

## Isle of Wight Council Pension Fund Governance Policy and Compliance Statement

### Version control sheet

Version	Date	Notes
1.0	07 October 2016	Created by Hymans Robertson Presented to Pension Board 8 December 2016
2.0	27 July 2017	Update
2.1	31 August 2017	All responses received
2.2	12 September 2017	Board comments; "section3" in 2016-17 annual report

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# Isle of Wight Council Pension Fund

## Governance Policy and Compliance Statement

### Governance Policy Statement

Updated: 28 July 2017

#### Introduction

This Policy and Compliance Statement outlines the governance arrangements for the Isle of Wight Council Pension Fund, as required by Regulation 55 of the Local Government Pension Scheme Regulations 2013 ("The Regulations").

Under that provision all LGPS Funds in England and Wales are required to produce a Governance Compliance Statement, keep it under review, revise it following any material change in its delegation arrangements and publish it, following such consultation as it considers appropriate. The statement is required to set out:

- whether the administering authority delegates their function or part of their function in relation to maintaining a pension fund to a committee, a sub-committee or an officer of the authority;
- if they do so
  - the terms, structure and operational procedures of the delegation;
  - the frequency of any committee or sub-committee meetings;
  - whether such a committee or sub-committee includes representatives of employing authorities (including authorities which are not Scheme employers) or members, and if so, whether those representatives have voting rights.
- the extent to which a delegation, or the absence of a delegation, complies with guidance given by the Secretary of State and, to the extent that it does not so comply, the reasons for not complying.
- details of the terms, structure and operational procedures relating to the local pension board established under the Regulations.

Each administering authority is required to:

- keep the statement under review;
- make such revisions as are appropriate following a material change in respect of any of the matters mentioned, above; and
- if revisions are made, publish the statement as revised.

In reviewing and making revisions to the statement, the authority must consult such persons as it considers appropriate.

#### About the Isle of Wight Council Pension Fund

Under the Local Government Pension Scheme Regulations 2013, Isle of Wight Council is required to maintain a pension fund (the Fund) for its employees and those of other Scheme Employers within its area.

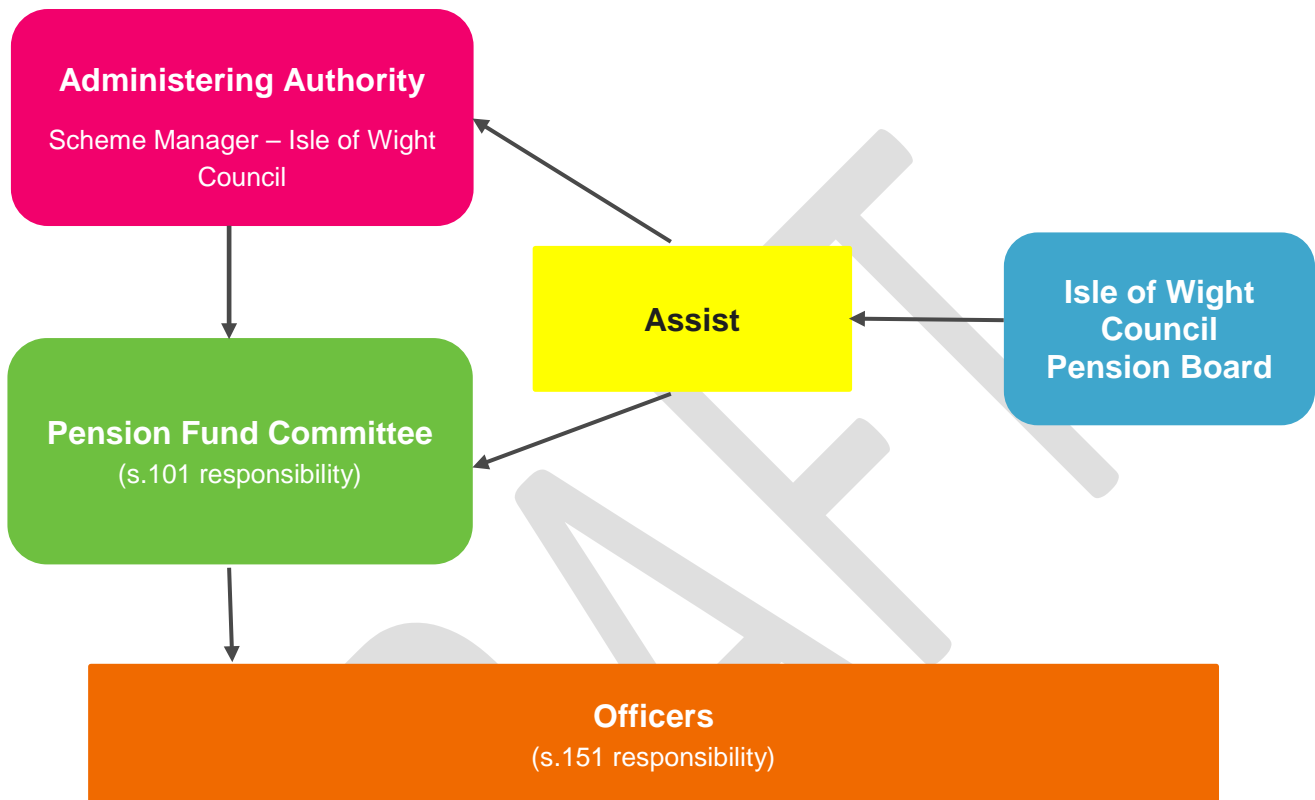
As at 31 March 2017, Isle of Wight Council administers the Fund for its own employees and those of 14 scheduled bodies and 15 admitted bodies.



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## Governance Structure

The Isle of Wight Council Pension Fund governance structure is illustrated below. This structure relates to the administering authority responsibilities only. The Isle of Wight Council is also an employer within the Isle of Wight Council Pension Fund. A separate governance structure and Scheme of Delegation is in place in relation to the Isle of Wight Council's employer responsibilities:



## Role of the Pension Committee

Under the terms of its constitution Isle of Wight Council (“the Council”), as the administering authority to the Fund, has delegated its functions with regard to the fund to its Pension Fund Committee (“the Committee”). This is in line with guidance from the Chartered Institute of Public Finance & Accountancy (CIPFA).

The Committee oversees the proper administration and management of the Fund. It is responsible for:

- appointing external fund managers and advisers
- making suitable custody arrangements for the fund's investments
- considering and approving actuarial valuations every three years and determining the level of employers' contributions
- considering changes in Local Government Pension Scheme (“LGPS”) regulations and determining actions required
- considering and approving strategic advice on investment policy
- considering and approving the external managers' asset allocation and investment strategies
- monitoring the investment performance of the managers against the scheme specific benchmarks

- the periodic review of this statement, the Investment Strategy Statement, the Funding Strategy Statement, the Communications Policy and any other Policies relating to the Management of the Fund

The Committee normally meets four times each year, in February, May, July and November. Each meeting considers the strategy and performance of the Fund, together with any business matters that require attention. These include, at least once per annum, consideration of fund management and investment advice arrangements, and the investment strategy of the fund.

The July meeting also forms the annual meeting to which all employers and employee representatives are invited to discuss fund performance and developments in the statutory framework.

As well as these formal meetings, ad hoc sessions are arranged as required, principally in order to explore available investment strategy options in some depth.

The committee is constituted to reflect the views of the council as administering authority and the largest member employer with 84% of the contributing membership.

The committee consists of

- seven councillors with voting rights plus the Leader of the Council in an ex-officio capacity
- one representative of the admission bodies/scheduled bodies in an observer capacity
- one representative of the trade unions in an observer capacity

### **Role of Officers**

Officers of the Council have certain statutory and formal responsibilities. Executive powers are delegated to the Officers where appropriate under the Council's Scheme of Delegations, which sets the parameters within which the Officers can implement Committee decisions and operate the day-to-day business of the Isle of Wight Council Pension Fund.

### **Role of Local Pension Board**

Following changes made to the LGPS Governance Regulations by the Public Service Pensions Act 2013, a Local Pension Board was established. This is a new layer of governance containing member and employer representatives. It is designed to assist with securing compliance with the LGPS regulations. The Local Pension Board is not a decision making body but works alongside the Fund's Committee and Officers.

- Securing compliance with the scheme regulations and other legislation relating to the governance and administration of the scheme and any statutory pension scheme that is connected with it;
- Securing compliance with requirements imposed in relation to the scheme and any connected scheme by the Pensions Regulator; and
- Such other matters as the scheme regulations may specify.

### **Review**

This policy statement will be reviewed annually, and revised and re-published following any material change in the above arrangements.

**OLD FORMAT GOVERNANCE COMPLIANCE STATEMENT (updated at July 2017 – For information only)**

Principle	Detail of best practice principle	Compliance (Full/Partial/Non)	Statement of Compliance
<b>A. Structure</b>	a) The management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing council.	Partial compliance	a) The Isle of Wight Council Pension Fund Committee forms part of the council's constitution, which includes the terms of reference for the committee. The terms of reference for the committee need to be updated to reflect the broader scope of their remit, beyond investment responsibilities. The Pension Board for the Local Government Pension Scheme was constituted by the council in January 2015. The terms of reference for that board were approved by full council and form part of the constitution. The terms of reference for the board need to be revised to reflect the developing work plan of the board. The precise status of the Board and its relationship to the Administering Authority is still subject to national clarification. Although the board is constituted under the Public Services Pensions Act 2013, at present it is operated, administered and supported as though it were a committee of the Council set up under Local Government Act 1972 powers, in the absence of explicit guidance to the contrary, to ensure best practice standards are applied, but this may change.
	b) That representatives of participating LGPS employers, admitted bodies and scheme members (including pensioner and deferred members) are members of either the main or secondary committee established to underpin the work of the main committee.	Full compliance	b) The terms of reference for the committee specify that the membership should include employer and member representatives. There is one non-voting representative from each of the two categories on the committee, nominated by employers and UNISON respectively. There are no representatives of pensioners or deferred members as such. The terms of reference for the board (in compliance with the Public Services Pensions Act 2013 and subsequent regulations) specify that employers and scheme members should be equally represented on the board. One employer representative is from the Council, the other nominated by other employers; the scheme member representatives are nominated by UNISON, representing retired and active members.
	c) That where a secondary committee or panel has been established, the structure ensures effective communication across both levels	Full compliance	c) There is no secondary committee
	d) That where a secondary committee or panel has been established, at least one seat on the main committee is allocated for a member from	Full compliance	d) Not applicable.

**OLD FORMAT GOVERNANCE COMPLIANCE STATEMENT (updated at July 2017 – For information only)**

Principle	Detail of best practice principle	Compliance (Full/Partial/Non)	Statement of Compliance
	the secondary committee or panel.		
<b>B. Committee Membership and Representation</b>	<p>a) That all key stakeholders are afforded the opportunity to be represented, within the main or secondary committee structure. These include:-</p> <p>i) employing authorities (including non-scheme employers, e.g. admitted bodies);</p> <p>ii) scheme members (including deferred and pensioner scheme members);</p> <p>iii) where appropriate, independent professional observers, and</p> <p>iv) expert advisors (on an ad-hoc basis)</p>	Full compliance	<p>a) The committee membership (as stated in the council's constitution) includes 7 elected members (the council being the largest employer), 1 employee representative (UNISON) and 1 employer representative (nominated by the other participating employers). Only elected members are permitted to vote, on the grounds that the Administering Authority is responsible for and underwrites the fund at local level.</p> <p><b>Area for improvement:</b> <i>Terms of reference to be updated to consider the situation should participating employers be unable to agree on a nominated representative.</i></p> <p>The committee is advised by officers, fund managers, actuaries and independent investment advisers.</p> <p>The board membership comprises two employer representatives (one being an elected member of the council, the other nominated by the other participating employers) and two scheme member representatives (one active and one retired, both nominated by UNISON).</p> <p>The board has access to expert advisers should their input be required.</p>
	b) That where lay members sit on a main or secondary committee, they are treated equally in terms of access to papers and meetings, training and are given full opportunity to contribute to the decision making process, with or without voting rights	Full compliance	<p>b) All members of both committee and board are given equal access to meetings and papers for both committee and board, which are published on the council's website.</p> <p>Members of the board are invited to attend committee meetings as observers.</p> <p>All members of both committee and board are invited to attend all training sessions, and any ad-hoc meetings convened for specific purposes (for example briefings about pooling of investments).</p>
<b>C. Selection and role of lay members</b>	a) That committee or panel members are made fully aware of the status, role and function they are required to perform on either a main or secondary committee	Partial compliance	<p>a) The role of the committee is fully explained in the council's constitution, however the terms of reference need to be updated to reflect the broader responsibilities of the committee in terms of administration, membership and governance. Training has been provided to all members on the background to the LGPS, the role of the committee, the governance structure and future changes.</p> <p>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</p>

**OLD FORMAT GOVERNANCE COMPLIANCE STATEMENT (updated at July 2017 – For information only)**

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			developing work plan of the board. The precise status of the Board is still under discussion at national level. In the meantime, the Board has put in place a draft programme covering work on administration, governance, investment and membership issues.
	b) That at the start of any meeting, committee members are invited to declare any financial or pecuniary interest related to specific matters on the agenda	Full compliance	b) There is a standing agenda item at the start of each committee and board meeting to record declarations of interest.
<b>D. Voting</b>	a) The policy of individual administering authorities on voting rights is clear and transparent, including the justification for not extending voting rights to each body or group represented on main LGPS committees.	Full compliance	a) Voting rights for each type of membership are set out in the council's constitution. For the pension board, all members have equal voting rights. For the committee, non-elected members do not have a vote because they do not represent organisations responsible for underwriting the fund at local level. <b>Area for improvement:</b> <i>The justification for excluding non-elected members (i.e. staff and employer representatives) from voting rights (as set out above) is not explicitly stated in the committee's terms of reference</i>
<b>E. Training/Facility time/Expenses</b>	a) That in relation to the way in which statutory and related decisions are taken by the administering authority, there is a clear policy on training, facility time and reimbursement of expenses in respect of members involved in the decision-making process.	Partial compliance	a) These items are set out in the council's constitution <b>Area for improvement:</b> <i>policies on reimbursement of expenses need to be made more explicit in the terms of reference for both committee and board. In the case of the Board, this may change subject to clarification at national level of its precise status.</i>
	b) That where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or	Full compliance	b) All items contained in the constitution are applicable to all members of the committee.



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Principle	Detail of best practice principle	Compliance (Full/Partial/Non)	Statement of Compliance
	any other form of secondary forum.		
	c) That the administering authority considers the adoption of annual training plans for committee members and maintains a log of all such training undertaken.	Partial compliance	c) The committee training needs analysis has not been formally updated since July 2013, although the training plan is regularly reviewed and updated throughout the year. Members' attendance at committee training sessions and external training is reported in the fund's Knowledge and Skills Compliance Statement, as part of the annual report. No formal training needs analysis has been undertaken for the LGPS Pension Board. Following the local elections in May 2017, and the formation of a new pension fund committee, a training programme for both committee and board members will be developed during the summer of 2017, and delivered over the next 12-18 months.
<b>F. Meetings (frequency/ quorum)</b>	a) That an administering authority's main committee or committees meet at least quarterly.	Full compliance	a) The committee meets four times a year. The terms of reference for the board specify that it will meet on a sufficiently regular basis to fulfil its statutory obligations. In practice, the board meets four times a year, within four weeks of the committee.
	b) That an administering authority's secondary committee or panel meet at least twice a year and is synchronised with the dates when the main committee sits.	Full compliance	b) Not applicable
	c) That an administering authority who does not include lay members in their formal governance arrangements, must provide a forum outside of those arrangements by which the interests of key stakeholders can be represented.	Full compliance	c) All employers are invited to the annual general meeting of the committee in July. Employers are also invited to meetings to consider the triennial valuation results. <b>Area for improvement:</b> <i>The format of the annual meeting for employers should be reviewed to ensure that it remains relevant for employers This will be reviewed during 2017-18..</i>
<b>G. Access</b>	a) That, subject to any rules in the council's constitution, all members of main and	Full compliance	a) All agendas, papers and minutes are available to members and the public via the council's website. All papers are published in advance of the meetings, in accordance with the council's democratic service standards.

**OLD FORMAT GOVERNANCE COMPLIANCE STATEMENT (updated at July 2017 – For information only)**

Principle	Detail of best practice principle	Compliance (Full/Partial/Non)	Statement of Compliance
	secondary committees or panels have equal access to committee papers, documents and advice that falls to be considered at meetings of the main committee.		
<b>H. Scope</b>	a) That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.	Partial compliance	<p>a) The committee now receives regular reports on membership (including employers), administration standards, and funding levels as well as continuing to receive reports and presentations from fund managers.</p> <p>The terms of reference of the committee need to be expanded to reflect the broader range of responsibilities including membership, administration, communications and governance; as well as the additional oversight responsibilities for the Fire Pension Schemes.</p> <p>The pension board receives reports on decisions made by the committee, to ensure that they have been made in line with internal policies and procedures and best practice, and are consistent with legislation and regulation.</p> <p>The board's work plan includes a review of the current governance arrangements of the fund, including policies and procedures, to ensure that they are sufficient and fit for purpose.</p>
<b>I. Publicity</b>	a) That administering authorities have published details of their governance arrangements in such a way that stakeholders with an interest in the way in which the scheme is governed, can express an interest in wanting to be part of those arrangements.	Partial compliance	<p>a) All statutory statements and policies form part of the fund's annual report, which is published on the council's website.</p> <p>All strategies and policies are now available on the Pensions section of the council's website.</p> <p>There is no cross-reference between the council's pensions' webpage and the committee webpage. This inhibits information about the governance of the fund being readily available to scheme members.</p> <p>A project has been initiated to develop the fund's website to improve communications with members and enhance the availability of information.</p>

## 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	<i>Enter here the committee and date the terms of reference were agreed and link or reference to where this can be found</i> 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
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	<i>Enter here whether individual training plans have been completed and where it can be found</i> 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.
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	<i>Enter here how the costs are being identified</i> 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.
E4	<b>Local Pension Board to have equal number of scheme member representatives and</b>	The terms of reference will provide for an equal number of scheme member representatives and employer representatives which is no	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.

Ref	Principle	Detail of best practice principle	Compliance (Full/Partial/Non)	Statement of Compliance
	<b>employer representatives which is no fewer than 4 in total.</b>	less than 4 in total		
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	<p><i>Enter here where the manner and terms by which members of the local pension board are clearly set out.</i></p> <p>The terms of reference for the pension board specify the method of appointment of board members.</p> <p>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.</p> <p>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.</p> <p><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></p>
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	<p><i>Enter here whether a conflicts of interest policy has been adopted, where it can be found and the review procedure.</i></p> <p><i>Is it to be a regular feature on the local pension board agenda?</i></p> <p><i>Is there a register of interests? Who is responsible for maintaining it?</i></p> <p><i>Are local pension board members aware of what could be considered a conflict of interest? (i.e. included in induction training)</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> <p>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.</p> <p>Members are invited to declare any interests they may have on agenda items at the start of each meeting.</p> <p>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.</p>

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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.
P1.2	<b>A process should be in place to ensure a member of the local pension</b>	A training strategy has been adopted and a training plan drafted in which there is provision for informing local	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

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
	<b>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>	pension board members of the law relating to pensions and matters prescribed in regulations.		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.
<b>P1.3</b>	<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.
<b>P1.4</b>	<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 lead on monitoring the training plan. This has not yet been taken forward.
<b>P1.5</b>	<b>The members of the pension board</b>	Information of the AVC options are provided to the local	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</i>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
	<b>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>	pension board members		<i>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 personal responsibilities in</b>	Local pension board members should have personalised training plans in place, making them aware of their personal responsibilities in terms of	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 framework is developed and implemented)</i> The pension board terms of reference set out the personal responsibilities of

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	<b>terms of knowledge and understanding</b>	knowledge and understanding		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.
<b>P1.9</b>	<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. 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.
<b>P1.10</b>	<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. 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. 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.
P1.11	<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>
P1.12	<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>			
P2.1	<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</b>	Provision is made on the Council website or Fund website that is available for all	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>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
	<b>about the local pension board and keep that information up to date</b>	scheme members to view and should include: - Name - Representative role - Employment and job title (where relevant) - The appointment process to the pension board		The names of the pension board members 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> 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</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	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,

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	<b>systems, arrangements and procedures for the administration and management of the Fund (including external service providers and third parties)</b>	clear separation of duties, processes for escalation and decision making and documented procedures for assessing and managing risk, reviewing breaches of law and managing contributions to the scheme.		which is under the Shared Services department. Accounting and governance is undertaken by the Technical Finance Team, 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</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.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
	pension board agendas			
<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</b>	Scheme members have a unique identifier on the pension administration	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</i></p>

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	<b>will enable it to uniquely identify a scheme member and calculate pension benefits correctly</b>	software system.		<p><i>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 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.</p> <p>Each employer within the fund is allocated a unique scheme reference number.</p> <p>A unique pensioner number is assigned when a member becomes a pensioner.</p>
<b>P5.4</b>	<b>The administering authority should require participating employers to provide them with timely and accurate data</b>	<p>Processes are established which facilitates the transmission of complete and accurate data.</p> <p>Employers are aware of the importance of accurate and timely submission of data and have access to expertise in order to resolve queries.</p>	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> <p>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.</p> <p>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.</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>
<b>P5.5</b>	<b>The administering authority should seek to ensure that employers understand the main events which</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 –	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> <p>This information is provided in the annual admitted bodies' administration</p>

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	<b>require information about members to be communicated</b>	<ul style="list-style-type: none"> <li>Joins or leaves the scheme</li> <li>Changes their rate of contributions</li> <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>guidance notes.</p> <p>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 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>
<b>P5.6</b>	<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>
<b>P5.7</b>	<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>

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P5.8	<b>The administering authority should ensure that appropriate procedures and timescales are in place for scheme employers to provide updated information when member data changes</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> <p>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.</p> <p>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.</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>
P5.9	<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	<p><i>Enter here confirmation that regular audits take place on the processes in accounting and reconciling monies into and out of the fund</i></p> <p>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.</p> <p>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</p>



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				auditors, Ernst & Young, Reports from both sets of auditors are presented to the pension fund committee and local pension board.
P5.10	<b>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.</b>	Records are available that show decisions made and discussions at local pension board meetings and those that take place outside and are later ratified at a local pension board meeting	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 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</b>	Scheme member records are reconciled with the relevant employers at least on an annual basis.	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>

	Requirement	Full Compliance	Compliance (Full/Partial/ Non)	Statement of Compliance
	<b>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</b>	Pension Administration software systems can identify scheme members approaching retirement, active members and deferred members.		<p>A monthly report for deferred members is run to enable information on pension options to be provided ahead of retirement.</p> <p>Information from active members wishing to retire is received via the payroll /HR teams.</p> <p>There is currently no process to regularly review the age profile of the fund's active members, particularly those approaching retirement. This is being developed.</p>
<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</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 compliant 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
		<p>Schemes (Scheme Administration) Regulations 1996</p> <ul style="list-style-type: none"> <li>Registered Pension Schemes (Provision of Information) Regulations 2006</li> <li>Data Protection Act 1998</li> <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.</p> <p>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 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.</p>
<b>P6.2</b>	<b>Employers should be provided with the necessary guidance to ensure</b>	Employers are provided with the necessary scheme documents and training requirements to fulfil their	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>

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	<b>they provide the required information to enable contributions to be monitored</b>	obligations within the Scheme. - Contribution templates - Fund liaison contact for contributions		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.  A project has been initiated to develop the fund's website, which will improve information available to employers.
<b>P6.3</b>	<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.
<b>P6.4</b>	<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</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.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
	where additional checks may be appropriate.			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 significance to the Regulator.</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.
<b>P7</b>	<b>Member communication</b>			
P7.1	<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.
P7.2	<b>The administering authority must provide scheme members with basic scheme</b>	The fund will have in place a communication policy which contains details of what information is provided to scheme members and 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 revised. This is in hand.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
	<b>information, meeting minimum legal requirements</b>	communication media.		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 and others to receive information that is relevant to their pension rights and scheme entitlements and provided within certain legal timescales</b>	The fund will have In place a communication policy that sets out how and when it will communicate with any of the following "relevant persons" within the prescribed legal timescales. <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>	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.  Pension awareness sessions have been run for staff seeking information on retirement, delivered by the council's AVC provider and council staff..  The Pension and Payroll Lead Officer attends the quarterly corporate induction sessions for new employees.  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.
<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	<i>Enter here whether or not the administering authority has complied with the legal requirements.</i> 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. 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.
<b>P7.5</b>	<b>The administering authority should</b>	A tracing service has been engaged to trace scheme	Partial compliance	<i>Enter here whether or not a tracing service is used and the circumstances in which it is used.</i>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
	<b>attempt to make contact with their scheme members and where contact is not possible carry out a tracing exercise to locate scheme members.</b>	members where contact details are considered incorrect		The pension administration team work closely with the council tax department to maintain contact details. The council does not currently use a tracing agent
<b>P7.6</b>	<b>Requests for information should be acknowledged if information requested cannot be immediately provided.</b>	A customer service standard is in place that requires a written response to be provided within a specified timescale and where that response cannot be provided that a letter of acknowledgement is sent with an indicative response time.	Partial compliance	<i>Enter here to confirm that a customer service standard is in place and what the response timescales</i> For communication received via the pension team generic e-mail account, and 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 – - Who it applies to - Who the adjudicator is (stage 1) - Who to contact with a dispute - The information that an applicant must include - How the final decision is reached - How the dispute can be escalated if dis-satisfied - The appropriate timescales	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</b>	A 'specified person' has been	Non	<i>Enter here if a list of the 'specified person' for each employer is in existence,</i>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
	<b>authority has ensured all scheme employers have appropriate arrangements in place for dealing with stage 1 disputes</b>	nominated by the scheme employer. The appropriate timescales known by the scheme employer for their reply.	compliance	<i>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 ensure its effectiveness and that the necessary timescales are being met (inc. the employer processes at stage 1)</b>	The administering authority to complete an annual review of its dispute process. Ongoing and completed disputes to be logged appropriately. Timescales for completion of dispute cases reviewed.	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.
<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	Partial compliance	<i>Enter here the details of all training provided and the corresponding training documentation.</i> <i>-Include the procedures used</i> <i>-List of names and roles that should report breaches within the Fund</i> <i>-Training list document</i> <i>-Annual review of post holders involved</i> 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. 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. 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



	Requirement	Full Compliance	Compliance (Full/Partial/ Non)	Statement of Compliance
		are able to meet their legal obligation.		responsibilities.
<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	<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> 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.
<b>P9.3</b>	<b>The administering authority should maintain a breaches log and have identified a person responsible for maintaining the breaches of the law policy, logging, reporting and recording processes</b>	Named person detailed within the Funds annual governance statement. Breaches log established, updated and maintained. Confirmation of the reporting of breaches.	Partial compliance	<i>Enter here the post title(s) of the person(s) responsible.</i> 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. The breaches log will be presented to the pension board and pension fund 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.