

## Summary Dashboard

A dashboard showing the summary of the results of the latest compliance checklist is shown below:

| No.                                | Completed       | Compliant           |
|------------------------------------|-----------------|---------------------|
| <b>Reporting Duties</b>            |                 |                     |
| A1                                 | Fully completed | Fully compliant     |
| A2                                 | Fully completed | Fully compliant     |
| A3                                 | Fully completed | Fully compliant     |
| A4                                 | Fully completed | Fully compliant     |
| <b>Knowledge and Understanding</b> |                 |                     |
| B1                                 | Fully completed | Fully compliant     |
| B2                                 | Fully completed | Fully compliant     |
| B3                                 | Fully completed | Partially compliant |
| B4                                 | Fully completed | Fully compliant     |
| B5                                 | Fully completed | Fully compliant     |
| B6                                 | Fully completed | Partially compliant |
| B7                                 | Fully completed | Fully compliant     |
| B8                                 | Fully completed | Partially compliant |
| B9                                 | Fully completed | Not yet relevant    |
| B10                                | Fully completed | Partially compliant |
| B11                                | Fully completed | Fully compliant     |
| B12                                | Fully completed | Partially compliant |
| <b>Conflicts of Interest</b>       |                 |                     |
| C1                                 | Fully completed | Fully compliant     |
| C2                                 | Fully completed | Fully compliant     |
| C3                                 | Fully completed | Fully compliant     |
| C4                                 | Fully completed | Fully compliant     |
| C5                                 | Fully completed | Fully compliant     |
| C6                                 | In progress     | Partially compliant |
| C7                                 | Fully completed | Partially compliant |
| C8                                 | Fully completed | Fully compliant     |
| C9                                 | Fully completed | Fully compliant     |
| C10                                | Fully completed | Fully compliant     |
| C11                                | Fully completed | Fully compliant     |
| <b>Publishing Information</b>      |                 |                     |
| D1                                 | Fully completed | Fully compliant     |
| D2                                 | Fully completed | Fully compliant     |
| D3                                 | Fully completed | Fully compliant     |
| D4                                 | Fully completed | Fully compliant     |

| No.  | Completed       | Compliant                       |
|--|-----------------|---------------------------------|
| <b>Risk and Internal Controls</b>                  |                 |                                 |
| E1   | Fully completed | Fully compliant                 |
| E2   | Fully completed | Fully compliant                 |
| E3   | Fully completed | Fully compliant                 |
| E4   | Fully completed | Fully compliant                 |
| E5   | Fully completed | Fully compliant                 |
| E6   | Fully completed | Fully compliant                 |
| E7   | Fully completed | Fully compliant                 |
| E8   | Fully completed | Partially compliant             |
| <b>Maintaining Accurate Member Data</b>            |                 |                                 |
| F1   | Fully completed | Partially compliant             |
| F2   | Fully completed | Fully compliant                 |
| F3   | Fully completed | Fully compliant                 |
| F4   | Fully completed | Fully compliant                 |
| F5   | Fully completed | Fully compliant                 |
| F6   | Fully completed | Fully compliant                 |
| F7   | Fully completed | Fully compliant                 |
| F8   | Fully completed | Partially compliant             |
| F9   | Fully completed | Fully compliant                 |
| F10  | Fully completed | Partially compliant             |
| F11  | Fully completed | Fully compliant                 |
| <b>Maintaining Contributions</b>                   |                 |                                 |
| G1   | Fully completed | Fully compliant                 |
| G2   | Fully completed | Fully compliant                 |
| G3   | Fully completed | Fully compliant                 |
| G4   | Fully completed | Fully compliant                 |
| G5   | Fully completed | Fully compliant                 |
| G6   | Fully completed | Fully compliant                 |
| G7   | Fully completed | Employers - Fully compliant     |
| G8   | Fully completed | Fully compliant                 |
| G9   | Fully completed | Fully compliant                 |
| <b>Providing Information to Members and Others</b> |                 |                                 |
| H1   | Fully completed | Employers - Partially compliant |
| H2   | Fully completed | Fully compliant                 |
| H3   | Fully completed | Fully compliant                 |
| H4   | Fully completed | Fully compliant                 |
| H5   | Fully completed | Fully compliant                 |
| H6   | Fully completed | Fully compliant                 |

| No.                                       | Completed        | Compliant                   |
|---|------------------|-----------------------------|
| H7  | Fully completed  | Employers - Fully compliant |
| H8  | Fully completed  | Fully compliant             |
| H9  | Fully completed  | Fully compliant             |
| H10                                       | Fully completed  | Fully compliant             |
| H11                                       | Not yet relevant | Not yet relevant            |
| H12                                       | Fully completed  | Fully compliant             |
| H13                                       | Fully completed  | Partially compliant         |
| <b>Internal Dispute Resolution</b>        |                  |                             |
| I1  | Fully completed  | Fully compliant             |
| I2  | Not yet relevant | Not yet relevant            |
| I3  | Fully completed  | Fully compliant             |
| I4  | Fully completed  | Fully compliant             |
| I5  | Fully completed  | Fully compliant             |
| I6  | Fully completed  | Fully compliant             |
| I7  | Fully completed  | Fully compliant             |
| I8  | Fully completed  | Partially compliant         |
| I9  | Not yet relevant | Not yet relevant            |
| <b>Reporting Breaches</b>                 |                  |                             |
| J1  | Fully completed  | Fully compliant             |
| J2  | Fully completed  | Fully compliant             |
| J3  | Fully completed  | Fully compliant             |
| <b>Scheme Advisory Board Requirements</b> |                  |                             |
| K1  | Fully completed  | Fully compliant             |
| K2  | Fully completed  | Fully compliant             |
| K3  | Fully completed  | Fully compliant             |
| K4  | Fully completed  | Fully compliant             |
| K5  | Fully completed  | Fully compliant             |
| K6  | Fully completed  | Partially compliant         |
| K7  | Fully completed  | Partially compliant         |
| K8  | Fully completed  | Fully compliant             |
| K9  | Fully completed  | Fully compliant             |
| K10                                       | Fully completed  | Partially compliant         |
| K11                                       | Fully completed  | Fully compliant             |
| K12                                       | Fully completed  | Fully compliant             |
| K13                                       | Fully completed  | Fully compliant             |
| K14                                       | Fully completed  | Fully compliant             |
| K15                                       | Fully completed  | Fully compliant             |

## 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   | London Borough of Hillingdon Approach / Evidence  | Frequency of Review  | Last Review Date | Check completed | Compliant       | Notes  | Action                           |
|-----|---|---|--|------------------|-----------------|-----------------|--|----------------------------------|
| A1  | Is your scheme registered with the Pension Regulator?                                     | The Fund is registered and the Corporate Pension Manager is key contact   | n/a  | n/a              | Fully completed | Fully compliant | 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?  | The Corporate Pension Manager will update the site for all current employers.<br>HMRC reporting is currently carried out by Surrey CC | Annual, or when a change is made, or when a scheme return is issued for completion | Aug-17           | Fully completed | Fully compliant | All returns submitted by tPR contain the correct contact details and address                           | Website last updated August 2017 |
| A3  | Have you completed this latest Scheme Return in the required timescale?                   | The last survey was completed August 2017.  | Ongoing (expected to be annual)  | Aug-17           | Fully completed | Fully compliant | Latest return completed and returned August 2017   |                                  |
| A4  | Have you responded to the latest TPR public service pension scheme survey /questionnaire? | This was completed by the Corporate Pension Manager in Summer 2015  | Ongoing (expected to be annual)  | Aug-15           | Fully completed | Fully compliant |  | Complete future surveys          |

## 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   | London Borough of Hillingdon Approach / Evidence   | Frequency of Review                 | Last Review Date | Check completed | Compliant           | Notes  | Action  |
|-----|---|--|-------------------------------------|------------------|-----------------|---------------------|--|---|
| B1  | Are there policies and arrangements in place to support pension board members in acquiring and retaining knowledge and understanding? | Training policy applies to Committee, Board and Officers. The Policy includes the requirements of the (updated for PB) CIPFA framework. Training items included in PC and/or LPB meetings and  | Every 3 years or sooner if required | 09/12/2015       | Fully completed | Fully compliant     |  |   |
| B2  | Has a person been designated to take responsibility for ensuring the framework is developed and implemented?                          | This is the Head of Pensions, Treasury and Statutory Accounting (Currently chief accountant during structure transition - though responsibilities may be delegated to other members of the finance team).<br><br>This responsibility has not been formally set out in the policy but the Head of Pensions, Treasury and Statutory  | Every 3 years or sooner if required | 05/07/2017       | Fully completed | Fully compliant     |  | At next review, specify in Policy who has responsibility for developing and implementing framework.                 |
| B3  | Is the Fund providing assistance to pension board members to determine the degree of knowledge and understanding required?            | All PB members have a copy of the Training Policy and the CIPFA framework, and have been given links to complete the TPR toolkit.<br><br>Not all members have completed the toolkit to date of this review - this has been identified as an action for PB members to complete and the Head of Pensions, Treasury and Statutory Accounting to monitor.<br><br>PB members have had access to PB and PC training sessions<br><br>An analysis of training needs is being carried out. Training is provided at the start of each Pension Committee meeting and at Board where relevant.<br><br>The PB Work Plan evolves throughout each year, with the input of the PB members so that they can judge in advance what training needs they will have in the coming | Annual (work plan)                  | 05/07/2017       | Fully completed | Partially compliant | Working with PB, but elected Members have been reluctant to commit to training and needs analysis completion. Configuration of board to be discussed with Lloyd as a statutory requirement.<br><br>Employee members have attended training and shown commitment. | Ensure PB members complete toolkit.<br><br>Complete PB workplan<br><br>Consider undertaking training needs analysis |
| B4  | Are the roles and responsibilities of pension boards and members of pension board clearly set out in scheme documentation?            | Although the PB Terms of Reference were refreshed 2016/17 they are quite brief and do not go into full detail of the roles and responsibilities.<br><br>However PB members are aware of their responsibilities via:<br>- Initial training which included information on what the roles and responsibilities are<br>- PB members had to apply for the role (at which point they saw the list of competencies and experience required as part of their application) - they were also interviewed - this process indicated the expectations   | Ongoing                             | 05/07/2017       | Fully completed | Fully compliant     |  | Consider expanding the Terms of Reference to include the detailed role/responsibilities in future reviews.          |
| B5  | Are pension board members aware of their legal responsibility in terms of Knowledge and Understanding?                                | The PB members have seen the requirements in training received, and in the Training Policy   | Ongoing                             | 10/02/2016       | Fully completed | Fully compliant     |  |   |

| No. | TPR Requirement  | London Borough of Hillingdon Approach / Evidence   | Frequency of Review                       | Last Review Date | Check completed | Compliant           | Notes   | Action  |
|-----|--|--|---|------------------|-----------------|---------------------|---|---|
| B6  | Have all pension board members got access to copies of the scheme rules and relevant Fund documentation?   | All documents that the PB members would need to access are available on the Fund website - the PB members have been made aware of this.<br><br>All policies have recently been reviewed through the work of the PB and the Work Plan includes the ongoing review of key policies/strategy documents such as Communications Policy (as well as annual report and accounts). The aim is that the PB will develop knowledge of them through this process.<br><br>Documents will also be linked in to any relevant training - and PB members are invited to Committee training | Ongoing                                   | 01/06/2017       | Fully completed | Partially compliant |   | Ensure PB members become fully conversant with required documents as part of review process   |
| B7  | Is there an up-to-date list of the Fund specific documents with which pension board members need to be conversant in?  | There is not a formal list of the required documents, but it is considered that the PB members should be able to view everything they should have knowledge on via the Fund website, and contained in the annual reports.<br><br>It has been noted that the website may be developed so the links to the required documents may be made clearer, and possibly all put in one easily accessible location.   | Ongoing                                   | 01/07/2017       | Fully completed | Fully compliant     |   | Action to ensure all required documents are available and up to date on the website - and consider how the site may be developed so it is clearer how to get to the documents.<br><br>Consider providing a full list of the documents the PB members must have a knowledge of - e.g. in future Training Policy reviews. |
| B8  | Are all pension board members investing sufficient time in their learning and development?   | To date, it is considered the PB members have invested sufficient time:<br>- PB members have attended all the scheduled meetings and attended all training provided.<br>- One PB member has requested additional training.<br>- PB members can attend Pension Committee meetings - they are encouraged to do so and some have been doing so.<br><br>Formal analysis on training needs is continuing to be carried out - reluctance of elected Members to engage.   | Annual (work plan)                        | 05/07/2017       | Fully completed | Partially compliant |   |   |
| B9  | Does the Fund offer pre-appointment training for new pension board members or mentoring by existing members?   | This will be in place for all new appointments   | Ongoing                                   | 05/07/2017       | Fully completed | Not yet relevant    |   |   |
| 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? | The Fund has a training log for each PB/PC member and this will help to identify gaps. PB elected Members are not engaging in this process to complete.  | Annual (including in work plan)           | 05/07/2017       | Fully completed | Partially compliant | Quarterly updates and chasers to engage                                     | Need member engagement  |
| B11 | Are records of learning activities being maintained?   | A training log is maintained which includes internally and externally provided training.   | Ongoing                                   | 05/07/2017       | Fully completed | Fully compliant     |   | As above, develop training log for each member and a knowledge/training needs assessment  |
| B12 | Have the pension board members completed the Pension Regulator's toolkit for training on the Code of Practice number 14?   | The PB members have been asked to complete this and this is currently in progress. A reminder will be sent shortly with an offer of assistance in any areas.   | Ongoing (as and when new members join PB) | 05/07/2017       | Fully completed | Partially compliant | Employee reps have completed. Employer reps have not informed of completion | Send a reminder to PB members to complete the toolkit, with an offer of assistance. Obtain a certificate of completion from each member for training records evidence.  |

## 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  | London Borough of Hillingdon Approach / Evidence  | Frequency of Review                   | Last Review Date | Check completed | Compliant           | Notes   | Action   |
|-----|--|---|---------------------------------------|------------------|-----------------|---------------------|---|--|
| C1  | Does the Fund have a conflict of interest policy and procedure, which include identifying, monitoring and managing potential conflicts of interest?                            | The Council has received advice that it does not need a separate policy as these areas are covered under the Council's Code of Conduct. The PB members are effectively co-opted members of the council, and so all had to complete declarations before they started under the Council's requirements.<br><br>It is noted that it would therefore be difficult to create a Fund specific policy, but Conflicts are raised and discussed as an agenda item at each meeting.<br><br>Related party forms are completed as part of the annual accounts purposes. | Annual                                | 05/07/2017       | Fully completed | Fully compliant     |   |  |
| 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?      | In the first few meetings the PB members have received training on this topic and all have made declarations of interest as required.<br><br>This is also a standing agenda item so that potential conflicts can be identified, discussed and managed.  | Ongoing (opportunity at each meeting) | 10/02/2016       | Fully completed | Fully compliant     |   |  |
| 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)? | PB members have provided declarations prior to appointment and in meetings they have the opportunity to make declarations - this is recorded in the minutes of each meeting.  | Ongoing (opportunity at each meeting) | 10/02/2016       | Fully completed | Fully compliant     |   |  |
| C4  | Does the appointment process for pension board members require disclosure of interests and responsibilities which could become conflicts of interest?                          | This is part of appointment process - this information is requested on application. Also, as co-opted members the Council, requirements regarding disclosure apply.   | Ongoing (as members appointed)        | 10/02/2016       | Fully completed | Fully compliant     |   |  |
| C5  | Is the conflicts policy regularly reviewed?  | The Council's Code of Conduct is annually reviewed  | Annual                                | TBC              | Fully completed | Fully compliant     |   |  |
| C6  | Does the Fund have a conflicts register and it is circulated for ongoing review and published?   | The Fund does not have a formal register.<br><br>The Fund publishes the meeting minutes so a record of the disclosed interests can be found through the meeting records on the website, however it is noted that this could be made more explicit via a Fund conflicts register - this will be considered.  | n/a                                   | n/a              | In progress     | Partially compliant | Councillors interests is on the democracy website - but doesn't include co-opted members who are not published - consider adding to the pension board pages or setting up a register. | Consider creating a Fund conflicts register to be (circulated before the meeting) reviewed at the start of each meeting under the agenda item. |
| C7  | Is appropriate information included in the register?   | The Council register includes all interests including corporate hospitality. This could be used to develop a register for the Fund.   | n/a                                   | n/a              | Fully completed | Partially compliant |   | Consider including all recommended items on the register if/when created for the Fund  |
| C8  | Is there a standing item on the agenda for declaring conflicts of interest?  | At the beginning of each meeting there is an agenda item to allow the declaration and consideration of any conflicts  | Ongoing (each meeting)                | 10/02/2016       | Fully completed | Fully compliant     |   |  |
| C9  | Do those involved know how to report a conflict of interest?   | This is set out in the council policy and there is an opportunity at each meeting to raise potential conflicts.   | Ongoing (each meeting)                | 10/02/2016       | Fully completed | Fully compliant     |   |  |

| No. | TPR Requirement  | London Borough of Hillingdon Approach / Evidence  | Frequency of Review | Last Review Date | Check completed | Compliant       | Notes | Action |
|-----|--|---|---------------------|------------------|-----------------|-----------------|-------|--------|
| C10 | Is the number of employer and member representatives on the board in line with legal requirements?       | There are 3 employer and 3 member representatives.  | Ongoing             | 01/07/2015       | Fully completed | Fully compliant |       |        |
| C11 | Is the board made up of the appropriate mix of representatives in order to minimise potential conflicts? | <p>The membership is 50% Council elected members only. The representation in terms of political balance is in line with the distribution on the Council, the employee representatives are:</p> <ul style="list-style-type: none"> <li>- one active member from the council;</li> <li>- another active member from the largest other employer - Currently vacant; and</li> <li>- a pensioner (a former HR manager).</li> </ul> <p>There are interviews to select the member representatives based on experience - for the first cohort there were many applicants and 6 were interviewed, 3 selected.</p> <p>Employer representatives are elected members of the</p> | Ongoing             | 01/07/2015       | Fully completed | Fully compliant |       |        |

## 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  | London Borough of Hillingdon Approach / Evidence   | Frequency of Review                | Last Review Date | Check completed | Compliant       | Notes | Action  |
|-----|--|--|------------------------------------|------------------|-----------------|-----------------|-------|---|
| D1  | Does the Administering Authority publish information about the pension board?                      | Website lists the PB members, who the PB is supported by, who is chair, vice chair and who is an employee representative . This is kept up to date (no changes have yet been required).<br><a href="https://www.hillingdon.gov.uk/article/29807/Local-Pensions-Board">https://www.hillingdon.gov.uk/article/29807/Local-Pensions-Board</a> | Ongoing (when changes occur)       | 01/08/2017       | Fully completed | Fully compliant |       | Need to update to include Aon as adviser  |
| D2  | Does the Administering Authority publish other useful related information about the pension board? | It has been agreed that the Terms of Reference will be added to the PB section of the site and so will the details of the current role of the employee members.  | Ongoing (when changes occur)       | n/a              | Fully completed | Fully compliant |       | Add the required information and TOR to the PB section of the website.                |
| D3  | Is all the information about the Pension Board kept up-to-date?                                    | The Corporate Pension Manager is responsible for keeping the website up to date. Other than the items in D2, the website is up to date.<br><br>The site will be updated each May (when elected employer representatives may change)  | Ongoing (when changes occur)       | 01/08/2017       | Fully completed | Fully compliant |       | Update in May if any changes to employer representatives. Otherwise as above          |
| D4  | Does the Administering Authority publish information about pension board business?                 | All agendas and minutes are available through the Council's committee papers website - an action may be to provide a link to this from the PB website<br><a href="http://modgov.hillingdon.gov.uk/ieListMeetings.aspx?Committeed=356">http://modgov.hillingdon.gov.uk/ieListMeetings.aspx?Committeed=356</a>                               | Ongoing (relating to each meeting) | 10/02/2016       | Fully completed | Fully compliant |       | Noted that it would be useful to put a link to the meeting papers through the PB site |

## 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  | London Borough of Hillingdon Approach / Evidence   | Frequency of Review | Last Review Date | Check completed | Compliant       | Notes | Action  |
|-----|--|--|---------------------|------------------|-----------------|-----------------|-------|---|
| E1  | Is there an agreed process for identifying and recording scheme risks?   | <p>There is a formal strategy for the management of Fund risks.</p> <p>There is also a fund specific risk register which is produced for the PC's consideration and then is seen by the PB<br/>This is reviewed quarterly - a report is generated for the PC meeting by the Head of Pensions, Treasury and Statutory Accounts.<br/>Standard risks are reviewed as part of the valuation process. New risks are identified through any breaches, new legislation or audit reports</p> <p>PC meeting papers are provided some days in advance of the meeting, so committee members have an opportunity to assess and identify new risks to add to the register.</p>  | Ongoing (quarterly) | 01/06/2017       | Fully completed | Fully compliant |       | Risk management policy to be drafted and agreed |
| E2  | Does the Fund have an adequate process to evaluate risks and establish internal controls?                                  | <p>Risks on the register are given scores for both likelihood and impact and are placed on a grid to compare risks and prioritise the most significant.</p> <p>Actions are detailed next to each risk along with comments - these are the internal controls in place. Progress against the action is then detailed.</p>  | Ongoing (quarterly) | TBC              | Fully completed | Fully compliant |       |   |
| E3  | Does the Administering Authority have a risk register to record all risks identified and action taken?                     | <p>All recommended items are included on the register, other than when the next review should be. However, the register is looked at on a quarterly basis so this is not considered necessary - specific details on timing is included in the action or progress comments as necessary.</p> <p>Likelihood is categorised from Low to High, and Impact from Small to Large (and whether the risk has changed in categorisation since the previous quarter (i.e. static, increasing, deteriorating)).</p>  | Quarterly           | Q1 2016          | Fully completed | Fully compliant |       |   |
| E4  | Does the Administering Authority review the effectiveness of the risk management and internal control systems of the Fund? | <p>The Risk register uses a red amber green approach, so red risks are prioritised. However there are some risks which remain under regular review i.e. investment risks, funding risks, employer risks, which are looked at by the PC with the help of external advisors.</p> <p>Also the format and process involved with the risk register helps to identify additional risks or update the status of risks.</p> <p>Old risks which are no longer red will remain on the register but as green so they are not forgotten.</p> <p>Covering report includes movements in risks and this is also shown on the register.</p> <p>Risks are formally reviewed on a quarterly basis, but identification is on an ongoing basis as a matter of management of the Fund</p> | Ongoing (quarterly) | TBC              | Fully completed | Fully compliant |       |   |
| E5  | Does the Administering Authority regularly review the risk register?   | <p>This is carried out quarterly at each PC meeting (though risks can be added at any time if identified sooner).</p>  | Ongoing (quarterly) | TBC              | Fully completed | Fully compliant |       |   |



| No. | TPR Requirement  | London Borough of Hillingdon Approach / Evidence   | Frequency of Review       | Last Review Date | Check completed | Compliant           | Notes  | Action  |
|-----|--|--|---------------------------|------------------|-----------------|---------------------|--|---|
| E6  | Is there a standing item on the Pension Board agenda to review scheme risks?   | Following any PC meeting the risk register/report will be included in the PB meeting as part of PC papers (PB meetings follow soon after PC meetings)  | Ongoing (quarterly)       | 12/01/2016       | Fully completed | Fully compliant     |  |   |
| 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 ?     | <p>Examples of administration related internal controls currently in place (see notes for accounting controls) - not all are documented which is an action for the process of appointing the new administration providers:</p> <ul style="list-style-type: none"> <li>- Access to building restricted</li> <li>- If any council member works at home via secure council link</li> <li>- Ken has access to Capita's system (read only)</li> <li>- Disaster recovery / business continuity systems in place including working from Surrey CC.</li> <li>- Altair is tested at a national level (applicable when move to surrey)</li> <li>- Use of Altair workflow/task management for certain standard tasks (applicable when move to surrey)</li> <li>- All calculations are supposed to be checked by a senior member of staff when payments made checked by team leader and senior officer</li> <li>- SLA reporting weekly</li> <li>- Use NFI</li> <li>- Annual benefit statements process and statements require members check their details.</li> <li>- Password security on system so restricted access for personnel.</li> <li>- Member comms scanned on internal systems and kept next to each member records</li> <li>- Overseas certificate checks</li> <li>- BACS for all pensioners</li> <li>- Breaches reporting procedure</li> <li>- Data systems backed up each day - to different locations Surrey (hosted - retained off site)</li> <li>- Triennial valuation identifies data issues and "fixed" at time.</li> </ul> <p>Changing providers so will set new requirements for Surrey and populate this once have transitioned.</p> | Ongoing                   | 21/09/2017       | Fully completed | Fully compliant     | <p>Accounting related controls in place:</p> <ul style="list-style-type: none"> <li>- Pension Fund bank account reconciliations vs paperwork notifications of payments made, carried out by Pension Fund Accountant on monthly basis - includes all investment transactions and expenses as well as benefit payments.</li> <li>- £150k held in bank account at all times</li> <li>- 3 authorised signatures required for transactions of certain size - required people who know about Fund business inc Corporate Pension Manager and Accounts team.</li> <li>- Audit reports also obtained from Custodian</li> <li>- Systems password protected and limited access to custodian website (Accountant only)</li> <li>- Purchase orders sat up for invoicing</li> <li>- Invoices recorded and checked vs agreements/POs and expectations</li> </ul> | Formally document controls in place in risk register and set out in contract with administration provider.                  |
| 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? | <p>Currently there is no formal arrangement with Prudential (AVC provider)s, there is limited communications with them though any issues are discussed with them at the time.</p> <p>This has been incorporated into the contract / SLAs with Surrey for administration of the fund. The Fund will require reporting in line with SLAs and external audit will get assurances from them.</p> <p>Northern Trust provide annual internal controls reports as part of year end process.</p>   | Contract and review dates | TBC              | Fully completed | Partially compliant | Ken to follow up about Prudential, perhaps through SCC   | <p>Agree SLAs with new administration provider once appointed.</p> <p>Investigate assurances available from Prudential.</p> |

## 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   | London Borough of Hillingdon Approach / Evidence  | Frequency of Review                             | Last Review Date | Check completed | Compliant           | Notes | Action   |
|-----|---|---|---|------------------|-----------------|---------------------|-------|--|
| F1  | Do member records record the information required as defined in the Record Keeping Regulations and is it accurate?          | Surrey record all data on Altair system.<br><br>A few outstanding issues from the transfer from Capita remain, although the 2017 ABS exercise should resolve this.  | Ongoing   | 30/06/2017       | Fully completed | Partially compliant |       |  |
| F2  | Does the Fund have the appropriate processes in place so employers can provide timely and accurate information?             | For annual checks, SCC supply a template to employers. Employers are required to return this by 8th April and will contact Council if any issues.<br><br>Payroll providers for each employer provide a listing (90% have same provider) to SCC and to LBH - this includes member and employer contributions and pay split by member and by employment.<br><br>The Pension fund accountant reconciles monthly returns.<br><br>Year end returns from employers come via Hillingdon Council for testing and checking before being sent to SCC to load to each members' record - this includes identifiers for correct posts where members have multiple posts. | Monthly   | 30/04/2017       | Fully completed | Fully compliant     |       |  |
| F3  | Does the Fund keep records of and reconcile transactions as required by the Record Keeping Regulations?                     | This task is performed monthly  | Monthly   |                  | Fully completed | Fully compliant     |       | Ensure reconciliations are adequate to ensure risks are identified and mitigated when this is brought back in house. |
| F4  | Are records kept of pension board meetings as required by the Record Keeping Regulations?                                   | All meeting minutes are kept and published on committee area of the Council website - the PB website may be updated to provide a link to these.   | Ongoing (quarterly meeting)                     | 10/02/2016       | Fully completed | Fully compliant     |       | Consider providing link to minutes through PB website  |
| F5  | Are records kept of decisions made by the pension board, outside of meetings as required by the Record Keeping Regulations? | The PB is not a decision making body, other than areas such as the decision whether to report breaches via individual responsibility. However this would be recorded under the breaches record.<br><br>However typically such discussions would take place via meetings and so would be recorded in minutes.  | Ongoing (quarterly meeting and breaches record) | 10/02/2016       | Fully completed | Fully compliant     |       |  |

| No. | TPR Requirement  | London Borough of Hillingdon Approach / Evidence  | Frequency of Review | Last Review Date | Check completed | Compliant           | Notes  | Action   |
|-----|--|---|---------------------|------------------|-----------------|---------------------|--|--|
| F6  | Are records retained for as long as they are needed?   | Surrey retain records for 7 years The Fund will keep records indefinitely - microfiche and microfilm is for historic - originals in Council office. From Oct 2002 everything has been scanned on to records, Surrey scan info to each record.<br><br>Surrey can pick up scanned records on access system<br>Surrey CC have now tranferred all old Fiche Records on to Altair system.  | n/a                 | 01/01/2017       | Fully completed | Fully compliant     |  |  |
| F7  | Does the Administering Authority have policies and processes to monitor data on an ongoing basis?  | Requirements are set out in the Administration strategy.  | Ongoing             | ongoing          | Fully completed | Fully compliant     |  | Set out data monitoring requirements in agreement with Surrey and in administration strategy |
| F8  | Does the Administering Authority carry out a data review at least annually?  | Data is reviewed triennially as part of the actuarial valuation<br><br>Mortality screening is carried out on pensioners (but only in England and Wales)<br>Other than NFI and life certificate checks there is no current annual exercise for reviewing data, the Fund will consider this in setting requirements/agreement with Surrey when the transition takes place.<br>Surrey do batch tracing<br>Life certificates were done and overseas tracing and NFI but NFI doesn't cover NI and Scotland   | Annual or Triennial | 01/08/2017       | Fully completed | Partially compliant | Have agreed to buy in a number of external suppliers, in conjunction with Surrey CC to ensure data held is as clean as possible. This will include mortality screening on a monthly basis and the issuing if LIFE Certificates to overseas pensioners. LBH also participates in the NFI. |  |
| F9  | Is a data improvement plan in place which is being monitored with a defined end date?  | Surrey CC has an ongoing plan to monitor and update all data held.  | Ongoing             | 01/11/2016       | Fully completed | Fully compliant     |  |  |
| F10 | Are processes and policies in place to reconcile scheme data with employer data?   | The requirement is documented in the Administration strategy  | Ongoing             | Ongoing          | Fully completed | Partially compliant | Ongoing with data transferred to SCC   |  |
| F11 | Do the Administering Authority's member data processes meet the requirements of the Data Protection Act 1998 and the data protection principles? | There is a secure email system between Surrey CC and Hillingdon Council - this is password controlled and Council filters also prevent member data from being sent unencrypted.<br><br>Surrey CC have secure email systems between themselves and other third parties.<br><br>DataPlan (the payroll provider) has secure transfer of information to Surrey CC, and employers also password protect the information.<br><br>The Corporate Pension Manager has access to the Altair system - but this is read only and the access password changes every month with a secure key. | Ongoing             | 10/02/2016       | Fully completed | Fully compliant     |  | Ensure Surrey system has adequate security in place when transition takes place              |

## 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  | To The Regulator: As soon as reasonably practicable     |
| Employee          | Paid within the prescribed period (19 <sup>th</sup> day of the month, or 22 <sup>nd</sup> day if paid electronically) or earlier date if required by the scheme regulations | Regulator: Within a reasonable period – 10 working days |

| No. | TPR Requirement   | London Borough of Hillingdon Approach / Evidence  | Frequency of Review                  | Last Review Date | Check completed | Compliant                   | Notes | Action  |
|-----|---|---|--------------------------------------|------------------|-----------------|-----------------------------|-------|---|
| G1  | Does the Fund have procedures and processes in place to identify payment failures?  | Monthly monitoring arrangements in place and reconciled monthly   | Monthly                              | 31/05/2017       | Fully completed | Fully compliant             |       | See details in approach   |
| G2  | Do those processes and procedures include a contributions monitoring record to determine whether contributions are paid on time and in full?  | Fully implmeneted   | Monthly                              | 31/05/2017       | Fully completed | Fully compliant             |       | See details in approach   |
| G3  | Do those processes and procedures include monitoring payments against the contributions monitoring record on an ongoing basis?  | Fully Implemented   | Monthly                              | 31/05/2017       | Fully completed | Fully compliant             |       | Formalise and document process for new member of staff to carry out monitoring            |
| G4  | Are these procedures regularly reviewed to ensure they are effective?   | Regularly checked by senior officers  | Monthly                              | 31/05/2017       | Fully completed | Fully compliant             |       |   |
| G5  | Do the Administering Authority's processes include managing overdue contributions in line with TPR's suggested approach?  | This process is done by Hillingdon Council in house, there is a spreadsheet to record on a monthly basis when payments are received, with a check on the number of members so queries can be raised with employers immediately. The spreadsheet includes details of the procedure and what to do if payments are late - the TPR recommendations is followed.<br><br>With regards to AVCs, Prudential always get in touch if payments are not received on time - this is very occassional (maybe 2 a year, typically same employer and a few days late but is resolved). | Monthly                              | 31/05/2017       | Fully completed | Fully compliant             |       | See details in approach   |
| G6  | Does the Fund maintain a record of any investigations and communications with employers?  | Currently any communications with Employers are stored in a centralised system with Surrey CC   | Ongoing                              | 21/09/2017       | Fully completed | Fully compliant             |       |   |
| G7  | Do employers provide sufficient information to monitor contributions and is this in accordance with the LGPS regulations?   | Employers are (with 1 exception) providing the right information in the right format to allow the monitoring to take place.<br><br>Surrey will have Iconnect - including for Employers to ensure the process of sending information is as smooth as possible.<br><br>Members will be able to make changes to their details online following the transition.   | Will be carried out monthly          | 10/02/2016       | Fully completed | Employers - Fully compliant |       | Ensure Surrey's Iconnect works appropriately for the Hillingdon Fund following transition |
| 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? | The breaches policy sets out the requirements for recording and reporting breaches.   | Ongoing (As and when breaches occur) | 10/02/2016       | Fully completed | Fully compliant             |       | See details in approaches above   |

| No. | TPR Requirement   | London Borough of Hillingdon Approach / Evidence | Frequency of Review | Last Review Date | Check completed | Compliant       | Notes | Action |
|-----|---|--|---------------------|------------------|-----------------|-----------------|-------|--------|
| 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? | This is not outsourced                           | n/a                 | n/a              | Fully completed | Fully compliant |       |        |

## 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   | London Borough of Hillingdon Approach / Evidence  | Frequency of Review | Last Review Date | Check completed | Compliant                       | Notes   | Action   |
|-----|---|---|---------------------|------------------|-----------------|---------------------------------|---|--|
| H1  | Has an annual benefit statement been provided to all active members within the required timescales?   | ABS production in 2017 much improved and reasons for no issue documented  | Annual              | 31/08/2017       | Fully completed | Employers - Partially compliant | Non-compliance is only partly down to Employer issues   |  |
| H2  | Do these meet the legal requirements in relation to format?   | All of the required figures and descriptions are included in the statements. It is noted that the quality of the statements produced by Surrey CC is of a high standard.  | Annual              | 01/08/2017       | Fully completed | Fully compliant                 |   |  |
| H3  | Has a benefit statement been provided to all active, deferred and pension credit members who have requested one within the required timescales? | The deferred statements were sent in September 2017- to all deferred members Surrey have an address for. Pension credit members are sent statements at the same time.   | Annual              | 21/09/2017       | Fully completed | Fully compliant                 |   |  |
| H4  | Does this meet the legal requirements in relation to format?  | All of the required figures and descriptions are included in the statements (we have not seen a pension credit member statement but assume they are the same as deferred statements and so are compliant).  | Annual              | 21/09/2017       | Fully completed | Fully compliant                 |   |  |
| H5  | Has an annual benefit statement been provided to all members with AVCs within the required timescales?  | Prudential send statements in April or May each year.<br><br>Currently they do not provide Hillingdon with a listing of who has been sent a statement in order to confirm that all relevant members have received one. This could be an action to check (this may be being done as part of accounts reconciliation) | Annual              | 21/09/2017       | Fully completed | Fully compliant                 |   | Consider obtaining list of members to check all relevant members are being sent a statement as an additional check.              |
| H6  | Do these meet the legal requirements in relation to format?   | Example statement not provided by Prudential to date (but we have assumed format and contents are the same as we have seen for other Funds with Prudential as AVC provider as all have been the same). This has been checked against the requirements and is compliant.   | Annual              | 10/02/2016       | Fully completed | Fully compliant                 | It is not clear whether there is the option for lifestyling in the Prudential funds offered and if so, there should be checks to ensure the required communications relating to lifestyling are also provided to members. | Suggest that the situation regarding lifestyling is checked with Prudential, and if it takes place how Disclosure Reg 18 is met. |

| No. | TPR Requirement   | London Borough of Hillingdon Approach / Evidence   | Frequency of Review | Last Review Date | Check completed  | Compliant                   | Notes  | Action  |
|-----|---|--|---------------------|------------------|------------------|-----------------------------|--|---|
| H7  | Is basic scheme information provided to all new and prospective members within the required timescales?                           | New member packs are sent out by HR with the members Contract of Employment, this is also the proceduer followed by all Scheme Employers.  | Regular monitoring  | 01/10/2016       | Fully completed  | Employers - Fully compliant | (Not employer issue)   | Details contained within Governance Policy agreed with all employers  |
| H8  | Does this meet the legal requirements in relation to format?  | The details are all provided on either the brief guide, the full guide (on the website) and in the letter sent to the member with the statutory notice.<br><br>There are a few areas where the information in the guide could be more explicit (see actions).  | Ongoing             | 10/02/2016       | Fully completed  | Fully compliant             | The regulations require that a statement be provided referring to any charges which might apply if upon leaving a member were to transfer, but this is probably not considered necessary at joining stage. | The contracting out information should be updated following April 2016.<br><br>Details of transfers-in could reference the legislation under which they take place.<br><br>IDRP address details could be provided in the 2 booklet guides for ease.<br><br>The fund could check whether the AVC providers provide the required details with respect to lifestyling (if this is offered) - the other details regarding money purchase benefits are given in the booklet. |
| H9  | Is all other information provided in accordance with the legal timescales?  | Pensioner payslips are issued in April and May of each year, the first 2 months after a member retires, or if the pension changes by £10 or more. This is compliant. If there are other changes members are informed and Capita do have SLAs for completing this and report against those SLAs and legal timescales so there is some control.<br><br>All standard letters do provide contact details with confirmation that member can get in touch for more information.<br><br>It is noted that this will be set as a requirement for Surrey as new administrators | Ongoing             | 10/02/2016       | Fully completed  | Fully compliant             |  | Action to check if AVC providers provide lifestyling information if lifestyle fund used   |
| H10 | Is all other information provided in the format and methods required by law?  | It is understood that the communications provided by Capita are compliant. An action following the transition will be to ensure all Surrey CC communications are also compliant.   | Ongoing             | 10/02/2016       | Fully completed  | Fully compliant             |  | Ensure compliance continues when administration transitions to Surrey.  |
| H11 | Where any information is only provided electronically (i.e. instead of any hard copy) does it comply with the legal requirements? | Surrey only send information to members via post. Members may receive some communications via email but nothing including member data.   | n/a                 | n/a              | Not yet relevant | Not yet relevant            | ABS will be sent electronically only from 2018   |   |

| No. | TPR Requirement   | London Borough of Hillingdon Approach / Evidence  | Frequency of Review | Last Review Date | Check completed | Compliant           | Notes   | Action   |
|-----|---|---|---------------------|------------------|-----------------|---------------------|---|--|
| 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? | <p>Surrey CC design communications and pass drafts to LBH, for agreement before issuing any communication.</p> <p>The Council have control over the Fund website so provide comprehensive information to members on there.</p> <p>No member surveys on communications have been recently carried out.</p> <p>It is noted that the Fund will look at the Communications policy and review their communications Policy.</p> | Ongoing             | 01/11/2016       | Fully completed | Fully compliant     |   | The Fund will look at the Communications policy and review during 2017/18. |
| H13 | Does the Administering Authority use a tracing service?   | There is no tracing exercise as part of the contract with Surrey although NFI and life certificate checks are being carried out. It is noted that this is considered sufficient as deferred members may move house several times before retirement without contacting the pension Fund.   | Annual              | 01/07/2017       | Fully completed | Partially compliant | Tracing services and mortality creening will be provided in conjunction with third parties and Surrey CC during 2017/18 |  |



## 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  | London Borough of Hillingdon Approach / Evidence  | Frequency of Review | Last Review Date | Check completed  | Compliant        | Notes | Action |
|-----|--|---|---------------------|------------------|------------------|------------------|-------|--------|
| I1  | Has the Administering Authority put in place an internal dispute resolution procedure?   | There is an IDRP - the leaflet is available on the Fund website   | TBC                 | TBC              | Fully completed  | Fully compliant  |       |        |
| I2  | Does the Administering Authority's process highlight or consider whether a dispute is exempt?  | This detail is not currently included in the leaflet - However there are no exempt discutes, all are covered within the IDRP  | N/a                 | n/a              | Not yet relevant | Not yet relevant |       |        |
| I3  | Does the information made available to applicants about the procedure clearly state the procedure and process to apply for a dispute to be resolved including:<br>- who it applies to<br>- who the specified person (stage 1) is<br>- the timescales for making applications<br>- who to contact with a dispute<br>- the information that an applicant must include<br>- the process by which decisions are reached? | The details of who the policy applies to could be made more explicit at the beginning of the employees guide.<br><br>The Specified person for stage 1 is given (Surrey Service Delivery Manager). This will need to be updated soon.<br><br>The process for stage 1 and 2 are provided in the IDRP leaflet.<br><br>Timescales are given in the IDRP leaflet.<br><br>The postal contact details for making an application are provided on the IDRP leaflet, with the application form which sets out the required information. | TBC                 | 21/09/2017       | Fully completed  | Fully compliant  |       |        |
| I4  | Has the Administering Authority ensured that employers who make first stage decisions also have IDRP in place?   | All Employers have adopted the Council's IDRP.  | n/a                 | n/a              | Fully completed  | Fully compliant  |       |        |

| No. | TPR Requirement  | London Borough of Hillingdon Approach / Evidence  | Frequency of Review | Last Review Date | Check completed  | Compliant           | Notes | Action   |
|-----|--|---|---------------------|------------------|------------------|---------------------|-------|--|
| 15  | Are the timescales in the procedure adhered to including sending an acknowledgment on receipt of an application?   | <p>The Corporate Pension Manager monitors IDRP timescales as they can affect any appeals to the Ombudsman - this is part of the routine weekly monitoring which takes place with Capita.</p> <p>An acknowledgement is sent from the Fund to all applications, with details of the expected timescales and a note that the case has been passed to Surrey. Surrey also then send an acknowledgement.</p> <p>No significant delays have come to light to date, but would be identified as part of the Corporate Pension Manager's monitoring.</p>   | Ongoing (weekly)    | 21/09/2017       | Fully completed  | Fully compliant     |       | Ensure monitoring continues under Surrey contract.   |
| 16  | Does the Administering Authority notify and advertise the procedure appropriately?                                 | <p>The IDRP is available on the "booklets and forms" section of the website.</p> <p>It is referred to in the LGPS guide which is also available on the website for new joiners.</p> <p>The administration strategy is currently being considered and reference to the IDRP may be included.</p> <p>Details of the Appeals Procedure are provided with the new starter information based on the statutory notice.</p> <p>However such details do not appear to be mentioned in letters to members where benefits are settled (e.g. retirement or transfers) - this should be investigated.</p> | Ongoing             | 10/02/2016       | Fully completed  | Fully compliant     |       | <p>Consider mentioning the IDRP in the administration strategy/policy.</p> <p>Look further into the communications provided to members when final benefits/transfers are paid to ensure IDRP process is mentioned appropriately.</p> |
| 17  | Are the notification requirements in relation to TPAS and the Pensions Ombudsman being adhered to?                 | This information is included in decision letters as standard, and in the employee guide leaflet on the website.   | Ongoing             | 10/02/2016       | Fully completed  | Fully compliant     |       |  |
| 18  | Does the Administering Authority regularly assess the effectiveness of its arrangements?                           | <p>There is not a formal review scheduled for the effectiveness but the Pension Manager is aware of the situation relating to IDRP cases:</p> <ul style="list-style-type: none"> <li>- Typically the cases relate to ill health retirements</li> <li>- Complaints are quite rare otherwise</li> </ul> <p>Regular reviews are carried out with Surrey CC including timescales, so it is considered that there are no fundamental issues with the effectiveness of the process.</p>   | n/a                 | 01/11/2016       | Fully completed  | Partially compliant |       | Consider whether a formal review of the effectiveness of the IDRP process is necessary   |
| 19  | Does the Administering Authority regularly assess the effectiveness where employers carry out a stage one process? | Hillingdon are not aware that any Employers carry out a stage 1 process.  | n/a                 | n/a              | Not yet relevant | Not yet relevant    |       |  |

## 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   | London Borough of Hillingdon Approach / Evidence   | Frequency of Review | Last Review Date | Check completed | Compliant       | Notes | Action |
|-----|---|--|---------------------|------------------|-----------------|-----------------|-------|--------|
| J1  | Is the Administering Authority satisfied that those responsible for reporting breaches under the legal requirements and TPR guidance understand the requirements? | A breaches procedure is in place - the Head of Pensions, Treasury and Statutory Accounting is responsible for managing and monitoring breaches.<br><br>The Corporate Pension Manager is then responsible for reporting breaches to the PC/PB.<br><br>The policy has been published on the Hillingdon pension Fund website and copies given to Surrey CC and all employers and third parties. | Annual              | 21/09/2017       | Fully completed | Fully compliant |       |        |
| J2  | Does the Administering Authority have appropriate procedures in place to meet their legal obligations for identifying and assessing breaches?                     | The procedure includes the required features<br><br>The PB and PC have received training on the procedure  | Annual              | 21/09/2017       | Fully completed | Fully compliant |       |        |
| J3  | Are breaches being recorded in accordance with the agreed procedures?   | Surrey are fully aware of process put in place.  | Ongoing             | 21/09/2017       | Fully completed | Fully compliant |       |        |

## 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 | London Borough of Hillingdon Approach / Evidence   | Frequency of Review    | Last Review Date | Check completed | Compliant           | Notes | Action   |
|-----|--|-------------|--|------------------------|------------------|-----------------|---------------------|-------|--|
| K1  | Administering Authority to have approved the establishment (including Terms of Reference) of the Local Pension Board by 1 April 2015.  | 5           | Approved by full Council [add date] and added to Constitution                                    | Ongoing (annual check) | 01/05/2017       | Fully completed | Fully compliant     |       |  |
| 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           | The first meeting was held in early July (with 2 subsequent meetings since then Oct and Jan)     | Ongoing (annual check) | 30/07/2015       | Fully completed | Fully compliant     |       |  |
| 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           | Training Policy agreed / adopted   | Annual                 | 09/12/2015       | Fully completed | Fully compliant     |       |  |
| 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           | This is the Head of Pensions, Treasury and Statutory Accounting - This is set out in the policy. | Ongoing (annual check) | 09/12/2016       | Fully completed | Fully compliant     |       |  |
| K5  | The Administering Authority should offer access to high quality induction training and provide relevant ongoing training to the appointed members of the Local Pension Board.  | 6           | Training has been provided at PB meetings and via attendance at PC meetings                      | Ongoing (annual check) | 21/09/2017       | Fully completed | Fully compliant     |       |  |
| 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           | A formal list has not yet been produced but the key documents are available on the Fund website  | Ongoing (annual check) | 01/05/2017       | Fully completed | Partially compliant |       | Action to ensure all required documents are available and up to date on the website - and consider how the site may be developed so it is clearer how to get to the documents. |
| K7  | Members of a Local Pension Board should undertake a personal training needs analysis and put in place a personalised training plan.  | 6           | Personal training needs analyses and plans are in place. However not all members have completed. | Ongoing (annual check) | 01/08/2017       | Fully completed | Partially compliant |       | Develop training log for each member and a knowledge/training needs assessment   |

| No. | SAB Requirement  | SAB Section | London Borough of Hillingdon Approach / Evidence  | Frequency of Review    | Last Review Date | Check completed | Compliant           | Notes | Action |
|-----|--|-------------|---|------------------------|------------------|-----------------|---------------------|-------|--------|
| 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           | TOR is in place and Council's Code of Conduct and Conflict Policy applies to PB and PC members.   | Annual                 | 21/09/2017       | Fully completed | Fully compliant     |       |        |
| K9  | Training should be arranged for officers and members of a Local Pension Board on conduct and conflicts.  | 7           | Brief training has been provided and conflicts is also an agenda item at each meeting.  | Ongoing (annual check) | 21/09/2017       | Fully completed | Fully compliant     |       |        |
| K10 | A Local Pension Board should establish and maintain a register of interests for its members.   | 7           | This is included in the Council register - there currently is no Fund register - this is being considered.  | Ongoing (annual check) | 01/05/2017       | Fully completed | Partially compliant |       |        |
| K11 | An Administering Authority should agree the ongoing reporting arrangements between the Local Pension Board and the Administering Authority.  | 8           | The reporting arrangements are agreed as an annual report to Pensions Committee. First report September 2017.   | Ongoing (annual check) | 01/05/2017       | Fully completed | Fully compliant     |       |        |
| 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           | The requirements are included in the Council's Code of Conduct so members will be aware of the requirements if they are Council members. This will also be explained to the pensioner member who is the only member who may not have been exposed to this before - the FOI officer will discuss this with the member. | Ongoing (annual check) | 01/02/2017       | Fully completed | Fully compliant     |       |        |
| K13 | A Local Pension Board should put in place arrangements to meet the duty of its members to report breaches of law.  | 8           | A procedure is in place and recording/reporting is under way  | Ongoing (annual check) | 21/09/2017       | Fully completed | Fully compliant     |       |        |
| K14 | A Local Pension Board should consider (with its Administering Authority) the need to publish an annual report of its activities.   | 8           | First to Pensions Committee in September 2017.  | Annual                 | 21/09/2017       | Fully completed | Fully compliant     |       |        |
| K15 | An Administering Authority should consult on, revise and publish its governance compliance statement to include details of the terms, structure and operational procedures relating to its Local Pension Board.  | 8           | Updated for October PB meeting  | Annual                 | 21/09/2017       | Fully completed | Fully compliant     |       |        |