

Isle of Wight Council Pension Fund Governance Compliance Statement Updated **9 October 2020**

Isle of Wight Council Pension Fund | Hymans Robertson LLP

Establishment of the local pension board

Ref	Principle	Detail of best practice principle	Compliance (Full/Partial/Non)	Statement of Compliance
E1	Local pension board to be established by 1 April 2015	Local Pension Board terms of reference agreed and approved by the Council	Full compliance 	<p><i>Enter here the committee and date the terms of reference were agreed and link or reference to where this can be found</i></p> <p>The LGPS Pension Board was approved and constituted at the meeting of the Isle of Wight Council on 21 January 2015 https://www.iwight.com/Meetings/committees/mod-council/21-1-15/minutes.pdf (minute 41)</p> <p>The terms of reference form Article 11 to the council's Constitution. Following a review of the CIPFA <i>Guide for local pension boards</i>, revisions to the terms of reference have been included in the updated Council Constitution to be approved at full council in November 2020 (deferred from May 2020 due to Covid-19 pandemic).</p> <p>The revisions to the board's terms of reference include changes to the way the board is administered and the way in which board meetings are conducted. Implications for publishing information about the board to be considered.</p>

Ref	Principle	Detail of best practice principle	Compliance (Full/Partial/Non)	Statement of Compliance
E2	All pension board members to have a personalised training plan in place that is regularly monitored and updated	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	Partial compliance 	<p><i>Enter here whether individual training plans have been completed and where it can be found</i></p> <p>All board members have completed the Pensions Regulator's online toolkit. Board members undertook a knowledge and understanding self-assessment questionnaire in November 2019. This was replicated by Committee members in January 2020.</p> <p>The fund participated in the Hymans Robertson National Knowledge Assessment in March 2020, to assess levels of understanding against national comparators. The output from this assessment will support development of a knowledge and understanding policy and individual training plans for members of both board and committee. There remains a need for the fund to develop and implement a comprehensive induction programme for both board and committee members.</p> <p>The fund publishes CIPFA Knowledge and Skills Framework compliance statements in its annual report and accounts, which designates the Section 151 officer as having responsibility for ensuring the framework is implemented. Review of officer roles and responsibilities to be undertaken as part of assessment of impact of SAB's good governance project to determine appropriate named person.</p> <p>Role profile for pension board members to include requirement that TPR online toolkit to be completed within 6 months of joining the board.</p>

Ref	Principle	Detail of best practice principle	Compliance (Full/Partial/Non)	Statement of Compliance
E3	Expenses of the local pension board to be part of the expenses of administration of the pension fund	Provision has been made in the accounting procedures to identify the costs incurred in the establishment and operational costs of the local pension board	Partial compliance 	<p><i>Enter here how the costs are being identified</i></p> <p>All costs incurred in respect of the administration of the pension fund are coded to an administration cost centre within the council's financial hierarchy. These costs are recharged to the pension fund accounts on a quarterly basis</p> <p>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.</p> <p>The board's work programme now includes regular reporting of the non-member-related expenditure of the fund, to ensure greater understanding.</p> <p>There is no specific budget set for the costs incurred by the pension fund (other than the staffing budget within the council's accounts which is subsequently recharged), or for expenses of the pension board, although reasonable costs agreed with the Director of Finance and section 151 officer are borne by the fund.</p> <p>Adoption of a detailed budget is a recognised priority within the development programme.</p>
E4	Local Pension Board to have equal number of scheme member representatives and employer representatives which is no fewer than 4 in total.	The terms of reference will provide for an equal number of scheme member representatives and employer representatives which is no less than 4 in total	Full compliance 	<p><i>Enter here the number of scheme member and employer representatives</i></p> <p>There are currently two employer representatives and two scheme member representatives on the pension board.</p> <p>The terms of reference form Article 11 to the council's Constitution. Following a review of the CIPFA <i>Guide for local pension boards</i>, revisions to the terms of reference have been included in the updated Council Constitution to be approved at full council in November 2020 (deferred from May 2020 due to Covid-19 pandemic).</p> <p>The revisions to the board's terms of reference include provision for the number of members to increase to 6 (retaining the equal balance between scheme member and employer representatives) along with provision for the appointment of an independent chairman for the board.</p> <p>The process for the recruitment of the additional board members and the independent chairman was discussed at the board meeting in September 2020.</p>

Ref	Principle	Detail of best practice principle	Compliance (Full/Partial/Non)	Statement of Compliance
E5	Determine the manner and terms by which members of the local pension board are appointed.	The manner and terms by which members of the local pension board are clearly set out.	Full compliance 	<i>Enter here where the manner and terms by which members of the local pension board are clearly set out.</i> The terms of reference for the pension board specify the method of appointment of board members. One of the employer representatives shall be an elected member of the Isle of Wight Council; one will be appointed from amongst the other employers of the fund, following nominations; the third will be selected from officers of the council, as the largest employer within the fund. A maximum of two scheme member representatives shall be appointed from suitable candidates proposed by UNISON. In the event of UNISON not being able to propose suitable candidates then the Administering Authority would seek suitable candidates from amongst all active, deferred and retired members. The third will be selected from officers of the council, as the largest employer within the fund.
E6	The administering authority to be satisfied that persons appointed to the local pension board do not have a conflict of interest.	The administering authority will have a conflict of interest policy and procedure in order to identify and manage actual and potential conflicts of interest	Partial compliance 	<i>Enter here whether a conflicts of interest policy has been adopted, where it can be found and the review procedure.</i> <i>Is it to be a regular feature on the local pension board agenda?</i> <i>Is there a register of interests? Who is responsible for maintaining it?</i> <i>Are local pension board members aware of what could be considered a conflict of interest? (i.e. included in induction training)</i> Pension Board members are subject to a conflict of interest policy based upon the Council's Code of Conduct contained within the constitution. Board members are required to complete a declaration of interests at the start of their term of appointment and review it annually to confirm any changes. This is maintained by the council's democratic services team. The current declaration form is the same as that required for all elected members, much of which is irrelevant for the pension board member role. As part of development of new conflicts of interest policy, a new declaration form to be developed and completed. Members are invited to declare any interests they may have on agenda items at the start of each meeting. All board members have completed the Pensions Regulator's online toolkit module dealing with conflicts of interest.

Ref	Principle	Detail of best practice principle	Compliance (Full/Partial/Non)	Statement of Compliance
E7	The administering authority to have regard to guidance issued by the Secretary of State	The administering authority will have knowledge and access of the LGPS Advisory Board website (http://www.lgpsboard.org) 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 an individual officer, but falls within the remit of the Technical Finance Manager. Other methods of update include CIPFA and LGA bulletins, emails and networking events and Pension Regulator updates. Updates are provided at all board meetings, with additional information circulated to board members in between meetings.

The Pensions Regulator's Code of Practice

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P1	Knowledge and Understanding			
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	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.	Full Compliance 	<i>Enter here whether a training strategy and plan have been adopted, where it can be found and the review process.</i> All board members have completed the Pensions Regulator's online toolkit. Board members undertook a knowledge and understanding self-assessment questionnaire in November 2019. This was replicated by Committee members in January 2020. The fund participated in the Hymans Robertson National Knowledge Assessment in March 2020, to assess levels of understanding against national comparators. The output from this assessment will support development of a knowledge and understanding policy and individual training plans for members of both board and committee.

	Requirement	Full Compliance	Compliance (Full/Partial/ Non)	Statement of Compliance
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	A training strategy has been adopted and a training plan drafted in which there is provision for informing local pension board members of the law relating to pensions and matters prescribed in regulations.	Full Compliance ↑	<i>Enter here whether a training strategy and plan have been adopted, where it can be found and the review process.</i> See P1.1
P1.3	The administering authority should establish and maintain policies and arrangements for acquiring and retaining knowledge and understanding	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.	Full Compliance ↑	<i>Enter here whether a training strategy and plan have been adopted, where it can be found and the review process.</i> See P1.1 The fund publishes CIPFA Knowledge and Skills Framework compliance statements in its annual report and accounts.
P1.4	The administering authority should designate a person to take responsibility for ensuring that a training framework is developed and implemented.	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	Full 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> See P1.1 The fund publishes CIPFA Knowledge and Skills Framework compliance statements in its annual report and accounts, which designates the Section 151 officer as having responsibility for ensuring the framework is implemented. Review of officer roles and responsibilities to be undertaken as part of assessment of impact of SAB's good governance project to determine appropriate named person.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
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.	Information of the AVC options are provided to the local pension board members	Partial Compliance 	<i>Enter here how information of the AVC options are provided to the local pension board members (e.g. induction training, contained in the training plan, provided with an information pack)</i> Briefing sessions for scheme members have been arranged by the fund's AVC provider – one of these sessions will be used to provide an update to board and committee members.
P1.6	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.	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> An updated list of documents is maintained, but this has not been updated since 2018 due to work pressures on officers. Action will be taken to update this list for current compliance by December 2020. Linking into outputs from the SAB Good governance project, need to review and create programme for rolling renewal.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P1.7	The roles and responsibilities of pension board members to be clearly documented.	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 explained in the terms of reference, which form part of the council's constitution. Following a review of the CIPFA <i>Guide for local pension boards</i> , revisions to the terms of reference have been included in the updated Council Constitution to be approved at full council in November 2020 (deferred from May 2020 due to Covid-19 pandemic). Once the constitution has been approved, a new document setting out the role profile for board members will be finalised, setting out key requirements for the role.
P1.8	Local pension board members to be aware of their personal responsibilities in terms of knowledge and understanding	Local pension board members should have personalised training plans in place, making them aware of their personal responsibilities in terms of knowledge and understanding	Full 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> Existing board members are aware of the requirements, through ongoing meetings and other activities. Role profile for board members to be finalised, setting out key requirements for prospective members. The output from the Hymans Robertson National Knowledge Assessment will support development of a knowledge and understanding policy and individual training plans for members of both board and committee.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P1.9	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)	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	Partial Compliance 	<i>Enter here whether a training strategy and plan have been adopted, where it can be found and the review process.</i> <i>Also state the post title or name of the person designated to take responsibility for ensuring that a framework is developed and implemented and how this is achieved</i> All board members have completed the Pensions Regulator's online toolkit. Board members undertook a knowledge and understanding self-assessment questionnaire in November 2019. This was replicated by Committee members in January 2020. The Technical Finance Manager is a key participant in pension board meetings, and plays a key role in identifying and procuring training needs. The output from the Hymans Robertson National Knowledge Assessment will support development of a knowledge and understanding policy and individual training plans for members of both board and committee, as well as supporting the development of an induction training programme for new committee and board members.
P1.10	The administering authority to maintain individual training plans for local pension board members	Individual training records are kept and maintained of the learning activities of the local pension board members.	Partial Compliance 	<i>Enter here the post title or name of the person designated to take responsibility for maintaining the individual training records of the local pension board members.</i> <i>Are these regularly reported to the board / individual?</i> The output from the Hymans Robertson National Knowledge Assessment will support development of a knowledge and understanding policy and individual training plans for members of both board and committee.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P1.11	Local pension board members to invest sufficient time in their learning and development alongside their other responsibilities.	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.	Full 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? When / how?</i> All board members have completed the Pensions Regulator's online toolkit. Board members are encouraged to attend development sessions held after pension fund committee meetings, and are supported in their attendance at regional and national training events. Each board meeting agenda includes time for board members to report back on training events attended. Board members' training and development is reported in the board's annual report. The output from the Hymans Robertson National Knowledge Assessment will support development of individual training plans for members of both board and committee. A recording and reporting system will need to be developed following this.
P1.12	Pension board members complete tPR's e-learning programme	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	Full compliance 	<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> All board members have completed all modules of the Pensions Regulator's online toolkit. Role profile for pension board members to include requirement that TPR online toolkit to be completed within 6 months of joining the board.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P2	Conflicts of Interest			
P2.1	The administering authority should have in place an appropriate conflicts of interest policy, clearly identifying individual roles in identifying and reporting potential conflicts of interest and to whom any potential conflict should be reported	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 	<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> Pension Board members are currently subject to a conflict of interest policy based upon the Council's Code of Conduct contained within the constitution, as are all committee members. Following the revision of the board's terms of reference, and in response to SAB Good Governance project, there needs to be a new conflicts of interest policy specific to the pension board, with a register of interest form relevant to board members. All board members have passed the Pension Regulator's training toolkit module dealing with conflicts of interest. As part of formulation of new policy and declaration process, development session with board and committee members to understand what is or could be a conflict of interest, how those can be identified and how they should be reported/managed.
P2.2	The conflicts of interest policy has a regular review date incorporated in to it	Regular review date specified within the policy.	Partial compliance 	<i>Enter here if a regular review date has been implemented</i> The board-specific policy described in P2.1 will have a three yearly review date incorporated.
P2.3	The administering authority to maintain a register of all conflicts (and potential conflicts) that are raised, reviewing them appropriately	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.	Partial 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. Details of the review process and action taken should be clearly documented</i> Board and committee members are required to complete a declaration of interests at the start of their term of appointment and review it annually to confirm any changes. This is maintained by the council's democratic services team. The current declaration form is the same as that required for all elected members, much of which is irrelevant for the pension board member role. As part of development of new conflicts of interest policy, a new declaration form to be developed and completed.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P2.4	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)	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 and committee members are required to complete a declaration of interests at the start of their term of appointment and review it annually to confirm any changes. 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 board and committee meeting.
P3	Publishing information about schemes			
P3.1	The administering authority must publish information about the local pension board and keep that information up to date	Provision is made on the Council website or Fund website that is available for all scheme members to view and should include: - Name - Representative role - Employment and job title (where relevant) - The appointment process to the pension board	Full compliance 	<i>Enter here where the information about the local pension board is published and the post title of the person(s) responsible for its maintenance</i> <i>Add link to webpage</i> The pension fund website includes a page dedicated to the pension board: https://www.isleofwightpensionfund.org/isle-of-wight-pension-fund/about-us/local-pension-board/ The names of the pension board members are also published on the council's democratic web pages, but this does not include their representation category. https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=187 The appointment process is covered in the terms of reference for the board included within the council's constitution which is referenced on the above web pages. The board's terms of reference are being reviewed in light of the CIPFA <i>Guide for local pension boards</i> , and will be presented, as part of a revised constitution, to full council in September 2020. These revisions include changes to the way the board is administered and the way in which board meetings are conducted. Implications for publishing information about the board need to be considered in light of these changes. A board member role profile is being developed, which should also be published on the website, which will increase transparency and encourage engagement.

	Requirement	Full Compliance	Compliance (Full/Partial/ Non)	Statement of Compliance
P3.2	The administering authority should publish information about the local pension board's business	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 	<p><i>Enter here where the board paper, agendas and minutes of meetings can be viewed.</i></p> <p><i>Add link to webpage</i></p> <p>All board meeting agendas, papers and minutes are published on the council's democratic web pages https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=187</p> <p>The revisions to the terms of reference in respect to changes to the way the board is administered and the way in which board meetings are conducted need to be considered.</p>
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	<p>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.</p> <p>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</p>	Full compliance 	<p><i>Enter here where the details can be found.</i></p> <p><i>Confirm if there is a procedure in place for determining requests for further information to be published</i></p> <p>Governance information is published on the democratic web pages for both committee https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=150 and https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=187 board</p> <p>A pension fund website has been launched which provides a wide variety of regulatory, statutory and local information and which is accessible to all members (active, deferred and retired) and employers of the fund. https://www.isleofwightpensionfund.org/isle-of-wight-pension-fund/</p> <p>The fund has entered into a contract which includes an on-going updating service for the regulatory and statutory information, facilitating a step change in the quality, timeliness and range of available information.</p> <p>A review of the information published on the fund's website should be undertaken, considering the information requirements within TPR's Code of Practice 14 and the changes in the administration and operation of board meetings from the revised terms of reference.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P4	Managing Risks			
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)	There are in place systems, arrangements and procedures to ensure that the scheme is being run in accordance with the scheme rules as set out in regulations. This will include a clear separation of duties, processes for escalation and decision making and documented procedures for assessing and managing risk, reviewing breaches of law and managing contributions to the scheme.	Partial compliance 	<p><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></p> <p>The administration of the pension fund is undertaken by the Pensions Team, which is part of the Council's Business Centre. Accounting, governance, and oversight of funding and investment is undertaken by the Technical Finance Team, within the Finance department.</p> <p>The fund launched its own Risk Management Policy in December 2019 and began development of a risk register at that point. This is a key area for further work during 2020-21.</p> <p>Pension administration is subject to internal audit and is reviewed every three years – the last review was in 2019-20 (reasonable assurance). The council's Key Financial Systems are reviewed annually by internal audit; all controls in place for the council's own 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.</p> <p>The fund launched its administration strategy in November 2018. A report on employer compliance with the data and contribution submission requirements of the strategy is provided to each pension board meeting. Key performance indicators (KPIs) for the Pension Team have been identified, and are reported at each board meeting. The reported KPIs are reviewed regularly to ensure the correct information is being provided to the board.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/ Non)	Statement of Compliance
P4.2	The administering authority should have in place a risk register to record all risks and actions taken, which is reviewed regularly	An appropriate risk register is produced, recording all identified risks and action taken. This should be a standing item at all Pension Board meetings.	Non compliance 	<i>Enter where (if) the risk register is available and the person responsible for maintaining it.</i> The fund launched its own Risk Management Policy in December 2019 and began development of a risk register at that point. Although each report to pension fund committee and pension board contains a section on risk management relevant to the topic being presented, there is no formal risk register in place. This is a key area for further work during 2020-21.
P4.3	The administering authority should regularly review the effectiveness of its risk management and internal control processes	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> 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. The fund launched its own Risk Management Policy in December 2019. The pension fund committee adopted a set of investment and funding beliefs and governance and administration objectives in 2018. All decisions taken during 2019-20 have been framed against those beliefs and objectives. The fund's funding strategy statement from the 2019 valuation contains information about the actions taken to assess and mitigate financial, demographic, regulatory and governance risks. The fund is reviewing its investment strategy in light of the results of the 2019 valuation to ensure the strategy contributes to the achievement of the funding strategy. Both strategy statements are available on the fund's website: https://isleofwightpensionfund.org/isle-of-wight-pension-fund/about-us/forms-and-publications/ Although each report to pension fund committee and pension board contains a section on risk management relevant to the topic being presented, there is no formal risk register in place. This is a key area for further work during 2020-21.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P4.4	Risk management and internal controls should be a standing item on the Pension Committee and pension board agendas	Risk Management and internal controls included as an agenda item with the Pension Committee and pension board agendas.	Partial compliance 	<i>Enter here whether risk management and internal controls have been added to the agenda.</i> Although each report to pension fund committee and pension board contains a section on risk management relevant to the topic being presented, there is no formal risk register in place. This is a key area for further work during 2020-21. Internal audit reports are presented to the pension fund committee and pension board as they are received.
P5	Scheme record keeping			
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	There is in place a reliable pension administration software system for the purpose of keeping accurate and up to date scheme member data.	Full Compliance 	<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> 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. There is regular attendance at Aquila Heywood user group CLASS meetings to discuss any issues and seek resolutions to any difficulties. Pension administration team members attend training sessions to keep them abreast of any system updates to ensure that records are maintained accurately. Project plan has been developed for the procurement of a replacement pension administration system during 2020, as a result of the expiration of current contract. Good progress has been made with the on-boarding of employers to the <i>i-connect</i> online portal, enabling employers to upload their monthly data submissions automatically. As at March 2020, there were three employers using the system; at 31 August 2020, 15 employers were using the system, representing 65% of active members. A project plan has been developed to schedule the remaining employers (including the schools' external payroll providers and the College) to be bought on-board by the end of April 2021. This plan is being monitored by the pension board.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
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	<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>	<p>Full compliance</p> <p>↑</p>	<p><i>Enter here whether such procedures exist to notify changes in scheme member data</i></p> <p>The key tasks from the first data improvement plan, arising from the 2016 triennial valuation data issues, and the low data quality scores identified in September 2018, has been completed. There has been a significant improvement in the fund's measured data quality scores:</p> <p>Common data Sep-19: 95% (Sep-18: 91%) Scheme specific data Sep-19: 95% (Sep-18: 70%)</p> <p>All members are encouraged to notify the pension administration team of any changes in their circumstances. The preferred method of notification is via 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. Members can also write or email in their changes.</p> <p>Scheme employers are provided with copies of change forms for their members. A new version of member self-service portal rolled out in April 2020, to which all members (active, deferred and retired) have access. Statistics on usage will be reported to the pension board regularly.</p> <p>Any changes to the scheme are published on the fund's website (www.isleofwightpensionfund.org), in the council's internal newsletter and information provided to admitted bodies to forward to their staff.</p> <p>The use of the i-connect online portal for monthly data submissions will continue to improve the notification of starters and leavers, and changes to employment data.</p> <p>The Administration Strategy launched in November 2018 appears to have had a positive impact on employer compliance with monthly data and contribution submission deadlines:</p> <p>In 2019-20 there were only 12 instances (8 employers) of late submission of data, and 13 instances (9 employers) of late payment of contributions.</p> <p>Employer compliance is reported to the pension board at each meeting, and is reported in the pension fund's annual report and accounts.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P5.3	The administering authority must keep specific data which will enable it to uniquely identify a scheme member and calculate pension benefits correctly	Scheme members have a unique identifier on the pension administration software system.	Full compliance 	<p><i>Enter here what identifier is used (e.g. NI number, payroll number, scheme reference number)</i></p> <p><i>Enter also whether or not scheme members can be identified by searching by surname or alternative if unique number not yet allocated or unavailable</i></p> <p>All members have their NI number recorded.</p> <p>All active members have a payroll number provided by their provider. This 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>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P5.4	The administering authority should require participating employers to provide them with timely and accurate data	Processes are established which facilitates the transmission of complete and accurate data. Employers are aware of the importance of accurate and timely submission of data and have access to expertise in order to resolve queries.	Full 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>The Administration Strategy standardises the requirements for all employers and includes provision for the application of sanctions (including financial penalties where appropriate) for late or inaccurate submission of data. This appears to have had a positive impact on employer compliance with monthly data and contribution submission deadlines:</p> <p>In 2019-20 there were only 12 instances (8 employers) of late submission of data, and 13 instances (9 employers) of late payment of contributions. No fines or penalties were issued during the year.</p> <p>Good progress has been made with the on-boarding of employers to the <i>i-connect</i> online portal, enabling employers to upload their monthly data submissions automatically. As at March 2020, there were three employers using the system; at 31 August 2020, 15 employers were using the system, representing 65% of active members. A project plan has been developed to schedule the remaining employers (including the schools' external payroll providers and the College) to be bought on-board by the end of April 2021.</p> <p>The <i>i-connect</i> online portal ensures that email reminders are automatically sent to employers each month. The portal has recently been upgraded to enable administration team members to categorise employers with late submissions using a traffic light colour system.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P5.5	<p>The administering authority should seek to ensure that employers understand the main events which require information about members to be communicated</p>	<p>Processes are in place for employers to inform the administering authority in the event there is an event affecting a scheme member, such as –</p> <ul style="list-style-type: none"> • Joins or leaves the scheme • Changes their rate of contributions • Changes their name, address or salary • Changes their membership status • Transfers employment between scheme employers • Strike days or breaks in service • 50/50 membership <p>(This list is not exhaustive)</p>	<p>Full compliance</p> <p style="text-align: center;">↔</p>	<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 guidance notes.</p> <p>Templates for leavers and starters are provided on the pension webpages. The Administration Strategy (launched in November 2018) standardises the data and reporting requirements for all employers and includes provision for the application of sanctions (including financial penalties where appropriate) for late or inaccurate submission of data.</p> <p>Good progress has been made with the on-boarding of employers to the <i>i-connect</i> online portal, enabling employers to upload their monthly data submissions automatically. As at March 2020, there were three employers using the system; at 31 August 2020, 15 employers were using the system, representing 65% of active members. A project plan has been developed to schedule the remaining employers (including the schools' external payroll providers and the College) to be bought on-board by the end of April 2021.</p> <p>For those employers using <i>i-connect</i> any starters, leavers and changes are automatically detected at the point of the monthly submission. The administration team review the reports generated by the system for each of these events.</p> <p>All members are encouraged to notify the pension administration team of any changes in their circumstances. The preferred method of notification is via 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. Members can also write or email in their changes.</p> <p>Scheme employers are provided with copies of change forms for their members. A new version of member self-service portal rolled out in April 2020, to which all members (active, deferred and retired) have access.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P5.6	The administering authority should have policies and procedures in place for the regular monitoring of data	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.	Full 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 at the end of each financial year to validate data provided and raise any irregularities with payroll providers for resolution. The <i>i-connect</i> project to enable the automatic upload of information from payroll providers into the <i>Altair</i> administration system, allowing real-time validation of data and resolution of queries on a monthly basis, is in progress. As at March 2020, there were three employers using the system; at 31 August 2020, 15 employers were using the system, representing 65% of active members.</p> <p>Data for the 2019 triennial valuation of the fund was submitted ahead of schedule in June 2019. The actuaries confirmed that there were no significant data quality issues.</p> <p>As part of the year end processes, the fund uses the Hymans Robertson data portal (as used for each triennial valuation) to identify any further issues for data accuracy.</p>
P5.7	The administering authority should carry out regular (at least annually) data reviews	Administering authorities establish twice yearly dates to review the data quality held for the scheme. Internal process completed to investigate quality.	Full compliance ↔	<p><i>Enter here confirmation details of the data reviews</i></p> <p>The key tasks from the first data improvement plan, arising from the 2016 triennial valuation data issues, and the low data quality scores identified in September 2018, has been completed. There has been a significant improvement in the fund's measured data quality scores: Common data Sep-19: 95% (Sep-18: 91%) Scheme specific data Sep-19: 95% (Sep-18: 70%) The data scores have been recommissioned for September 2020</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P5.8	<p>The administering authority should ensure that appropriate procedures and timescales are in place for scheme employers to provide updated information when member data changes</p>	<p>Processes are established which details the timely transmission of complete and accurate data</p>	<p>Full Compliance</p> <p style="text-align: center;">↑</p>	<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 guidance notes.</p> <p>Templates for leavers and starters are provided on the pension webpages. The Administration Strategy (launched in November 2018) standardises the data and reporting requirements for all employers and includes provision for the application of sanctions (including financial penalties where appropriate) for late or inaccurate submission of data.</p> <p>Scheme employers are provided with copies of change forms for their members.</p> <p>Good progress has been made with the on-boarding of employers to the <i>i-connect</i> online portal, enabling employers to upload their monthly data submissions automatically. As at March 2020, there were three employers using the system; at 31 August 2020, 15 employers were using the system, representing 65% of active members. A project plan has been developed to schedule the remaining employers (including the schools' external payroll providers and the College) to be bought on-board by the end of April 2021.</p> <p>For those employers using <i>i-connect</i> any starters, leavers and changes are automatically detected at the point of the monthly submission. The administration team review the reports generated by the system for each of these events. Additional information is requested as necessary, e.g. for leavers who are over age 55 and entitled to received pension benefits</p> <p>All members are encouraged to notify the pension administration team of any changes in their circumstances. The preferred method of notification is via 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. Members can also write or email in their changes.</p> <p>A new version of member self-service portal rolled out in April 2020, to which all members (active, deferred and retired) have access.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/ Non)	Statement of Compliance
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	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 administration team chase the missing information. 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 fund's external auditors, Ernst & Young,</p> <p>Reports from both sets of auditors are presented to the pension fund committee and local pension board.</p>
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.	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 	<p><i>Enter here where the records are available</i></p> <p><i>Add link to webpage</i></p> <p>All board meeting agendas, papers and minutes are published on the council's democratic web pages https://www.iwight.com/Meetings/current/committeeDetail.aspx?cmteld=187 Published board minutes include full recordings of all discussions during the meeting.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/ Non)	Statement of Compliance
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	A policy on document retention is in place that includes the retention of local pension board papers and documents	Full compliance 	<p><i>Enter here whether there is a policy document in place that includes the retention of local pension board papers and documents</i></p> <p><i>Add the retention time limit</i></p> <p><i>Add link to webpage</i></p> <p>Retention policy follows that of the Isle of Wight Council, updated to reflect the requirement of the General Data Protection Regulations (GDPR).</p> <p>The fund is looking to introduce a specific data retention policy document relevant to the Local Government Pension Scheme, and issue guidance to employers on this data that is required to be maintained for scheme members.</p>
P5.12	Where the administering authority has identified poor quality or missing data there should be a data improvement plan in place	A data improvement plan is in place which contains measures for the administering authority to monitor and a timeframe for attaining accurate data	Full compliance 	<p><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></p> <p>The key tasks from the first data improvement plan, arising from the 2016 triennial valuation data issues, and the low data quality scores identified in September 2018, has been completed. There has been a significant improvement in the fund's measured data quality scores:</p> <p>Common data Sep-19: 95% (Sep-18: 91%)</p> <p>Scheme specific data Sep-19: 95% (Sep-18: 70%)</p> <p>The data scores have been recommissioned for September 2020</p> <p>Good progress has been made with the on-boarding employers to the <i>i-connect</i> online portal, enabling employers to upload their monthly data submissions automatically. As at March 2020, there were three employers using the system; at 31 August 2020, 15 employers were using the system, representing 65% of active members. A project plan has been developed to schedule the remaining employers (including the schools' external payroll providers and the College) to be bought on-board by the end of April 2021.</p> <p>The fund regularly monitors the quality of the data it maintains, and identifies actions to improve issues as they arise.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/ Non)	Statement of Compliance
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	Scheme member records are reconciled with the relevant employers at least on an annual basis. Pension Administration software systems can identify scheme members approaching retirement, active members and deferred members.	Partial compliance 	<i>Enter here when and how scheme member records are reconciled with their relevant employers.</i> <i>Confirm that the pension administration software system can identify scheme members approaching retirement, active members and deferred members.</i> A manual report for deferred members is run monthly to enable information on pension options to be provided ahead of retirement. Information from active members wishing to retire is received via the payroll /HR teams. There remains no current process to regularly review the age profile of the fund's active members, particularly those approaching retirement. Member tracing service to be implemented to ensure ability to track deferred members in particular. Members are encouraged to use the new member self-service portal to keep their personal information up to date.
P5.14	The administering authority must ensure that processes created to manage scheme member data are compliant with the General Data Protection Regulation (GDPR) 2018, in association with the Data Protection Act 2018 and the data protection principles.	GDPR and Data Protection Act are complied with and all relevant persons are aware of their responsibilities	Partial compliance 	<i>Enter here how this awareness is communicated</i> <i>Officers – internal</i> <i>Committee/LPB members –induction / info packs</i> The council has introduced mandatory GDPR training for all staff (online modules for all staff, supplemented by face-to-face training for managers) The induction plan for elected members includes a session on data protection, delivered by the monitoring officer. There is currently no formal induction process for board members who are not elected members. All board members have passed the Pension Regulator's training toolkit module dealing with maintaining accurate member data. The fund is developing an induction programme for new committee and board members, and is reviewing the process by which learning and development activities are recorded and reported.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P5.15	The administering authority should be able to demonstrate that records are kept in accordance with other relevant legislation	<p>Evidence that key requirements are set out where applicable under the following legislation –</p> <ul style="list-style-type: none"> • Pensions Act 1995 and 2004 • Pensions Act 2008 and the Employers' Duties (Registration and Compliance) Regulations 2010 • Occupational Pension Schemes (Scheme Administration) Regulations 1996 • Registered Pension Schemes (Provision of Information) Regulations 2006 • General Data Protection Regulation (GDPR) 2018 • Data Protection Act 1998 • Freedom of Information Act 2000 	<p>Full compliance</p> <p>↔</p>	<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> <p>Project plan has been developed for the procurement of a replacement pension administration system during 2020, as a result of the expiration of current contract.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P6	Maintaining Contributions			
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	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.	Full 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>The Administration Strategy (launched in November 2018) standardises the requirements for all employers and includes provision for the application of sanctions (including financial penalties where appropriate) for late or inaccurate submission of data and contributions. Every year a new template and reinforcement of the guidance is issued to all admitted bodies and Payroll providers.</p> <p>A monthly control check list of returns and contributions received is maintained. Late or missing information is followed up with the relevant employer, and is reported to management. A report of employer compliance with reporting and payment deadlines is presented to each pension board meeting.</p> <p>All employers pay their contributions on a monthly basis, mostly by electronic transfer. Those employers who pay by cheque are being encouraged to switch to electronic payment methods.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P6.2	Employers should be provided with the necessary guidance to ensure they provide the required information to enable contributions to be monitored	Employers are provided with the necessary scheme documents and training requirements to fulfil their obligations within the Scheme. - Contribution templates - Fund liaison contact for contributions	Full compliance 	<p><i>Enter here where the employer contribution documents are held and the person responsible for maintaining them.</i> <i>Detail the Fund's contact for contribution pay over.</i></p> <p>Contribution templates are provided to all employers at the beginning of each financial year.</p> <p>There is a manual anomaly checking process to ensure the contributions paid match the membership data submissions. Any inconsistencies are referred back to the employer.</p> <p>The receipt of contributions is monitored by both the pensions administration team and the Treasury Management team.</p> <p>A generic email address is provided for any employer queries: pensions@iow.gov.uk.</p> <p>The Administration Strategy standardises the requirements for all employers and includes provision for the application of sanctions (including financial penalties where appropriate) for late or inaccurate submission of data and contributions. A report on employer compliance with reporting and payment deadlines is provided to each board meeting. The administration strategy needs updating to include requirement for employers to submit their monthly data via the i-connect portal.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
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) and maintain a record of investigations and communications in relation to such failures	Records are maintained of investigations and communications (and outcomes) in relation to payment failures, together with communication with the employer	Full compliance 	<p><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></p> <p>A monthly control check list of returns and contributions received is maintained. Late or missing information is followed up with the relevant employer, and is reported to management.</p> <p>A report on employer compliance with reporting and payment deadlines is provided to each board meeting.</p> <p>The Administration Strategy standardises the requirements for all employers and includes provision for the application of sanctions (including financial penalties where appropriate) for late or inaccurate submission of data and contributions. It also sets out the process the administering authority will follow in cases of non-compliance.</p>
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.	This will be identified on the fund's risk register A regular review of processes to detect fraud is undertaken	Full compliance 	<p><i>Enter here confirmation the process to detect situations where fraud may take place is recorded on the risk register (enter reference)</i></p> <p><i>Confirm that regular reviews of the process to detect fraud are undertaken (date of last review / date of next review)</i></p> <p>The administration team manually check that the contribution information provided is consistent with the member's pay and contribution rate; data and payment is consequently reconciled on a monthly basis.</p> <p>The completion of the i-connect roll-out will ensure any changes in membership data are automatically reconciled on a monthly basis.</p> <p>The council participates in the National Fraud Initiative (NFI) exercise to match data and ensure consistency.</p> <p>The fund acknowledges that there is a need to improve its processes for monitoring employer financial health to identify those employers where fraudulent activity may be of higher risk.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P6.5	The administering authority must report payment failures which are likely to be of material significance to the Regulator.	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	Full compliance ↑	<p><i>Enter here where the procedure is documented (reporting policy)</i></p> <p>The <i>Reporting breaches of the law to the Pensions Regulator</i> policy (adopted in November 2017) is published on the fund's website https://isleofwightpensionfund.org/media/3806/1468-reporting-breaches-of-the-law-policy-final.pdf</p> <p>Reporting on employer compliance with data submission and payment deadlines is provided at each board meeting. Due to the size of the employers within the fund, it is unlikely that any failure to report and pay will be of material significance to the Pensions Regulator. However, all incidents will be included on the breaches log, with an assessment of significance.</p> <p>A breach log report is provided to each pension board meeting. A review of the breaches policy, including identification, recording and reporting processes is planned for 2020-21.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P7	Member communication			
P7.1	<p>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</p>	<p>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.</p>	<p>Full compliance</p> 	<p><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></p> <p>Annual Benefits Statements (ABS) for all active, deferred and pension credit members are issued by 31 August in line with statutory deadlines, via the Member Self Service (MSS) portal.</p> <p>A review is being undertaken to ensure that the necessary notification process was undertaken to inform members of electronic communication methods only. In 2020, paper statements were sent to three members who specifically requested them.</p> <p>Emails have been sent to deferred members notifying them that ABS would only be published electronically.</p> <p>Initial analysis data available from the new MSS portal shows that there has been an increase in members accessing their information through this medium. Further analysis will be completed and report to the board in due course.</p> <p>The new pension website will improve information available to members, including promotion of the publication of the ABS.</p> <p>The fund's AVC provider, Prudential, issue their ABS to the individual member directly. The fund is seeking confirmation from Prudential that the 2020 statements have been sent, however members have confirmed that they have received individual statements.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P7.2	The administering authority must provide scheme members with basic scheme information, meeting minimum legal requirements	The fund will have in place a communication policy which contains details of what information is provided to scheme members and the communication media.	Full compliance ↑	<p><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></p> <p>New employees are provided with information in their contract of employment and access to Member Self Service which holds individual data.</p> <p>A representative of the pension administration team delivers information about the LGPS at each council corporate induction event.</p> <p>Work is beginning with other employers, particularly the Isle of Wight College, to introduce similar employee briefings to promote membership.</p> <p>The pension fund website https://isleofwightpensionfund.org/ provides up to date local information to prospective and existing members on the scheme, including links to the National LGPS website.</p> <p>The communications policy is published on the fund's website. https://isleofwightpensionfund.org/media/4428/iwfppluscommunicationspluspolicyplus2019plusfinal.pdf</p> <p>During 2019-20, the fund issued a newsletter to active members via the website, promoted by internal council communications and emails via external employers. A deferred members newsletter was sent to members by post, with a covering letter promoting the member self-service portal, and a paper reply slip to confirm their mailing preferences.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P7.3	<p>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</p>	<p>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.</p> <ul style="list-style-type: none"> • Active members • Deferred members • Pensioner members • Prospective members • Spouses, civil partners of members or prospective members • Other beneficiaries • Recognised trade unions 	<p>Full compliance</p> 	<p><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></p> <p>The communications policy is published on the fund's website. https://isleofwightpensionfund.org/media/4428/iwpluscommunicationspluspolicyplus2019plusfinal.pdf</p> <p>The communication policy sets out the proposed methods and frequency of communications with scheme members and employers.</p> <p>The pension fund website https://isleofwightpensionfund.org/ provides up to date local information to prospective and existing members on the scheme, including links to the National LGPS website.</p> <p>2018-19 Annual Benefit Statements for all active, deferred and pension credit members, were published on the member self-service portal in advance of the 31 August 2019 statutory deadline.</p> <p>2018-19 Pension Savings Statements for impacted members were issued individually in advance of the 6 October 2019 decline.</p> <p>Pension awareness sessions have been run for staff seeking information on retirement, delivered by the council's AVC provider and council staff.</p> <p>A representative of the administration team attends the quarterly corporate induction sessions for new council employees. Work is in progress to roll out similar employee briefing sessions for other scheme employers, particularly the Isle of Wight College.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/ Non)	Statement of Compliance
P7.4	Where information is provided electronically it should comply with legal requirements	Administering authority ensuring that all electronically produced information complies with the legal requirement	Full compliance ↑	<p><i>Enter here whether or not the administering authority has complied with the legal requirements.</i></p> <p>ABS for active and deferred members are primarily published on the MSS self-service portal.</p> <p>All active members have been informed of the MSS portal via internal communication at the council, and emails to school business partners and nominated payroll contacts at external employers.</p> <p>Deferred members have been notified of the MSS portal by email.</p> <p>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 only three requests for hard copy information, and a high take up of on-line access requests.</p> <p>The information provided complies with the legal requirements.</p>
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.	A tracing service has been engaged to trace scheme members where contact details are considered incorrect	Partial compliance ↔	<p><i>Enter here whether or not a tracing service is used and the circumstances in which it is used.</i></p> <p>The pension administration team work closely with the council tax department to maintain contact details. During 2019-20 approximately 450 letters were sent to pension scheme members using address information received from the council tax department – about 15% of these letters received a response.</p> <p>Pension benefits are not put into payment unless firm contact details for the member have been established.</p> <p>The council does not currently use a tracing agent.</p> <p>The fund has written to deferred members based on last known contact address, which has identified a significant number of “gone away” returns. Further action, including consideration of the appointment of a tracing agent, has yet to be undertaken.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P7.6	Requests for information should be acknowledged if information requested cannot be immediately provided.	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.	Full compliance 	<i>Enter here to confirm that a customer service standard is in place and what the response timescales</i> The communications policy, published on the fund's website https://isleofwightpensionfund.org/media/4428/iwfppluscommunicationspluspolicyplus2019plusfinal.pdf , establishes timescales to responses to various requests for information. For communication received via the pension team generic e-mail account (pensions@iow.gov.uk), an automatic acknowledgement is delivered advising a response will be made within 5 working days. Members are also referred to the member self-service portal where some information is readily available. Key performance indicators of performance against agreed service standards are reported to each meeting of the pension board.
P8	Internal Dispute Resolution Procedure			
P8.1	The administering authority has in place an Internal Dispute Resolution Procedure	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	Full 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> The <i>Complaints and Internal Disputes Resolution Procedure</i> (adopted in November 2017) is published on the fund's website: https://isleofwightpensionfund.org/media/3812/1468-pensions-complaints-internal-dispute-resolution-procedure-final.pdf To date, there have been no incidents reported through the formal complaints process, or through the internal dispute resolution procedure.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P8.2	The administering authority has ensured all scheme employers have appropriate arrangements in place for dealing with stage 1 disputes	A 'specified person' has been nominated by the scheme employer. The appropriate timescales known by the scheme employer for their reply.	Non-compliance 	<i>Enter here if a list of the 'specified person' for each employer is in existence, where it is held and who maintains it.</i> Unknown: as part of the approval process for the new Internal Dispute Resolution Procedure, contact will be made with all scheme employers to determine and record their internal processes. No progress has been made on this issue since the last reporting period.
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)	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 Complaints and IDRPs procedure includes provision for review every three years – next due November 2020. https://isleofwightpensionfund.org/media/3812/1468-pensions-complaints-internal-dispute-resolution-procedure-final.pdf Due to the coronavirus pandemic, it is likely that the scheduled review of the IDRPs will be delayed until early in calendar year 2021.

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P9	Breaches of the Law			
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.	Those responsible for reporting breaches are made aware of the legal requirements and the regulator code of practice. Relevant training should be provided to those responsible for reporting breaches. Sign off required on completion of training and understanding. All those that are responsible to report breaches, should establish and operate appropriate and effective procedures to ensure that they are able to meet their legal obligation.	Partial compliance 	<p><i>Enter here the details of all training provided and the corresponding training documentation.</i></p> <p><i>-Include the procedures used</i></p> <p><i>-List of names and roles that should report breaches within the Fund</i></p> <p><i>-Training list document</i></p> <p><i>-Annual review of post holders involved</i></p> <p>All board members have passed the Pensions Regulator's online training toolkit module on reporting breaches of the law. An additional development session for board members was held on 23 September 2020.</p> <p>Further improvements are required in the level of understanding of officers, committee and board members in terms of what constitutes a breach, and what should be included on the breaches log.</p> <p>Following the forthcoming review of the policy (see P9.2 below) a programme for its relaunch will be developed, including a programme of communications for scheme members and employers to ensure everyone is aware of the requirements.</p>
P9.2	The administering authority should have a breaches of the law policy in place	Breaches of the law policy detailed within the Fund's annual governance statement	Partial compliance 	<p><i>Enter here whether a policy is in existence, where it is available and the post title(s) of the person(s) responsible for maintaining it.</i></p> <p>The <i>Reporting breaches of the law to the Pensions Regulator</i> policy was adopted by the pension fund committee in November 2017. It is published on the fund's website https://isleofwightpensionfund.org/media/3806/1468-reporting-breaches-of-the-law-policy-final.pdf</p> <p>The policy has not been reviewed since it was first introduced, although it states an annual review schedule.</p> <p>Pension board will review the current policy in advance of their December 2020 meeting, for onward recommendation to the pension committee in January 2021.</p>

	Requirement	Full Compliance	Compliance (Full/Partial/Non)	Statement of Compliance
P9.3	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	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 Technical Finance Manager has responsibility for maintaining the breaches log, and the Monitoring Officer for receiving notifications of potential breaches. These areas of responsibility will be reviewed as part of the review of the policy detailed in P9.2 above. The reporting of breaches is a standing agenda item at all pension board meetings, but the breaches log has not been updated for some time. Future meetings will include reference on the breaches log to items included in other standard reports to the board, for example employer compliance with data submission and contribution payment deadlines, and administration service KPIs.