

The Pension Regulator’s and Scheme Advisory Board Compliance Checklist

Date of Completion - _____

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Introduction

This document outlines how Lincolnshire County Council (LCC) complies with the Pensions Regulator’s (TPR) Code of Practice No 14 Governance and administration of public service pension schemes ('the TPR Code') in relation to the management of the Lincolnshire Pension Fund, which is part of the Local Government Pension Scheme (LGPS). It will be updated regularly by officers of the Fund and reported annually to the Pensions Committee and Pension Board.

This document highlights all the key elements of the TPR Code and then evidences whether LCC meets these areas of best practice. As part of this evidence it shows when the element was last checked and whether, at that point, it was considered fully, partially or not compliant. Where they are partially or not compliant, it also highlights whether the Council have identified actions to be carried out to improve their current practices. Where an element is not yet active, the commentary will generally still highlight where advanced progress is being made.

Those reading this document should be mindful that the TPR Code applies equally to all public service pension schemes and therefore it is generic in nature. There may be a number of elements that are more specifically stipulated within LGPS legislation and it is not the purpose of this compliance checklist to consider that level of detail. Further, LCC may also incorporate key elements of national guidance from the LGPS Scheme Advisory Board into this compliance checklist. This version contains the checklists included as part of the Shadow Scheme Advisory Boards “Guidance on the creation and operation of Local Pension Boards in England and Wales”.

Key

Frequency of review and last review date: Where a process, policy or practice is officially reviewed at a set interval, the actual interval will be shown as well as the last interval date. However, in many circumstances processes and procedures are ongoing and part of the day-to-day operation of the Fund. In these circumstances, an annual check will be carried out to ensure that the ongoing process meets the TPR Code expectations and therefore the date shown will be the date that annual check was carried out and the frequency will be shown as “ongoing (annual check)”.

Completed:	Compliant:	Where the responsibility relates to employers:
Fully completed	Fully compliant	Employer – Fully compliant
In progress	Partially compliant	Employer – Partially compliant
Not started	Non-compliant	Employer – Non-compliant
Not yet relevant	Not yet relevant	Not yet relevant

Definitions:

<i>PSPA13</i>	Public Service Pensions Act 2013
<i>LGPS</i>	Local Government Pension Scheme
<i>TPR</i>	The Pensions Regulator
<i>TPR Code</i>	The Pensions Regulator’s Code of Practice No 14 Governance and administration of public service pension schemes
<i>Scheme Manager</i>	For the Lincolnshire Pension Fund, this is Lincolnshire County Council.
<i>Administering Authority</i>	The LGPS specific term for Scheme Manager. For the Lincolnshire Pension Fund, this is Lincolnshire County Council.
<i>IDRP</i>	Internal Dispute Resolution Procedure
<i>SAB</i>	The national LGPS Scheme Advisory Board
<i>PC</i>	Pensions Committee
<i>PB</i>	Pension Board

Summary Results Dashboard

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

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

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

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

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

A- Reporting Duties

Note the requirements in this section are not included in the TPR Code but they are a fundamental to the relationship with TPR.

Legal Requirements

All public service pension schemes have to be registered with TPR. In addition, all schemes must provide a regular scheme return to TPR, containing prescribed information. A return is required when the scheme receives a scheme return notice from the regulator. The scheme manager must also keep the regulator informed of any changes to registrable scheme details.

Note the requirements in this section are not included in the TPR Code but are a requirement for all schemes.

No.	TPR Requirement	LCC Approach/Evidence	Frequency of Review	Last Reviewed	Completed	Compliant	Notes	Actions
A1	Is your scheme registered with the Pension Regulator?	Will be reassessed annually to ensure new registration is not required.	Annual	Aug 15			New registration will only be required if a new LGPS is created that is deemed to be a separate scheme.	
A2	Is the information held on the Pensions Regulator's website about the scheme up-to-date?	Intention will be to update as employers join or leave the scheme and check annually for overall accuracy.	Ongoing (annual check)				Will commence when log in facility is made available to the public sector schemes.	
A3	Have you completed this latest Scheme Return in the required timescale?	Response submitted to TPR on 13/12/12 by JR	As and when received	Aug 15			No return requests received since Dec 2012.	
A4	Have you responded to the latest TPR public service pension scheme survey /questionnaire?	Intention is to respond to any such survey that is received, including on a voluntary basis.	As and when received	Aug 15			Last survey responded to 23/7/15.	

B - Knowledge and Understanding

Legal Requirements

A member of the pension board of a public service pension scheme must be conversant with:

- the rules of the scheme, and
- any document recording policy about the administration of the scheme which is for the time being adopted in relation to the scheme.

A member of a pension board must have knowledge and understanding of:

- the law relating to pensions, and
- any other matters which are prescribed in regulations.

The degree of knowledge and understanding required is that appropriate for the purposes of enabling the individual to properly exercise the functions of a member of the pension board.

No.	TPR Requirement	LCC Approach/Evidence	Frequency of Review	Last Reviewed	Completed	Compliant	Notes	Actions
B1	Are there policies and arrangements in place to support pension board members in acquiring and retaining knowledge and understanding?	Pension Fund Training Policy in place and Pension Board knowledge and understanding policy.	Annually	July 15				
B2	Has a person been designated to take responsibility for ensuring the framework is developed and implemented?	Responsibility is with the County Finance Officer.	Ongoing (annual check)	July 15				
B3	Is the Fund providing assistance to pension board members to determine the degree of knowledge and understanding required?	Dedicated induction training provided. Also all new members will be provided with key documents. PB members will be invited to go to the training for Pension Committee, in addition to carrying out additional ad - hoc training as other needs arise.	Ongoing (annual check)	July 15				
B4	Are the roles and responsibilities of pension boards and	In PB Terms of Reference and on website.	Ongoing (annual check)	July 15				

	members of pension board clearly set out in scheme documentation?						
B5	Are pension board members aware of their legal responsibility in terms of Knowledge and Understanding?	Articulated in Training Policy and part of Induction Training. All members to be provided with copy of Training Policy and reminded of Policy on an annual basis.	Ongoing (annual check)	July 15			
B6	Have all pension board members got access to copies of the scheme rules and relevant Fund documentation?	Part of induction training. Ongoing training part of normal Committee business (which PB members will be given access to).	Ongoing (annual check)	July 2015			
B7	Is there an up-to-date list of the Fund specific documents with which pension board members need to be conversant in?	Covered in induction training.	Ongoing (annual check)	July 2015			
B8	Are all pension board members investing sufficient time in their learning and development?	Training plans will be agreed each July going forwards. Initial training areas will be identified at Oct 15 meeting. Members maintaining individual training logs. Monitoring of attendance at training is undertaken and recorded annually in governance update in annual report and accounts.	Ongoing (annual check)	Oct 15			
B9	Does the Fund offer pre-appointment training for new pension board members or mentoring by existing members?	Induction process in Training Policy including providing information on key documents.	Ongoing (annual check)	July 15			
B10	Is there a process in place for regularly assessing the pension board members' level of knowledge and understanding is sufficient for their role, responsibilities and duties?	An annual Training Plan will be developed from next year. Annual self-assessment will be carried out for PB going forward.	Ongoing (annual check)	July 15			In August Cipfa released a Framework for PB members which was emailed to PB on 6/8/15. To include in the annual training plan.

B11	Are records of learning activities being maintained?	This is included in the annual report and accounts at PC level and will include PB going forwards. Individuals are also required to keep their own records.	Ongoing (annual check)	July 15				
B12	Have the pension board members completed the Pension Regulator's toolkit for training on the Code of Practice number 14?	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.	Ongoing (annual check)	July 15			All PB and PC members requested to complete it.	

C - Conflicts of interest

Legal Requirements

The Public Service Pensions Act 2013 sets out the legal requirements for scheme managers and pension boards for conflicts of interest.

In relation to the pension board, scheme regulations must include provision requiring the scheme manager to be satisfied:

- that a person to be appointed as a member of the pension board does not have a conflict of interest and
- from time to time, that none of the members of the pension board has a conflict of interest.

Scheme regulations must require each member or proposed member of a pension board to provide the scheme manager with such information as the scheme manager reasonably requires for the purposes of meeting the requirements referred to above.

Scheme regulations must include provision requiring the pension board to include employer representatives and member representatives in equal numbers.

No.	TPR Requirement	LCC Approach/Evidence	Frequency of Review	Last Reviewed	Completed	Compliant	Notes	Actions
C1	Does the Fund have a conflict of interest policy and procedure, which include identifying, monitoring and managing potential conflicts of interest?	PC falls under LCC Conflict Policy. PB has in place with appropriate objectives and measurements in place which includes procedures to identify, monitor and manage potential conflicts of interest.	Annual	July 2015			Potentially the PC should also adopt the PB policy and it becomes a Fund policy?	
C2	Do pension board members have a clear understanding of their role, the circumstances in which they may have a conflict of interest and how to manage potential conflicts?	PB members must complete a declaration which requires them to sign that they understand the requirements. Declarations must be completed by all PB members and reaffirmed annually. In addition, opportunity for new declarations is provided at the start of each meeting. Conflicts policy adopted at	Annual	July 2015				

		first PB meeting.					
C3	Have all Pension Board members provided appropriate information for the Administering Authority to determine whether a conflict exists (on appointment and from time to time)?	<p>Policy requires each PB member to complete a declaration on appointment and annually.</p> <p>The register is reviewed annually to ensure conflicts are being registered at the earliest opportunity.</p>	Annual	July 2015			Not all received back yet.
C4	Does the appointment process for pension board members require disclosure of interests and responsibilities which could become conflicts of interest?	<p>The Policy and procedures and the declarations require PB members to highlight potential, as well as actual, conflicts.</p> <p>The procedure requires declaration annually and at each meeting (if not already declared).</p> <p>The County Finance Officer has responsibility for ensuring the procedure is followed.</p>	Ongoing (annual check)	July 2015			
C5	Is the conflicts policy regularly reviewed?	Every three years or earlier if considered appropriate.	Triennially	July 2015			Suggested timeframe.
C6	Does the Fund have a conflicts register and it is circulated for ongoing review and published?	<p>There is a register of interests which is updated on an ongoing basis based on information in individual declarations and provided to the Chair prior to each meeting.</p> <p>The information is available on request.</p> <p>All declarations made at meetings will be recorded in the minutes which are public.</p>	Ongoing	July 2015			
C7	Is appropriate information included in the register?	Register of interests updated on an ongoing	Ongoing (annual	July 2015			

		basis but this will be reviewed annually to ensure it is being used correctly. Register includes all this information and is included as an appendix to the Conflicts policy.	check)				
C8	Is there a standing item on the agenda for declaring conflicts of interest?	Part of standard PC and PB meeting agenda.	Ongoing	July 2015			
C9	Do those involved know how to report a conflict of interest?	Members provided with copy of Conflicts Policy annually. Also Policy referred to at start of each meeting.	Ongoing (annual check)	July 2015			
C10	Is the number of employer and member representatives on the board in line with legal requirements?	Outlined in the terms of reference.	Ongoing (annual check)	July 2015			
C11	Is the board made up of the appropriate mix of representatives in order to minimise potential conflicts?	Covered as part of appointment process and then reviewed annually to ensure this continues.	Ongoing (annual check)	July 2015			

D - Publishing information about schemes

Legal Requirements

The scheme manager for a public service scheme must publish information about the pension board for the scheme(s) and keep that information up-to-date.

The information must include:

- who the members of the pension board are
- representation on the board of members of the scheme(s), and
- the matters falling within the pension board's responsibility.

No.	TPR Requirement	LCC Approach/Evidence	Frequency of Review	Last Reviewed	Completed	Compliant	Notes	Actions
D1	Does the Administering Authority publish information about the pension board?	See - http://www.wyph.org.uk/Member/PensionBoard/Lincoln/PensionBoard_Lincoln_Index.aspx	Ongoing	July 2015				
D2	Does the Administering Authority publish other useful related information about the pension board?	See - http://www.wyph.org.uk/Member/PensionBoard/Lincoln/PensionBoard_Lincoln_Index.aspx Already has appointment process, terms of reference and roles and responsibilities. Links to minutes, agenda etc.	Ongoing	July 2015				
D3	Is all the information about the Pension Board kept up-to-date?	Information regularly checked.	Ongoing	July 2015				
D4	Does the Administering Authority public information about pension board business?	All pension board meetings are public meetings and information will be contained on the LCC website.	Ongoing	July 2015				

E - Managing risk and internal controls

Legal Requirements

The scheme manager must establish and operate internal controls which adequately ensure the scheme is administered and managed in accordance with the scheme rules and the requirements of the law.

Internal controls are defined in the legislation as:

- arrangements and procedures to be followed in the administration and management of the scheme
- systems and arrangements for monitoring that administration and management
- arrangements and procedures to be followed for the safe custody and security of the assets of the scheme

The legal requirements apply equally where a scheme outsources services connected with the running of the scheme.

No.	TPR Requirement	LCC Approach/Evidence	Frequency of Review	Last Reviewed	Completed	Compliant	Notes	Actions
E1	Is there an agreed process for identifying and recording scheme risks?	The Council has a risk management policy. The Fund has a risk register which is reported quarterly and reviewed annually at PC.	Ongoing (annual review)	July 2015				
E2	Does the Fund have an adequate process to evaluate risks and establish internal controls?	The risk management process includes how risks are to be evaluated and internal controls established. It makes use of a RAG status based on impact and likelihood and the associated control is then shown as part of the risk register.	Ongoing	July 2015				
E3	Does the Administering Authority have a risk register to record all risks identified and action taken?	Risk register is in place which includes all internal controls and action taken.	Ongoing (annual review)	July 2015				
E4	Does the Administering Authority review the effectiveness of the risk management and internal control systems of the	Our risk management and internal controls are continually reviewed for effectiveness as part of a number of processes	Annually	July 2015				

	Fund?	<p>including:</p> <ul style="list-style-type: none"> • The ongoing updating of the risk register which includes the control of those risks • Issues identified through regular monitoring reports such as performance monitoring for PC, IDRP updates, reports from WYPF and breaches notifications. • Regular internal and external audit reports. • Annual internal control reports from custodian and fund managers. • Annual update of TPR Code compliance checklist. • Periodic ad-hoc reviews (e.g. LGPS2014 audit). 						
E5	Does the Administering Authority regularly review the risk register?	<p>Risk management is ongoing and therefore the register can be updated as a result of risk identification through a number of means including:</p> <ul style="list-style-type: none"> • annual review at pensions committee • performance measurement against agreed objectives • quarterly update in PC report • findings of internal and external audit and other adviser reports • feedback from the local Pension Board, employers and other stakeholders • informal meetings of senior officers or other staff involved in the management of the Fund • liaison with other organisations, regional and 	Quarterly update and Annual review	July 2015				

		national associations, professional groups, etc.					
E6	Is there a standing item on the Pension Board agenda to review scheme risks?	It is a standing item on the Pensions Committee each July and, as a matter of course, is then shared with the Pension Board.	Annually	July 2015			
E7	Does the Administering Authority have adequate systems, arrangements and procedures (internal controls) in place for the administration and management of the Fund and are they documented?	It is considered that there are adequate internal controls in place. These are articulated in the risk register and reviewed by both internal and external audit regularly.	Annually	July 2015			
E8	Do these procedures apply equally to outsourced services, are internal controls reflected in contracts with third party providers and is there adequate reporting in relation to those controls?	The key outsourced services for this purpose are JPMorgan (custodian) and Fund managers. These providers are required to provide annual internal control reports and a control sheet is used to ensure they are received and reviewed. In addition, PC receives quarterly reports from the shared service with WYPF, and a collaboration board exists to monitor the service.	Annually	May 2015			

F - Maintaining accurate member data

Legal Requirements

Scheme managers must keep records of information relating to:

- member information
- transactions, and
- pension board meetings and decisions.

The legal requirements are set out in the Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014 ('the Record Keeping Regulations').

The Data Protection Act 1998 and the data protection principles set out additional requirements for using, holding and handling personal information. Other requirements are set out in the:

- Pensions Act 1995 and 2004
- Pensions Act 2008 and the Employers' Duties (Registration and Compliance) Regulations 2010
- Occupational Pension Schemes (Scheme Administration) Regulations 1996 (SI 1996/1715)
- Occupational Pension Schemes (Scheme Administration) Regulations (Northern Ireland) 1997 (SR 1997 No 94)
- Registered Pension Schemes (Provision of Information) Regulations 2006 (SI 2006/567)

No.	TPR Requirement	LCC Approach/Evidence	Frequency of Review	Last Reviewed	Completed	Compliant	Notes	Actions
F1	Do member records record the information required as defined in the Record Keeping Regulations and is it accurate?	<p>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.</p> <p>As part of the transition to WYPF, they are carrying out work to assess the accuracy and completeness of LCC's records and reporting back.</p>	<p>Annually (WYPF) or if change provider.</p> <p>Part of actuarial valuation (triennial)</p>	Ongoing at the moment			WYPF have the ISO 9001:2008 quality standard and are audited annually to ensure they are still compliant.	

		Data accuracy and completeness reports are also received via the triennial valuation, which cover some of these elements.					
F2	Does the Fund have the appropriate processes in place so employers can provide timely and accurate information?	The Pension Administration Strategy includes a list of all employer responsibilities and duties including timescales. All employers are offered training. WYPF has a portal for provision of information, with standard forms and a monthly returns/spreadsheet with explanatory notes. This includes contributions, changes of address, change of hours, change of salary, date of joining, date of leaving etc.	PAS under regular review by WYPF.	April 2015			WYPF have the ISO 9001:2008 quality standard and are audited annually to ensure they are still compliant.
F3	Does the Fund keep records of and reconcile transactions as required by the Record Keeping Regulations?	All info recorded on scheme records. PF bank account flows across to the LCC PF general ledger and all feeds into annual report and accounts. There are also some spreadsheets that are used for further checks (contribution monitoring). There is an annual reconciliation to ensure all contributions are received and coded correctly as part of the year end process.	Ongoing	April 2015			
F4	Are records kept of pension board meetings as required by the Record Keeping Regulations?	Full minutes are maintained and published on the LCC website and linked from WYPF website. Annual check to ensure this continues to be the case.	Ongoing	July 2015			
F5	Are records kept of decisions made by the	We do not expect there to be decisions outside of the	Ongoing	July 2015			

	pension board, outside of meetings as required by the Record Keeping Regulations?	PB. This will be monitored.					
F6	Are records retained for as long as they are needed?	LCC consider it necessary to retain records for as long as is possible due to the number of enquiries from employees relating to periods many decades ago. Accordingly personal records are maintained in addition to other data such as contributions and pensions increases reports.	Ongoing	April 2015			
F7	Does the Administering Authority have policies and processes to monitor data on an ongoing basis?	There are a number of separate processes in place to monitor data on an ongoing including: <ul style="list-style-type: none"> • monthly returns provide a further opportunity to highlight any data discrepancies • All data entry is checked for input accuracy • Various tolerance checks such as changes in pay • Processes if pensioner payslips are returned (including suspension of pension on second return), using only BACs payments for pensioners and life certificate exercises (overseas and over a certain age annually and then all cases every 2 or 3 years) and national fraud initiative every 2 years. • Triennial valuation highlights data issues. • Process exists for warning and charging levies to 	Ongoing	April 2015			

		employers if incomplete monthly data is provided or if provided late • checks on 'common' data					
F8	Does the Administering Authority carry out a data review at least annually?	Annual year end reconciliations as described above plus for annual report and accounts, pension increases and benefit statements. Monthly returns from employers verify data. WYPF carry out additional data reviews.	Ongoing	April 2015			WYPF to be asked to complete Conditional data review and ongoing programme of reporting to be developed for it and common data, once all transition data cleaned.
F9	Is a data improvement plan in place which is being monitored with a defined end date?	Bi-monthly meeting held between LCC and WYPF where improvement plan is discussed and actions/timescales agreed. Employers are charged an administration fee where they fail to meet standards.	Ongoing	April 2015			
F10	Are processes and policies in place to reconcile scheme data with employer data?	Monthly data remittance through the portal assists with reconciling data. Interfaces being developed for main employers to provide final checks.	Ongoing	April 2015			
F11	Do the Administering Authority's member data processes meet the requirements of the Data Protection Act 1998 and the data protection principles?	Ensure all those involved with data understand the DPA: • Part of induction at WYPF • LCC staff periodic training • DPA officer at both Bradford and LCC • Council data protection policy in place and guidance on intranet. Evidence of processes includes: • Secure email or portal is used for data transfer with all employers, WYPF and LCC	Ongoing	April 2015			

		<ul style="list-style-type: none">• Focalpoint used for data transfer with actuary.						
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G - Maintaining contributions

Legal requirements

Contributions must be paid as detailed below, and where not done, they should be reported to TPR in circumstances where the scheme manager has reasonable cause to believe that the failure is likely to be of **material significance** to TPR in the exercise of any of its functions. Reporting must be carried out as detailed below.

Contribution Type	Contributions must be paid	When a failure should be reported
Employer	On or before the due date as defined by the scheme regulations – 19 th of the month following deduction for LGPS	To The Regulator: As soon as reasonably practicable
Employee	On or before the due date as defined by the scheme regulations – 19 th of the month following deduction for LGPS	To The Regulator: Within a reasonable period – 10 working days

No.	TPR Requirement	LCC Approach/Evidence	Frequency of Review	Last Reviewed	Completed	Compliant	Notes	Actions
G1	Does the Fund have procedures and processes in place to identify payment failures?	There is a master spreadsheet where all contributions received are entered and monitored within the LCC team.	Ongoing	April 2015				
G2	Do those processes and procedures include a contributions monitoring record to determine whether contributions are paid on time and in full?	The monitoring highlights where a payment is not received by 19th each month, and prior months sensibility checks are carried out. The WYPF portal also carries out checks on data received and returns incorrect submissions to the employer.	Ongoing	April 2015			WYPF currently developing comparing contribution rate to pensionable pay.	
G3	Do those processes and procedures include monitoring payments against the contributions monitoring record on an ongoing basis?	The process includes reconciliation with the payment received, the data input through the portal and shown in the financial system.	Ongoing	April 2015				

G4	Are these procedures regularly reviewed to ensure they are effective?	Payments are generally always on time. Bi-monthly meeting between WYPF and LCC to consider any concerns. Late payers referred to Pension Fund Manager for intervention when required.	Ongoing	April 2015			System currently being reviewed following transition to WYPF, move to Agresso and insourcing of contribution monitoring.	
G5	Do the Administering Authority's processes include managing overdue contributions in line with TPR's suggested approach?	For main scheme contributions, monitoring spreadsheet maintained by LCC. Identification and escalation process, currently under review. Prudential automatically notify the scheme manager if any AVC payments are received late from employers.	Ongoing	April 2015			System currently being reviewed following transition to WYPF, move to Agresso and insourcing of contribution monitoring.	
G6	Does the Fund maintain a record of any investigations and communications with employers?	Information is collated in individual records relating to each employer. Information is available on the historic monitoring spreadsheets. WYPF's system stores email and letter communications with employers	Ongoing	April 2015				
G7	Do employers provide sufficient information to monitor contributions and is this in accordance with the LGPS regulations?	Current ongoing issues with some employers not providing sufficient information, following changes to service providers, systems and processes. This has been escalated to the Council. Year-end returns have been received from the majority of employers to verify the information, and queries responded to, to enable reconciliation of member contributions with	Ongoing	April 2015			Current year end returns outstanding from LCC and academies managed by Serco.	

		service.					
G8	Is there a satisfactory process in place to assess the materiality of any payment failures and ensure that those which are material are reported to the Regulator within a reasonable period?	Existing spreadsheets in place identify late payment. However, current process does not consider significance of failures and whether they should be reported.	Ongoing	April 2015			Part of current review to develop process.
G9	If the administration of contributions outsourced to a service provider, is there a process in place to obtain regular information on the payment of contributions to the scheme?	Yes, for main scheme (administered by WYPF), spreadsheet maintained by LCC and data shared from WYPF when employers complete the monthly process through the portal. Discussed as part of bi-monthly service review meeting. In relation to AVC's (administered by Prudential), all late payments are notified directly to LCC.	Ongoing	April 2015			

H - Providing information to members and others

Legal requirements

The law requires schemes to disclose information about benefits and scheme administration to scheme members and others. This includes requirements relating to benefit statements and certain other information which must be provided under the requirements of the 2013 Act, HM Treasury directions and the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 ('the Disclosure Regulations 2013'). In addition to these duties, there are other legal requirements relating to the provision of information to members and others under other legislation.

No.	TPR Requirement	LCC Approach/Evidence	Frequency of Review	Last Reviewed	Completed	Compliant	Notes	Actions
H1	Has an annual benefit statement been provided to all active members within the required timescales?	Sent annually. Regs changed for March 2015 requiring them to be issued by 31 st August 2015. All members are sent out unless there is no address to send to.	Annual	Aug 2015		Employer	37% of Statements as at 31 st August 2015 were issued. LCC not provided year end data so unable to issue majority of statements. Move to CARE has caused an issue for numerous Funds, and able to use new regs as reason not to report this year – advice from LGA.	Escalated with LCC, part of overall transition to Serco issues.
H2	Do these meet the legal requirements in relation to format?		Annual	Aug 2015				Check with WYPF
H3	Has a benefit statement been provided to all active, deferred and pension credit members who have requested one within the required timescales?	Benefit statements are issued automatically to all active and deferred members annually, which is more proactive than this provision (which just relates to issuing them on request).	Annual	Aug 2015		Employer	Only able to provide those where year-end data had been received.	
H4	Does this meet the legal requirements in relation to format?							Check with WYPF
H5	Has an annual benefit statement been provided to all members with AVCs within the required timescales?	Provided by Prudential directly.						

H6	Do these meet the legal requirements in relation to format?	Provided by Prudential directly.						
H7	Is basic scheme information provided to all new and prospective members within the required timescales?	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.				Employer	Issue with LCC currently due to Serco not sending information to WYPF.	Escalated to LCC Check with WYPF agreed response time from notification.
H8	Does this meet the legal requirements in relation to format?							Check with WYPF
H9	Is all other information provided in accordance with the legal timescales?							Check with WYPF
H10	Is all other information provided in the format and methods required by law?							Check with WYPF
H11	Where any information is only provided electronically (i.e. instead of any hard copy) does it comply with the legal requirements?							Check with WYPF
H12	Does the Administering Authority aim to design and deliver communications in a way that ensures scheme members are able to engage with their pension provision?	Communications strategy approved by PC. WYPF have marketing and comms manager to ensure quality of comms.	Ongoing	April 2015				

H13	Does the Administering Authority use a tracing service?	WYPF use a number of channels to find pensioner and deferred members.	Ongoing	April 2015				
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I - Internal Dispute Resolution

Legal requirements

The Pensions Act 1995 requires scheme managers to set up and implement an Internal Dispute Resolution Procedure (IDRP) to help resolve disputes between the scheme manager and people with an interest in the scheme.

The act states that a person has an interest in the scheme if they:

- are a member or beneficiary
- are a prospective member
- have ceased to be a member, beneficiary or prospective member
- claim to be any of the above and the dispute relates to this claim.

The Act also states that the procedure must include:

- how an application is to be made
- what must be included in an application
- how decisions are to be reached and notified
- a specified period (which is reasonable) within which applications must be made.

The procedure may require people with an interest in the scheme to first refer matters in dispute to a 'specified person' in order for that person to consider and give their decision on those matters. This decision may then be confirmed or replaced by the decision taken by the scheme manager after reconsideration of the matters. However, legislation provides flexibility for scheme managers to decide the details of these.

No.	TPR Requirement	LCC Approach/Evidence	Frequency of Review	Last Reviewed	Completed	Compliant	Notes	Actions
11	Has the Administering Authority put in place an internal dispute resolution procedure?	Yes – booklet outlining procedure is available on website.	Ongoing	April 2015				
12	Does the Administering Authority's process highlight or consider whether a dispute is exempt?	Booklet outlining IDRP procedure includes this information.	Ongoing	April 2015				
13	Does the information made available to applicants about the procedure clearly state the procedure and process to apply for a dispute to be resolved	Booklet outlining IDRP procedure includes this information.	Ongoing	April 2015				

	including: <ul style="list-style-type: none"> • who it applies to • who the specified person (stage 1) is • the timescales for making applications • who to contact with a dispute • the information that an applicant must include • the process by which decisions are reached? 							
14	Has the Administering Authority ensured that employers who make first stage decisions also have IDRPs in place?	Requirement has been regularly communicated to employers in the past. Part of the Admin Strategy. Part of employer training programme.	Ongoing	April 2015				
15	Are the timescales in the procedure adhered to including sending an acknowledgment on receipt of an application?	Responses sent and WYPF forward details onto relevant employer.				employer		Need to check what monitoring WYPF do with employers.
16	Does the Administering Authority notify and advertise the procedure appropriately?	Leaflet included on the website (which is where joining information also is). All letters concerning benefits contain reference to IDRPs.	Ongoing	April 2015				
17	Are the notification requirements in relation to TPAS and the Pensions Ombudsman being adhered to?							Need to check with WYPF
18	Does the Administering Authority regularly assess the effectiveness of its arrangements?						Not currently reported to PC.	Ask WYPF to include IDRPs update in quarterly report.
19	Does the Administering Authority regularly assess the effectiveness where employers carry out a stage one process?							Check with WYPF

J - Reporting breaches of the law

Legal Requirements

Certain people are required to report breaches of the law to the regulator where they have reasonable cause to believe that:

- a legal duty which is relevant to the administration of the scheme has not been, or is not being, complied with
- the failure to comply is likely to be of material significance to the regulator in the exercise of any of its functions.

People who are subject to the reporting requirement ('reporters') for public service pension schemes are:

- scheme managers
- members of pension boards
- any person who is otherwise involved in the administration of a public service pension scheme
- employers: in the case of a multi-employer scheme, any participating employer who becomes aware of a breach should consider their statutory duty to report, regardless of whether the breach relates to, or affects, members who are its employees or those of other employers
- professional advisers including auditors, actuaries, legal advisers and fund managers: not all public service pension schemes are subject to the same legal requirements to appoint professional advisers, but nonetheless the regulator expects that all schemes will have professional advisers, either resulting from other legal requirements or simply as a matter of practice
- any person who is otherwise involved in advising the managers of the scheme in relation to the scheme.

The report must be made in writing as soon as reasonably practicable.

No.	TPR Requirement	LCC Approach/Evidence	Frequency of Review	Last Reviewed	Completed	Compliant	Notes	Actions
J1	Is the Administering Authority satisfied that those responsible for reporting reaches under the legal requirements and TPR guidance understand the requirements?	Discussed and policy approved PB in July 2015. Procedure on website. Will be shared with all PC and key officers.	Annual	July 2015				To be shared with PC.
J2	Does the Administering Authority have appropriate procedures in place to meet their legal obligations for identifying and assessing breaches?	Breaches procedure is in place and approved by PB.	Annual	July 2015				
J3	Are breaches being recorded in accordance	Procedure launched July 2015 so no historical						

	with the agreed procedures?	recording. The Pension Fund Manager will maintain a record of breaches and the quarterly PC update report from October 2015 will to include a comment on whether any breaches have been reported, whether they are systemic and action taken. Some details may need to be withheld for confidentiality reasons.					
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K - Scheme Advisory Board - Guidance on the creation and operation of Local Pension Boards in England and Wales

Legal Requirements

Clause 7 of the Public Service Pensions Act provides that the national Scheme Advisory Board (SAB) may provide advice to scheme managers or pension boards in relation to the effective and efficient administration and management of the scheme.

It also provides that a person to whom advice is given by virtue of subsection (1) or (2) must have regard to the advice.

The Scheme Advisory Board has published guidance on the creation and operation of Local Pension Boards in England and Wales which incorporates a number of action point check lists at the end of some of the sections. The following are the items in those checklists.

No.	SAB Requirement	SAB Section	LCC Approach/Evidence	Frequency of Review	Last Reviewed	Completed	Compliant	Notes	Actions
K1	Administering Authority to have approved the establishment (including Terms of Reference) of the Local Pension Board by 1 April 2015.	5	LCC full Council approved 25-3-15 PB approved 30-7-15	Annual	July 2015				
K2	The Local Pension Board must be operational (i.e. had its first meeting no later than 4 months after the 1 April 2015).	5	First meeting held 30-7-15						
K3	Once established a Local Pension Board should adopt a knowledge and understanding policy and framework (possibly in conjunction with the Pensions Committee if appropriate).	6	Approved at first meeting on 30-7-15	Annual	July 15				
K4	A Local Pension Board should designate a person to take responsibility for ensuring that the knowledge and understanding policy and framework is developed and implemented.	6	Designated to County Finance Officer.	Annual	July 2015				
K5	The Administering Authority	6	Training plan being developed						

	should offer access to high quality induction training and provide relevant ongoing training to the appointed members of the Local Pension Board.		following October meeting. Full induction training provided to all board members. PB members invited to PC training.						
K6	A Local Pension Board should prepare (and keep updated) a list of the core documents recording policy about the administration of the Fund and make the list and documents (as well as the rules of the LGPS) accessible to its members.	6	Discussed in induction training.						Need to bring this together
K7	Members of a Local Pension Board should undertake a personal training needs analysis and put in place a personalised training plan.	6	An annual Training Plan will be developed from next year. Annual self-assessment will be carried out for PB going forward.					In August Cipfa released a Framework for PB members which was emailed to PB on 6/8/15. To include in the annual training plan.	
K8	An Administering Authority should prepare a code of conduct and a conflicts policy for its Local Pension Board for approval in accordance with the Administering Authority's constitution and at the first meeting of the Local Pension Board. The Local Pension Board should keep these under regular review.	7	Code of conduct and conflicts policy approved at first meeting on 30-7-15.	Annual	July 2015				
K9	Training should be arranged for officers and members of a Local Pension Board on conduct and conflicts.	7	Covered in first meeting on 30-7-15.						

K10	A Local Pension Board should establish and maintain a register of interests for its members.	7	There is a register of interests which is updated on an ongoing basis based on information in individual declarations and provided to the Chair prior to each meeting. The information is available on request. All declarations made at meetings will be recorded in the minutes which are public.	Ongoing	July 2015			Still awaiting some declarations to be returned.	
K11	An Administering Authority should agree the ongoing reporting arrangements between the Local Pension Board and the Administering Authority.	8	Outlined in PB Terms of Reference	Ongoing	July 2015				
K12	A Local Pension Board should understand the Administering Authority's requirements, controls and policies for FOIA compliance so that the Local Pension Board is aware of them and can comply with them.	8	Copy of Council's FOI policy will be provided to all PB members.	Ongoing	Oct 2015				Circulate FOI policy to all PB members
K13	A Local Pension Board should put in place arrangements to meet the duty of its members to report breaches of law.	8	Breaches procedure approved at first meeting on 30-7-15.	Ongoing	July 2015				
K14	A Local Pension Board should consider (with its Administering Authority) the need to publish an annual report of its activities.	8	A requirement outlined in PB Terms of Reference	Annual	July 2015				
K15	An Administering Authority should consult on, revise and publish its governance compliance statement to include details of the terms,	8	Completed and approved at PC July 2015	Annual	July 2015				

	structure and operational procedures relating to its Local Pension Board.								
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