



LGPS LOCAL PENSION BOARD

MONDAY, 15 JANUARY 2018 at 10.00 AM

COMMITTEE ROOM TWO, COUNTY OFFICES, NEWLAND, LINCOLN LN1 1YL

MEMBERS OF THE BOARD

Independent Chair (non-voting): Roger Buttery

Employer Representatives (voting): Councillor M A Whittington and Kirsty McGauley

Scheme Member Representatives (voting): Ian Crowther and David Vickers

AGENDA

Item	Title	Pages
1	Apologies for Absence	
2	Declarations of Members' Interests	
3	Minutes of the previous meeting of the LGPS Local Pension Board held on 18 October 2017	3 - 12
4	Employer issue - LCC Improvement Plan <i>(To receive a report by Jo Ray, Pension Fund Manager, which gives an overview of the issues between the employer in the Fund (LCC) providing the necessary information to the Fund's administrator (WYPF) and invites LCC to give the Board a presentation on how these issues were being addressed)</i>	13 - 14
5	Pensions Administration Report <i>(To receive a report by Yunus Gajra, Business Development Manager, for West Yorkshire Pension Fund (WYPF), which provides a quarterly update on current administration issues)</i>	15 - 46

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| 6 | Pension Fund Update Report
<i>(To receive a report by Jo Ray, Pension Fund Manager, which provides an update on Pension Fund matters including any current issues)</i> | 47 - 76 |
| 7 | Pension Board Training
<i>(To receive a report by Jo Ray, Pension Fund Manager, which invites the Board to consider training opportunities or requires to assist them in maintaining the knowledge and skills required to undertaken their duties)</i> | 77 - 82 |
| 8 | Annual Report and Accounts - Additional Information
<i>(To receive a report by Jo Ray, Pension Fund Manager, which introduces a presentation providing additional details and explanation on areas of the Pension Fund Annual Report and Account, as requested by the Board)</i> | 83 - 84 |
| 9 | Work Programme
<i>(This item provides an opportunity for the Board to agree the business for consideration at forthcoming meetings)</i> | Verbal
Report |

Published on Friday, 5 January 2018

Should you have any queries on the arrangements for this meeting, please contact Andrea Brown via telephone 01522 553787 or alternatively via email at andrea.brown@lincolnshire.gov.uk



LGPS LOCAL PENSION BOARD 18 OCTOBER 2017

PRESENT:

Independent Chair: Roger Buttery

Employer Representatives: Councillor M A Whittington and Kirsty McGauley

Scheme Member Representatives: Ian Crowther and David Vickers

No Councillors attended the meeting as observers

Officers in attendance:-

Andrea Brown (Democratic Services Officer), David Forbes (County Finance Officer), Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund (WYPF)), Mike Norman (External Auditor, KPMG) and Jo Ray (Pension Fund Manager)

11 APOLOGIES FOR ABSENCE

No apologies for absence were received and all members of the Board were in attendance.

12 DECLARATIONS OF MEMBERS' INTERESTS

Mr D Vickers highlighted a potential interest due to an ongoing issue between Mouchel Pension Scheme, of which he is a Trustee, and the Lincolnshire Pension Fund which was administered by West Yorkshire Pension Fund. Although not relevant to any item on the agenda, the Board was asked to note the potential conflict of interest during consideration of future items.

Councillor M A Whittington declared that his wife was in receipt of a pension from the Fund.

There were no other declarations of interest at this point of the proceedings.

13 MINUTES OF THE PREVIOUS MEETING OF THE LGPS LOCAL PENSION BOARD HELD ON 25 JULY 2017

RESOLVED

That the minutes of the previous meeting of the LGPS Local Pension Board held on 25 July 2017 be agreed as a correct record and signed by the Chairman.

14 PENSION FUND EXTERNAL AUDIT COMPLETION REPORT

Consideration was given to a report from Jo Ray (Pension Fund Manager) which presented the Audit Completion Report undertaken by KPMG, the external auditors for the Council.

The Pension Fund Annual Report and Accounts for the year ending 31 March 2017 had been completed and approved by the Pensions Committee on 21 September 2017. KPMG had independently audited the Annual Report and Accounts and produced a joint ISA 260 report for LCC and the Pension Fund.

Two significant risks had been identified for the 2016/17:-

- Significant changes in the pension liability due to the triennial LGPS valuation; and
- The continuing weaknesses in the Agresso system control and financial reporting arrangements.

Changes to the disclosure requirements and the improving performance of the new pensions fund administrator arrangements were identified as areas of audit focus.

The financial statements audit did not identify any material misstatements within the Pension Fund accounts nor were there any matters directly arising from the audit work on significant risks applying to the Pension Fund.

The financial statements audit also found that the Annual Report complied with the requirements of the LGPS (Administration) Regulations 2008 and that the information contained was not inconsistent with the financial information within the audited financial statements.

The Chairman welcomed Mike Norman (Audit Manager, KPMG) to the meeting and invited him to present the report.

The Board was advised that the Audit Committee had raised no issues in relation to the report.

In relation to the fees, noted on page 18, additional work had been undertaken to identify significant risks at an earlier stage in the process. This work had incurred a charge of £994.00 in addition to the scale fee of £24,350 although this charge was subject to the approval of Public Sector Appointments on behalf of the National Audit Office.

Although the audit had been straightforward, there had been some anxiety due to the issues relating to the Agresso system. Despite this, the team were commended by KPMG as they had managed the workload and provided the relevant information to KPMG when required.

During discussion, the following points were noted:-

- It was noted that the issues with Agresso were improving, however the payroll system remained an area of concern;
- The Board was advised that the Council was engaged in a technical upgrade which was required for the system to continue to function. A road map was also being developed to improve the Agresso system as the original implementation required a number of improvements to enable full functionality;
- 160 cases of late payments of contributions had not been an issue during the audit as all cases had been worked through and resolved satisfactorily or an explanation provided as to why the information was inaccurate.

The Chairman thanked Mr Norman for his attendance and clear presentation and, on behalf of the Board, thanked him and his team for the work and support throughout the audit.

RESOLVED

That the Audit Completion Report be noted.

15 PENSIONS ADMINISTRATION REPORT

The Chair of the Board welcomed Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund) to the meeting and invited him to introduce the report which provided a quarterly update on current administration issues.

Mr Gajra introduced the report and highlighted the following areas to noted:-

- The reasons for underperforming KPIs:
 - Deferred Benefits set up on leave – underperformance was given a low priority due to the volumes. Members were informed in writing that they would receive details of their benefits as soon as possible;
 - Change to Bank Details – 20 days were allocated to ensure changes were actioned and, although usually prioritised, some were missed;
 - Monthly Posting – internal processes needed to be improved as this showed the performance of employers performance which was the information received by them and not from WYPF. This could result in the figures being low due to the information received and although WYPF aim to process all information within 10 days, the information has to be accurate.
- The deadline to submit the Scheme Return (noted on page 27) was 27 October 2017 but this had been submitted in early October;
- Consultation was underway regarding the development of a member-led national Cross Pool Information Forum (CPF) for the LGPS in England and Wales. Consideration was being given to the membership as part of the consultation and it would be made up of Pension Committee members as opposed to officers;
- As a result of the Supreme Court rulings (detailed on pages 29 and 30), the Board was advised that all records were being reviewed in order to identify where payment entitlement was required;

- The Government had published their response to the pension scams consultation which confirmed that the plan would proceed with all three measures to tackle pension scams. Measures included introduction of a ban on cold-calling in relation to pensions; limitation of the statutory right to transfer so that individuals only have the right to transfer to certain schemes; and to allow only active companies to register a pension scheme except in legitimate circumstances.

During discussion, the following points were noted:-

- As there was no longer the compulsion to retire at the age of 65 the fund had 43 active members over the age of 70;
- WYPF indicated that they would only be concerned about the satisfaction rate if it were to drop below 75%;
- The Chair of the Board noted that the figure of 24196 quoted on page 23 for total active members did not mirror the figure of 21196 quoted on page 28 of active Annual Benefit Statements. WYPF was asked to provide clarification of the difference in the two figures;
- It was explained that some academies were paying less than local authority schools but some were paying more. At the 2013 valuation academies were given the option to remain on the LCC rate and to not take their true rate until the anticipated guidance from the Department for Education (DfE) had been received. That guidance had not materialised and at the latest valuation (2016) the option to remain on the LCC rate had been removed which had resulted in a considerable increase to those schools who had previously chosen to remain on the lower rate;
- In relation to exit payments, it was reported that the cap would be £95,000;
- Although the report noted, at paragraph 7.1, that the projected target cost per member would be £15.05, it was not anticipated that this would increase from the current cost per member of £13.85.

The Board asked that their congratulations be taken back to WYPF for their recent achievement in winning the Scheme Governance Award, hosted by the LAPF Investment Awards, on 19 September 2017.

RESOLVED

That the report be noted.

16 PENSIONS ADMINISTRATION DATA REPORT

The Board considered a report by Yunus Gajra (Business Development Manager, West Yorkshire Pension Fund) which presented the data cleansing activity undertaken by West Yorkshire Pension Fund, as the Fund's administrator, including the common data requirements of the Pensions Regulator.

Mr Gajra introduced the report and gave a presentation on General Data Protection Regulations (GDPR) highlighting the following areas:-

- What is it?
- BREXIT – does GDPR still apply?
- Data Protection Roles – Information Commissioner; Data Controller; Data Processor; and Data Subject;
- Data Protection Principles;
- Individual Rights – to be informed; of access; to rectification; to erasure; to restrict processing; to data portability; to object; in relation to automated decision making and profiling;
- Changes under GDPR – breach notification; right access (SARs); right to be forgotten; data portability; compliance by design (major change); inclusion of data protection from the onset of designing systems, policies and procedures including Private Impact Assessments (PIAs); and Data Protection Officer;
- Changes under GDPR – Privacy Impact Assessments (PIA); Privacy Statement; Fair Processing Notice; Consent; Children's data and Overseas members;
- Sanctions for Non-Compliance – a warning in writing of first and non-intentional non-compliance; regular periodic data protection audits; a fine of up to €20m or up to 4% of the annual worldwide turnover of the preceding financial year, whichever is greater. It was noted that LCC would be responsible for the fine as the Data Controller;
- What are we doing? – map out where data is gathered, held and processed; undertake Privacy Impact Assessments; Staff Briefings; Collaboration with other pension funds; Collaboration with CBMDC Information Governance team; Educating employers (AGM/Forum); Data Cleanse review; Contract/Data Sharing Review; Working with Civica;
- Questions?

During discussion, the following points were noted:-

- The Board indicated concern at the huge exercise involved in gathering the required information due to the new regulations;
- It was reported that implied consent was no longer possible and forms would be sent to all existing members asking them to give written consent to use personal information. The Board was asked to note that this may impact on the administration costs of the fund;
- There were in the region of 3400 leavers forms outstanding from LCC and, as a result, WYPF did not have up-to-date information for those people;
- Common data and conditional data testing were undertaken by WYPF internally and it was confirmed that there were 12,000 cases which did not satisfy the requirements and for which an external bureau would be engaged;
- Both common data and conditional data for Lincolnshire had been satisfied with the exception of the leaver data previously reported;
- It was suggested that the Pensions Regulator be made aware of the outstanding information and it was explained that as this was a small percentage of the full membership this was unnecessary. The Pensions Regulator recognised the complexities of public sector funds;

- Although the new regulations were accepted from the perspective of the individual, Pension Funds were in a difficult position as records had to be kept, in some cases, for decades to ensure payment could be made or to answer any member queries;
- Should a member "request to be forgotten", the implications of doing so would be explained to them, including the inability to make future pension payments.

RESOLVED

That the Pensions Administration Data report and presentation in relation to General Data Protection Regulations (GDPR) be noted.

At 11.30am, the Chairman adjourned the meeting for a comfort break.

At 11.35am, the meeting was reconvened.

17 PENSION FUND UPDATE REPORT

Consideration was given to a report by Jo Ray (Pension Fund Manager) which provided an update on Pension Fund matters and included current issues.

The latest engagement report of the Local Authority Pension Fund Forum (LAPFF) could be found on their website at www.lapfforum.org, highlights of which were noted:-

- Voting alerts in relation to executive pay had been issued to LAPFF members with binding pay policies at Carillion, Smith & Nephew, GlaxoSmithKline, BP, Shell, Babcock and WPP;
- A number of voting alerts had also been issued which recommended that members back shareholder resolutions on climate change disclosure at US energy firms PPL, Chevron and Exxon Mobil. These resolutions were in line with the policies of the LAPFF;
- An announcement was made that the LAPFF was to partner with the 50/50 Climate Project which was expected to enhance the Forum's actions to promote climate competent boards and enhance collective investor action;
- The LAPFF submitted a response to the consultation of the Green Paper, relating to Corporate Governance, which recommended that the problems with the FRC were so deep rooted that the FRC be disbanded and that a proper competent authority be set up in its place;
- An Executive Member of the LAPFF met with the Chairman of BT to discuss a number of issues including Brexit, the British economy and the recent accounting scandal and cybersecurity of BT; and
- An Executive Member of the LAPFF met with the Chairmen of Aberdeen Asset Management and Standard Life to discuss the imminent merger of the two companies
- BCPP had drawn up a responsible investment policy which had gone out to all underlying funds for comment with a request to align their own policies to the

BCPP policy. The Board was assured that LPF would use the BCPP policy to create their policy and that the BCPP policy and guidelines were to be presented to the Joint Committee on 20 October 2017 for approval;

- The Board was advised that a letter had been received from a scheme member in relation to responsible investments and their dissatisfaction in the investment in a tobacco company. A joint response had been drafted which would be shared with the Board. The issue had also been discussed at the Pensions Committee including the moral issue of other investment areas such as armaments, alcohol and fossil fuel, etc. It was confirmed that the Government could not direct investment and that the investment in the tobacco company (BAT) had returned 210% over the last seven years, compared to 80% for the FTSE 100 index, which the fund had greatly benefitted from.

The Pension Fund Manager continued by referring to the TPR Checklist Dashboard and, in particular, drew the Board's attention to B12 – Knowledge and Understanding, requesting that the last remaining member of the Board complete the Pension Regulators Toolkit.

F1 – Maintaining Accurate Member Data – The Lincolnshire Employers Administration Forum (LEAF) met on 17 October 2017 where a presentation on TPR requirements was given. The Board noted that the largest area of concern was in relation to academies with outsourced payroll functions. The importance of data cleansing was reiterated to all present.

H5 & H6 – Maintaining Contributions – a request had been made at the Pensions Committee that the Prudential be invited to attend a future meeting.

H1 – Maintaining Contributions – the Board was advised that the figure had further increased since the report was published and that 98% of Statements had now been issued.

In relation to the Risk Register, the Board noted that Risk 24 – UK Leaving the EU – remained red due to the uncertainty surrounding Brexit. Risk 22 – Team Workloads – unfortunately the recruitment process to appoint an Accounting, Investment and Governance Manager had been unsuccessful. It was reported that the Person Specification had been adjusted slightly in order to attract more applicants and made clear in the advertisement that a qualified accountant was required. The closing date for applications was 5 November 2017.

Members were invited to ask questions, during which the following points were noted:-

- It was confirmed that late contributions had increased since April but that extenuating circumstances were considered before implementing fines. Some employers were, however, repeat offenders but since fines were issue, the situation had improved. The Board noted that this issue was not unique to Lincolnshire but that it was more prevalent due to monthly posting;

**LGPS LOCAL PENSION BOARD
18 OCTOBER 2017**

- HR colleagues had met with Serco colleagues to discuss leaver information and how to relay that information to WYPF more efficiently. Following discussion, it was suggested and agreed to arrange a meeting between the Pension Fund Manager, WYPF, Serco and HR to find a solution. It was also agreed to add this to the agenda for the next meeting of the Board and invite those involved to attend also;
- The Pension Fund Manager reported that following the appointment of the Chairman and Chief Executive of BCPP, an announcement was imminent to report the appointment of the Chief Operating Officer and two Non-Executive Directors;
- Councillor Whittington reported that the quality of presentations at the York event had been exceptional and hoped that this quality would continue for future events;
- The Chairman, attended the PLSA event in September, the theme of which was "Pension Boards Two Years on", and concern was noted that there were only twelve attendees from across the country. The event had highlighted that those Board representatives in attendance appeared to be working in the same way.

RESOLVED

1. That the Pension Fund Update report be noted.
2. That LCC Leaver Information be added to the agenda for the next meeting of the Board and to invite representatives from WYPF, Serco and HR to attend.

18 PENSION FUND ANNUAL REPORT AND ACCOUNTS

Consideration was given to a report Jo Ray (Pension Fund Manager) which provided the Board with the Annual Report and Accounts.

The Lincolnshire Pension Fund Report and Accounts had been produced for the year ending 31 March 2017. The Council's external auditors, KPMG, had issued their opinion on the accounts, the draft version of which was included within the agenda pack at Appendix A.

The Pensions Committee approved the report in September 2017 following which it was presented to the Audit Committee at the end of September.

The Pension Fund Manager indicated that the Board had previously requested training on the accounts and asked that Board Members advise, via email, what elements they would like to be covered during the training/report at the next meeting.

The Board thought that the Annual Report and Accounts was an excellent and comprehensive document and looked forward to looking at it in more detail at the next meeting.

RESOLVED

That the Pension Fund Annual Report and Accounts be noted.

19 TRAINING NEEDS

The Pension Fund Manager confirmed that three Board Members had attended all or part of the two day training session organised for members of the Pensions Committee and Pension Board which were part of the Border to Coast Pensions Partnership (BCPP).

Three members had also attended the combined Pensions Committee and Board training held on 21 September which included an update on Lincolnshire's asset pooling progress and a presentation by the Pensions Regulator.

As agreed in the previous item, training on the annual accounts would be provided at the next meeting.

RESOLVED

That the update in relation to the training needs of the Board be noted.

20 WORK PROGRAMME

Following discussion, the Board requested that the following items be considered at the next meeting, scheduled for 18 January 2018:-

- Standard Fund Update Report;
- Serco & LCC Presentation (Leaver Information); and
- Details on the Annual Report (Training Element)

It was also requested that the next meeting be rearranged to enable all members of the Board to attend. All members were asked to provide availability to the Democratic Services Officer for week commencing 15 January 2018.

RESOLVED

1. That the items noted above be added to the agenda for the January 2018 meeting of the LGPS Pension Board; and
2. That the meeting in January be rearranged to enable all members of the Board to attend.

The meeting closed at 12.55 pm

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Open Report on behalf of Pete Moore - Executive Director of Finance and Public Protection	
Report to:	Lincolnshire Pension Board
Date:	15th January 2018
Subject:	Employer issue – LCC Improvement Plan

Summary:

The Pension Board have previously been made aware of an issue with an employer in the Fund, LCC, in providing certain required information to the Fund's administrator, WYPF. This report introduces a presentation from LCC, on how they are addressing this issue.

Recommendation(s):

That the Board consider the improvement plan and note the report.

Background

- 1 It has previously been brought to the attention of the Board that the Fund's largest employer, LCC, had developed a backlog in providing detailed leaver information to the Fund's administrator, WYPF. At the last Board meeting in October, it was agreed that the Pension Fund Manager would organise a meeting with all parties (LCC, Serco, WYPF and the Fund) to discuss the issue and for LCC to draw up an improvement plan to address the backlog.
- 2 A meeting was held in November with all parties. It was agreed that Serco, as the outsourced payroll provider for LCC, would work with WYPF to ensure that current leavers were dealt with correctly at the point of leaving, and that they would produce an improvement plan to address the backlog. LCC agreed to improve their monitoring of the situation, and update reports would be sent monthly once the plan was in place.
- 3 The issue was logged on the breaches register, but not reported to the Pensions Regulator at that point, on the understanding that an improvement plan would be put in place to the agreement of all parties, and that the situation would be monitored to ensure that the plan was kept on track.
- 4 Representatives from LCC and Serco will today present to the Board to provide assurance that the situation is improving and that LCC are monitoring the performance across all areas of the payroll contract to ensure

that the statutory responsibilities of the employer are being met. The improvement plan offered is shown below:

Based on keeping in line with WYPF, the maximum number of cases that can be submitted through the backlog process is 200 cases per week. We are therefore proposing to provide information on the 200 cases per week via this process.

*From 1/1/2018 this gives us 17 weeks until the end of April 2018.
200*17= 3,400. The current outstanding total is 3,111 (as at 22/12/2017).*

This will be based on the information we have available to us at this point in time. Any resulting queries we will have to work through accordingly.

In addition we will be completing current leavers, opt outs and urgent cases as agreed with the early leavers team.

- 5 LCC will be required to report monthly on progress.

Conclusion

- 6 The Pension Fund monitors the performance of the scheme employers against their statutory responsibilities, and ensures that the Pension Board is made aware of any issues. The Board will consider whether any action is required, and will look to work with the Fund, WYPF and the employer to address any concerns.

Consultation

a) Have Risks and Impact Analysis been carried out?

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the author of this report.

Background Papers

This report was written by Jo Ray, who can be contacted on 01522 553656 or jo.ray@lincolnshire.gov.uk

Open Report on behalf of Pete Moore - Executive Director of Finance and Public Protection

Report to:	Lincolnshire Pension Board
Date:	15 January 2018
Subject:	Pensions Administration Report

Summary:

This is the quarterly report by the Fund's pension administrator, West Yorkshire Pension Fund.

Recommendation(s):

That the Board note the report.

Background

1.0 Performance and Benchmarking

1.1 WYPF uses workflow processes developed internally to organise their daily work with target dates and performance measures built into the system. The performance measures ensure tasks are prioritised on a daily basis, however Team Managers have the flexibility to re-schedule work should time pressure demand.

1.2 The table below shows the performance against key areas of work for the period 1 September 2017 to 30 November 2017.

LPF - KPI's for the Period 1.9.17 – 30.11.17					
WORKTYPE	TOTAL CASES	TARGET DAYS FOR EACH CASE	TARGET MET CASES	MINIUM TARGET PERCENT	TARGET MET PERCENT
AVC In-house (General)	79	10	75	85	94.94
Age 55 Increase LG	1	20	1	85	100
Article 4 Payment Death LG	3	10	2	85	66.67
Article 4 Payment Own Right LG	58	10	41	85	70.69
LPF - KPI's for the Period 1.9.17 – 30.11.17					
Change of Address LG	464	5	454	85	97.84
Change of Bank Details LG	129	5	120	85	93.02

DG Nomination Form Received LG	746	20	744	85	99.73
DWP request for Information LG	12	10	11	85	91.67
Death Grant to Set Up LG	30	5	29	85	96.67
Death In Retirement LG	114	5	95	85	83.33
Death In Service LG	6	5	5	85	83.33
Death on Deferred LG	12	5	11	85	91.67
Deferred Benefits Into Payment Actual	171	5	150	90	87.72
Deferred Benefits Into Payment Quote	206	35	191	85	92.72
Deferred Benefits Set Up on Leaving	570	20	493	85	86.49
Divorce Quote LG	66	20	65	85	98.48
Divorce Settlement Pension Sharing order Implemented	1	80	1	100	100
Enquiry LG	2	5	2	85	100
General Payroll Changes LG	35	5	31	85	88.57
Initial Letter Death in Service LG	6	5	6	85	100
Initial letter Death in Retirement LG	114	5	104	85	91.23
Initial letter Death on Deferred LG	12	5	8	85	66.67
Life Certificate Received LG	127	10	124	85	97.64
Monthly Posting	527	10	442	95	83.87
NI Modification LG	6	20	6	85	100
Pension Estimate	265	10	183	75	69.06
Refund Payment	213	10	205	95	96.24
Refund Quote	230	35	218	85	94.78
Retirement Actual	155	3	146	90	94.19
Retirement Quote	200	10	183	85	91.5
Set Up New Spouse Pension LG	61	5	56	85	91.8
Spouse Potential LG	10	10	7	85	70
Transfer In Actual	26	35	24	85	92.31
Transfer In Quote	36	35	34	85	94.44
Transfer Out Payment	15	35	13	85	86.66
Transfer Out Quote	100	20	88	85	88

Reasons for underperforming KPI's:

Transfer in quote	Delays in receiving appropriate documentation.
Article 4 Payment Death LG	Complex cases requiring further investigation or information.

Article 4 Payment Own Right LG	Complex cases requiring further investigation or information.
Initial letter Death on Deferred LG	NFI returns have resulted in new cases where we have no details of next of kin so require further investigation.
Monthly Posting	Files that cannot be validated because of errors, queries, mismatches etc. Average time taken across all employers is less than 10 days.
Pension Estimate	Larger than normal volumes across all Employers
Spouse Potential LG	NFI returns have resulted in new cases where we have no details of next of kin so require further investigation.

2.0 Scheme Information

2.1 Membership numbers as at 15 December '17 were as follows:

Numbers	Active	Deferred	Undecided	Pensioner	Frozen
LGPS	24,604	26,406	4,168	19,980	1,941

Councillors	1	39	0	43	-
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Totals no.s	24,605	26,445	4,168	20,023	1,941
Change	+407	+229	-807	+260	-20

2.2 Age Profile of the Scheme

Status	Age Groups												TOTAL
	U20	20-25	26-30	31-35	36-40	41-45	46-50	51-55	56-60	61-65	66-70	70+	
Active	431	1694	1598	2160	2558	3331	4341	3932	2878	1401	229	50	24603
Beneficiary Pensioner	96	38	2	4	4	17	39	83	141	216	311	1523	2474
Deferred	6	410	1452	2082	2179	3114	5238	5881	4750	1208	35	7	26362
Deferred Ex Spouse	0	0	0	0	3	1	9	15	9	1	0	0	38
Pensioner	0	0	1	1	6	11	48	122	1159	4404	5019	6709	17480
Pensioner Deferred	0	0	0	0	0	0	1	0	2	1	0	0	4
Pensioner Ex Spouse	0	0	0	0	0	0	0	0	2	12	5	4	23
Preserved Refund	39	186	111	124	143	214	281	300	226	157	107	54	1942
Undecided													4168

Councillors													83
Total													77,177

2.3 Employer Activity

Academies and Prime Account Schools

Between 1 September 2017 to 30 November 2017 two academies became Scheme employers in the Fund.

WYPF are currently working on ten schools that are in the process of converting to academies or Prime Account Schools.

Town and Parish Councils

Between 1 September 2017 to 30 November 2017 no Town and Parish Council became Scheme employers. No decisions are outstanding from Town and Parish Councils as to whether to become Scheme employers in the Fund.

Admission Bodies

Between 1 September 2017 to 30 November 2017 there were two new Admission Bodies in the Fund.

WYPF are currently working on the admissions for four Admission Bodies.

Employers ceasing Participation

Between 1 September 2017 to 30 November 2017 one employer ceased their participation in LPF.

Number of Employers in WYPF

These changes to employers bring the total number of employers in LPF as at 30 November 2017 to 251.

Admission Bodies in progress

EMPLOYER	ISSUE	CURRENT POSITION	ACTION	NEXT ACTION REQUIRED
Future Cleaning Services	Request for admission received.	Need employee data.	Employee data received and application received.	Actuarial assessment completed. Admission agreement issued for signature. Admission still with academy trust. Contacted by Academy Trust - responding to queries re their liability as guarantor.

Outspoken Training	Admission due from 1/9/2017.	Application received.		Admission agreement signed by Outspoken. Now with LCC Legal for signing and sealing of document.
Taylor Shaw (Branston Academy)	Request for admission received.	Need employee data and application form.	Employer confirmed willing to act as interim employer. Update on employee data requested.	Chasing up employer for up to date contribution info.
Compass Group	Request for admission received.	CGS wish to backdate entry. We are asking academies to confirm if they are willing to act as scheme employer for the interim period.	Conference call held with DRET and Compass Group.	Further conference call due with Dataplan to agree a way forward.

3.0 Praise and Complaints

3.1 Over the quarter July to September we received **5** online customer responses. **113** Lincolnshire member's sample survey letters were sent out and **13 (11.51%)** returned:

Overall Customer Satisfaction Score;

July to September 2016	October to December 2016	January to March 2017	April to June 2017	July to September 2017
79.55%	77.22%	87.07%	78.63%	89.62%

Appendix 1 shows full responses.

3.2 Employer Training

Over the quarter July to September one Employer session was held in Lincolnshire (one was cancelled due to lack of attendees). The session was on Employer Responsibilities.

Feedback from the event is attached at Appendix 2.

4.0 **Internal Disputes Resolution Procedures**

4.1 All occupational pension schemes are required to operate an IDR. The LGPS has a two-stage procedure. Stage 1 appeals, which relate to employer decisions or actions, are considered by a person specified by each employer to review decisions (the 'Adjudicator'). Stage 1 appeals relating to appeals against administering authority decisions or actions are considered by the Pension Fund Manager. Stage 2 appeals are considered by a solicitor appointed by Lincolnshire County Council.

Stage 1 appeals against scheme employers

No appeal decisions in this period. Two appeals currently outstanding.

Date of appeal	Employer	Reason for appeal	Decision	Outcome / comments
15/8/2017	Compass Point Business Services	Appeal against not backdating ill health pension		
28/11/2017	Lincolnshire County Council	Appeal against being refused an ill health pension		

Stage 2 appeals

One appeal upheld in current period. Two appeals currently outstanding.

Date of appeal	Employer	Reason for appeal	Decision	Outcome / comments
27/7/2017	Lincolnshire County Council	Appeal against refusal to pay deferred benefit on unreduced basis.	Referred back for reconsideration.	
2/10/2017	Boston Borough Council	Appeal against service used in pension calculation.		
27/9/2017	Lincolnshire County Council	Actual value of benefits paid was less than shown on annual statements - qualifying service incorrectly		

		shown.		
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4.2 The Pensions Ombudsman can consider appeals and allegations of maladministration, once the two stages of the IDRPs have been exhausted. There were no new appeals to the PO.

5.0 Administration Update

5.1 Outstanding Leaver forms

A meeting took place recently between LCC, Serco, LPF and WYPF to discuss the large volume of outstanding leaver forms. Serco has promised to provide an action plan which will highlight how the backlog of forms will be completed and the timescales for completion.

6.0 Current Issues

6.1 Assistant coroners & eligibility for LGPS

The LGPS Secretariat have received a Counsel's view on the eligibility of assistant coroners for membership of the LGPS in England and Wales, which concludes that assistant coroners are eligible for membership of the scheme.

6.2 Publication of LGPS statistics for 2016/17

DCLG have [published their annual statistics](#) on the LGPS in England and Wales, covering the 2016/17 scheme year.

The statistics are collated from the SF3 forms completed by LGPS funds each year and show the following (removing the effect of the merger of the Richmond and Wandsworth pension funds during 2016/17):

- Total expenditure in 2016/17 was £11.8 billion, up £0.4 billion from 2015/16.
- Total income in 2016/17 was £14.7 billion, up £0.7 billion from 2015/16.
- Overall, total expenditure was 81% of income in 2016/17, the same as in 2015/16.
- The market value of LGPS funds was £259 billion at the end of March 2017, an increase of £45 billion or 21% on March 2016.
- Active membership was up to 1,964,000 in 2016/17, from 1,943,000 in 2015/16.

- Active membership as a proportion of total membership was 35.16% in 2016/17, down from 36.00% in 2015/16.

6.3 **September 2017 rate of CPI**

On 17 October 2017, [the Office for National Statistics \(ONS\) announced](#) that the Consumer Prices Index (CPI) rate of inflation for September 2017 was 3.0%.

Government policy in recent years has been to base both pensions increase under the Pensions (Increase) Act 1971 and revaluation of pension accounts under section 9 of the Public Service Pensions Act 2013 on the rate of CPI for September of the previous year.

We await confirmation from the Government that revaluation and pensions increase for April 2018 will apply in the LGPS at a rate of 3.0%.

6.4 **SAB tier 3 employer project – publication of surveys**

The Scheme Advisory Board for the LGPS in England and Wales (SAB) has appointed Aon Hewitt to help them in their review of Tier 3 employers in the LGPS. Tier 3 employers are all those with no tax-payer backing (i.e. colleges, universities, housing associations, charities and any admission bodies with no guarantee from a Council, academy or other tax-payer backed employer).

For clarity, admission bodies falling within paragraph 1(d) of Part 3 of Schedule 2 to the LGPS 2013 Regulations, i.e. bodies formerly known as transferee admission bodies, are not classed as Tier 3 employers because they have a statutory guarantee from the related employer.

The aims of the exercise are to identify:

- the duties, benefits, issues and challenges for LGPS funds, Tier 3 employers and their scheme members with regard to their participation in the LGPS
- options for change that would improve the funding, administration, participation and member experience with regard to Tier 3 employers.

A key element of this project is information gathering and, on 27th November, the SAB launched three surveys for completion by:

- a) LGPS administering authorities – <http://lgpsregs.org/survey/administering-authorities.php>,
- b) Tier 3 employers - <http://lgpsregs.org/survey/employer.php>,
and

- c) LGPS members employed by tier 3 employers - <https://lgpsmember.org/survey/member.php>

The surveys are due to close on 31st December 2017.

6.5 **SAB letter to the Minister regarding survivor benefits**

As agreed by the Scheme Advisory Board on the 16th November, the Chair, Councillor Roger Phillips, wrote to the Local Government Minister, Marcus Jones on the 27th November setting out the Board's intention to explore the scope for eliminating any existing inequalities in the scheme regarding survivor benefits.

The letter went on to confirm that the Government Actuary's Department should be commissioned to cost any such proposal ranging from full retrospection to equalising future survivor benefits only. At this stage, and in the absence of any such costing, the Board has no firm view on how any such proposal should be applied.

In the meantime, representations will continue to be made to DCLG for clarification on the extent to which the Brewster judgement applies to the LGPS in England and Wales.

6.6 **Legal opinion on GDPR and the LGPS**

LGPC Secretariat circulated a legal opinion from the legal firm Squire Patton Boggs on a number of questions regarding the implications of the EU's General Data Protection Regulation (GDPR) for the LGPS.

The topics Squire Patton Boggs have considered in the opinion include:

- Whether member consent is needed to process LGPS members' personal data for the purposes of the basic administration of the scheme.
- The legal power for administering authorities to share personal data with AVC providers, a) where a member has entered into an AVC arrangement, and b) for marketing purposes to those who have not entered into AVC arrangements.
- The retention of personal data by an administering authority where there is no remaining liability for an individual.
- The 'right to erasure' and how this relates to the LGPS.
- The 'right to restrict processing' and how this relates to the LGPS.
- 'Privacy by design' and how this relates to the LGPS.
- The formal role each of the following parties has in respect of LGPS member data under GDPR – i.e. whether data controller, data processor or joint data controller:

- administering authority
- scheme employer
- fund actuary
- What GDPR means for practices whereby the administering authority gives the scheme employer access to parts of the pension administration system in order to view or update member records.

Work is also underway at a national level by the communications working group to produce a number of sample documents for LGPS administering authorities to make use of in their preparations for GDPR. These consist of the following:

- A privacy impact assessment (PIA),
- A Fair Processing notice (FPN),
- An incident report form, and
- A data protection policy.

6.7 Pensions Dashboard update

The Association of British Insurers (ABI), the organisation which steered the development of the Dashboard prototype, [published a report](#) containing a series of policy recommendations on how to develop a Dashboard that would bring about lasting benefits for pensions savers in the UK.

At the PLSA Conference, Guy Opperman MP, Minister for Pensions and Financial Inclusion, announced that DWP will take over responsibility for the introduction of the Pensions Dashboard from HM Treasury. DWP's involvement will begin with the undertaking of a feasibility study in the coming months, with the Department due to provide a fuller update on its plans in spring.

6.8 Ban on pensions cold calling – draft legislation to be brought forward in 2018

The Government intend to bring forward measures to restrict the likelihood of pension scams occurring, including the introduction of a cold calling ban.

6.9 Autumn Budget 2017

On 22nd November 2017, the Chancellor of the Exchequer delivered the [Autumn Budget 2017](#).

The Budget was a relatively quiet one for pensions but did include confirmation that the lifetime allowance will be going up to £1,030,000 from 6th April 2018. This increase is in line with the policy that the Government

announced in the March 2015 Budget.

7 Finance

7.1 Cost per member

Shared service cost per member 2017/18 £13.62 (£15.05 for 2018/19 initial budget)

The shared service pension admin cost per member of £13.62 has been used to recharge LPF for this year. Our cost target for shared service pension admin is to maintain a cost target of £17. The projected cost for 2018/10 Pension Admin shared services has been estimated at £15.05. Our projected cost per member is therefore below our target cost of £17.

8 News

8.1 Awards

WYPF has been shortlisted by Pensions Age Awards under the following categories:

DB Scheme of the Year

Pension Scheme Communication Award

Pension Administration award

Pension Scheme Innovation Award

9 GDPR Update

9.1 WYPF will provide an update on their progress towards meeting the requirements under GDPR (attached at appendix 3).

Conclusion

WYPF and LPF continue to work closely as shared service partners to provide an efficient and effective service to all stakeholders within the Lincolnshire Pension Fund.

Appendices

These are listed below and attached at the back of the report	
Appendix 1	Customer Survey Results
Appendix 2	Feedback Summary
Appendix 3	GDPR – WYPF Update

Consultation

a) Have Risks and Impact Analysis been carried out??

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the author of this report.

Background Papers

No background papers within Section 100D of the Local Government Act 1972 were used in the preparation of this report.

This report was written by Yunus Gajra, who can be contacted on 01274 432343 or Yunus.gajra@wypf.org.uk

Customer Survey Results - Lincolnshire Members (1st July to 30th September 2017)

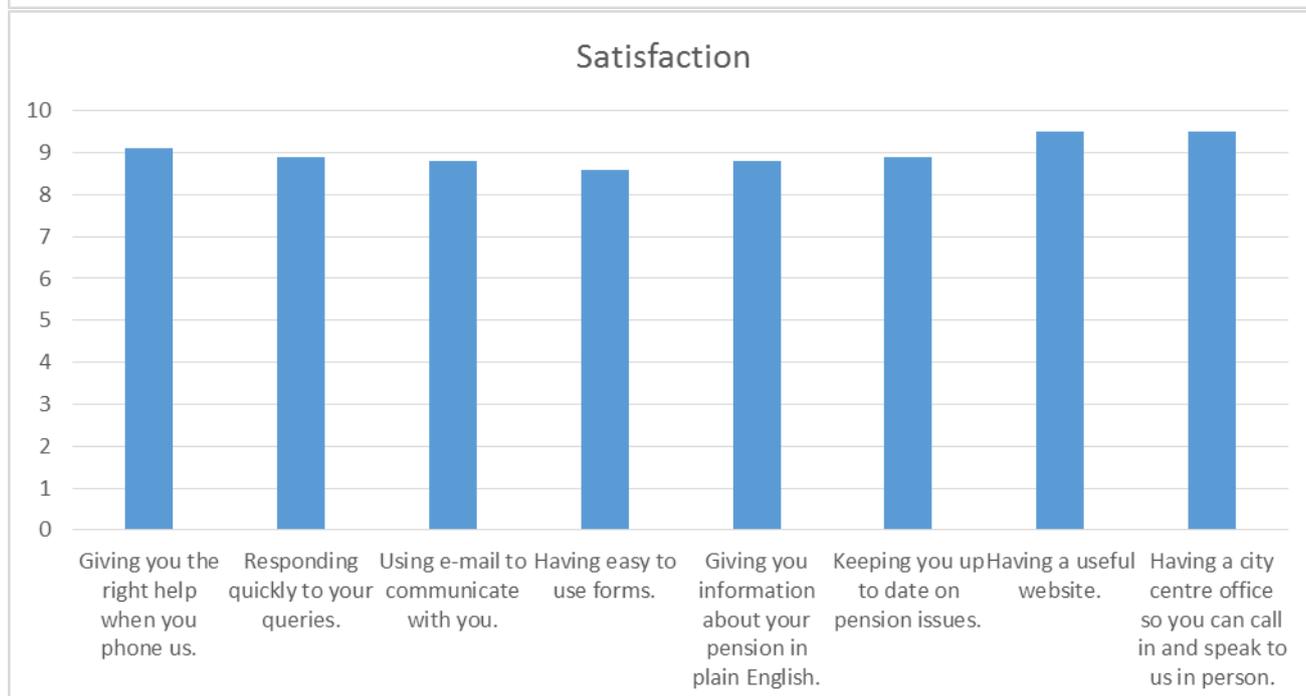
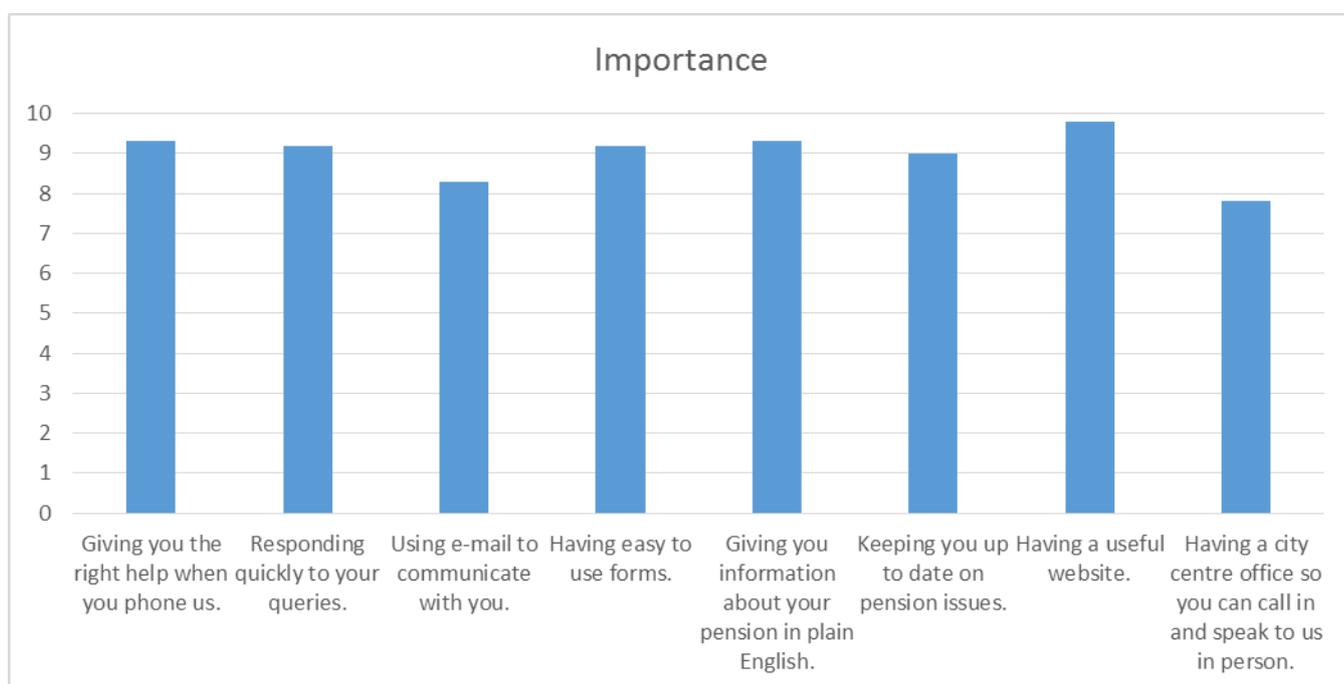
Over the quarter July to September we received **5** online customer responses.

Over the quarter July to September **113** Lincolnshire member's sample survey letters were sent out and **13 (11.51%)** returned:

Overall Customer Satisfaction Score;

July to September 2016	October to December 2016	January to March 2017	April to June 2017	July to September 2017
79.55%	77.22%	87.07%	78.63%	89.62%

The charts below give a picture of the customers overall views about our services;



Sample of positive comments:

Member Number	Comments
Online	Got straight through without the annoying selection stuff and I talked to Nicola who was straight and understood what I wanted. Excellent service. Can't think of any improvements needed.
Online	Generally satisfactory since website available. I would like to see information become available on an ongoing basis regarding the amount a spouse would receive on death of the pensioner so they know what they are likely to receive.
8030755	Very good service which gave me peace of mind

Complaints/Suggestions:

Member Number	Comments	Corrective/ Preventive Actions
None		

**Employer Feedback (LPF)
Quarter 3 July – September 2017**

Pensionable Pay – 10 July 2017

Feedback score: N/A

- Workshop cancelled due to lack of attendees booked on.

Employer Responsibilities – 21 September 2017

Feedback score: 95.87%

Comment	Action taken
The IDRPs slides were too Bradford Council focussed at stage 2.	Agreed, however the difference was discussed during the presentation.
Found the exercises to be a waste of time, some not used. Better use of time to talk through.	There is an ongoing discussion about the form of this workshop and what constitutes a relevant exercise.

A summary of the compliments

- Made to feel comfortable and welcome. David was helpful and fun to learn with, kept it interesting.
- David - well presented. Learned a few things today & got list of things to check back at the office.

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West Yorkshire Pension Fund

General Data Protection Regulation (GDPR) - Update

Example data map



Where is data stored?



*Laptops/
devices*



Spreadsheets



*Paper
records*



*Meeting
papers*



*USB
sticks*



Microfiche



Database



*Cloud based
storage*



Emails

Who is processing our data?



What personal data is held?

Names

ID numbers

Gender

Medical records

Dates of birth

Criminal records

Contact details

Salaries

Pension payments

Marital status

Dependants' details

Service dates

Employment history

Bank details

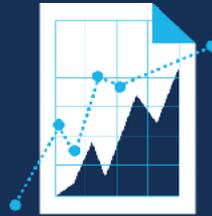
Benefits

Contributions

What is data being used for?



*Scheme
administration*



*Actuarial
valuations*



*Preparing
accounts*



*Providing
legal advice*



*Exercising
discretionary powers*

Who are the data subjects?

Active
members

Pensioners

Potential
Beneficiaries

Deferred
Pensioners

Former
members

Ex-Spouses

Who is data shared with and how?

DOCUMENT ALL DATA FLOWS

- *How is data stored?*
- *Is it secure?*
- *Is data shared outside the EU?*
- *Are there any alternatives?*



How long is the data kept?

- *How long should you keep data?*
- *What about former members?*
- *How long are our processors keeping data?*
- *How is data destroyed?*
- *Ask to see each party's policy on data destruction*



RECORD OF PROCESSING ACTIVITIES

Processing details

Who holds the data?	Processor or controller?	What personal data do they hold?	Why are they using the data?	Who are the data subjects?	Will the data be shared with any third parties?	Is data transferred outside EEA?	How long is data kept?	How is the data secured?
Trustees	Joint Controller		Scheme administration		Administrators	No	Lifetime of scheme	
Administrators	Processor	Names, DOB, gender, contact details, service dates, salaries, benefits	Scheme administration	Active members, deferred members, pensioners, former members, potential beneficiaries, ex-spouses	Trustees, Actuary, Legal Advisers, IFAs, etc	No	Lifetime of scheme	
		Special categories of data - medical records, sexual orientation	Ill-health retirements, nomination forms			No	x years after event	
Employer	Controller in common				Administrators	No		

Is data secure?

- Pseudonymisation/encryption
- Is security regularly tested?
- How quickly can data be restored
- Relevant accreditations
- Ask to see each processors security policy



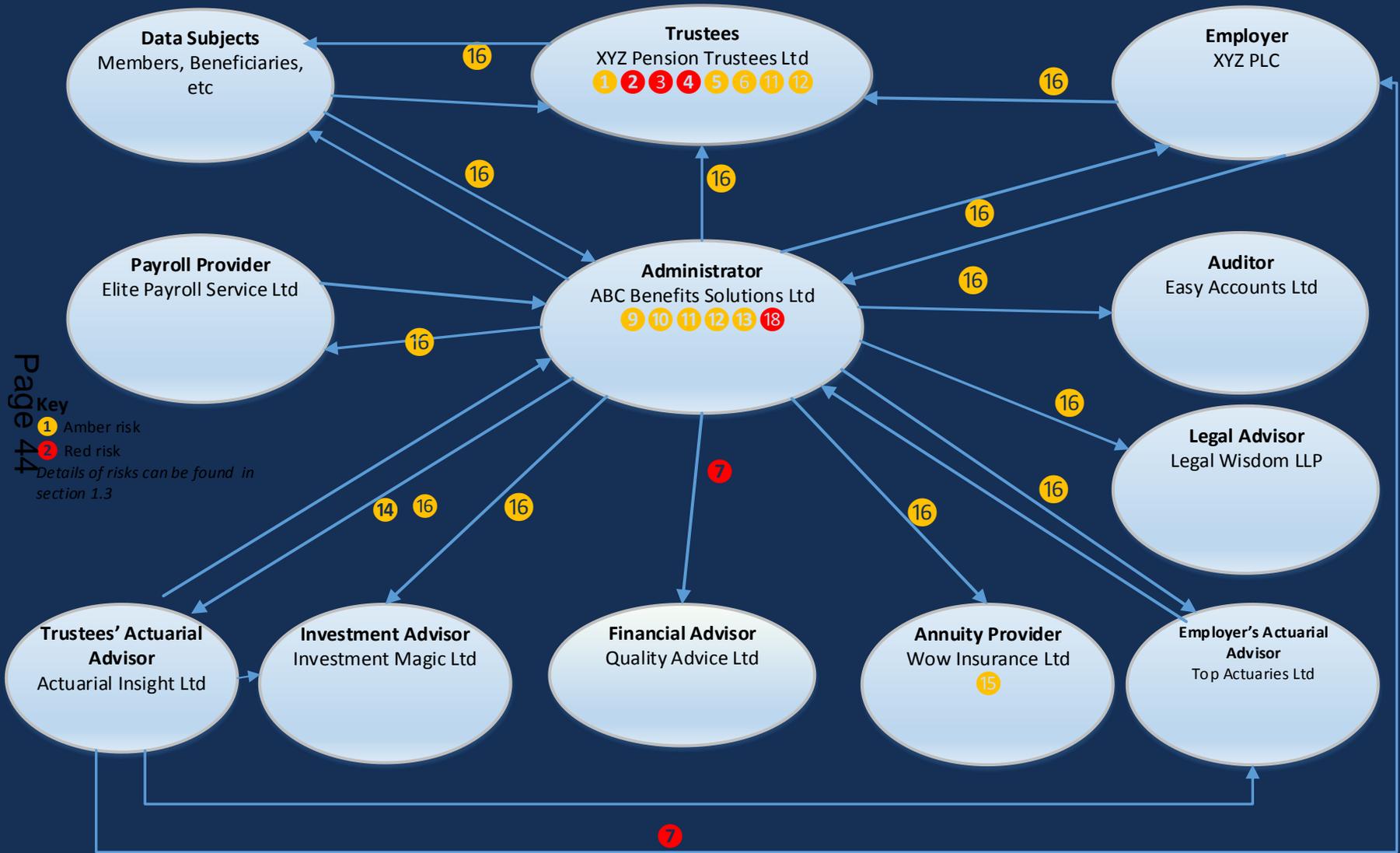
Summary

- 1. Coordinate data mapping and ongoing requirement for records of processing activities*
- 2 Keep in mind all the locations data is stored*
- 3 Consider each processor in turn*
- 4 Don't forget former advisers and former trustees*
- 5 Make sure your data is current*
- 6 Keep it simple and focussed but legal*
- 7 Don't forget data on trustees/advisers themselves*
- 8 Don't forget sub-processor*
- 9 Don't be afraid to keep data long term as long as you can justify it.*
- 10 Document policies via links in spreadsheet*

Summary of tips

- 1 /** *Coordinate data mapping and ongoing requirement for records of processing activities*
- 2 /** *Keep in mind all the locations data is stored*
- 3 /** *Consider each processor in turn*
- 4 /** *Don't forget former advisers and former trustees*
- 5 /** *Make sure your data is current*
- 6 /** *Keep it simple and focussed but legal*
- 7 /** *Don't forget data on trustees/advisers themselves*
- 8 /** *Don't forget sub-processor*
- 9 /** *Don't be afraid to keep data long term as long as you can justify it*
- 10 /** *Document policies via links in spreadsheet*

Data map with risks



Questions

Page 45



West Yorkshire Pension Fund



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Open Report on behalf of Pete Moore - Executive Director of Finance and Public Protection

Report to:	Lincolnshire Pension Board
Date:	15th January 2018
Subject:	Pension Fund Update Report

Summary:

This report updates the Board on Pension Fund matters and any current issues.

Recommendation(s):

That the Board note the report.

Background

1 Responsible Investment

1.1 To assist the Fund in meeting its requirements as a responsible investor, it participates in the Local Authority Pension Fund Forum (LAPFF) that has a work plan addressing the following matters:

- **Corporate Governance** – to develop and monitor, in consultation with Fund Managers, effective company reporting and engagement on governance issues.
- **Overseas employment standards and workforce management** - to develop an engagement programme in respect of large companies with operations and supply chains in China.
- **Climate Change** - to review the latest developments in Climate Change policy and engage with companies concerning the likely impacts of climate change.
- **Mergers and Acquisitions** - develop guidance on strategic and other issues to be considered by pension fund trustees when assessing M&A situations.
- **Consultations** – to respond to any relevant consultations.

1.2 The latest LAPFF engagement report can be found on their website at www.lapffforum.org. Some of the highlights during the quarter included:

- LAPFF's engagement with Sports Direct International continued through correspondence over voting recommendations for the 2017 AGM. Sports Direct has been embroiled for some time in a controversy over poor corporate governance and workplace practices at its Shirebrook warehouse. At the AGM, employment practices remained a focus, and LAPFF called for an independent review of current employment practices.
- A LAPFF representative attended Ashtead Group's AGM to discuss the company's remuneration in light of the new Department for Business, Energy and Industrial Strategy's green paper. The Forum was pleased that the company listened to shareholders following the 2016 AGM by changing the leverage incentive in the Performance Share Plan (PSP) pay scheme. The Forum further inquired whether the company welcomed the Government's Green Paper proposals, specifically in regards to executive pay and whether the company thinks that comparisons of CEO pay to median worker pay is a useful disclosure item for the company's stakeholders.
- Cllr Toby Simon of LAPFF met with Lonmin Plc to obtain an explanation of how the company will meet its commitments to its Social Labour Plan (SLP), to understand the company's position on carbon price and to confirm the company's ability to sustain long-term performance. The Forum was pleased with Lonmin's openness to dialogue and asked about the poor conditions of the platinum market, the company's ability to increase its net cash under these conditions, and the effectiveness of the recent rights issues.
- The Forum met with Richard Burrows, the Chair of British American Tobacco to understand the role public health plays in influencing the company's business strategy and business model. The meeting followed a previous meeting in 2013 on similar concerns and followed up with discussions about the necessary steps taken to address public health issues and comply with anti-smoking regulations, including the introduction of new next generation products.
- LAPFF has written to the Chairmen of HSBC Holdings, Standard Chartered, WPP, Aviva and International Consolidated Airlines Group SA, seeking meetings to better understand each company's respective approaches to cybersecurity and how this issue is managed at the board level.
- LAPFF attended the National Grid AGM, and asked the Chair, Sir Peter Gershon, how the final recommendations of the Taskforce on Climate-Related Financial Disclosure (TCFD) would affect the company's reporting on climate change and in particular on scenario planning. Notably the Finance Director responded, who is aiming to see if other

finance directors can commit to the TCFD and noted that there will be a statement around the release of next year's annual report.

- 1.3 Members of the Board should contact the author of this report if they would like further information on the Forum's activities.
- 1.4 In addition to being members of LAPFF, the Fund votes on all its segregated holdings with external asset managers. A summary of votes cast is provided to the Pensions Committee in each quarterly Fund Update Report.

2 TPR Checklist Dashboard

- 2.1 The Pension Regulator's (TPR's) checklist for how Lincolnshire meets the code of practice 14 for public service pension schemes is attached at Appendix A.
- 2.2 The Areas that are not fully completed and compliant are listed below. There have been no changes since the last update report.

B12 – Knowledge and Understanding - Have the pension board members completed the Pension Regulator's toolkit for training on the Code of Practice number 14?

Amber – It is the intention that all PB and PC members carry this out, and provide copies of the completion certificate to the Pension Fund Manager, however completion certificates have not been received for all members.

F1 – Maintaining Accurate Member Data - Do member records record the information required as defined in the Record Keeping Regulations and is it accurate?

Amber - Scheme member records are maintained by WYPF. Therefore much of the information here and in later questions relates to the records they hold on LCC's behalf. However, as the scheme manager, LCC is required to be satisfied the regulations are being adhered to. Data accuracy is checked as part of the valuation process and the annual benefits statement process. Monthly data submission will improve data accuracy going forwards, however there are a number of historical data issues that are in the process of being identified and rectified.

F5 - Maintaining Accurate Member Data - Are records kept of decisions made by the Pension Board, outside of meetings as required by the Record Keeping Regulations?

Grey – not relevant as we do not expect there to be decisions outside of the PB. This will be monitored.

H5 - Maintaining Contributions - Has an annual benefit statement been provided to all members with AVCs within the required timescales?

Grey – provided directly by Prudential, with no Pension Fund involvement.

H6 – Maintaining Contributions - Do these meet the legal requirements in relation to format?

Grey – provided directly by Prudential, with no Pension Fund involvement.

H7 - Maintaining Contributions - Is basic scheme information provided to all new and prospective members within the required timescales?

*Amber - New starter information is issued by WYPF, **when they have been notified by employers**. This is done by issuing a notification of joining with a nomination form, transfer form and a link to the website. However, because the SLA relates to when notified, it does not necessarily mean the legal timescale has been met which is within 2 months of joining the scheme. The monthly data returns are improving this process.*

K7 – Scheme Advisory Board Guidance - Members of a Local Pension Board should undertake a personal training needs analysis and put in place a personalised training plan.

Remaining Amber - Annual Training Plan of Committee shared with PB and all PB members invited to attend. Self-assessments were carried out in March, however no personal training plans have been put in place, as the assessments have been used to identify training areas required across the Board.

3 Risk Register Update

- 3.1 The risk register is a live document and updated as required. Any changes are reported quarterly to the Committee and Board, and the register is taken annually to Committee to be approved.
- 3.2 Two risks have changed status over the quarter. Risk 28, concerning opting up to professional investor status, under the MIFIDII requirements has moved from red to green, as all managers have now accepted the opt-up requests. Risk 22, concerning resourcing issues within the LCC team, has also moved from red to blue. The Accounting, Investment and Governance Manager has now been appointed, however it has not yet gone to green due to the 6 month phased transition into the team, which will still mean additional workloads for the Pension Fund Manager.

Risk 28	Consequences	Controls	Risk Score	
			L	I
Failure to be opted up to professional investor status following the implementation of MIFIDII	Fire sale of assets, inability to implement investment strategy	Use of LGA/SAB templates and letters, trained Committee, professional officers, use of investment advisors and consultants	1	2

Risk 22	Consequences	Controls	Risk Score	
			L	I
LCC team - workloads and resources - additional work of asset pooling along with team losses, means resources will be very stretched for the coming months	Statutory requirements not met Reputational risk Increase in key man risk	Monthly meetings with County Finance Officer Concerns reported to Pensions Committee and Pension Board	2	3

- 3.3 One new risk has been added over the quarter, risk 29 – concerning the implementation of the Global Data Protection Regulations (GDPR) from May 2018. This impacts how data is held and shared, and requires additional policies and procedures being put in place by WYPF as the Fund's administrator. This is not as onerous as first thought. Legal advice obtained by LGA confirms that the statutory requirements of managing the pension fund remove some of the most time-consuming and difficult requirements – such as explicit consent to hold data.

Risk 29	Consequences	Controls	Risk Score	
			L	I
Failure to meet the timescales to implement the requirements under GDPR	Reputational risk, referrals to ICO	WYPF project plan, monitoring, use of LGA guidance	1	3

- 3.4 There is now one red risk, risk 24, which was added in June '16 as a result of the Brexit vote, and given the continuing uncertainty as to how this will play out, it is felt that the red status is still appropriate.

Risk 24	Consequences	Controls	Risk Score	
			L	I
UK leaving the EU	Volatility of market Lower gilt yields leading to higher liabilities Inflation increasing liabilities Uncertainty of political direction re pooling	Increased monitoring of managers Review investment strategy Regular communications with Committee and Board	4	3

3.4 The full risk register is available from officers should any member of the Board wish to see it.

4 Breaches Reporting

4.1 The Breaches Reporting Policy was brought before this Board at the July meeting, for annual review. The Fund, and those charged with its governance, has a requirement to log and, where necessary, report breaches to the Pensions Regular. The Breaches Register attached at appendix B shows those breaches logged since recording began. Since the last Pension Board meeting, two breaches have been added. These are detailed below:

4.2 **Late payment of contributions** – a summary of all late payers since April has been logged on the report, with an additional analysis included at appendix C, including last financial year's figures for comparison. As can be seen from this analysis, the number of employers with late contributions (or late data returns) average at 21 per month, reflecting 8.5% of the employers. None of these individually have been material and therefore not reported to the Pensions Regulator. Contribution monitoring is managed within the LCC team and each employer is contacted in any instance of late payment, and it is recorded within the monitoring system. Employers can be fined if they are late in any three months out of a rolling six month period, in line with the WYPF charging policy adopted by Lincolnshire Pension Fund. Since April, 19 invoices have been raised to employers. Employers are regularly reminded of the requirement to pay contributions in line with the statutory deadlines.

4.3 **Late receipt of member information** – WYPF have been working closely with Lincolnshire County Council's payroll provider, Serco, regarding their outstanding data submissions, particularly in respect of leavers. In September the Pension Fund Manager wrote to LCC to ask for an improvement plan and timescales in which to clear the backlog of this information. A meeting was held in November with LCC, Serco and WYPF to discuss the issue, and a further meeting was held in December. An improvement plan was agreed and LCC and Serco are presenting to this meeting of the Board to explain their position.

5 Asset Pooling Update

5.1 The Joint Committee of BCPP met on 20th October and the papers and minutes have been shared with the Committee. Papers included:

- Briefing from the Chairman and Chief Executive Officer
- Update on Executive and Non-Executive appointments
- Update on general staff terms and conditions
- Discussion on BCPP Board structure
- Update on FCA submissions
- Updates on project workstreams

- 5.2 At the time of the meeting, it was expected that the Chief Investment Officer (CIO) and Chief Risk Officer (CRO) would be appointed in November. However, at the time of writing, these posts have not been filled. Recruitment for the posts of Head of Client Services, Head of Finance and Reporting, Head of Compliance and Head of Legal and Company Secretary has been started.
- 5.3 The CEO, Rachel Elwell has been visiting all partner funds to meet their Committees and share her vision of the development and future operation of BCPP and presented to the Lincolnshire Pensions Committee on 14th December. In addition, she has been meeting with officers to discuss their asset allocations and how the sub funds being developed will meet the funds' investment strategy requirements.
- 5.4 Progress across the workstreams continues at some pace, and the project is still on track for the June 2018 implementation date. Key milestones that have been met include the appointment of the service provider for the operation of BCPP, the third party administrator, and the site for the office accommodation in Leeds.
- 5.5 The next meeting of the Joint Committee is on Monday 16th January in Northallerton. The proposed budget and cost sharing principles will be taken to this meeting. Papers will be shared once received. Having seen the papers, should any member of the Board have any questions that they would like raising at the meeting, please let the Lincolnshire representative, Councillor Strengiel, know.

6 The Pensions Regulator Annual Governance Survey

- 6.1 The Pensions Regulator (TPR) issued their annual governance survey on 8th November 2017, with a completion deadline of 1st December 2017. Last year 90% of all public service schemes completed the survey, and this helped TPR build a comprehensive picture of governance and administration standards. This year's survey is designed to provide an update on how schemes are progressing as well as capturing data on some new areas of interest. TPR is hoping that all public service schemes will participate in the 2017 research.
- 6.2 To ensure that the response was representative of the Board, a copy of the survey was sent to the Independent Chair to complete, before being completed online by the Pension Fund Manager. A copy of the survey, with the Chair's response and any amendments by the Pension Fund Manager, is included at appendix D. The survey was submitted to TPR on 28th November, ahead of the deadline date.

Conclusion

- 7 The Fund Update report is a quarterly report to the Pension Board, to update the Board on Pension Fund matters and any current issues

Consultation

a) Have Risks and Impact Analysis been carried out?

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the author of this report.

Appendices

These are listed below and attached at the back of the report	
Appendix A	TPR Checklist Dashboard
Appendix B	Breaches Register
Appendix C	Late Contributions Analysis
Appendix D	The Pensions Regulator Annual Survey

Background Papers

There are no background papers.

This report was written by Jo Ray, who can be contacted on 01522 553656 or jo.ray@lincolnshire.gov.uk

The Pension Regulator's and Scheme Advisory Board Compliance Checklist

Summary Results Dashboard

No	Completed	Compliant
Reporting Duties		
A1	G	G
A2	G	G
A3	G	G
A4	G	G
Knowledge & Understanding		
B1	G	G
B2	G	G
B3	G	G
B4	G	G
B5	G	G
B6	G	G
B7	G	G
B8	G	G
B9	G	G
B10	G	G
B11	G	G
B12	A	A
Conflicts of Interest		
C1	G	G
C2	G	G
C3	G	G

No	Completed	Compliant
C4	G	G
C5	G	G
C6	G	G
C7	G	G
C8	G	G
C9	G	G
C10	G	G
C11	G	G
Publishing Scheme Information		
D1	G	G
D2	G	G
D3	G	G
D4	G	G
Risk and Internal Controls		
E1	G	G
E2	G	G
E3	G	G
E4	G	G
E5	G	G
E6	G	G
E7	G	G
E8	G	G

No	Completed	Compliant
Maintaining Accurate Member Data		
F1	A	A
F2	G	G
F3	G	G
F4	G	G
F5		
F6	G	G
F7	G	G
F8	G	G
F9	G	G
F10	G	G
F11	G	G
Maintaining Contributions		
G1	G	G
G2	G	G
G3	G	G
G4	G	G
G5	G	G
G6	G	G
G7	G	G
G8	G	G
G9	G	G

No	Completed	Compliant
Providing Information to Members and Others		
H1	G	G
H2	G	G
H3	G	G
H4	G	G
H5		
H6		
H7	G	A
H8	G	G
H9	G	G
H10	G	G
H11	G	G
H12	G	G
H13	G	G
Internal Dispute Resolution		
I1	G	G
I2	G	G
I3	G	G
I4	G	G
I5	G	G
I6	G	G
I7	G	G

No	Completed	Compliant
I8	G	G
I9	G	G
Reporting Breaches		
J1	G	G
J2	G	G
J3	G	G
Scheme Advisory Board Requirements		
K1	G	G
K2	G	G
K3	G	G
K4	G	G
K5	G	G
K6	G	G
K7	A	A
K8	G	G
K9	G	G
K10	G	G
K11	G	G
K12	G	G
K13	G	G
K14	G	G
K15	G	G

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Lincolnshire Pension Board Record of Breaches

Date	Category (e.g. administration, contributions, funding, investment, criminal activity)	Description and cause of breach	Possible effect of breach and wider implications	Reaction of relevant parties to breach	Reported / Not reported (with justification if not reported and dates)	Outcome of report and/or investigations	Outstanding actions
31/7/15	Contributions	Late payment by LCC for June contributions, following late payment for April and May.	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Aware of breach, extenuating circumstances, trying to fix issues.	Reported through portal 31/7/15		
31/8/16	ABS's	100% required output of ABS's not met	Late receipt of ABS info to members	Not material and improvement on previous year – first full year of monthly returns	Not reported – total 92.6% of active and deferred produced overall – not material to report		
31/3/17	Contributions (see report)	Late payments over the year	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Made aware and fined in some circumstances	Not reported – not material to LPF		

May 2017	Administration	Data security breach – a small number of ABS's went out unsealed	Potential for individuals data to be seen by unauthorised individuals	WYPF contacted printing company for explanation. Breach reported to information security officers at both WYPF and LPF	Not reported to tPR. Small number impacted, human error the cause.		
Sept 17	Contributions	Late payments May to August	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Made aware and fined in some circumstances	Not reported – not material to LPF		Issue raised at LEAF meeting
Sept 17	Leavers information	Outstanding leavers information not sent to WYPF by LCC	Incorrect ABS's, over statement of liabilities	LCC given opportunity to provide improvement plan and timescales	Not reported, but under review.		
Dec 17	Leavers information – updated	Outstanding leavers information not sent to WYPF by LCC	Incorrect ABS's, over statement of liabilities	Improvement plan provided, presentation to Board to discuss in January	Not reported, but under review.		
Dec 17	Contributions - updated	Late payments Sept to November	Cashflow issues, data not provided to WYPF to action – e.g. retirements	Made aware and fined in some circumstances	Not reported – not material to LPF		Issue to be raised at Feb employers meeting

Late contributions – April to November 2017

Late contributions

Month	No.	%	Comments
April	6	2.50	
May	11	4.58	
June	30	12.50	Included all CIT schools (7) and most Strictly Education schools (7) having late data submitted
July	21	8.75	Included most Strictly Education schools (7) having late data submitted
August	26	10.83	Included 7 CIT schools and 5 Capita schools
September	34	14.17	Included 7 Strictly Education schools and 14 Dataplan schools. Note: all CASH was in on time. ALL late contributions were data.
October	10	4.17	
November	26	10.83	Included 8 Strictly Education (100%), 6 Dataplan, 6 EPM and 3 Judicium schools. Note: CASH was in on time for 23 employers.
Average	21	8.54	

Previous period (April 2016 to March 2017) for comparison

Late contributions

April	12	5.00%
May	14	5.83%
June	20	8.33%
July	12	5.00%
August	9	3.75%
September	23	9.58%
October	19	7.90%
November	25	10.40%
December	9	3.75%
January	8	3.33%
February	21	8.75%
March	21	8.75%
Average	16	6.7%

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The Pensions Regulator Public Service Governance Survey 2017

THIS DOCUMENT IS INTENDED TO BE USED AS A GUIDE TO HELP YOU GATHER THE INFORMATION REQUIRED FOR THE SURVEY. PLEASE NOTE, HOWEVER, THAT WE NEED YOU TO COMPLETE THE QUESTIONNAIRE THROUGH THE ONLINE SURVEY LINK CONTAINED IN YOUR INVITATION EMAIL.

Thank you for taking the time to complete this survey.

The questions in the survey should be answered in relation to the scheme referenced in your invitation email. Where the scheme is locally administered, we mean the sub-scheme or fund administered by the local scheme manager.

Your responses will be kept anonymous unless you consent otherwise at the end of the survey. Linking your scheme name to your answers will help inform The Pension Regulator's engagement with you in the future.

This survey should be completed by the scheme manager or by another party on behalf of the scheme manager. You should work with the pension board chair to complete it, and other parties (e.g. the administrator) where appropriate.

SECTION A – BASIC INFORMATION

QA1. EVERYONE TO ANSWER

Which of the following best describes your role within the pension scheme?

Please select one answer only

1. Scheme manager or representative of the scheme manager* JR amended
2. Pension board chair /
3. Pension board member
4. Administrator
5. Other (please specify):

**In this survey 'scheme manager' refers to the definition within the Public Service Pensions Act, e.g. the Local Authority, Fire and Rescue Authority, Police Pensions Authority, Secretary of State/Minister or Ministerial department.*

SECTION B – GOVERNANCE

The first set of questions is about how your pension board works in practice.

QB1. EVERYONE TO ANSWER

Does your scheme have a documented policy to manage the pension board members' conflicts of interest?

Please select one answer only

1. Yes /
2. No
3. Don't know

QB2. EVERYONE TO ANSWER

Does your scheme maintain a register of pension board members' interests?

Please select one answer only

- 1. **Yes /**
- 2. No
- 3. Don't know

QB3. EVERYONE TO ANSWER

How often does your pension board meet?

Please select one answer only

- 1. At least monthly
- 2. **At least quarterly /**
- 3. At least every six months
- 4. At least annually
- 5. Less frequently than annually
- 6. Don't know

QB4. EVERYONE TO ANSWER

How often does the scheme manager, or a representative of the scheme manager, attend pension board meetings?

Please select one answer only

- 1. **Every time the pension board meets /**
- 2. As required
- 3. Rarely
- 4. Never
- 5. Don't know

QB5. EVERYONE TO ANSWER

Thinking about the interaction between the pension board and the scheme manager (or representative of the scheme manager), which of the following apply to your scheme?

Please select all that apply and use the 'Other' option to specify any other ways in which the pension board and scheme manager interact

- 1. **The scheme manager commissions advice from the pension board /**
- 2. **The pension board submits written reports to the scheme manager / e.g. Annual Report**
- 3. **The pension board chair has face-to-face meetings with the scheme manager / Tend to be telephone calls**
- 4. **Other (please specify) .../ The scheme manager produces reports for the Pension Board meetings.....**
- 5. Don't know

QB6. EVERYONE TO ANSWER

Has the pension board done any of the following?

Please select one answer per row

	Yes – in last 12 months	Yes – but not in last 12 months	No – not needed to do this	No – not done this	Don't know
a) Identified to the scheme manager where there are poor standards and/or non-compliance with legal requirements	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Set out recommendations to the scheme manager on addressing poor standards and/or non-compliance with legal requirements	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Advised the scheme manager on scheme regulations, the governance and administration requirements set out in legislation, and the standards expected by TPR	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
d) Taken or secured actions to address poor standards and/or non-compliance with legal requirements	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

QB7. EVERYONE TO ANSWER

Do the scheme manager and pension board have sufficient time and resources to run the scheme properly?

Please select one answer only

1. Yes /
2. No
3. Don't know

QB8. EVERYONE TO ANSWER

Do the scheme manager and pension board have access to all the knowledge, understanding and skills necessary to properly run the scheme?

Please select one answer only

1. Yes /
2. No
3. Don't know

QB9. EVERYONE TO ANSWER

Does the scheme manager or pension board carry out a regular evaluation of the performance and effectiveness of the board as a whole?

Please select one answer only

1. Yes /
2. No
3. Don't know

SECTION C – MANAGING RISKS

The next set of questions is about managing risks.

QC1. EVERYONE TO ANSWER

Does your scheme have documented procedures for assessing and managing risk?

Please select one answer only

- 1. Yes /
- 2. No
- 3. Don't know

QC2. EVERYONE TO ANSWER

Does your scheme have a risk register?

Please select one answer only

- 1. Yes /
- 2. No
- 3. Don't know

QC3. EVERYONE TO ANSWER

To what do the top three governance and administration risks on your register relate? If you do not have a risk register please identify the top three risks facing your scheme.

Please select up to three options below

- 1. Funding or investment
- 2. Record keeping
- 3. Guaranteed Minimum Pension (GMP) reconciliation
- 4. Securing compliance with legislation
- 5. Employer compliance
- 6. Lack of resources/time
- 7. Recruitment and retention of staff or knowledge
- 8. Lack of knowledge, effectiveness or leadership among key personnel
- 9. Poor communications between key personnel (board, scheme manager, administrator, etc.)
- 10. Failure of internal controls
- 11. Systems failures (IT, payroll, administration systems, etc)
- 12. Administrator issues (expense, performance, etc)
- 13. **Other (please specify): ..a)...Failure to be opted up to professional status following the implementation of MIFIDII..b) UK Leaving the EU c) LCC team workloads & resources because of asset pooling along with staff losses**
.....
- 14. Don't know

QC4. EVERYONE TO ANSWER

How often do you review the scheme's exposure to new and existing risks?

Please select one answer only

- 1. At least monthly
- 2. **At least quarterly /**
- 3. At least every six months
- 4. At least annually
- 5. Less frequently than annually
- 6. Don't know

QC5. EVERYONE TO ANSWER

Which of the following best describes your administration services?

Please select one answer only

1. Delivered in house
2. Outsourced to another public body (e.g. a county council)
3. Outsourced to a commercial third party
4. Other - **In partnership with another local authority**
5. Don't know

QC6. EVERYONE TO ANSWER

Which of the following do you use to monitor and manage the performance of your administrators (whether in-house or outsourced)?

Please select all the options that apply

1. **Performance metrics are set out in contracts or service level agreements /**
2. **Administrators provide independent assurance reports /**
3. Independent auditors review the performance of administrators – **JR included this**
4. **Administrators deliver regular reports to the scheme manager and/or pension board on the service provided /**
5. **Administrators attend regular meetings with the scheme manager and/or pension board /**
6. Penalties are applied where contractual terms or service standards are not met
7. Other
8. Don't know

SECTION D – ADMINISTRATION AND RECORD-KEEPING PROCESSES

The next set of questions is about administration and record-keeping.

QD1. EVERYONE TO ANSWER

How often does the pension board include administration as a dedicated item on the agenda at board meetings?

Please select one answer only

1. **Every time the pension board meets /**
2. As required
3. Rarely
4. Never
5. Don't know

QD2. EVERYONE TO ANSWER

Do you have processes in place to monitor scheme records for all membership types on an ongoing basis to ensure they are accurate and complete?

Please select one answer only

1. **Yes /**
2. No
3. Don't know

QD3. EVERYONE TO ANSWER

Does the scheme have an agreed process in place with employer(s) to receive, check and review data?

Please select one answer only

- 1. Yes /
- 2. No
- 3. Don't know

QD4. EVERYONE TO ANSWER

What proportion of your scheme's employers...

Please write in a percentage. If you do not know exactly, please give an approximate percentage.

- a) Provide you with timely data? **93... %**
- b) Provide accurate and complete data?**90.... % (estimated)**

QD5. EVERYONE TO ANSWER

Does the scheme have a process in place for monitoring the payment of contributions?

Please select one answer only

- 1. Yes /
- 2. No
- 3. Don't know

QD6. EVERYONE TO ANSWER

Does the scheme have a process in place for resolving contribution payment issues and assessing whether to report payment failures to TPR?

Please select one answer only

- 1. Yes /
- 2. No
- 3. Don't know

QD7. EVERYONE TO ANSWER

Which of these controls does your scheme have in place to ensure the security of members' data?

Please select all the options that apply

- 1. **Your scheme and the administrators have training in the principles of the Data Protection Act /**
- 2. **You have a process to ensure data breaches are reported to the administrator and by the administrator to the scheme manager /**
- 3. The credentials of staff able to access scheme and member records are regularly reviewed
- 4. **Your scheme and the administrators are familiar with how to protect against cyber threat, e.g. familiarity with the government's Cyber Essentials guidance. /**
- 5. None of these
- 6. Don't know

QD8. EVERYONE TO ANSWER

How are your records held?

Please select one answer only

1. All electronically – **JR amended to this**
2. **Mainly electronically but some held on paper /**
3. Mainly held on paper
4. All on paper
5. Don't know

SECTION E – DATA REVIEW

QE1. EVERYONE TO ANSWER

Before completing this survey, how familiar were you with the terms 'common data' and 'scheme specific (conditional) data'?

- Common data are basic data items which are used to identify scheme members.
- Scheme-specific (conditional) data are other data items needed to run the scheme e.g. to accurately calculate member benefits. This includes data required by scheme regulations or needed to comply with other pieces of legislation.

Please select one answer per row

	Very familiar	Quite familiar	Not very familiar	Not at all familiar	Don't know
a) Common data	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Scheme specific (conditional) data	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

QE2. EVERYONE TO ANSWER

Does your administrator currently measure your common data score and scheme specific (conditional) data score?

Please select one answer only

1. **Yes, they measure both the common and conditional data scores /**
2. They only measure the common data score
3. They only measure the conditional data score
4. No, they do not measure either score
5. Don't know

QE3. EVERYONE TO ANSWER

When did your scheme last carry out a data review exercise?

Please select one answer only

1. **Within the last 12 months /**
2. More than 12 months ago
3. Never
4. Don't know

QE4. ANSWER IF SCHEME HAS CARRIED OUT A DATA REVIEW EXERCISE (QE3=1 OR 2)

Did the data review look at any of the following?

Please select all the options that apply

1. **Members' basic details (e.g. name, DOB & NI number) /**
2. **Address data /**
3. **Existence checks /**
4. **Salary or earnings data /**
5. **Member benefit data /**
6. **Key dates held on member records /**
7. **Contracted out data /**
8. Other (please specify):
9. None of these
10. Don't know

QE5. ANSWER IF SCHEME HAS CARRIED OUT A DATA REVIEW EXERCISE (QE3=1 OR 2)

Did your scheme's most recent data review exercise identify any issues or problems?

Please select one answer only

1. **Yes /**
2. No
3. Don't know

QE6. ANSWER IF MOST RECENT DATA REVIEW IDENTIFIED ANY ISSUES OR PROBLEMS (QE5=1)

Has any action been taken to address the issues identified?

Please choose one answer that most closely describes the action your scheme has taken to date

1. **An improvement plan is in development /**
2. An improvement plan is in place but rectification work is not yet complete
3. An improvement plan has been put in place and rectification work has been completed
4. Rectification work has been undertaken without an improvement plan
5. No plan has been developed and no work has taken place
6. Other (please specify):
7. Don't know

SECTION F – COMMUNICATIONS

The next set of questions is about communicating to members and resolving issues or complaints the scheme has received.

QF1. EVERYONE TO ANSWER

In 2017, what proportion of active members received their annual benefit statements by the statutory deadline?

Please write in a percentage. If you do not know exactly, please give an approximate percentage.

- a)**98**..... %
- b) Don't know

QF2. ANSWER IF DEADLINE WAS MISSED FOR ANY MEMBERS (QF1=0-99%)

Was the missed deadline for issuing active member statements reported to TPR?

Please select one answer only

1. Yes - and Breach of Law report made
2. Yes - but decided not to make a Breach of Law report
- 3. No - not reported /**
4. Don't know

QF3. EVERYONE TO ANSWER

How confident are you that member communications are accurate, clear, relevant and provided in plain English?

Please select one answer only

1. Very confident
- 2. Fairly confident**
3. Not very confident
4. Not at all confident
5. Don't know

SECTION G – RESOLVING ISSUES

QG1. EVERYONE TO ANSWER

In the last 12 months, how many complaints have you received from members or beneficiaries in relation to their benefits and/or the running of the scheme?

Please write in below. Number at B should be equal or lower than number at A.

- | | |
|---|--|
| a) Total number of complaints received | .. not sure but relatively few.....27 |
| b) Number of complaints that have entered the Internal Dispute Resolution (IDR) process | .not sure but around 12.....25 |

QG2. ANSWER IF ANY COMPLAINTS RECEIVED IN THE LAST 12 MONTHS (QG1a>0)

To what did the top three types of complaint relate?

Please select up to three options below

- 1. Eligibility for ill health benefit /**
- 2. Slow or ineffective communication / JR excluded**
3. Inaccuracies or disputes around pension value or definitions **JR added**
4. Delays to benefit payments
5. Disputes or queries about the amount of benefit paid
- 6. Delay or refusal of pension transfer /**
7. Inaccurate data held and/or statement issued
8. Pension overpayment and recovery
9. Other (please specify):
10. Don't know

SECTION H – REPORTING BREACHES

QH1. EVERYONE TO ANSWER

Does the scheme have procedures in place to allow the scheme manager, pension board members and others to identify breaches of the law?

Please select one answer only

- 1. **Yes /**
- 2. No
- 3. Don't know

QH2. EVERYONE TO ANSWER

In the last 12 months, have you identified any breaches of the law?

Please select one answer only

- 1. Yes
- 2. **No /**
- 3. Don't know

QH3. ANSWER IF ANY BREACHES HAVE BEEN IDENTIFIED IN THE LAST 12 MONTHS (QH2=1)

What were the root causes of the breaches identified?

Please select all the options that apply

- 1. Systems or process failure
- 2. Failure to maintain records or rectify errors
- 3. Management of transactions (e.g. errors or delays in payments of benefits)
- 4. Failure of employers to provide timely, accurate or complete data
- 5. Other employer-related issues (please specify):
- 6. Conflicts of interest
- 7. Lack of knowledge and understanding
- 8. Something else (please specify):
- 9. Don't know

QH4. EVERYONE TO ANSWER

Are there procedures in place to assess breaches of the law, and report these to TPR if required?

Please select one answer only

- 1. **Yes /**
- 2. No
- 3. Don't know

QH5. ANSWER IF ANY BREACHES HAVE BEEN IDENTIFIED IN THE LAST 12 MONTHS (QH2=1)

In the last 12 months, have you reported any breaches to TPR as you thought they were materially significant?

Please select one answer only

- 1. Yes
- 2. **No /**
- 3. Don't know

SECTION I – GOVERNANCE AND ADMINISTRATION

The next set of questions is about your progress in addressing governance and administration issues.

Q1. EVERYONE TO ANSWER

To what do the main three barriers to improving the governance and administration of your scheme relate?

Please select up to three options below

- 1. Lack of resources or time **JR included**
- 2. Complexity of the scheme **JR included**
- 3. The volume of changes that are required to comply with legislation
- 4. Recruitment, training and retention of staff and knowledge
- 5. Lack of knowledge, effectiveness or leadership among key personnel
- 6. Poor communications between key personnel (board, scheme manager, administrator, etc)
- 7. Employer compliance
- 8. Issues with systems (IT, payroll, administration systems, etc) **JR included**
- 9. Other (please specify):
- 10. There are no barriers / JR excluded**
- 11. Don't know

Q12. EVERYONE TO ANSWER

To what would you attribute any improvements made to the scheme's governance and administration in the last 12 months?

Please select all the options that apply

- 1. Improved understanding of underlying legislation and standards expected by TPR /**
- 2. Improved engagement by TPR
- 3. Improved understanding of the risks facing the scheme
- 4. Resources increased or redeployed to address risks
- 5. Administrator action (please specify):
- 6. Scheme manager action (please specify): ...Regular meetings with Administrator; Unqualified Accounts.....**
- 7. Pension board action (please specify): Regular review of tPR Check List, Challenging questions to Administrator.....**
- 8. Other (please specify):
- 9. No improvements to governance/administration in last 12 months
- 10. Don't know

SECTION J – TPR PRODUCTS AND PERCEPTIONS

The final set of questions is about your views of TPR and its materials.

QJ1. EVERYONE TO ANSWER

Have you used or are you aware of the following materials provided by TPR?

Please select one answer per row

	Used in last 12 months	Used but not in last 12 months	Aware of this but not used it	Not aware of this	Don't know
a) Public service section of the TPR website	/o	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Public service code of practice	/o	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Guide to issuing annual benefit statements	<input type="radio"/>	<input type="radio"/>	/o	<input type="radio"/>	<input type="radio"/>
d) Guides to public service pension boards	/o	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e) Public service toolkit	/o	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f) Reporting breaches guidance	<input type="radio"/>	<input type="radio"/>	/o	<input type="radio"/>	<input type="radio"/>
g) Self-assessment tool	<input type="radio"/>	<input type="radio"/>	/o	<input type="radio"/>	<input type="radio"/>
h) Data improvement quick guide	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	o/	<input type="radio"/>
i) Example risk register	<input type="radio"/>	<input type="radio"/>	o/	<input type="radio"/>	<input type="radio"/>
j) Quick guide to scheme return	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	/o	<input type="radio"/>
k) Internal controls checklist	<input type="radio"/>	<input type="radio"/>	/o	<input type="radio"/>	<input type="radio"/>
l) Record keeping quick guide	<input type="radio"/>	/o	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
m) News by email service	o/	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

QJ2. ANSWER FOR EACH TPR PRODUCT USED (CODES 1 OR 2 AT QJ1A-M)**How useful did you find each of the following TPR materials?***Please select one answer per material used*

	Very useful	Fairly useful	Not very useful	Not at all useful	Don't know
a) Public service section of the TPR website	/o	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Public service code of practice	/o	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Guide to issuing annual benefit statements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	/
d) Guides to public service pension boards	o/	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e) Public service toolkit	<input type="radio"/>	o/	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f) Reporting breaches guidance	<input type="radio"/>	/o	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g) Self-assessment tool	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	o/
h) Data improvement quick guide	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	o/
i) Example risk register	<input type="radio"/>	/o	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j) Quick guide to scheme return	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	/o
k) Internal controls checklist	<input type="radio"/>	o/	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l) Record keeping quick guide	/o	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
m) News by email service	/o	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

QJ3. EVERYONE TO ANSWER**When did you most recently visit TPR's website?***Please select one answer only*

1. In the last month /
2. 2-3 months ago
3. 4-6 months ago
4. 7-12 months ago
5. More than a year ago
6. Don't know / can't remember
7. Have never visited the TPR website

QJ4. ANSWER IF HAVE USED TPR'S WEBSITE (QJ3=1-5)**To what extent would you say you get what you want from the TPR website when you visit it?****Would you say you typically...?***Please select one answer only*

1. Get everything you want /
2. Get most of what you want
3. Get some of what you want
4. Do not get what you want
5. Don't know

QJ5. EVERYONE TO ANSWER

Thinking about your overall perception of TPR, to what extent do you agree or disagree with the following words as ways to describe TPR?

Please select one answer per row

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
a) Tough	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Efficient	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
c) Visible	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d) Fair	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e) Respected	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f) Evidence-based	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g) Decisive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h) Clear	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i) Approachable	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

QJ6. EVERYONE TO ANSWER

Thinking now about how TPR operates, how effective do you think it is at improving standards in scheme governance and administration in public service pension schemes?

Please select one answer only

1. Very effective
2. Fairly effective /
3. Neither effective nor ineffective
4. Not very effective
5. Not at all effective
6. Don't know

QJ7. EVERYONE TO ANSWER

In September TPR started an email campaign aimed at driving up the standards of governance in pension schemes. The campaign is also referred to as 21st century trusteeship. It outlines how people involved in running schemes can take action to meet the expected standards.

Do you remember receiving any emails about this from TPR?

Please select one answer only

1. Yes /
2. I think so
3. No
4. Don't know

QJ8. ANSWER IF RECEIVED OR THINK RECEIVED A 21ST CENTURY TRUSTEE EMAIL (QJ7=1 OR 2)

What action, if any, did you take as a result of receiving the email(s)?

Please select all the options that apply

1. **Visited the TPR website /**
2. Forwarded the email on to someone else
3. Discussed it with other members of the pension board
4. Checked aspects of the scheme’s governance
5. Took steps to improve the scheme’s governance
6. Spoke with the advisory board
7. Spoke with the administrators
8. Other (please specify):**I intend placing it on the Agenda of the next Pension Board meeting**...../.....
9. None of these things
10. Don’t know / can’t remember

QJ9. ANSWER IF RECEIVED OR THINK RECEIVED A 21ST CENTURY TRUSTEE EMAIL (QJ7=1 OR 2)

To what extent would you agree or disagree that the emails were...?

Please select one answer per row

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don’t know
a) Useful	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Clear	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Relevant	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

SECTION K – ATTRIBUTION

Thank you for completing this survey. Your responses will help TPR understand how schemes are progressing and any issues they may face, which will inform further policy and product developments. Before you submit your answers, there are just four more questions about your survey responses.

QK1. EVERYONE TO ANSWER

What other parties did you consult with to complete this survey?

Please select all the options that apply

1. Scheme manager or representative of the scheme manager
2. Pension board chair **JR included**
3. Pension board member
4. Administrator
5. Other
6. **Did not consult with any other parties / JR excluded**

QK2. EVERYONE TO ANSWER

To inform TPR’s engagement going forward, they would like to build an individual profile of your scheme by linking your scheme name to your survey answers. This will only be used for internal purposes by TPR and your identity will not be revealed in any published report.

Are you happy for your responses to be linked to your scheme name and supplied to TPR for this purpose?

Please select one answer only

- 1. Yes, I am happy for my responses to be linked to my scheme name and supplied to TPR /
- 2. No, I would like my responses to remain anonymous

QK3. EVERYONE TO ANSWER

And would you also be happy for the responses you have given to be linked to your scheme name and shared with the relevant scheme advisory board? This is to help inform the advisory boards of areas for improvement and to further their engagement with pension boards.

Please select one answer only

- 1. Yes, I am happy for my responses to be linked to my scheme name and shared with the relevant advisory board /
- 2. No, I would like my responses to remain anonymous

QK4. EVERYONE TO ANSWER

Please record your name below. This is just for quality control purposes and will not be passed on to TPR.

Please write in

.....ROGER BUTTERY.....**Amended to Jo Ray**.....

Open Report on behalf of Pete Moore - Executive Director of Finance and Public Protection

Report to:	Lincolnshire Pension Board
Date:	15th January 2018
Subject:	Pension Board Training

Summary:

This report acts as a discussion document to set out training opportunities or requirements for the Pension Board, to assist them in maintaining the knowledge and skills required to undertake their duties.

Recommendation(s):

That the Board agree any training requirements and note the report.

Background

- 1 The Pension Board is required to undertake regular training to ensure that all members of the Board have the required level of knowledge and skills to assist them in undertaking their role. This Pension Board Training paper is a standing item on the Board meeting agenda to capture any training requirements or opportunities.
- 2 Paper 8 on this meeting agenda will cover additional training identified from the Annual Report and Accounts report taken to the October meeting.
- 3 **21st Century Trusteeship**
 - 3.1 On 18 September 2017, the Pensions Regulator (TPR) formally launched its campaign on 21st century trusteeship, with a new section dedicated to the subject on its website (<http://www.thepensionsregulator.gov.uk/21st-century-trusteeship.aspx>). This follows the discussion paper published in 2016 looking at how standards could be raised across trustees, to improve the way that pension funds are managed, and research findings that many pension schemes are not meeting the governance standards that TPR expects. Attached at appendix A is a briefing note on the programme from consultant Punter Southall.

- 3.2 The programme includes a series of communications to make clear what TPR expectations are on those responsible for managing a scheme effectively. This includes the main things that need to be in place and which will support good decision-making. For example:
- clear roles and responsibilities and clear strategic objectives
 - a skilled, engaged and diverse board led by an effective chair
 - close relationships with employers, advisers and others involved in running the scheme
 - sound structures and processes focused on outcomes
 - a robust risk management framework focused on key risks
- 3.3 The overall programme is divided into three themes:
- Good governance
 - Clear roles and responsibilities
 - Clear purpose and strategy
- 3.4 TPR are clear to point out that they not creating new or higher standards of governance for those running schemes, rather they are making clearer what they think good governance looks like, and what they will do if they don't see these standards being met. Overall the message is clear: trustees who fail to comply will face enforcement action.
- 3.5 As part of the Board's oversight role, they may wish to consider the TPR's new programme.
- 4 The Pension Fund Manager will keep the Board up-to-date with any training opportunities, and the Board are encouraged to suggest any topics or areas that they would wish to have additional training. If any Board members are approached directly with training opportunities, please contact the Pension Fund Manager before accepting them.

Conclusion

- 5 The Pension Board is required to undertake regular training to ensure that all members of the Board have the required level of knowledge and skills to assist them in undertaking their role. This Pension Board Training paper is a standing item on the Board meeting agenda to capture any training requirements or opportunities. The Board are encouraged to suggest any topics or areas that they would wish to have additional training.

Consultation

a) Have Risks and Impact Analysis been carried out?

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the author of this report.

Appendices

These are listed below and attached at the back of the report	
Appendix A	TPR 21 st Century Trusteeship Briefing Note

Background Papers

No background papers

This report was written by Jo Ray, who can be contacted on 01522 553656 or jo.ray@lincolnshire.gov.uk

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In brief

- ▶ TPR has launched its campaign on 21st century trusteeship
- ▶ Good governance is an essential part of effective scheme management for all schemes
- ▶ TPR has set out a new policy on monetary penalties and definition of professional trustees
- ▶ TPR is already making greater use of its powers to prosecute and impose fines
- ▶ Trustees will be required to report their record-keeping scores in their 2018 scheme return

Next steps

- ▶ Trustees should review their governance framework to ensure that it is robust

21st century trusteeship: raising governance standards

On 18 September 2017, the Pensions Regulator (TPR) formally launched its campaign on 21st century trusteeship, with a new section dedicated to the subject on its website. TPR's message is clear: trustees who fail to comply will face enforcement action.

Background

Over the last year, TPR has been talking about the '21st century trustee', and how it sees the role evolving. From TPR's perspective, 21st century trusteeship is all about raising standards of trustee competence so that schemes are better run and members achieve good retirement outcomes. TPR kicked off the initiative in July 2016 with a discussion paper on how to achieve this. In its response, TPR confirmed that it would make greater use of its powers where there have been scheme governance and administration failings.

Launched formally in September 2017, the 21st century trusteeship programme aims to provide more support for trustees – particularly those in smaller schemes – to help them meet its expected standards. TPR insists that it is not creating new or higher standards of governance. Rather, it is clarifying what 'good' governance looks like, and spelling out what enforcement action it will take where these standards are not met.

As part of this drive, TPR finalised its approach to monetary penalties in August 2017. Its underlying objective is to promote compliance with pensions law – the rationale being that 'penalties punish wrongdoing, deter repetition and act as a warning to others'. At the same time, TPR confirmed who would fall within the scope of a 'professional trustee' and consequently who is expected to meet higher standards of governance.

The overall programme is divided into bite-sized themes, with new content added monthly. Three themes have been published so far. As the campaign continues, it will cover further core areas such as the importance of managing advisers, providers and conflicts of interest.

Theme 1: good governance

TPR points out that good governance is the bedrock of a well-run pension scheme, and key for members' retirement outcomes. It is not a 'nice to have' – it is an essential part of effective scheme management, for *all* schemes.

Research conducted by TPR during the first part of 2017 highlighted that, whilst some trustees are doing a good job, many trustee boards – particularly in small and medium-sized schemes – have failed to act on TPR's codes of practice and guidance to meet standards of good governance.

TPR makes clear that trustee boards must ensure that they have the right people, structures and processes in place, which work well for their particular scheme. This will assist in effective decision-making, managing risks to the scheme and members, and setting clear objectives. It will also help with effectively overseeing administration, record-keeping, funding (for defined benefit (DB) schemes), investment and member communications.

Getting the basics right is the first step. This includes ensuring TPR has up-to-date information about the scheme, paying the scheme levy on time, completing the annual scheme return accurately and on time, and responding to TPR's requests for scheme information. For trustees of defined contribution (DC) schemes, it also means producing a good quality Chair's statement; indeed, TPR has issued guidance on what a 'good' and 'poor' statement looks like. DB scheme trustees must ensure that valuations (and any recovery plan) are submitted within the statutory 15-month deadline, risks are managed in an integrated way and necessary action is taken to secure fair treatment between scheme and shareholders.

Failing to comply with these basic legal duties is likely to be a sign of wider governance failings; TPR is paying much more attention to such schemes as it believes they pose a greater risk. During 2017, TPR has 'named and shamed' a number of trustees on its website for breaches of legislation, including failure to submit the annual scheme return and complete the Chair's statement. Whilst the reputational damage of appearing on this list may be a more significant sanction for some, TPR also has the power (and, in the case of the Chair's statement, the duty) to impose financial penalties. TPR has imposed the maximum fine on professional trustees who have failed to comply with the basics.

Overall, TPR has made use of its wider powers in 2017, ranging from issuing improvement notices to tell trustees where they are getting it wrong and what is expected of them, to using its criminal prosecution powers under section 72 of the Pensions Act 2004.

Theme 2: clear roles and responsibilities

Just like any other corporate board, trustee boards need to have people with the right skills, experience and knowledge.

October's theme highlights the importance of clear roles and responsibilities. Trustees must be clear on their objectives and devote their time to the areas that have the greatest impact on achieving those objectives. This means focusing on strategic issues and considering whether to delegate some day-to-day tasks and decision-making. For delegated matters, trustees should decide and document how decisions are made and escalated, and who does this. The trustees should document what to report to the board, by whom and how. There is guidance on example terms of reference for trustee boards and sub-committees, as well as examples of what good and poor behaviours look like.

Theme 3: clear purpose and strategy

Setting a clear purpose and strategy is essential for managing a scheme effectively and achieving good outcomes for members. According to TPR, a business plan is vital to help a scheme to plan ahead and ensure effective use of time and compliance with legal requirements.

The importance of good data

TPR is also striving to improve the quality of record-keeping as poor data can negatively affect members. Its experience has shown that good administration links to better outcomes for members.

For the first time in 2018, schemes will be asked to report their scores for 'common' and 'conditional' data as part of the scheme return process. ('Conditional' data links a person to a particular scheme, such as their pensionable salary and the date they joined the scheme.) The 2018 scheme return will include two new questions on both categories of data: when it was last reviewed and what the scheme's data score is. A new guide on how to measure data is now available on TPR's website and sets out how to calculate a data score. DB scheme return notices will be issued from January 2018, whilst DC ones will follow in summer 2018.

What's next?

TPR has set out an intention to be 'clearer, quicker and tougher', so it is important for trustees to ensure they are comfortable with the governance framework they have in place. This could be done in conjunction with their integrated risk management framework, where operational risks should not be forgotten as the fourth pillar of risk, alongside covenant, funding and investment risks.

Trustees should ensure they are engaged with scheme governance. It should not be a tick-box exercise relegated to the end of meeting agendas, but a regular and integral part of meeting discussions.

Punter Southall offers a risk review service. This provides an independent perspective to give comfort in the robustness of a scheme's governance framework and flag any areas to consider.

Where can I get further information?

Please get in touch with **Rob Wallace**.

 0118 313 0700

 robert.wallace@puntersouthall.com

 company/punter-southall  @puntersouthall

Alternatively, please speak to your usual Punter Southall contact.

Punter Southall has offices across the UK.
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Open Report on behalf of Pete Moore - Executive Director of Finance and Public Protection

Report to:	Lincolnshire Pension Board
Date:	15th January 2018
Subject:	Annual Report and Accounts – Additional Information

Summary:

This report introduces a presentation that provides additional details and explanation on areas of the Pension Fund Annual Report and Accounts that the Board have identified where they would like additional information.

Recommendation(s):

That the Board note the presentation and the report.

Background

- 1 The Pension Fund Annual Report and Accounts, as at March 2017, was taken to the Pension Board meeting on 18th October. In considering the report, the Board requested further information on some areas within it, to improve their knowledge and understanding. It was agreed that all Board members would inform the Pension Fund Manager of any areas where further information would be useful.
- 2 Following the meeting, comments from two Board members were received. The areas identified for further information were:
 - an overview of the main funds detailed within the top holdings (p11 of the report and accounts); and
 - matters relating to Financial Markets and Products Knowledge, Procurement and Relationship Management from the Knowledge and Skills Framework – in particular how do the external managers support the Funding and Investment Strategy, and the wider relationships with managers.
- 3 The Pension Fund Manager will provide a presentation to the Board, as part of a training session, to cover the questions raised by Board Members.

Conclusion

- 4 The Pension Board have requested additional information on two areas within the Pension Fund Annual Report and Accounts, to assist in their knowledge and understanding. As part of the on-going training that is provided to the Board, the Pension Fund Manager will provide a presentation to cover the areas identified.

Consultation

a) Have Risks and Impact Analysis been carried out?

Yes

b) Risks and Impact Analysis

The Pension Fund has a risk register which can be obtained by contacting the author of this report.

Background Papers

No background papers

This report was written by Jo Ray, who can be contacted on 01522 553656 or jo.ray@lincolnshire.gov.uk