has not yet been taken forward.
<b>P1.11</b>	<b>Local pension board members to invest sufficient time in their learning and development alongside their other responsibilities.</b>	There is provision in the individual training plans to monitor and record attendance at training events and whether sufficient time is being invested in learning and development.	Partial compliance	<p><i>Enter here the post title or name of the person designated to take responsibility for maintaining the individual training records of the local pension board members.</i></p> <p><i>Are these regularly reported to the board / individual?</i></p> <p><i>When / how?</i></p> <p>Board members have been sign-posted to the Pension Regulators' online training toolkit in the first instance, to identify basic knowledge and understanding requirements.</p> <p>Members of the board completed the online toolkit during the year, and have undertaken specific reading relevant to their role. This has not been recorded on a training log.</p> <p>It has been suggested that one of the board members be nominated to take a lead on monitoring the training plan. This has not yet been taken forward.</p>
<b>P1.12</b>	<b>Pension board members complete tPR's e-learning programme</b>	Local pension board members are required to complete the Pensions Regulator's e-learning programme but this is not in isolation and is supplemented by specific LGPS and related Fund learning activities	Partial compliance	<p><i>Enter here whether the training strategy sets out the requirement or method by which local pension board members complete the Pensions Regulator's e-learning programme and how this is recorded and monitored</i></p> <p>Board members have been sign-posted to the Pension Regulators' online training toolkit in the first instance, to identify basic knowledge and understanding requirements.</p> <p>At each board meeting, members are asked to update on their completion of the toolkit and to identify further areas of learning arising</p>
<b>P2</b>	<b>Conflicts of Interest</b>			
<b>P2.1</b>	<b>The administering authority should have in place an appropriate conflicts of interest policy, clearly identifying individual roles in identifying and reporting potential</b>	Administering authorities should ensure that there is an agreed and documented conflicts policy & procedure, which includes identifying, monitoring & managing potential conflicts of interest.	Partial compliance	<p><i>Enter here whether a conflicts policy is in existence, where it is available and the post title(s) of the person(s) responsible for maintaining it.</i></p> <p>Pension Board members are subject to a conflict of interest policy based upon the Council's Code of Conduct contained within the constitution. A specific policy for the pension fund, incorporating guidance for the Pensions Regulator is being prepared for approval.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
	<b>conflicts of interest and to whom any potential conflict should be reported</b>			
<b>P2.2</b>	<b>The conflicts of interest policy has a regular review date incorporated in to it</b>	Regular review date specified within the policy.	Partial compliance	<i>Enter here if a regular review date has been implemented</i> Pension Board members are subject to a conflict of interest policy based upon the Council's Code of Conduct contained within the constitution. A specific policy for the pension fund, incorporating guidance for the Pensions Regulator is being prepared for approval.
<b>P2.3</b>	<b>The administering authority to maintain a register of all conflicts (and potential conflicts) that are raised, reviewing them appropriately</b>	The administering authority should retain and regular review a register of all conflicts (and potential conflicts) that have been raised. Conflicts should be reviewed and any action taken forward.	Full compliance	<i>Enter here whether a register of conflicts exists, where it can be found and the post title(s) of the person(s) responsible for maintaining it.</i> <i>Details of the review process and action taken should be clearly documented</i> Board members are required to complete a declaration of interests at the start of their term of appointment. This is maintained by the council's democratic services team.
<b>P2.4</b>	<b>Declaration of conflicts (or potential conflicts) of interest to be disclosed on appointment and at regular intervals (inc. as a standing item at all meetings)</b>	The administering authority should retain a 'register of interest'. This is a simple and effective means of recording and monitoring dual interests and responsibilities of the Pension Board members.	Full compliance	<i>Enter here whether a register of conflicts exists, where it can be found and the post title(s) of the person(s) responsible for maintaining it.</i> <i>This should include initially disclosed conflicts of interest and any additional thereafter.</i> Board members are required to complete a declaration of interests at the start of their term of appointment. This is maintained by the council's democratic services team. Members are invited to declare any interests they may have on agenda items at the start of each meeting.
<b>P3</b>	<b>Publishing information about schemes</b>			
<b>P3.1</b>	<b>The administering authority must publish information about the local</b>	Provision is made on the Council website or Fund website that is available for all scheme members to view and	Partial compliance	<i>Enter here where the information about the local pension board is published and the post title of the person(s) responsible for its maintenance</i> <i>Add link to webpage</i> The names of the pension board members are published on the council's

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
	<b>pension board and keep that information up to date</b>	should include: - Name - Representative role - Employment and job title (where relevant) - The appointment process to the pension board		democratic web pages <a href="https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=187">https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=187</a> No other information is published about board members. The appointment process is covered in the terms of reference for the board, included within the council's constitution, but is not linked to the above web page. A project has been initiated to develop the fund's website to improve the availability of information.
<b>P3.2</b>	<b>The administering authority should publish information about the local pension board's business</b>	All board papers, agendas and minutes of meetings are available on the Council website or Fund website for all scheme members to view	Full compliance	<i>Enter here where the board paper, agendas and minutes of meetings can be viewed.</i> <i>Add link to webpage</i> All board meeting agendas, papers and minutes are published on the council's democratic web pages <a href="https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=187">https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=187</a>
<b>P3.3</b>	<b>The administering authority should consider any requests for additional information to be published to encourage scheme member engagement and promote a culture of transparency</b>	There will be details on the Council website or Fund website informing scheme members who to contact if they wish to make any requests for further information to be published. There will be a procedure in place for determining what scheme member requests will be agreed and how the decision is communicated to the scheme member	Partial compliance	<i>Enter here where the details can be found.</i> <i>Confirm if there is a procedure in place for determining requests for further information to be published</i> Pensions information is published on the council's website <a href="https://www.iwight.com/Council/Working-for-the-Council/Pensions-IWC/About0">https://www.iwight.com/Council/Working-for-the-Council/Pensions-IWC/About0</a> Governance information is published on the democratic web pages for both committee <a href="https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=150">https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=150</a> and board <a href="https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=187">https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=187</a> However there is no link between the two pages. A project has been initiated to develop the fund's website to improve communications with members and enhance the availability of information.
<b>P4</b>	<b>Managing Risks</b>			
<b>P4.1</b>	<b>The administering authority is required to have in place internal controls that include adequate systems, arrangements and</b>	There are in place systems, arrangements and procedures to ensure that the scheme is being run in accordance with the scheme rules as set out in regulations. This will include a clear separation of duties, processes for escalation and	Partial compliance	<i>Enter here details of hierarchy and reporting</i> <i>The existence of a risk register and its review frequency</i> <i>The auditing arrangements of the fund administration.</i> <i>If outsourced or shared service how the service provider is monitored against service levels</i> The administration of the pension fund is undertaken by the Pensions Team, which is under the Shared Services department. Accounting and governance is undertaken by the Technical Finance Team,

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	<b>procedures for the administration and management of the Fund (including external service providers and third parties)</b>	decision making and documented procedures for assessing and managing risk, reviewing breaches of law and managing contributions to the scheme.		within the Finance department. Pensions administration forms part of the internal audit universe, and is reviewed every three years – the last review was in 2016-17. The council's Key Financial Systems are reviewed annually by internal audit – controls in place for the council's accounting processes are replicated for the pension fund. Internal audit reports are presented to the pension fund committee and pension board for review and monitoring of actions. The fund does not have an administration strategy, nor is there any formal monitoring of service standards by the committee or board.
<b>P4.2</b>	<b>The administering authority should have in place a risk register to record all risks and actions taken, which is reviewed regularly</b>	An appropriate risk register is produced, recording all identified risks and action taken. This should be a standing item at all Pension Board meetings.	Full compliance	<i>Enter where (if) the risk register is available and the person responsible for maintaining it.</i> A risks and issues log is maintained for the pension fund, overseen by an officer working group, led by the Head of Resources. The log is reported to each meeting of both pension fund committee and pension board.
<b>P4.3</b>	<b>The administering authority should regularly review the effectiveness of its risk management and internal control processes</b>	Scheduled review dates should be included within the business remit of the Administering Authority. A review report should be produced detailing the effectiveness and any adjustments required with the Schemes risk management and internal controls	Partial compliance	<i>Enter here if there are scheduled review dates and their frequency.</i> A risks and issues log is maintained for the pension fund, overseen by an officer working group which meets on a bi-monthly basis, led by the Head of Resources. Risk management and internal control processes for the pension fund mirror those for the administering authority, which are subject to review periodically by the council's internal audit team.
<b>P4.4</b>	<b>Risk management and internal controls should be a standing item on the Pension Committee and pension board agendas</b>	Risk Management and internal controls included as an agenda item with the Pension Committee and pension board agendas.	Full compliance	<i>Enter here whether risk management and internal controls have been added to the agenda.</i> The pension fund risk and issues log is reported to each pension fund committee and pension board meeting. Internal audit reports are presented to the pension fund committee and pension board as they are received.



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<b>P5</b>	<b>Scheme record keeping</b>			
<b>P5.1</b>	<b>The administering authority must be able to demonstrate that they keep accurate, up to date and enduring records to be able to govern and administer the LGPS effectively</b>	There is in place a reliable pension administration software system for the purpose of keeping accurate and up to date scheme member data.	Partial Compliance	<p><i>Enter here the system operated and its industry acceptance</i>  <i>If outsourced or shared service how the data is monitored for accuracy or how member information is kept up to date and notified to the service provider</i></p> <p>The Isle of Wight Council use Aquila Heywood's <i>altair</i> pension administration system which is a well-known database enabling the administration of pensions. The system is externally hosted, which ensures that all system updates are actioned on a timely basis, and system and data issues can be investigated promptly.</p> <p>There is regular attendance at Aquila Heywood user group CLASS meetings to discuss any issues and seek resolutions to any difficulties.</p> <p>Pension administration team members attend training sessions to keep them abreast of any system updates to ensure that records are maintained accurately.</p>
<b>P5.2</b>	<b>The administering authority must ensure that scheme member data across all membership categories specified in the Record Keeping Regulations is complete and accurate and the data is subject to regular data evaluation</b>	<p>There is in place a procedure for all membership categories to pass on information with regard to changes in their own circumstances</p> <p>There is in place a procedure for scheme employers to advise of changes in circumstances of their scheme members</p>	Partial compliance	<p><i>Enter here whether such procedures exist to notify changes in scheme member data</i></p> <p>All members are encouraged to notify the pension administration team of any changes in their circumstances.</p> <p>All scheme members (active, deferred and pensioner) have access to the <i>altair</i> member self-service (MSS) portal which is a secure method of making changes to their member records.</p> <p>In addition, copies of change forms are available on the pension web pages.</p> <p>Members can also write or e mail in their changes.</p> <p>Scheme employers are provided with copies of change forms for their members.</p> <p>Any changes to the scheme are published in the council's internal newsletter and information provided to admitted bodies to forward to their staff.</p>
<b>P5.3</b>	<b>The administering authority must keep specific data which will enable it to uniquely identify a scheme member</b>	Scheme members have a unique identifier on the pension administration software system.	Full compliance	<p><i>Enter here what identifier is used (e.g. NI number, payroll number, scheme reference number)</i></p> <p><i>Enter also whether or not scheme members can be identified by searching by surname or alternative if unique number not yet allocated or unavailable</i></p> <p>All members have their NI number recorded.</p> <p>All active members have a payroll number provided by their provider. This</p>

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	<b>and calculate pension benefits correctly</b>			would be unique to their role. If a unique reference has not been provided by a payroll provider or employer a member would be able to be identified by name date of birth and address.  Each employer within the fund is allocated a unique scheme reference number.  A unique pensioner number is assigned when a member becomes a pensioner.
<b>P5.4</b>	<b>The administering authority should require participating employers to provide them with timely and accurate data</b>	Processes are established which facilitates the transmission of complete and accurate data. Employers are aware of the importance of accurate and timely submission of data and have access to expertise in order to resolve queries.	Partial compliance	<i>Enter here whether an established process is in place for the timely and accurate transmission of data</i> <i>Is there a pension administration strategy in place?</i> <i>Is there information for employers on the website?</i> <i>Are there penalties for late submission or supply of inaccurate data?</i> There is a timetable and guidance provided to each employer and payroll provider each year which sets out the requirements for providing data. A template for this information is also provided. Admission agreements for employers joining the fund in the last three years contain details of the standards expected for data collection; however this is not the case of older admission bodies, or for scheduled bodies, for whom no admission agreement is required. The fund is looking into developing and publishing an administration strategy which will standardise the requirements for all employers, and will facilitate the introduction and implementation of sanctions (including financial penalties where appropriate) for late or inaccurate submission of data. In addition a project has been initiated to develop the fund's website, which will improve information available to employers.
<b>P5.5</b>	<b>The administering authority should seek to ensure that employers understand the main events which require information about members to be communicated</b>	Processes are in place for employers to inform the administering authority in the event there is an event affecting a scheme member, such as – <ul style="list-style-type: none"> <li>• Joins or leaves the scheme</li> <li>• Changes their rate of contributions</li> </ul>	Partial compliance	<i>Enter here whether an established process is in place for the timely and accurate transmission of data</i> <i>Is there a pension administration strategy in place?</i> <i>Is there information for employers on the website?</i> <i>Are there penalties for late submission or supply of inaccurate data?</i> This information is provided in the annual admitted bodies' administration guidance notes. Templates for leavers and starters are provided on the pension webpages. Admission agreements for employers joining the fund in the last three years contain details of the standards expected for data collection; however this is not

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		<ul style="list-style-type: none"> <li>Changes their name, address or salary</li> <li>Changes their membership status</li> <li>Transfers employment between scheme employers</li> <li>Strike days or breaks in service</li> <li>50/50 membership</li> </ul> (This list is not exhaustive)		<p>the case of older admission bodies, or for scheduled bodies, for whom no admission agreement is required.</p> <p>The fund is looking into developing and publishing an administration strategy which will standardise the requirements for all employers, and will facilitate the introduction and implementation of sanctions (including financial penalties where appropriate) for late or inaccurate submission of data.</p> <p>In addition, a project has been initiated to develop the fund's website, which will improve information available to employers.</p>
P5.6	<b>The administering authority should have policies and procedures in place for the regular monitoring of data</b>	Scheme managers must establish and operate adequate internal controls, which should include processes and systems to support record-keeping requirements and ensure that they are effective at all times.	Partial compliance	<p><i>Enter here whether there are policies and procedures in place, where it is available and the post title(s) of the person(s) responsible for maintaining it.</i></p> <p>A manual process is currently operated to validate data provided and raise any irregularities with payroll providers for resolution. This is time consuming and inefficient.</p> <p>A project has been initiated to enable the automatic upload of information from payroll providers into the <i>altair</i> administration system, which will allow real-time validation of data and resolution of queries. A project plan for delivery, including timeframes and interim solutions, is being developed.</p>
P5.7	<b>The administering authority should carry out regular (at least annually) data reviews</b>	Administering authorities establish twice yearly dates to review the data quality held for the scheme. Internal process completed to investigate quality.	Partial compliance	<p><i>Enter here confirmation details of the data reviews</i></p> <p>A manual process is currently operated to validate data provided on an annual basis and raise any irregularities with payroll providers for resolution. This is time consuming and inefficient.</p> <p>A project has been initiated to enable the automatic upload of information from payroll providers into the <i>altair</i> administration system, which will allow real-time validation of data and resolution of queries. A project plan for delivery, including timeframes and interim solutions, is being developed.</p> <p>The implementation of this system will facilitate more regular and timely data quality reviews.</p>
P5.8	<b>The administering authority should ensure that appropriate procedures and</b>	Processes are established which details the timely transmission of complete and accurate data	Partial compliance	<p><i>Enter here whether an established process is in place for the timely and accurate transmission of data</i></p> <p><i>Is there a pension administration strategy in place?</i></p> <p><i>Is there information for employers on the website?</i></p> <p><i>Are there penalties for late submission or supply of inaccurate data?</i></p>

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	<b>timescales are in place for scheme employers to provide updated information when member data changes</b>			Employers are provided with guidance notes on an annual basis. These notes contain details of the timeframe for submission of data and payments. Change forms are provided to be completed when changes in circumstances occur. Admission agreements for employers joining the fund in the last three years contain details of the standards expected for data collection; however this is not the case of older admission bodies, or for scheduled bodies, for whom no admission agreement is required. The fund is looking into developing and publishing an administration strategy which will standardise the requirements for all employers, and will facilitate the introduction and implementation of sanctions (including financial penalties where appropriate) for late or inaccurate submission of data. In addition, a project has been initiated to develop the fund's website, which will improve information available to employers.
<b>P5.9</b>	<b>The administering authority should be able to trace the flow of funds into and out of the scheme, reconcile these and keep records of transactions</b>	There are audited processes in place that record transactions into and out of the Fund	Full compliance	<i>Enter here confirmation that regular audits take place on the processes in accounting and reconciling monies into and out of the fund</i> The fund uses the Logotech Public Sector Treasury Management System to record and monitor cash flows in and out of the fund, recording the anticipated contributions (timing and estimated values) and the actual amounts received, as well as forecast benefit payments against those actually paid. If funds are not received on the expected date, the treasury team communicates with the administration team, who also monitor the receipt of data, and missing information is chased. This information is used to forecast the levels of operational cash maintained by the fund. The fund uses the SAP accounting system to record all financial transactions for the fund, and to produce regular accounting information for the pension fund committee and local pension board as well as the annual report and accounts. The treasury management processes for the fund are covered by the council's internal audit universe and are reviewed annually by the internal audit provider. The financial statements for the fund are audited annually by the funds external auditors, Ernst & Young, Reports from both sets of auditors are presented to the pension fund committee and local pension board.
<b>P5.10</b>	<b>The administering authority must keep records of pension</b>	Records are available that show decisions made and discussions at local pension	Full compliance	<i>Enter here where the records are available</i> <i>Add link to webpage</i> All board meeting agendas, papers and minutes are published on the council's

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	<b>board meetings and discussions and records of decisions made other than at a local pension board meeting that is later ratified.</b>	board meetings and those that take place outside and are later ratified at a local pension board meeting		democratic web pages <a href="https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=187">https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=187</a>
P5.11	<b>The administering authority should retain records for as long as they are needed and have in place an adequate system and process for record retention</b>	A policy on document retention is in place that includes the retention of local pension board papers and documents	Partial compliance	<i>Enter here whether there is a policy document in place that includes the retention of local pension board papers and documents</i> <i>Add the retention time limit</i> <i>Add link to webpage</i> Retention policy follows that of the Isle of Wight Council, which is currently under review in line with the new General Data Protection Regulations (GDPR). Specific data retention requirements for the pension fund need to be reviewed in line with current best practice.
P5.12	<b>Where the administering authority has identified poor quality or missing data there should be a data improvement plan in place</b>	A data improvement plan is in place which contains measures for the administering authority to monitor and a timeframe for attaining accurate data	Partial compliance	<i>Enter here whether a data improvement plan is in place with timescales for data improvement or what measures will be taken where inaccurate data is discovered</i> Specific issues are addressed as they arise – for example, The Pensions manager has met with School Business Managers and communication with them will continue on a regular basis. Next meeting September 2017. An escalation process has been adopted. There is no data improvement plan in place – this needs to be developed
P5.13	<b>The administering authority should reconcile member records with the relevant employers and be able to identify those scheme members who are approaching retirement, those</b>	Scheme member records are reconciled with the relevant employers at least on an annual basis. Pension Administration software systems can identify scheme members approaching retirement, active members and deferred members.	Partial compliance	<i>Enter here when and how scheme member records are reconciled with their relevant employers.</i> <i>Confirm that the pension administration software system can identify scheme members approaching retirement, active members and deferred members.</i> A monthly report for deferred members is run to enable information on pension options to be provided ahead of retirement.  Information from active members wishing to retire is received via the payroll /HR teams.  There is currently no process to regularly review the age profile of the fund's

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	<b>who are active members and those that are deferred members</b>			active members, particularly those approaching retirement. This is being developed.
<b>P5.14</b>	<b>The administering authority must ensure that processes created to manage scheme member data are compliant with the Data Protection Act 1998 and data protection principles.</b>	Data Protection Act is complied with and all relevant persons are aware of their responsibilities	Partial compliance	<p><i>Enter here how this awareness is communicated</i></p> <p><i>Officers – internal</i></p> <p><i>Committee/LPB members –induction / info packs</i></p> <p>All employees complete data protection awareness training on -line as part of their induction and this training is reviewed from time to time (3 years maximum)</p> <p>The induction plan for elected members includes a session on data protection, delivered by the monitoring officer.</p> <p>There is current no specific training for pension board members on data protection. Members have been referred to the Pensions Regulator's online toolkit to assist with developing their knowledge and skills.</p> <p>A training programme for both pension committee and board members will be developed during the summer of 2017, with a view to delivery over the next 12-18 months.</p>
<b>P5.15</b>	<b>The administering authority should be able to demonstrate that records are kept in accordance with other relevant legislation</b>	<p>Evidence that key requirements are set out where applicable under the following legislation –</p> <ul style="list-style-type: none"> <li>• Pensions Act 1995 and 2004</li> <li>• Pensions Act 2008 and the Employers' Duties (Registration and Compliance) Regulations 2010</li> <li>• Occupational Pension Schemes (Scheme Administration) Regulations 1996</li> <li>• Registered Pension Schemes (Provision of Information) Regulations 2006</li> <li>• Data Protection Act 1998</li> </ul>	Full compliance	<p><i>Enter here some evidence or statement that the relevant pieces of legislation are complied with in relation to the Fund's record keeping</i></p> <p>The pension's Aquila Heywood system is complaint in keeping records under the aforementioned rules and regulations and is supported operationally by means of guidance and process notes.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/ Non)	Statement of Compliance
		<ul style="list-style-type: none"> <li>Freedom of Information Act 2000</li> </ul>		
<b>P6</b>	<b>Maintaining Contributions</b>			
<b>P6.1</b>	<b>The administering authority should ensure there are effective policies and procedures in place to identify payment failures and assess the materiality of any failures identified</b>	All employers are aware of the payment deadlines Procedures and processes are in place to monitor the payment of contributions, record payments of contributions to the Fund, manage overdue contributions and identified payment failures are reported to a senior officer.	Partial compliance	<p><i>Enter here how employers are made aware of their responsibilities to meet contribution payment deadlines (Pension Administration Strategy, Admission Agreement)</i></p> <p><i>Confirmation that procedures are in place to monitor and record payments of contributions to the</i></p> <p><i>The action taken when a payment failure is identified and the reporting responsibilities</i></p> <p>Admission agreements for employers joining the fund in the last three years contain information regarding payment deadlines and their duties / responsibilities; however this is not the case of older admission bodies, or for scheduled bodies, for whom no admission agreement is required. The fund is looking into developing and publishing an administration strategy which will standardise the requirements for all employers.</p> <p>Every year a new template and reinforcement of the guidance is issued to all admitted bodies and Payroll providers.</p> <p>A monthly control check list of returns and contributions received is maintained. Late or missing information is followed up with the relevant employer, and is reported to management. A report of non-compliance is made on a regular basis to pension fund committee and pension board.</p>
<b>P6.2</b>	<b>Employers should be provided with the necessary guidance to ensure they provide the required information to enable contributions to be monitored</b>	Employers are provided with the necessary scheme documents and training requirements to fulfil their obligations within the Scheme. - Contribution templates - Fund liaison contact for contributions	Partial compliance	<p><i>Enter here where the employer contribution documents are held and the person responsible for maintaining them.</i></p> <p><i>Detail the Fund's contact for contribution pay over.</i></p> <p>Contribution templates provided at the beginning of each financial year.</p> <p>There is an anomalies checking process to ensure the information is consistent Any inconsistencies are raised back to the employer A generic e mail address is provided for any employer queries.</p> <p>A project has been initiated to develop the fund's website, which will improve information available to employers.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/ Non)	Statement of Compliance
P6.3	<b>Where the administering authority identify a payment failure they should follow a process to resolve issues quickly (e.g. monthly monitoring of employer payments to ensure contributions paid on time and in full) and maintain a record of investigations and communications in relation to such failures</b>	Records are maintained of investigations and communications (and outcomes) in relation to payment failures, together with communication with the employer	Partial compliance	<i>Enter here confirmation that a procedure and process is in place to resolve issues where there is a payment failure by an employer</i> A monthly control check list of returns and contributions received in maintained. Late of missing information is followed up with the relevant employer, and is reported to management. A report of non-compliance is made on a regular basis to pension fund committee and pension board.
P6.4	<b>The administering authority should review 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.</b>	This will be identified on the fund's risk register A regular review of processes to detect fraud is undertaken	Full compliance	<i>Enter here confirmation the process to detect situations where fraud may take place is recorded on the risk register (enter reference)</i> <i>Confirm that regular reviews of the process to detect fraud are undertaken (date of last review / date of next review)</i> Audit requirement dictate that we receive a starter form in respect of any new contributions received for an employee.  We also check that the information provided is consistent with their pay and contribution rate and consequently reconciled on a monthly basis.  NFI exercise undertaken annually to match data and ensure consistency.
P6.5	<b>The administering authority must report payment failures which are likely to be of material</b>	Responsible officers are aware of the requirement and there is a procedure in place for reporting payment failures to the regulator in accordance with the code of practice	Partial compliance	<i>Enter here where the procedure is documented (reporting policy)</i> A new policy <i>Reporting breaches of the law to the Pensions Regulator</i> has been drafted and will be sent to members of the pension board for review and recommendation to the pension fund committee for adoption.



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	significance to the Regulator.			
<b>P7</b>	<b>Member communication</b>			
<b>P7.1</b>	<b>Administering authority to provide an annual benefit statement to all active, deferred and pension credit members containing certain legal information and to ensure all AVC members are provided with a similar statement from their AVC provider</b>	Annual benefit statements are issued to each active, deferred pensioner and pension credit member. Statements must be issued no later than 5 months after the end of the Scheme year to which it relates The Administering Authority will have liaised with the Schemes AVC provider and ensured an appropriate timetabled production of the members AVC statement is produced.	Full compliance	<i>Enter here the date annual benefit statements were issued to active, deferred and pension credit members and the relevant Scheme year to which it relates</i> <i>Enter here the Administering Authorities AVC provider and the agreement details for the member's annual benefit statement production.</i> Annual Benefits Statements (ABS) for all active, deferred and pension credit members are issued by 31 August in line with statutory deadlines. For the year ended 31 March 2017, statements were published via the Member Self Service (MSS) portal on 24 August 2017.  The fund's AVC provider, Prudential, issue their ABS to the individual directly. The fund is notified when the statements have been sent.
<b>P7.2</b>	<b>The administering authority must provide scheme members with basic scheme information, meeting minimum legal requirements</b>	The fund will have in place a communication policy which contains details of what information is provided to scheme members and the communication media.	Partial compliance	<i>Enter here confirmation that a communication policy is in place (link to webpage) which sets out what information is provided to scheme members and how it is communicated (scheme booklet, dedicated fund website, council webpage)</i> There is an old and out of date communications policy which needs to be revised. This is in hand. New employees are provided with information in their contract of employment and access to Member Self Service which holds individual data. A project has been initiated to develop the fund's website, which will improve information available to members.
<b>P7.3</b>	<b>Disclosure regulations make provision for scheme members</b>	The fund will have in place a communication policy that sets out how and when it will communicate with any of the	Partial compliance	<i>Enter here confirmation that a communication policy is in place (link to webpage) which sets out what information is provided to scheme members and how it is communicated (scheme booklet, dedicated fund website, council webpage)</i> There is an old and out of date communications policy which needs to be

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
	<b>and others to receive information that is relevant to their pension rights and scheme entitlements and provided within certain legal timescales</b>	<p>following “relevant persons” within the prescribed legal timescales.</p> <ul style="list-style-type: none"> <li>• Active members</li> <li>• Deferred members</li> <li>• Pensioner members</li> <li>• Prospective members</li> <li>• Spouses, civil partners of members or prospective members</li> <li>• Other beneficiaries</li> <li>• Recognised trade unions</li> </ul>		<p>revised. This is in hand.</p> <p>Pension awareness sessions have been run for staff seeking information on retirement, delivered by the council’s AVC provider and council staff..</p> <p>The Pension and Payroll Lead Officer attends the quarterly corporate induction sessions for new employees.</p> <p>Processes for monitoring and reporting the volume and timeliness of the provision of information to members have yet to be fully developed. The majority of information requested by members is provided within the required timescales.</p>
<b>P7.4</b>	<b>Where information is provided electronically it should comply with legal requirements</b>	Administering authority ensuring that all electronically produced information complies with the legal requirement	Full compliance	<p><i>Enter here whether or not the administering authority has complied with the legal requirements.</i></p> <p>ABS for active and deferred members are primarily published on the MSS self-service portal. The information provided complies with the legal requirements. All active members have been informed of the MSS portal via internal communication at the council, and emails to school business partners and nominated payroll contacts at external employers.</p> <p>Deferred members have been notified of the MSS portal by email. Members have been informed that the ABS will only be provided on-line, but have the option to request a paper copy – there have been very few requests for hard copy information, and a high take up of no-line access requests.</p>
<b>P7.5</b>	<b>The administering authority should attempt to make contact with their scheme members and where contact is not possible carry out a tracing exercise to locate scheme members.</b>	A tracing service has been engaged to trace scheme members where contact details are considered incorrect	Partial compliance	<p><i>Enter here whether or not a tracing service is used and the circumstances in which it is used.</i></p> <p>The pension administration team work closely with the council tax department to maintain contact details.</p> <p>The council does not currently use a tracing agent</p>
<b>P7.6</b>	<b>Requests for information should be acknowledged if</b>	A customer service standard is in place that requires a written response to be provided within	Partial compliance	<p><i>Enter here to confirm that a customer service standard is in place and what the response timescales</i></p> <p>For communication received via the pension team generic e-mail account, and</p>

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	information requested cannot be immediately provided.	a specified timescale and where that response cannot be provided that a letter of acknowledgement is sent with an indicative response time.		automatic acknowledgement is delivered advising a response will be made within 5 working days.
<b>P8</b>	<b>Internal Dispute Resolution Procedure</b>			
<b>P8.1</b>	<b>The administering authority has in place an Internal Dispute Resolution Procedure</b>	An Internal Dispute Resolution Procedure is in place in accordance with the LGPS regulations and it clearly states the procedure and process to apply for a dispute to be resolved including – <ul style="list-style-type: none"> <li>- Who it applies to</li> <li>- Who the adjudicator is (stage 1)</li> <li>- Who to contact with a dispute</li> <li>- The information that an applicant must include</li> <li>- How the final decision is reached</li> <li>- How the dispute can be escalated if dis-satisfied</li> <li>- The appropriate timescales</li> </ul>	Partial compliance	<i>Enter here confirmation that there is an Internal Dispute Resolution Procedure in place in accordance with the LGPS regulations and the required information included in correspondence where required (inc. website, booklets, etc.)</i> <i>Link to webpage</i> There is an old and out of date procedure which is referenced in statements at the end of correspondence to members. A revised procedure has been drafted and is being reviewed by pension board and committee members, with a deadline of November 2017 for approval.
<b>P8.2</b>	<b>The administering authority has ensured all scheme employers have appropriate arrangements in place for dealing with stage 1 disputes</b>	A 'specified person' has been nominated by the scheme employer. The appropriate timescales known by the scheme employer for their reply.	Non compliance	<i>Enter here if a list of the 'specified person' for each employer is in existence, where it is held and who maintains it.</i> Unknown: as part of the approval process for the new Internal Dispute Resolution Procedure, contact will be made with all scheme employers to determine and record their internal processes.
<b>P8.3</b>	<b>The administering authority should regularly review its dispute process to</b>	The administering authority to complete an annual review of its dispute process. Ongoing and completed	Partial compliance	<i>Enter here the details of the annual review, where it is held and the post title(s) of the person(s) responsible for maintaining it.</i> <i>Is this accessible on the Fund's website?</i> The new draft procedure includes provision for an annual review.

	Requirement	Full Compliance	Compliance (Full/Partial/ Non)	Statement of Compliance
	ensure its effectiveness and that the necessary timescales are being met (inc. the employer processes at stage 1)	disputes to be logged appropriately. Timescales for completion of dispute cases reviewed.		
<b>P9</b>	<b>Breaches of the Law</b>			
<b>P9.1</b>	<b>The administering authority should be satisfied that those responsible for reporting breaches of the law are made aware of their legal requirements and the Pensions Regulator's guidance.</b>	Those responsible for reporting breaches are made aware of the legal requirements and the regulator code of practice. Relevant training should be provided to those responsible for reporting breaches. Sign off required on completion of training and understanding. All those that are responsible to report breaches, should establish and operate appropriate and effective procedures to ensure that they are able to meet their legal obligation.	Partial compliance	<p><i>Enter here the details of all training provided and the corresponding training documentation.</i></p> <p><i>-Include the procedures used</i></p> <p><i>-List of names and roles that should report breaches within the Fund</i></p> <p><i>-Training list document</i></p> <p><i>-Annual review of post holders involved</i></p> <p>Members of the pension fund committee and pension board have been referred to the Pensions Regulator's online training toolkit module on reporting breaches of the law.</p> <p>A new policy <i>Reporting breaches of the law to the Pensions Regulator</i> has been drafted and is being reviewed by pension board and committee members, with a deadline of November 2017 for approval. This covers the responsibilities of all parties to report potential breaches.</p> <p>Once the policy is formally launched, briefings will be offered to officers, committee and board members to ensure all are aware of their roles and responsibilities.</p>
<b>P9.2</b>	<b>The administering authority should have a breaches of the law policy in place</b>	Breaches of the law policy detailed within the Fund's annual governance statement	Partial compliance	<p><i>Enter here whether a policy is in existence, where it is available and the post title(s) of the person(s) responsible for maintaining it.</i></p> <p>A new policy <i>Reporting breaches of the law to the Pensions Regulator</i> has been drafted and is being reviewed by pension board and committee members, with a deadline of November 2017 for approval.</p>
<b>P9.3</b>	<b>The administering authority should maintain a breaches log and have identified a</b>	Named person detailed within the Funds annual governance statement. Breaches log established, updated and maintained.	Partial compliance	<p><i>Enter here the post title(s) of the person(s) responsible.</i></p> <p>The new policy identifies the Technical Finance Manager as having responsibility for maintaining the breaches log, and the Monitoring Officer for receiving notifications of potential breaches.</p> <p>The breaches log will be presented to the pension board and pension fund</p>

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	<b>person responsible for maintaining the breaches of the law policy, logging, reporting and recording processes</b>	Confirmation of the reporting of breaches.		committee at every meeting. Potential breaches which have been identified prior to the formal adoption of the policy will be recorded and actions taken will be documented to prevent future recurrence.