

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