West Midlands Fire and Rescue Authority

Pension Board

You are summoned to attend the meeting of Pension Board to be held on
Thursday, 20 July 2017 at 11:00

at Fire Service HQ, 99 Vauxhall Road, Nechells, Birmingham B7 4HW

for the purpose of transacting the following business:

Agenda – Public Session

Distribution:

Neil Chamberlain - Independent Chair, Stuart Bourne - Employee Representative, Wendy Browning-Sampson - Employer Representative, Andrew Dennis - Employee Representative and Kal Shoker - Employer Representative

Clerk Name: Karen Gowreesunker

Clerk Telephone: 0121 380 6678

Clerk Email: Karen.Gowreesunker@wmfs.net

Agenda prepared by Julie Connor

Strategic Hub, West Midlands Fire Service

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This agenda and supporting documents are also available electronically on the West Midlands Fire Service website at www.wmfs.net

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Minutes of a Meeting of the Pensions Board

6 February 2017 at 1400 hours
at Fire Service Headquarters, Vauxhall Road, Birmingham

Present: Mr Kal Shoker (Chair)
Ms Wendy Browning-Sampson
Mr Andrew Dennis
Mr Stuart Bourne
Mr Paul Gwynn (Adviser)

Apologies: Mr Neil Chamberlain

1/17 Declarations of Interest

Mr Andrew Dennis declared an interest stating that he is in receipt of a Fire Service Pension.

2/17 Minutes of the Pensions Board held on 11 July 2016 and actions arising

The Minutes were agreed as a correct record.

Actions

Action 1 - Pension Adviser to liaise with another Fire Service regarding sample checking of pension records for deferred members.

Action 2 – The Adviser to publish the link to the Discretions Policy to the Pensions Page on Internet with a link to the Pay Policy Document from Pensions Page

Action 3 – The Adviser had liaised with the Treasurer. A communication to members about the change to the regulations and the decrease in response times due to greater demands for requests for information and staff shortages had not been sent out. It was agreed that a communication would be sent out when the new structure in the Pensions Team comes in place on 1 April 2017.

Action 4 – Mr Shoker to liaise with the Treasurer regarding the conference call to each Chair of a Pension Board (referenced on page 2 of the Scheme Advisory Board document)

3/17 Minutes of the Pension Board held on 25 October 2016

The minutes were agreed as a true record.

4/17 Minutes of the Audit Committee held 14 November 2016

The minutes of the Audit Committee were noted and the resolutions of the Breach of Disclosure Regulations had been actioned. The other actions were to be considered at the Pensions Board meeting.

The Adviser confirmed that the costs related to a self-service system had been previously considered and found to be prohibitive.

5/17 Terms of Reference

Further to Minute No. 51/16 of the Audit Committee of the 14 November 2016 in respect the Breach of the Disclosure Regulations, the Pension Board was requested to consider its Terms of Reference in respect of the reporting of breach of the law to the Pensions Regulator.

The Board agreed that Section 16 of the Terms of Reference should be amended to include breaches of the law that need to be reported to the Pensions Regulator. Members of the Board to formulate a paragraph to be included in the Terms of Reference. This would be shared with the Pensions Board before being included in the updated Terms of Reference.

Section 4 Quorum would also be amended to reflect the arrangements for a Chair of the Board in the absence of the Independent Chair.

6/17 Annual Report

The Members of the Board considered examples of Annual Reports prepared by other Metropolitan Fire Service Pension Boards. The Board agreed that they would present an Annual Report to the Audit Committee on the 5th June 2017 for their consideration and inclusion with the Audit Annual Report to the Annual General Meeting.

A draft Annual Pensions Board Report would be prepared with assistance from the Adviser. The draft Annual Report would be available at the May Pension Board for comments and approval.

7/17 Consideration of Reappointment of Members

WBS reminded the members of the Board, that their three year appointments were due for renewal in 2018. It was agreed that the consideration of the reappointment of Members of the Board would be placed as a standing item on the Agenda of all future Pension Boards until the next round of appointments.

8/17   Correspondence from the Pension Regulator

Correspondence had been received from the Pension Regulator in respect of record keeping and the importance of complete and accurate records.

The Adviser would liaise with another Fire Authorities in respect of sample checking of audit records. Internal Audit had found that accurate record keeping was being undertaken in a recent audit of the Pensions Team. The record-keeping quick guide provided by the Regulator would be used to Review the record-keeping and an update would be provided at the Pension Board scheduled for July 2017.

Mr Shoker confirmed that that External Auditors conducted sample testing and the payment of benefits as part of the end of year audit.

9/17.   Legal Duty to Publish Information about the Pension Board

The Board considered further correspondence from the Pension Regulator regarding the legal duty to publish information about their pension boards and keep this information up to date and make sure this information is available to all members.

It was confirmed that all the Pension Board information was held on the West Midlands Fire and Rescue Authority, Committee Management Information System (CMIS) and was available via the wmfs.net website.

The Pension Adviser confirmed that an email was forwarded to all members of the Pension Schemes informing them of the Pension Board and where to find the minutes.

SB suggested that a table-top exercise is undertaken to ensure that members are able to access the information.

10/17   Public Service Governance Survey

The Board considered the Pension Regulator's Public Service Governance Survey 2016. The Survey was completed in September 2016. Each question was considered individually and the answers were found to be appropriate. The Pension Board were comfortable with the survey and agreed to present it to the Scheme Manager at the next scheduled meeting of the Audit Committee.

11/17   Scheme Advisory Board Chair's Update

The Pension Board noted the contents of the Scheme Advisory Board Chair's Update together with the letter from the Minister of State for Policing and the Fire Service.

12/17 Feedback from Annual Pension Conference

Mr Shoker had attended the Annual Pension Conference on behalf of the Independent Chair in October 2016 in London. The Conference was Chaired by the Scheme Advisory Board Chair, Malcolm Eastwood. There were a number of presentations, including one on the GAD case. One of the three workshops at the Conference focussed on the Annual Benefit Statement and it was noted that a number of Authorities had missed the deadline due to software issues.

13/17 Pension Section Update

The Pension Board received an update on the work of the Pension Section from the Adviser.

It was noted there had been 63 age related retirements and 5 ill-health retirements. The opt out were higher than they had been during the last three years. There had been one returnee from a career break. 19 applications had been received to transfer in or out.

The average response time was now four months due to staff shortages. Another member of the team was being recruited to deliver shorter timescales.

Annual Benefit Statements were not issued by 31 August 2016. The reasons for this and a recovery plan were detailed as part of an emergency Pension Board held in October 2016.

The Adviser stated that the 2015 Scheme was based on a retirement age of 60, however members could retire earlier if they had reached the age of 55 or achieved 30 years' service.

The Adviser confirmed that he had received a larger number of divorce quotations, but had not received many retirement estimate requests due to new Scheme.

The Board noted the levels of Opt outs during the period 1 January to 31 December 2016 and the main reason for opting out appeared to be cost, although none of those opting out of the 2015 scheme were new recruits.

14/17 Risk Register

The Pension board received the Risk Register and agreed that the Legal Challenge in respect of the Transitional Regulations should be added as a high risk to the Register.

15/17 <u>Training</u>

Mr Shoker and Mr Bourne had undertaken pension training at Hereford and Worcester Fire Service where a dialogue had taken place with Mr Ian Pollett about Regional Training. This would take the form of one day's training or sandwich courses and would be hosted around the West Midlands area. Any potential areas of training were to be forwarded to Ms Browning-Sampson and this could be condensed into one training session or drip fed through.

16/17 <u>Annual Effectiveness Assessment</u>

It was agreed that the Annual Report would provide an assessment of the effectiveness of the Pension Board.

17/17 <u>Update on Topical, Legal and Regulatory Issues</u>

There were no new issues to be reported.

18/17 <u>Pension Board Activity Log 2016/17</u>

The Pension Board Activity Log was noted.

19/17 <u>Pension Board Work Programme 2016/17</u>

The Pension Board Work Programme was noted

20/17 <u>Date and Time of Next Meeting</u>

The next meeting was scheduled for May 2017 to consider progress on the production of the Annual Benefit Statement with the formal meeting scheduled for July 2017.

PENSIONS BOARD

6 February 2017

ACTIONS

Action No.	Action
1.	Pension Adviser to liaise with another Fire Service regarding sample checking of pension records for deferred members.
2.	The Adviser to publish the link to the Discretions Policy to the Pensions Page on Internet with a link to the Pay Policy Document from Pensions Page
3.	The Adviser had liaised with the Treasurer. A communication to members about the change to the regulations and the decrease in response times due to greater demands for requests for information and staff shortages had not been sent out. It was agreed that a communication would be sent out when the new structure in the Pensions Team comes in place on 1 April 2017.
4.	Mr Shoker to liaise with the Treasurer regarding the conference call to each Chair of a Pension Board (referenced on page 2 of the Scheme Advisory Board document)
5.	Terms of Reference to be updated in respect of breaches of the law that need to be reported to the Pensions Regulator. Members of the Board to formulate a paragraph to be included in the Terms of Reference. This would be shared with the Pensions Board before being included in the updated Terms of Reference.
6.	Section 4 Quorum would also be amended to reflect the arrangements for a Chair of the Board in the absence of the Independent Chair.
7.	A draft Annual Pensions Board Report would be prepared with assistance from the Adviser.
8.	The Pension Board were comfortable with the survey and agreed to present it to the Scheme Manager at the next scheduled meeting of the Audit Committee
9.	Legal Challenge in respect of the Transitional Regulations should be added as a high risk to the Register
10.	Requests for training to be forwarded to Ms Browning Sampson.

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Notes of the Pension Board
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Tuesday 9 May 2017 at 1030 hours
at Fire Service Headquarters, Vauxhall Road, Birmingham

Present: Neil Chamberlain   Independent Chair
            Wendy Browning-Sampson   Employer Representative
            Kal Shoker   Employer Representative

Apologies: Stuart Bourne   Employee Representative
            Andy Dennis   Employee Representative

Officer: Paul Gwynn   Payroll and Pension Manager
            Pension Advisor

21/17   Declarations of Interest

            There were no declarations of interest on this occasion.

22/17   Progress Report on Action Plan for Production of Annual Benefit
            Statement

            Further to the Extraordinary meeting of the Pensions Board held
            on 25 October 2016, the Pension Adviser outlined the details of
            the Breach of Disclosure Regulations by the failure to issue an
            Annual Benefit Statement to all scheme members by 31 August
            2016 for the benefit of the Board, and the action plan required to
            avoid a recurrent of the delay when Annual Benefit Statements
            are issued in 2017.

            Action to prevent a recurrence in 2017

            To avoid a recurrence of the delay when statements are issued
            in 2017 the following process will be used.

            1.   Membership data will be checked during the period January
                 to March 2017. This is to ensure that all records are updated
                 as needed with the correct scheme information.

            2.   Discussions will take place with the Admin team to ensure
                 that they will have an appropriate level of staff availability to
                 envelope and distribute the statements.

3. The documents to be produced will be reviewed during March 2017 to ensure that they are as uniform as possible and hold all the required data.

4. Payroll data will be loaded to ALTAIR at the earliest opportunity after 31st March 2017.

5. A test batch of statements for each of the 4 groups will be produced by 30th April 2017. Any errors will be notified to Aquila Heywood as soon as discovered and a fix will be requested.

6. An informal Pension Board meeting will be held during May to monitor progress of this action plan and to consider alternative solutions should any issue be encountered.

7. The test batch will be reprocessed following delivery of any fix.

8. If no errors remain unfixed statements will be printed during July 2017 and issued during August to ensure receipt prior to 31st.

9. If errors remain at 30th June these will be escalated to Aquila Heywood management team and statements will be produced for all members unaffected during July as planned.

10. Any statements which are still in error at 31st July will be amended and issued manually.

A briefing note confirming the progress against the action plan is attached to these notes.

The Adviser had looked at his Section and the management of the workload to ensure there was no repetition.

All work has been amended with software.
User group have input into the design of the statement
The statement will be different
The Advisers/User Group felt this was good for the LGPS but not for the Firefighters Pension Scheme.
Revised the statement – new schemes.
Old style statement -

Everyone will now get a modified statement this year.

All Fire and Rescue Services will use the statement (tested) by Aquila Heywood.

The statement will include an estimate of benefits to be paid at normal pension age, the date Members are due to retire either 55 or when they have served 30 years or age 60.

From the 31 March 2017 the estimates will be for age 55 and age 60.

The Adviser had been part of the testing Working Party but had not consulted internally.

It was suggested that this could be shared with the Unions at the Joint Consultative Committee in June.

The Statements will continue to be provided as a paper version. Self-service had not been implemented due to costs.

It was noted that the LGPS statement are self-service but this obligatory.

Administration will be enveloping and posting the statements. Pensions team were currently working on the P60s.

Actions 4 and 5 had not been completed but the Pensions Team would have this work loaded onto Altair and completed by the 31 Mary 2017. A test batch of statements would then be produced.

If there were any problems the Adviser would inform the Kal Shoker and Wendy Browning-Sampson.

It was suggested that the Adviser request support from the Administration Team re the distribution of bulk work and to make them aware of the statutory requirements of the distribution of the statements and that it should be treated as a priority.

It was confirmed that the statements would be prepared for July and posted in August.

The test batch would be provided for the JCC meeting scheduled for 6 June 2017.

The Statements set out benefits, payments, service and any strike action dates. They can run to three pages in total and are printed on single pages.

There had been quite a few requests the previous year for reprints. The Statements had been posted to work addresses and 95% had reached the recipients. It was felt that an electronic self service system would overcome this problem.

It was agreed that an example of an Annual Benefit Statement would be provided at the next Pensions Board meeting in July.

The Adviser would email members of the Board if there were any issues.

An action plan/summary of work undertaken would be provided and the Risk Register would be updated.

23/17   The Adviser stated that a valuation of the scheme was awaited. The Chairman of the English Firefights' Scheme Advisory Board had made a statement about this and he had asked for recommendations on how to reduce the number of administrators nationally.

A meeting of senior Fire Officers had been held and attended by the Deputy Chief Fire Officer and Strategic Enabler (Finance and Resources). There didn't appear to be an appetite for regionalisation and Hereford and Worcester were tendering for a pension provider. It was noted that West Yorkshire provide LGPS and Fire Pension Fund services for several organisations.

Opportunities for collaboration were being considered for regional provision.

The meeting closed at 1200 hours.

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Julie Connor
Strategic Hub
0121 380 6906
Julie.Connor@wmfs.net
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<u>Briefing Note – Breach of Disclosure regulations</u>
<u>Failure to issue an Annual Benefit Statement to all scheme members by 31st</u>
<u>August 2016</u>

1. Background

    West Midlands Fire Service has a Statutory obligation under The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 and The Public Sector Pensions Act 2013 to provide an Annual Benefit Statement to all active members of each of the Firefighters Pension schemes no later than 31st August each year.

    Failure to meet the required obligation must be reported to The Pension Regulator.

    The responsibility for monitoring compliance with the regulations is vested in the Local Pension Board.

    This briefing note is provided to the Pension Board to inform them of the breach, provide an explanation of the causes of the breach, and outline remedial action being taken to prevent a recurrence in subsequent years.

2. Causes

    Annual Benefit Statements are produced by West Midlands Fire Service Pensions section using the ALTAIR System provided to them under licence from Aquila Heywood Plc. As the 2016 Annual Benefit Statements were the first to be issued since the implementation of the 2015 Firefighters Pension Scheme a software update was required from the system supplier before production of the statements could begin.

    The software update was provided to West Midlands Fire Service on Friday 29th July 2016.

    In addition to the ability to produce the Annual Benefit Statements this update also enabled Authorities to extract the data required by the Government Actuaries Department for the 2016 valuation exercise. This data was required by 12th August and was produced and submitted by 5th.

    Owing to Annual Leave commitments work on the Annual Benefit Statements was then begun on Monday 15th August.

    Production of the statements needed to be done in four separate batches to account for the following membership types;

    a) Fully Protected 1992 scheme members
    b) Fully Protected 2006 scheme members
    c) Members of the 1992 or 2006 scheme who had joined or would join the 2015 scheme before retirement
    d) Members of the Modified Pension scheme

Whilst production of the statements for the first two batches was a simple matter of running the process used in previous years this was not the case for those members of the third or fourth groups.

When producing the statements the process operated as follows;

1. Relevant members were selected
2. Statements were produced
3. Spot checking of Statements took place
4. Errors detected were reported to system supplier. Owing to timescales the system supplier did not fix these errors but simply advised on a work around.
5. Work around was implemented
6. Process returns to point 2 until no errors are detected.
7. Statements are printed
8. Statements are issued by registry

Following this process from step 1 to 5 could take up to a week depending on the number of errors found and the speed with which a work around was notified.

Processing benefit statements for groups a to c took until 9th September and the statements then took a further two weeks to be distributed via registry. The statements for group d were manually produced and issued via email on 20th September.

3. Action to prevent a recurrence in 2017

    To avoid a recurrence of the delay when statements are issued in 2017 the following process will be used.

    1. Membership data will be checked during the period January to March 2017. This is to ensure that all records are updated as needed with the correct scheme information.
    2. The documents to be produced will be reviewed during March 2017 to ensure that they are as uniform as possible and hold all the required data.
    3. Payroll data will be loaded to ALTAIR at the earliest opportunity after 31st March 2017.
    4. A test batch of statements for each of the 4 groups will be produced by 30th April 2017. Any errors will be notified to Aquila Heywood as soon as discovered and a fix will be requested.
    5. The test batch will be reprocessed following delivery of any fix.
    6. If no errors remain unfixed statements will be printed during July 2017 and issued during August to ensure receipt prior to 31st.
    7. If errors remain at 30th June these will be escalated to Aquila Heywood management team and statements will be produced for all members unaffected during July as planned.
    8. Any statements which are still in error at 31st July will be amended and issued manually.

WEST MIDLANDS FIRE AND RESCUE AUTHORITY

PENSION BOARD

20 JULY 2017

PENSION SECTION SUPPORTING INFORMATION

1.   **WEST MIDLANDS FIRE SERVICE FIREFIGHTERS' PENSION SCHEMES MEMBERSHIP AS AT 31st MAY 2017**

Scheme	Actives	Deferred	Pensioners (Including Dependants)
1992	353	239	2,524
2006	9	166	3
2015	917	8	
Modified	3	1	3

2.   **ANNUAL ACTIVITY LEVELS**

2.1   During the last twelve months (01/06/2016 to 31/05/2017) the following levels of activity have been experienced:-

Age Related Retirements	64
Ill Health Retirements	3
Opt outs	18
Other leavers	23
New joiners	1
Applications to transfer in/out	27
Inter-brigade transfer requests processed	11
Cash transfer payments made	1
Transfers not completed	12

Ref. AU92606171

2.2 The section has also processed the requests shown in the table below and achieved the levels of performance shown.

Request type	Received	Responded to	Average Response time (days))
Benefit Estimate	85	131	155
CETV for Divorce	20	28	137
General Information	140	187	183

The number of cases responded to includes a sizeable number of cases which were received prior to 1st June 2016 but not responded to until the year being reported. This has led to the average response time being higher than the 92 day target.

3. **RISK REGISTER**

No updates have been made to the Risk Register since the last Pension Board meeting.

4. **ANNUAL BENEFIT STATEMENTS**

4.1 Annual Benefit Statements are due to be issued by 31st August 2017. At the current time the section expects to meet these deadlines.

5. **INTERNAL DISPUTE RESOLUTION PROCEDURE (IDRP)**

The dispute reported at the last Pension Board meeting went to appeal and the Committee upheld the decision of the Deputy Chief Fire Officer. The member now has the option of taking his complaint to The Pension Ombudsman.

Ref. AU92606171

6. **OPT OUT LEVELS AND REASONS**

West Midlands Fire Service has experienced the levels of Opt outs shown in the following table during the period 1st June 2016 to 31st May 2017.

Month	1992 Scheme	2015 Scheme	Total	Primary Reason if known
June 16				
July		1	1	
August			1	
September			1	
October	1	2	3	92 Member opt out to take benefits as he had reached age 60
November		2	2	
December		2	2	
January 17	1	1	2	92 Member opt out to take benefits as he had reached age 60
February		4	4	
March		1	1	
April		1	1	
May		2	2	

Anecdotally the reason for opting out appears to be cost. Of those opting out of the 2015 scheme 7 were previously members of the 2006 scheme, 6 had membership of the 1992 scheme, 2 members had been automatically re-enrolled, and 1 had chosen to re-join but subsequently opted out again.

Paul Gwynn
Payroll and Pensions Manager

Ref. AU92606171

Issue Date: 4 August 2017

Section 1: Personal Details

Member Full Name and Title:	Firefighter	Date of Birth:	NI Number:
Partnership Status:		Payroll Number:	Member Ref. Number:

Fire Authority at 31 March 2017:
West Midlands Fire Service

Date Comm. Emp.:
18 September 2006

FPS 2015 Start Date:
1 April 2015

Pension Scheme at 31 March 2017: Firefighters Pension Scheme 2015

This statement should be read in conjunction with the accompanying notes.
It is important that you check these for accuracy and contact Pensions@wmfs.net should
there be any inaccuracies

KEEP IT SAFE!
Remember - this statement contains personal information.

Section 2: Summary of Total Benefits at 31 March 2017

Your benefits accrued at 31/03/2017:
(as detailed in sections 3 and 4)

Benefits payable on your death in service at 31/03/2017:

Annual Pension:
£5220.63

Death in Service Lump Sum:
£91444.44

Annual Survivor Pension:
£0.00

Section 3: Career Average Pension Benefits as at 31 March 2017 (payable from 02/10/2045)

PLEASE NOTE: The benefits calculated in this section of the statement are based on the pay figures shown. It is important that you check this and the pension build-up on the lines below and contact Pensions@wmfs.net to report any perceived inaccuracies.

Pensionable Pay for year ending 31 March 2017:	£30481.48

Amount of pension built up in year 2016/17:

2016/17: Earned Pension	Additional Pension bought	Transfers In	Total
30481.48 / 59.7 = £510.58	£0.00	£0.00	= £510.58

Total Career Average Pension to 31 March 2017:

Closing balance at 31/03/2016	Increase for cost of living (added 01/04/2016)	In Year build up (as shown above)	Total Career Average Pension at 31/03/2017
£505.53	+ £10.11	+ £510.58	= £1026.22

Section 4: Value of 2006 Benefits as at 31 March 2017 (payable from 02/10/2045)

Final Salary Pay: £29564.77

Annual pension: £4194.41

Section 5: Projections if you remain contributing to the Scheme until Normal Retirement Date 02/10/2045

Pension (no LS) at 02/10/2045:
£19774.20

Maximum Lump Sum:
£59322.48

Pension (max LS) at 02/10/2045:
£14830.66

(Including:
Projected 2015 Scheme Pension
= £15579.78
and Projected 2006 Pension to NPA
= £4194.42)

(Including:
2015 Scheme Lump Sum
= £46739.28
and 2006 Lump Sum
= £12583.20)

(Including:
Projected 2015 Scheme Pension
= £11684.84
and Projected 2006 Pension to NPA
= £3145.82)

Prospective survivor's annual pension if you remain in the Scheme to NPA (no LS taken):
£0.00

Prospective survivor's annual pension if you remain in the Scheme to NPA (max LS taken):
£0.00

(including £0.00 from the 2015 Scheme and £0.00 from the 2006 Scheme)

(including £0.00 from the 2015 Scheme and £0.00 from the 2006 Scheme)

Section 6: Value of Pension Debits as at 31/03/2017

Divorce Debit: £0.00

Scheme Pays Debit: £0.00

PLEASE NOTE: The above debits have been deducted from any of the benefits calculated above

Section 7: Annual Allowance as at 05/04/2017

Pension Input Amount: £9293.76

Carry Forward Amount: £30706.24

Section 8: Lifetime Allowance Details as at 31/03/2017

Value of Crystallised Benefits: £104412.60

Section 9: Service History Details

Employer	From	To	Years and days
West Midlands FRA	01/04/2015	31/03/2017	02/000
	18/09/2006	31/03/2015	08/187

Pensions Board – 20 July 2017

Amended Terms of Reference for Approval

Terms of Reference for the Pension Board of the West Midlands Fire & Rescue Authority

Terms of Reference and Delegated Authorities

Introduction

~~This~~ The purpose of this document outlines ~~is to set of~~ the terms of reference for the local Pension Board of the West Midlands Fire & Rescue Authority.

Role of the Pension Board

The role of the local Pension Board as defined by section 5(1) and (2) of the Public Service Pensions Act 2013 is to-

• Assist the Scheme Manager:

- to secure compliance with the Scheme regulations and any other legislation relating to the governance and administration of the Firefighters' Pension Scheme ("the Scheme").

- to secure compliance with requirements imposed in relation to the Scheme by the Pensions Regulator.

- in such other matters as the Scheme regulations may specify.

• Secure the effective and efficient governance and administration of the Scheme for the West Midlands Fire & Rescue Authority.

• Provide the Scheme Manager with such information as it requires ensuring that any member of the Pension Board or person to be appointed to the Pension Board does not have a conflict of interest.

The Pension Board will ensure it effectively and efficiently complies with the code of practice on the governance and administration of public service pension schemes issued by the Pension Regulator.

The Pension Board will also ensure that the Scheme is managed and administered effectively and efficiently and complies with the code of practice on the governance and administration of public service pension schemes issued by the Pension Regulator.

The Pension Board shall meet sufficiently regularly to discharge its duties and responsibilities effectively.

Appointment of Member of the Pension Board

The process for selecting members of the Pension Board is set out below:-

The Fire Service will consider matters such as who is eligible to stand, how the nomination process will work and what sort of information candidates will need to submit. The Service will appoint through election or selection with the rules of governing the process. The Fire Authority has an independent chair who will chair the Pension Board meetings, this role will be an independent role.

The Pension Board shall consist of 5 members and be constituted as follows:-

i)   2 employer representatives, which have been identified, and appointed

ii)   2 scheme member representatives, which have been identified, and elected

iii)   1 independent chair selected.

Scheme member and employer representatives shall be appointed in equal number and shall together form the majority of the Board's membership.

The Chair of the Pension Board will be determined by the Authority. It will be the role of the Chair to ensure that all members of the Board show due respect for process, that all views are fully heard and considered and to determine when consensus has been met.

The term of office for the Chair will be determined by the Scheme Manager.

Each employer representative and scheme member representative so appointed shall serve for a fixed period (of up to three years) which can be extended for further period(s) subject to re-nomination and/or election.

Each Board Member should endeavour to attend all Board meetings during the year and is required to attend at least 2 meetings each year. In the event of consistent non-attendance by any Board member, then the tenure of that membership should be reviewed by the other Board members in liaison with the Scheme Manager.

Other than by ceasing to be eligible as set out above, a Board member may only be removed from office during a term of appointment by the unanimous agreement of all of the other members. The removal of the independent member requires the consent of the Scheme Manager.

The Board may, with the approval of the Scheme Manager, co-opt persons who are not members of the Board to serve on sub committees, particularly where this would add skills and experience. Notwithstanding the appointment of co-opted members, the majority of the Board shall be comprised of employer and Scheme member representative, represented in equal number.

Quorum

The Board shall have a formal quorum when at least one employee representative and one employer representative are in attendance.

In the absence of the Independent Chair, a Chair person will be selected on a rotational basis between employee and employer representatives.

Advisors and co-opted persons do not count towards the quorum.

Conflicts of Interest

The policy for identifying conflicts of interest is set out in a separate policy document. Any conflicts of interest that would prevent you from carrying out the role effectively will need to be highlighted to the Service.

Board Review Process

The Board will undertake at the first meeting of the year, a formal review process to assess how well it and its committees and the members are performing with a view to seeking continuous improvement in the Board's performance.

Advisers to the Board

The Board may be supported in its role and responsibilities through the appointment of advisers and shall, subject to any applicable regulation and legislation from time to time in force, consult with such advisers to the Board and on such terms as it shall see fit to help better perform its duties including:-

● A Governance Adviser.

● The Fund's Actuary.

● The Fund's Administrator.

● The Scheme Manager.

● Other advisers, so approved by the Scheme Manager.

The Board shall ensure that the performance of the advisers so appointed are reviewed on a regular basis.

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Knowledge and Skills

The Code of Practice No. 14 Governance and Administration of public service pension schemes states "A member of the Pension Board must have a working knowledge and understanding of the law relating to pensions (and any other prescribed matters) sufficient for them to exercise the function of their role. Pension board members should be aware of the range and extent of the law relating to pensions which apply to their Scheme and have sufficient understanding of the content and effect of that law to recognise when and how it impacts on their responsibilities and duties".

It is for individual Pension Board members to be satisfied that they have the appropriate degree of knowledge and understanding to enable them to properly exercise their functions as a member of the Pension Board.

In line with this requirement Pension Board members are required to be able to demonstrate their knowledge and understanding and to refresh and keep their knowledge up to date. Pension Board members are therefore required to maintain a written record of relevant training and development.

Pension Board members should regularly review their skills, competencies and knowledge to identify gaps or weaknesses. Pension Board members will be expected to attend training to ensure that their knowledge and skills are maintained.

Board Meetings – Notice and Minutes

The Scheme Manager shall give notice to all Pension Board members of every meeting of the Pension Board. The Scheme Manager shall ensure that a formal record of Pension Board proceedings is maintained. Following the approval of the minutes by the Chair of the Board or Board Committee, they shall be circulated to all members of the Board and forwarded to the Scheme Manager.

There will be two Pension Board meetings a year to be held six monthly. The minutes of the Pension Board will be approved by the Scheme Manager and shared with pension scheme members.

Remit of the Board

The Pension Board must assist the Scheme Manager with such other matters as the Scheme regulations may specify. It is for Scheme regulations and the Scheme Manager to determine precisely what the Pension Board's role entails.

Standards of Conduct

The role of Pension Board members requires the highest standards of conduct and therefore the 'seven principles of public life will be applied to all Pension Board members and embodied in their code of conduct.

Commented [JC4]: Include in yearly assessment/plan/work schedule

These are:-

- Selflessness

- Integrity

- Objectivity

- Accountability

- Openness

- Honesty

- Leadership.

Decision Making

Each member of the Pension Board will have an individual voting right but it is expected the Pension Board will, as far as possible, reach a consensus. The Independent Chair of the Pension Board will not have voting rights.

Publication of Pension Board Information

Scheme Members and other interested parties will want to know that the Scheme is being efficiently and effectively managed. They will also want to be confident that the Pension Board is properly constituted, trained and competent in order to comply with Scheme regulations, the governance and administration of the Scheme and requirements of the Pension Regulator.

Up to date information will be posted on the West Midlands Fire & Rescue Authority website showing:-

- The names and information of the Pension Board members.

- How the Scheme members are represented on the Pension Board.

- The responsibilities of the Pension Board as a whole.

- The full terms of reference and policies of the Pension Board and how they operate.

- The Pension Board appointment process.

- Who each individual Pension Board member represents.

- Any specific roles and responsibilities of individual Pension Board members.

Pension Board papers, agendas and minutes of meetings will be

published on the West Midlands Fire & Rescue Authority website. These may at the discretion of the Scheme Manager be edited to exclude items on the grounds that they are deemed as being confidential for the purposes of the Data Protection Act 1998.

The Scheme Manager will also consider requests for additional information to be published or made available to individual Scheme members to encourage Scheme member engagement and promote a culture of openness and transparency.

Accountability

The Pension Board will be collectively and individually accountable to the Scheme Manager.

Expense Reimbursement [Remuneration and Allowances]

There will be no specific remuneration for undertaking the role of representative on the Local Pension Board. However, travel expenses in line with public transport or car mileage may be claimed with a valid receipt.

Reporting Breaches

Pension Board members are required to report breaches of the law to the regulator where they believe there is a legal duty that has not or is not being complied with or the failure to comply will be of material significance to the Pensions Regulator in the exercise of its functions. Any breach brought to the attention of the Pension Board, whether potential or actual, shall be dealt with in accordance with the procedure set out in a separate policy document. the Authority's Whistle Blowing Policy attached here: the Whistle Blowing Policy.

Definitions

The undernoted terms shall have the following meaning when used in this document.

"Pension Board" or Authority "Board"	Means the local Pension Board for the Fire as required under the Public Service Pensions Act 2013.
"Scheme Manager"	Means the West Midlands Fire & Rescue Authority as administering authority of the Pension Fund.
"Chair"	Reference to duties to be performed, or authorise exercised, by the Chair.
"Scheme"	Means the Firefighters' Pension Schemes.
"West Midlands Fire & Rescue Authority"	Means the West Midlands Fire & Rescue Authority.

Interpretation

Any uncertainty or ambiguity or interpretation required relating to any matters contained in this document shall be resolved by reference to the Scheme Manager.

WEST MIDLANDS FIRE SERVICE

FIRE FIGHTERSPENSION FUND

Reporting Breaches Procedure

MARCH 2017

1.   Introduction

1.1 This document sets out the procedures to be followed by certain persons involved with the West Midlands Fire Service (WMFS) Fire Fighters Pension Fund, managed and administered by WMFS, in relation to reporting breaches of the law to the Pensions Regulator.

1.2 Breaches can occur in relation to a wide variety of the tasks normally associated with the administrative function of a scheme such as keeping records, internal controls, calculating benefits and making investment or investment-related decisions.

1.3   This Procedure document applies, in the main, to:

- all members of the WMFS Pension Board;
- all officers involved in the management of the scheme such as: Audit Committee as Scheme Manager of the Pension Fund, members of the Finance Team and Pensions Administration Team, and the Strategic enabler for Resources (Section 151Officer and Deputy);
- any professional advisers including auditors, actuaries, legal advisers and fund managers; and
- officers of employers participating in the WMFS Fire Fighters Pension Fund who are responsible for Fire Fighters Pension n Scheme matters.

2.   Requirements

2.1   This section clarifies the full extent of the legal requirements and to whom they apply.

2.2   **Pensions Act 2004**
Section 70 of the Pensions Act 2004 (the Act) imposes a requirement on the following persons:

- a trustee or manager of an occupational or personal pension scheme;
- a member of the pension board of a public service pension scheme;
- a person who is otherwise involved in the administration of such a scheme an occupational or personal pension scheme;
- the employer in relation to an occupational pension scheme;
- a professional adviser in relation to such a scheme; and
- a person who is otherwise involved in advising the trustees or managers of an occupational or personal pension scheme in relation to the scheme, to report a matter to The Pensions Regulator as soon as is reasonably practicable where that person has reasonable cause to believe that:
(a)   a legal duty relating to the administration of the scheme has not been or is not being complied with, and

(b)   the failure to comply is likely to be of material significance to The Pensions Regulator.

The Act states that a person can be subject to a civil penalty if he or she fails to comply with this requirement without a reasonable excuse. The duty to report breaches under the Act overrides any other duties the individuals listed above may have. However the duty to report does not override 'legal privilege'. This means that, generally, communications between a professional legal adviser and their client, or a person representing their client, in connection with legal advice being given to the client, do not have to be disclosed.

2.3   **The Pension Regulator's Code of Practice**
Practical guidance in relation to this legal requirement is included in The Pension Regulator's Code of Practice including in the following areas:

- implementing adequate procedures.
- judging whether a breach must be reported.
- submitting a report to The Pensions Regulator.
- whistleblowing protection and confidentiality.

2.4   **Application to the WMFS Fire Fighters Pension Fund**
This procedure has been developed to reflect the guidance contained in The Pension Regulator's Code of Practice in relation to the WMFS Fire Fighters Pension Fund and this document sets out how the Board will strive to achieve best practice through use of a formal reporting breaches procedure.

3   **The WMFS Fire Fighters Pension Fund Reporting Breaches Procedure**

The following procedure details how individuals responsible for reporting and whistleblowing can identify, assess and report (or record if not reported) a breach of law relating to the WMFS Fire Fighters Pension Fund. It aims to ensure individuals responsible are able to meet their legal obligations, avoid placing any reliance on others to report. The procedure will also assist in providing an early warning of possible malpractice and reduce risk.

3.1   **Clarification of the law**
Individuals may need to refer to regulations and guidance when considering whether or not to report a possible breach. Some of the key provisions are shown below:

- Section 70(1) and 70(2) of the Pensions Act 2004: www.legislation.gov.uk/ukpga/2004/35/contents
- Employment Rights Act 1996: www.legislation.gov.uk/ukpga/1996/18/contents
- Occupational and Personal Pension Schemes (Disclosure of

Information) Regulations 2013 (Disclosure Regulations):
www.legislation.gov.uk/uksi/2013/2734/contents/made
- Public Service Pension Schemes Act 2013:
www.legislation.gov.uk/ukpga/2013/25/contents
- Fire Fighter Pension Regulations 1991, 2006, (INcude links)
- The Pensions Regulator's Code of Practice:
http://www.thepensionsregulator.gov.uk/codes/code-governance-administration-publicservice-pension-schemes.aspx

In particular, individuals should refer to the section on 'Reporting breaches of the law', and for information about reporting late payments of employee or employer contributions, the section of the code on 'Maintaining contributions'.

Further guidance and assistance can be provided by the Head of Finance Governance & Assurance (s151 Officer) and Monitoring Officer, provided that requesting this assistance will not result in alerting those responsible for any serious offence (where the breach is in relation to such an offence).

3.2 **Clarification when a breach is suspected**
Individuals need to have reasonable cause to believe that a breach has occurred, not just a suspicion. Where a breach is suspected the individual should carry out further checks to confirm the breach has occurred. Where the individual does not know the facts or events, it will usually be appropriate to check with the Strategicu Enabler for Resources as 151 Officer or the Deputy 151 Officer, the Monitoring Officer, a member if the Pension Board or others who are able to explain what has happened. However, there are some instances where it would not be appropriate to make further checks, for example, if the individual has become aware of theft, suspected fraud or another serious offence and they are also aware that by making further checks there is a risk of either alerting those involved or hampering the actions of the police or a regulatory authority. In these cases The Pensions Regulator should be contacted without delay.

3.3 **Determining whether the breach is likely to be of material significance**
To decide whether a breach is likely to be of material significance an individual should consider the following, both separately and collectively:

- cause of the breach (what made it happen);
- effect of the breach (the consequence(s) of the breach);
- reaction to the breach; and • wider implications of the breach.

Further details on the above four considerations are provided in Appendix A to this procedure.

The individual should use the traffic light framework described in Appendix B to help assess the material significance of each breach and to formally support and document their decision.

3.4   A decision tree is provided below to show the process for deciding whether or not a breach has taken place and whether it is materially significant and therefore requires to be reported.

Decision-tree: deciding whether to report
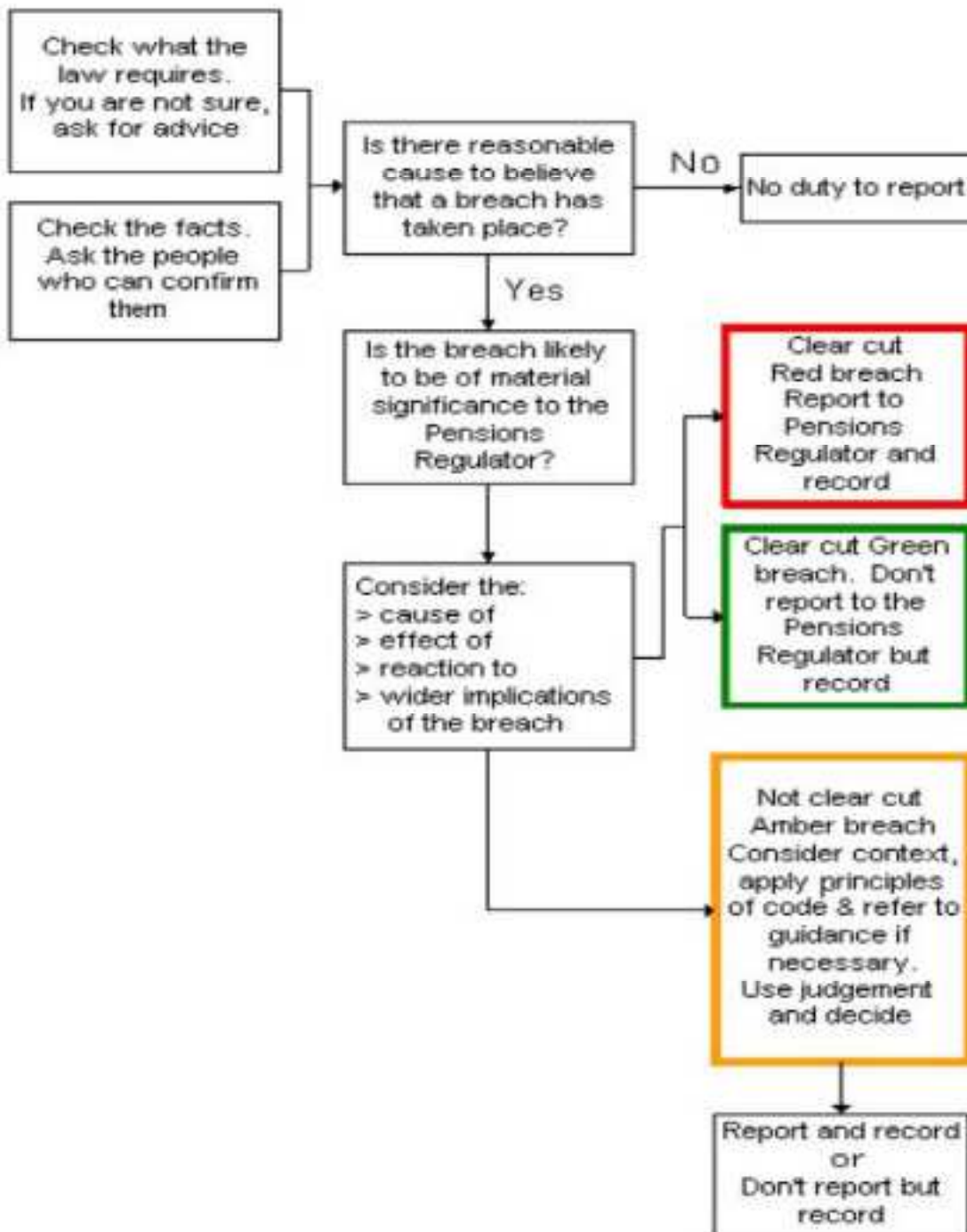
3.5 **Referral to a level of seniority for a decision to be made on whether to report**

WMFS has a designated Monitoring Officer to ensure the Fire Authority and Service acts and operates within the law. They are considered to have appropriate experience to help investigate whether there is reasonable cause to believe a breach has occurred, to check the law and facts of the case, to

maintain records of all breaches and to assist in any reporting to The Pensions Regulator, where appropriate. If breaches relate to late or incorrect payment of contributions or pension benefits, the matter should be highlighted to the Strategic Enabler for Resources and 151 Officer at the earliest opportunity to ensure the matter is resolved as a matter of urgency. Individuals must bear in mind, however, that the involvement of the Monitoring Officer is to help clarify the potential reporter's thought process and to ensure this procedure is followed. The reporter remains responsible for the final decision as to whether a matter should be reported to The Pensions Regulator.

The matter should not be referred to any of these officers if doing so will alert any person responsible for a possible serious offence to the investigation (as highlighted in section 2). If that is the case, the individual should report the matter to The Pensions Regulator setting out the reasons for reporting, including any uncertainty – a telephone call to the Regulator before the submission may be appropriate, particularly in more serious breaches.

3.6 Dealing with complex cases

The Strategic Enabler Resourcing and 151 Officer or Monitoring Officer may be able to provide guidance on particularly complex cases. Information may also be available from national resources such as the Scheme Advisory Board. If timescales allow, legal advice or other professional advice can be sought and the case can be discussed at the next Board meeting.

3.7. Timescales for reporting

The Pensions Act and Pension Regulators Code require that if an individual decides to report a breach, the report must be made in writing as soon as reasonably practicable. Individuals should not rely on waiting for others to report and nor is it necessary for a reporter to gather all the evidence which The Pensions Regulator may require before taking action. A delay in reporting may exacerbate or increase the risk of the breach. The time taken to reach the judgements on "reasonable cause to believe" and on "material significance" should be consistent with the speed implied by 'as soon as reasonably practicable'. In particular, the time taken should reflect the seriousness of the suspected breach.

3.8 Early identification of very serious breaches

In cases of immediate risk to the scheme, for instance, where there is any indication of dishonesty, The Pensions Regulator does not expect reporters to seek an explanation or to assess the effectiveness of proposed remedies. They should only make such immediate checks as are necessary. The more serious the potential breach and its consequences, the more urgently reporters should make these necessary checks. In cases of potential dishonesty the reporter should avoid, where possible, checks which might alert those implicated. In serious cases, reporters should use the quickest means possible to alert The Pensions Regulator to the breach.

3.9 **Recording all breaches even if they are not reported**

The record of past breaches may be relevant in deciding whether to report a breach (for example it may reveal a systemic issue). WMFS will maintain a record of all breaches identified by individuals and reporters should therefore provide copies of reports to the Strategic Enabler Resources and 151 Officer. Records of unreported breaches should also be provided as soon as reasonably practicable and certainly no later than within 20 working days of the decision made not to report. These will be recorded alongside all reported breaches. The record of all breaches (reported or otherwise) will be included in the quarterly Monitoring Report at each Pension Committee, and this will also be shared with the Pension Board.

3.10 **Reporting a breach**

Reports must be submitted in writing via The Pensions Regulator's online system at www.tpr.gov.uk/exchange, or by post, email or fax, and should be marked urgent if appropriate. If necessary, a written report can be preceded by a telephone call. Reporters should ensure they receive an acknowledgement for any report they send to The Pensions Regulator. The Pensions Regulator will acknowledge receipt of all reports within five working days and may contact reporters to request further information. Reporters will not usually be informed of any actions taken by The Pensions Regulator due to restrictions on the disclosure of information.

As a minimum, individuals reporting should provide:

• full scheme name (WMFS Fire Fighters Pension Fund);
• description of breach(es);
• any relevant dates;
• name, position and contact details;
• role in connection to the scheme; and
• employer name or name of scheme manager (the latter is West Midlands Fire and Rescue Authority - Audit Committee).

If possible, reporters should also indicate:

• the reason why the breach is thought to be of material significance to The Pensions Regulator;
• scheme address (provided at the end of this procedures document);
• scheme manager contact details (provided at the end of this procedures document);
• pension scheme registry number (xxxxxxx); and   include
• whether the breach has been reported before.

The reporter should provide further information or reports of further breaches if this may help The Pensions Regulator in the exercise of its functions. The Pensions Regulator may make contact to request further information.

3.11 Confidentiality

If requested, The Pensions Regulator will do its best to protect a reporter's identity and will not disclose information except where it is lawfully required to do so. If an individual's employer decides not to report and the individual employed by them disagrees with this and decides to report a breach themselves, they may have protection under the Employment Rights Act 1996 if they make an individual report in good faith.

3.12 Reporting to Scheme Manager and Pension Board

A report will be presented to the Scheme Manager and Pensions Board in line with the meeting schedule for Pension Board and will set out:

- all breaches, including those reported to The Pensions Regulator and those unreported, with the associated dates;
- in relation to each breach, details of what action was taken and the result of any action (where not confidential);
- any future actions for the prevention of the breach in question being repeated; and
- highlighting new breaches which have arisen in the last year/since the previous meeting.

This information will also be provided upon request by any other individual or organisation (excluding sensitive/confidential cases or ongoing cases where discussion may influence the proceedings). An example of the information to be included in the quarterly reports is provided in Appendix C to this procedure.

3.13 Review

This Reporting Breaches Procedure was originally developed in November 2015. It will be kept under review and updated as considered appropriate by the Strategic Enabler Resourcing and 151 Officer. It may be changed as a result of legal or regulatory changes, evolving best practice and ongoing review of the effectiveness of the procedure.

Further Information

If you require further information about reporting breaches or this procedure, please contact:

Mike Griffiths 151 Officer and Strategic Enabler Resources
Email: mike.griffiths@wmfs.net
Telephone: 0121 380 6919

Paul Gwynn Payroll and Pensions Administration Manager
Email: paul.gwynn@wmfs.net
Telephone: 0121 380 6928

WMFS Fire Fighters Pension Fund, West Midlands Fire Service 99 Vauxhall Road Birmingham B7 4HW

Designated officer contact details:
1) 151 Officer Mike Griffiths
Email:mike.griffiths@wmfs.net
Telephone: 0121 380 6919

2) Monitoring Officer – Satinder Sahota
Email: satinder_sahota@sandwell.gov.uk
Telephone: 0121 569

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Determining whether a breach is likely to be of material significance

To decide whether a breach is likely to be of material significance individuals should consider the following elements, both separately and collectively:

- cause of the breach (what made it happen);
- effect of the breach (the consequence(s) of the breach);
- reaction to the breach; and
- wider implications of the breach.

The cause of the breach
Examples of causes which are likely to be of concern to The Pensions Regulator are provided below:

- acting, or failing to act, in deliberate contravention of the law;
- dishonesty;
- incomplete or inaccurate advice;
- poor administration, i.e. failure to implement adequate administration procedures;
- poor governance; or
- slow or inappropriate decision-making practices.

When deciding whether a cause is likely to be of material significance individuals should also consider:

- whether the breach has been caused by an isolated incident such as a power outage, fire, flood or a genuine one-off mistake.
- whether there have been any other breaches (reported to The Pensions Regulator or not) which when taken together may become materially significant.

The effect of the breach
Examples of the possible effects (with possible causes) of breaches which are considered likely to be of material significance to The Pensions Regulator in the context of the LGPS are given below:

- Committee/Board members not having enough knowledge and understanding, resulting in pension boards not fulfilling their roles, the scheme not being properly governed and administered and/or scheme managers breaching other legal requirements.
- Conflicts of interest of Committee or Board members, resulting in them being prejudiced in the way in which they carry out their role and/or the ineffective governance and administration of the scheme and/or scheme managers breaching legal requirements.

- Poor internal controls, leading to schemes not being run in accordance with their scheme regulations and other legal requirements, risks not being properly identified and managed and/or the right money not being paid to or by the scheme at the right time.
- Inaccurate or incomplete information about benefits and scheme information provided to members, resulting in members not being able to effectively plan or make decisions about their retirement.
- Poor member records held, resulting in member benefits being calculated incorrectly and/or not being paid to the right person at the right time.
- Misappropriation of assets, resulting in scheme assets not being safeguarded.
- Other breaches which result in the scheme being poorly governed, managed or administered.

The reaction to the breach

A breach is likely to be of concern and material significance to The Pensions Regulator where a breach has been identified and those involved:

- do not take prompt and effective action to remedy the breach and identify and tackle its cause in order to minimise risk of recurrence;
- are not pursuing corrective action to a proper conclusion; or
- fail to notify affected scheme members where it would have been appropriate to do so.

The wider implications of the breach

Reporters should also consider the wider implications when deciding whether a breach must be reported. The breach is likely to be of material significance to The Pensions Regulator where the fact that a breach has occurred makes it more likely that further breaches will occur within the Fund or, if due to maladministration by a third party, further breaches will occur in other pension schemes.

Appendix B

Traffic light framework for deciding whether or not to report

It is recommended that those responsible for reporting use the traffic light framework when deciding whether to report to The Pensions Regulator. This is illustrated below:
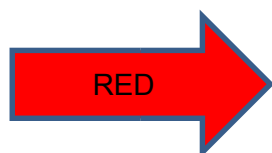
RED — Where the cause, effect, reaction and wider implications of a breach, when considered together, are likely to be of material significance.

These must be reported to The Pensions Regulator.

Example: Several members' benefits have been calculated incorrectly. The errors have not been recognised and no action has been taken to identify and tackle the cause or to correct the errors.

AMBER → Where the cause, effect, reaction and wider implications of a breach, when considered together, may be of material significance. They might consist of several failures of administration that, although not significant in themselves, have a cumulative significance because steps have not been taken to put things right. You will need to exercise your own judgement to determine whether the breach is likely to be of material significance and should be reported.

Example: Several members' benefits have been calculated incorrectly. The errors have been corrected, with no financial detriment to the members. However the breach was caused by a system error which may have wider implications for other public service schemes using the same system.
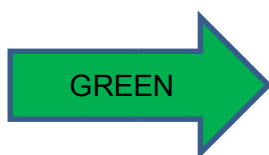
GREEN → Where the cause, effect, reaction and wider implications of a breach, when considered together, are not likely to be of material significance. These should be recorded but do not need to be reported.

Example: A member's benefits have been calculated incorrectly. This was an isolated incident, which has been promptly identified and corrected, with no financial detriment to the member. Procedures have been put in place to mitigate against this happening again.

All breaches should be recorded even if the decision is not to report.

When using the traffic light framework individuals should consider the content of the red, amber and green sections for each of the cause, effect, reaction and wider implications of the breach, before you consider the four together. Some useful examples of this is framework is provided by The Pensions Regulator at the following link:

http://www.thepensionsregulator.gov.uk/codes/code-related-notifiableevents.aspx

Appendix C Example Record of Breaches

Date	Category (e.g. administration, contributions, funding, investment, criminal activity)	Description and cause of breach	Possible effect of breach and wider implications	Reaction of relevant parties to breach	Reported / Not reported (with justification if not reported and dates)	Outcome of report and/or investigations	Outstanding actions

*New breaches since the previous meeting should be highlighted

Contact Details

If you can read this but know someone who cannot, please contact us on (0121) 380 6932 so we can provide this information in a more suitable format.

If you wish to contact us on any issue regarding your pension, please contact Pension Services.

Office Hours:
Monday- Thursday   8.45am-5.00pm
Friday   8.45am- 4.00pm

If you would prefer to discuss your pension in person, you are welcome to come in and see us at the address below:
Pension Services, West Midlands Fire Service Headquarters, 99 Vauxhall Road, Birmingham B7 4HW

Email: pensions@wmfs.net
Tel: 0121 380 6932
Web: www.wmfs.net

Annual Report of the Pensions Board
2016/17

1. Background

The Pension Board was established by the Audit Committee to delegate its duties by Fire Authority in 2015.

The role of the local Pension Board as defined by section 5(1) and (2) of the Public Service Pensions Act 2013 is to-

- Assist the Scheme Manager:

    - to secure compliance with the Scheme regulations and any other legislation relating to the governance and administration of the Firefighters' Pension Scheme ("the Scheme").

    - to secure compliance with requirements imposed in relation to the Scheme by the Pensions Regulator.

    - in such other matters as the Scheme regulations may specify.

- Secure the effective and efficient governance and administration of the Scheme for the West Midlands Fire & Rescue Authority.

- Provide the Scheme Manager with such information as it requires ensuring that any member of the Pension Board or person to be appointed to the Pension Board does not have a conflict of interest.

The Pension Board will ensure it effectively and efficiently complies with the code of practice on the governance and administration of public service pension schemes issued by the Pension Regulator.

The Pension Board will also ensure that the Scheme is managed and administered effectively and efficiently and complies with the code of practice on the governance and administration of public service pension schemes issued by the Pension Regulator.

The Pension Board shall meet sufficiently regularly to discharge its duties and responsibilities effectively.

The full Terms of Reference for the Committee can be found at Appendix A of this report.

2. Meetings

During 2016/17 the Committee met on the following dates:

- 25 October 2016
- 6 February 2017
- 9 May 2017

3. Attendance

	11/7/16	25/1016	6/2/17	09/05/17
Stuart Bourne Employee Representative	x	x	√	x
Wendy Browning-Sampson Employer Representative	√	√	√	√
David Wilkin Independent Chair	√	x	x	x
Neil Chamberlain Independent Chair	N/A	N/A	x	√
Kal Shoker Employer Representative	√	√	√	√
Andrew Dennis Employee Representative	√	√	√	x
Paul Gwynn (Adviser)	√	√	√	√

4. The Committee's business

During the year the Committee conducted the following business:

Completion of The Pension Regulator – Public Service Governance Survey Following the resignation of David Wilkin, the Pension Board welcomed a new Chair, Neil Chamberlain Created a Risk Register, Activity Log and Work Programme	Received Regular Updates from the Pension Adviser Discretions Policy Approval by Audit Committee and Published a link to this Received a comparison of Pension Schemes
Identified a Breach of Regulations and reported this to Audit Committee. Addressed the failure to produce the Annual Benefit Statement in 2016 and put steps in place to ensure that no duplication of this would occur. Held an extraordinary meeting to receive an update on the progress made for the production of the Annual Benefit Statement 2017 against the Action Plan agreed at the Extraordinary Pension Board on 25 October 2016.	Attendance at Annual Pensions Conference October 2016 Attendance at Regional Training September 2016 Submitted Minutes to the Audit Committee

5. The Committee's main achievements

The Committee believes its key achievements during the year were:

- Continuing to build a good working relationship with the Audit Committee
- Receiving and reviewing a number of useful sector updates from The Pension Regulator.
- Reviewing the Committee's Terms of Reference in order to ensure they remain fit for purpose.
- Providing additional assurance following a Breach of the Regulations and putting processes in place to prevent a reoccurrence
- Raising the profile of the Pensions Board ensuring regular communication with members of the Scheme
- Regular consideration and review of the Pension Board Risk Register and accompanying assurances.
- Building the skills and knowledge of Committee members through regular technical updates from the Pension Adviser
- The continued presence of the Adviser to receive regular updates
- Recruited an independent Chair in order to broaden the Committee's experience and provide an independent view point.
- Creation and Approval of a Discretions Policy
-

Terms of Reference for the Pension Board of the West Midlands Fire & Rescue Authority

Terms of Reference and Delegated Authorities

Introduction

The purpose of this document is to set of the terms of reference for the local Pension Board of the West Midlands Fire & Rescue Authority.

Role of the Pension Board

The role of the local Pension Board as defined by section 5(1) and (2) of the Public Service Pensions Act 2013 is to-

- Assist the Scheme Manager:

    - to secure compliance with the Scheme regulations and any other legislation relating to the governance and administration of the Firefighters' Pension Scheme ("the Scheme").

    - to secure compliance with requirements imposed in relation to the Scheme by the Pensions Regulator.

    - in such other matters as the Scheme regulations may specify.

- Secure the effective and efficient governance and administration of the Scheme for the West Midlands Fire & Rescue Authority.

- Provide the Scheme Manager with such information as it requires ensuring that any member of the Pension Board or person to be appointed to the Pension Board does not have a conflict of interest.

The Pension Board will ensure it effectively and efficiently complies with the code of practice on the governance and administration of public service pension schemes issued by the Pension Regulator.

The Pension Board will also ensure that the Scheme is managed and administered effectively and efficiently and complies with the code of practice on the governance and administration of public service pension schemes issued by the Pension Regulator.

The Pension Board shall meet sufficiently regularly to discharge its duties and responsibilities effectively.

Appointment of Member of the Pension Board

The process for selecting members of the Pension Board is set out below:-

The Fire Service will consider matters such as who is eligible to stand, how the nomination process will work and what sort of information candidates will need to submit. The Service will appoint through election or selection with the rules of governing the process. The Fire Authority has an independent chair who will chair the Pension Board meetings, this role will be an independent role.

The Pension Board shall consist of 5 members and be constituted as follows:-

i)   2 employer representatives, which have been identified, and appointed

ii)   2 scheme member representatives, which have been identified, and elected

iii)   1 independent chair selected.

Scheme member and employer representatives shall be appointed in equal number and shall together form the majority of the Board's membership.

The Chair of the Pension Board will be determined by the Authority. It will be the role of the Chair to ensure that all members of the Board show due respect for process, that all views are fully heard and considered and to determine when consensus has been met.

The term of office for the Chair will be determined by the Scheme Manager.

Each employer representative and scheme member representative so appointed shall serve for a fixed period (of up to three years) which can be extended for further period(s) subject to re-nomination and/or election.

Each Board Member should endeavour to attend all Board meetings during the year and is required to attend at least 2 meetings each year. In the event of consistent non-attendance by any Board member, then the tenure of that membership should be reviewed by the other Board members in liaison with the Scheme Manager.

Other than by ceasing to be eligible as set out above, a Board member may only be removed from office during a term of appointment by the unanimous agreement of all of the other members. The removal of the independent member requires the consent of the Scheme Manager.

The Board may, with the approval of the Scheme Manager, co-opt persons who are not members of the Board to serve on sub committees, particularly where this would add skills and experience. Notwithstanding the appointment of co-opted members, the majority of the Board shall be comprised of employer and Scheme member representative, represented in equal number.

Quorum

The Board shall have a formal quorum when at least one employee representative and one employer representative are in attendance.

Advisors and co-opted persons do not count towards the quorum.

Conflicts of Interest

The policy for identifying conflicts of interest is set out in a separate policy document. Any conflicts of interest that would prevent you from carrying out the role effectively will need to be highlighted to the Service.

Board Review Process

The Board will undertake at the first meeting of the year, a formal review process to assess how well it and its committees and the members are performing with a view to seeking continuous improvement in the Board's performance.

Advisers to the Board

The Board may be supported in its role and responsibilities through the appointment of advisers and shall, subject to any applicable regulation and legislation from time to time in force, consult with such advisers to the Board and on such terms as it shall see fit to help better perform its duties including:-

● A Governance Adviser.

● The Fund's Actuary.

● The Fund's Administrator.

● The Scheme Manager.

● Other advisers, so approved by the Scheme Manager.

The Board shall ensure that the performance of the advisers so appointed are reviewed on a regular basis.

Knowledge and Skills

 The Code of Practice No. 14 Governance and Administration of public service pension schemes states "A member of the Pension Board must have a working knowledge and understanding of the law relating to pensions (and any other prescribed matters) sufficient for them to exercise the function of their role. Pension board members should be aware of the range and extent of the law relating to pensions which apply to their Scheme and have sufficient understanding of the content and effect of that law to recognise when and how it impacts on their responsibilities and duties".

It is for individual Pension Board members to be satisfied that they have the appropriate degree of knowledge and understanding to enable them to properly exercise their functions as a member of the Pension Board.

In line with this requirement Pension Board members are required to be able to demonstrate their knowledge and understanding and to refresh and keep their knowledge up to date. Pension Board members are therefore required to maintain a written record of relevant training and development.

Pension Board members should regularly review their skills, competencies and knowledge to identify gaps or weaknesses. Pension Board members will be expected to attend training to ensure that their knowledge and skills are maintained.

Board Meetings – Notice and Minutes

The Scheme Manager shall give notice to all Pension Board members of every meeting of the Pension Board. The Scheme Manager shall ensure that a formal record of Pension Board proceedings is maintained. Following the approval of the minutes by the Chair of the Board or Board Committee, they shall be circulated to all members of the Board and forwarded to the Scheme Manager.

There will be two Pension Board meetings a year to be held six monthly. The minutes of the Pension Board will be approved by the Scheme Manager and shared with pension scheme members.

Remit of the Board

The Pension Board must assist the Scheme Manager with such other matters as the Scheme regulations may specify. It is for Scheme regulations and the Scheme Manager to determine precisely what the Pension Board's role entails.

Standards of Conduct

The role of Pension Board members requires the highest standards of conduct and therefore the 'seven principles of public life will be applied to all Pension Board members and embodied in their code of conduct.

These are:-

● Selflessness

● Integrity

● Objectivity

● Accountability

● Openness

- Honesty

- Leadership.

Decision Making

Each member of the Pension Board will have an individual voting right but it is expected the Pension Board will, as far as possible, reach a consensus. The Independent Chair of the Pension Board will not have voting rights.

Publication of Pension Board Information

Scheme Members and other interested parties will want to know that the Scheme is being efficiently and effectively managed. They will also want to be confident that the Pension Board is properly constituted, trained and competent in order to comply with Scheme regulations, the governance and administration of the Scheme and requirements of the Pension Regulator.

Up to date information will be posted on the West Midlands Fire & Rescue Authority website showing:-

- The names and information of the Pension Board members.

- How the Scheme members are represented on the Pension Board.

- The responsibilities of the Pension Board as a whole.

- The full terms of reference and policies of the Pension Board and how they operate.

- The Pension Board appointment process.

- Who each individual Pension Board member represents.

- Any specific roles and responsibilities of individual Pension Board members.

Pension Board papers, agendas and minutes of meetings will be published on the West Midlands Fire & Rescue Authority website. These may at the discretion of the Scheme Manager be edited to exclude items on the grounds that they are deemed as being confidential for the purposes of the Data Protection Act 1998.

The Scheme Manager will also consider requests for additional information to be published or made available to individual Scheme members to encourage Scheme member engagement and promote a culture of openness and transparency.

Accountability

The Pension Board will be collectively and individually accountable to the Scheme Manager.

Expense Reimbursement [Remuneration and Allowances]

There will be no specific remuneration for undertaking the role of representative on the Local Pension Board. However, travel expenses in line with public transport or car mileage may be claimed with a valid receipt.

Reporting Breaches

Any breach brought to the attention of the Pension Board, whether potential or actual, shall be dealt with in accordance with the procedure set out in the Authority's Whistle Blowing Policy attached here: the Whistle Blowing Policy.

Definitions

The undernoted terms shall have the following meaning when used in this document.

"Pension Board" or Authority	Means the local Pension Board for the Fire
"Board"	as required under the Public Service Pensions Act 2013.
"Scheme Manager"	Means the West Midlands Fire & Rescue Authority as administering authority of the Pension Fund.
"Chair"	Reference to duties to be performed, or authorise exercised, by the Chair.
"Scheme"	Means the Firefighters' Pension Schemes.
"West Midlands Fire & Rescue Authority"	Means the West Midlands Fire & Rescue Authority.

Interpretation

Any uncertainty or ambiguity or interpretation required relating to any matters contained in this document shall be resolved by reference to the Scheme Manager.

# Public service governance and administration survey

Summary of results and commentary

The Pensions Regulator

May 2017

Background

We regulate the governance and administration of public service pension schemes, which provide pensions for civil servants, the judiciary, local government, teachers, health service workers, members of fire and rescue services, members of police forces and members of the armed forces. These schemes cover over 16.5 million memberships, and 24,000 employers.

8 workforces

16.5 million
memberships

24,000
employers
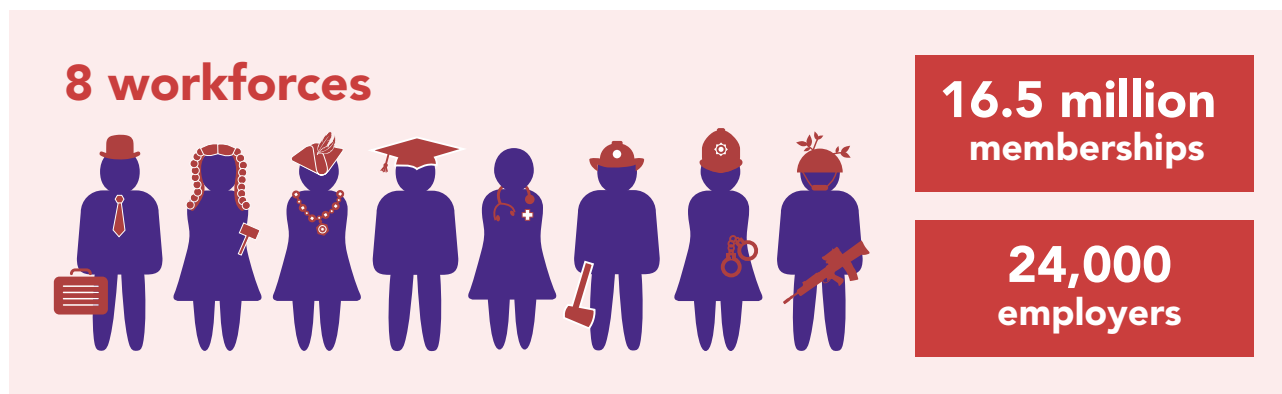
Our Code of Practice no. 14 sets out the standards of conduct and practice we expect, and we provide practical guidance on how to comply with legal requirements. It can be viewed at www.tpr.gov.uk/code14. We open cases based on the risks we see in schemes and in response to breach of law and whistle blowing reports. Where standards are not being met and issues are not being resolved we consider enforcement action, including the use of improvement notices and civil penalties.

To help us focus our efforts, we surveyed public service pension schemes in autumn 2016 to assess how they were being run. This built on a previous survey in summer 2015, and delved deeper into key risks and why some schemes are still struggling to improve.

We achieved a 90% response rate, covering 98% of membership, which allows us to draw robust conclusions. The survey supports our existing assessment that the top risks in this landscape are around scheme governance, record-keeping, internal controls and member communications. This report sets out how we have interpreted the findings, our expectations of those involved in running the schemes and what we will be doing over the next year to address these issues. It accompanies the full research report which sets out the responses to all survey questions.

98%
of membership represented in responses

Top risks

⚠ Governance

⚠ Internal controls

⚠ Record-keeping

⚠ Member comms

Scheme governance

Good governance is essential to pension schemes delivering good member outcomes. This is a key focus for us, as set out in our recent discussion paper on 21st century trusteeship and governance, which can be read at www.tpr.gov.uk/21c-trustee.
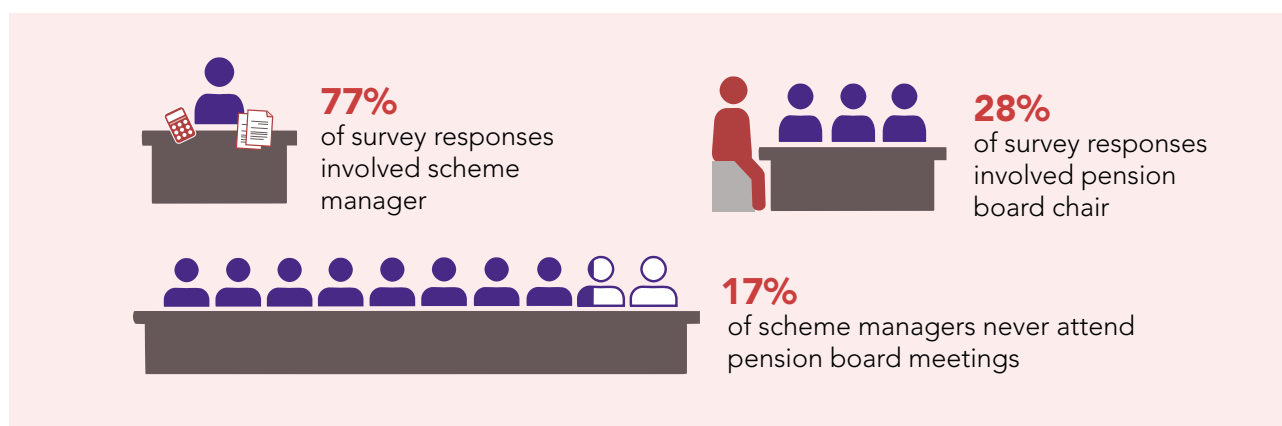
Public service pension schemes are governed differently to other occupational pension schemes. They do not have trustees. Instead the overall management and/or administrative responsibility for the schemes sits with scheme managers. Scheme managers are supported by pension boards, which assist them in complying with their legal duties.

Scheme managers should be fully aware of their duties. While in practice many delegate specific activities (such as member record-keeping) to other parties, they remain accountable for their scheme, in the same way that trustees of private sector schemes are accountable. Most enforcement action we take is likely to be against scheme managers.

Pension board members have a key role to play in supporting scheme managers. We expect scheme managers to use this resource, and for pension boards to take an active role in identifying risks and driving forward improvements, in particular in those areas set out below: record-keeping, internal controls and member communications.

We are concerned that a significant minority of scheme managers and pension board members may not be effective in, or even fully aware of, their governance duties:

▶ 23% of survey responses were completed without involving the scheme manager, who is ultimately accountable for most of the legal requirements. The pension board chair was involved in only 28% of survey responses, and other pension board members in only 21%.

▶ Over a quarter (27%) of scheme managers do not attend pension board meetings regularly, and 17% never attend.

▶ Our discussions with scheme managers, pension boards and other stakeholders have highlighted some gaps in understanding the roles and responsibilities of various parties involved in public service pension schemes, particularly pension boards.

77% of survey responses involved scheme manager

28% of survey responses involved pension board chair

17% of scheme managers never attend pension board meetings

Over the coming year we will continue to focus on improving governance in public service pension schemes. As part of our 21st century trusteeship and governance work, we will provide clarity on the roles and responsibilities of those involved in running these schemes. We will clearly set out the standards we expect of all parties and provide tools they can use to meet the standards. We will continue to educate scheme managers and pension boards through online tools and face-to-face, and support initiatives to create peer networks and share best practice. Where appropriate, we will work with scheme advisory boards and other stakeholders to reach disengaged scheme managers.

Record-keeping

Failure to maintain complete and accurate member records can affect a scheme's ability to carry out basic functions like paying the right members the right benefits at the right time. Good record-keeping became even more critical when the public service schemes introduced career average benefits.

Record-keeping issues in public service schemes are well known and it is not surprising that over a third (36%) of survey respondents identified record-keeping as a top risk to their scheme.

36% identified record-keeping as a top risk

79% had done data review in last 12 months
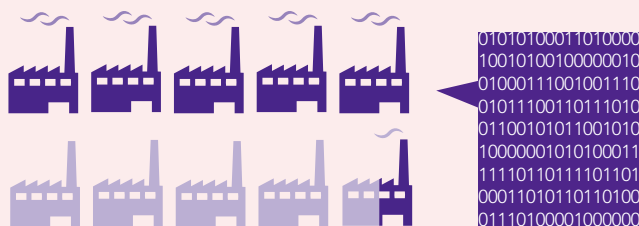
18% had put an improvement plan in place

We have made our expectations clear. All schemes should do an annual data review, and put a plan in place to put things right if required:

▶ While most schemes (79%) had completed a review in the last year, the survey raises concerns about how effective these data reviews are. Over a third (35%) of schemes that had completed a review did not identify any issues, which is questionable in such large and complex schemes.

▶ The survey shows that only 18% of schemes had put an improvement plan in place. In addition, the improvement plans we have seen are of varying quality.

To ensure record-keeping failures are identified and tackled effectively, we will provide additional education in 2017, including guidance on developing a good data improvement plan. We will also set out more clearly our expectations of scheme managers regarding data security.

We will consider enforcement action where scheme managers fail to demonstrate that they are taking appropriate steps to improve their records, including having a robust improvement plan in place. From 2018 we will require scheme managers to report on their record-keeping standards in the scheme return, so we can more effectively intervene where they are failing in their duties.

Out of 24,000 employers, only **55% provide good data** as a matter of course

0101010001101000010010010010000000101010001110010011101010111001011110100011001010110010100100000010101000110111110110111101101100011010110110100101110100001000001

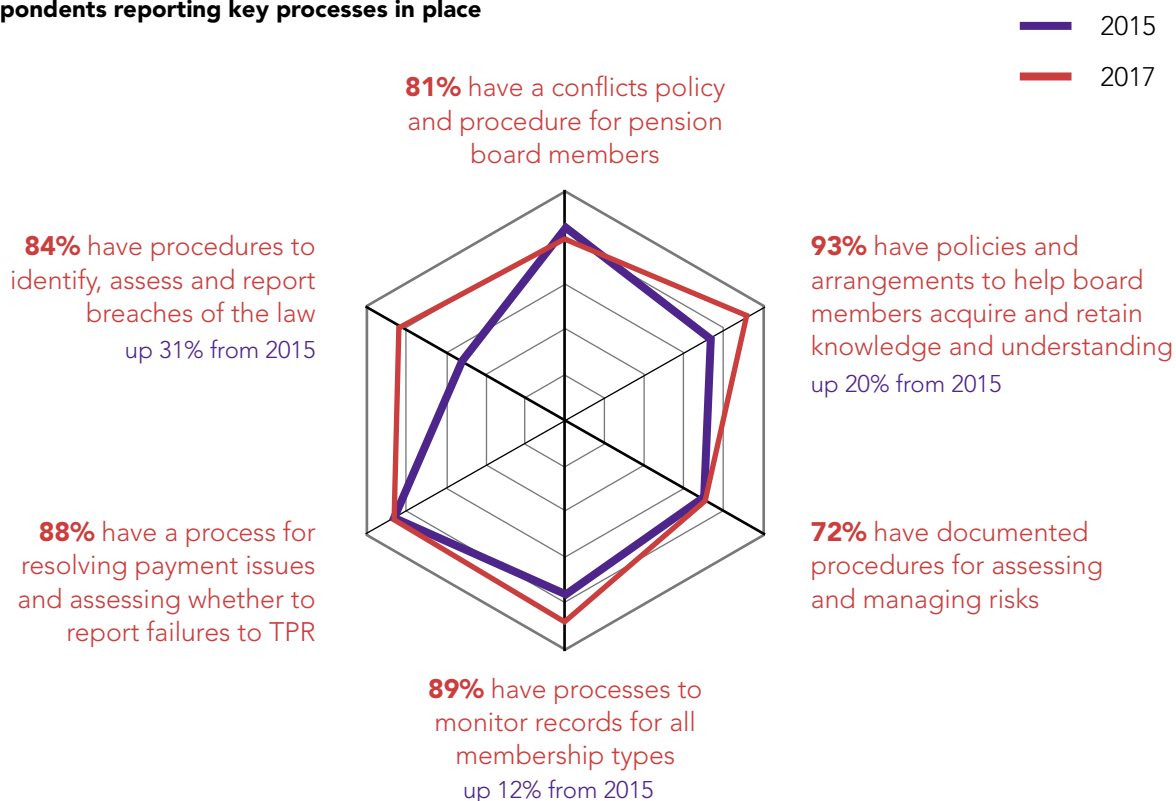**1 in 5** identified employer compliance as a barrier to improving governance and administration

The survey also highlights that the quality of data provided by employers remains an issue – only 55% of employers provide good data as a matter of course. 23% of respondents identify employer compliance as a top risk, and 20% as a barrier to improving the governance and administration of their scheme.

Scheme managers should work with employers to ensure processes are effective and fit for purpose, and take action to rectify issues in the first instance. But we can intervene where required – our recent report on the Teachers' Pension Scheme, at www.tpr.gov.uk/section-89, is an illustration of where we have done so. We will also promote good practice where we identify this in public service and other pension schemes.

Internal controls

Survey respondents were asked to confirm if they had a number of key processes in place which we would expect to see in a well run scheme.

Respondents reporting key processes in place

81% have a conflicts policy and procedure for pension board members

84% have procedures to identify, assess and report breaches of the law
up 31% from 2015

93% have policies and arrangements to help board members acquire and retain knowledge and understanding
up 20% from 2015

88% have a process for resolving payment issues and assessing whether to report failures to TPR

72% have documented procedures for assessing and managing risks

89% have processes to monitor records for all membership types
up 12% from 2015

— 2015
— 2017

Overall, the proportion of schemes with these processes in place is increasing. Of particular note was a marked improvement in schemes with processes to identify, assess and report breaches of the law (up 31 percentage points) – an area we highlighted in last year's survey commentary.

However, some concerning gaps remain:

▶ 28% of schemes could not confirm they had risk processes in place and 30% are potentially operating without a risk register.

▶ Though scheme managers, pension board members and other parties have a duty to report breaches of the law to us in certain circumstances, 16% of schemes could still not confirm if they had processes in place to do so.

These gaps are mainly in locally-administered firefighters' and police pension schemes. We will focus our face-to-face education on these schemes and work with scheme advisory boards where appropriate to drive real improvements in the coming year.

Across the landscape we will continue to promote our existing educational material, in particular our internal controls checklist and example risk register (www.tpr.gov.uk/ps-risk) and guidance on reporting breaches (www.tpr.gov.uk/ps-breaches). Where we open cases, we will work with the schemes involved to resolve gaps in their risk and breach of law processes. When considering action or setting fines we will take into account a party's co-operation with us, and their efforts to put things right. Therefore, those who fail to report breaches to us quickly could receive a higher penalty for a breach, and an additional penalty for a failure to report. You can find further information in our draft monetary penalty policy at www.tpr.gov.uk/ps-monetary.

In addition to key processes, the survey asked scheme managers how they monitored and managed the performance of their administrators. Respondents typically used several methods, in particular meetings or receiving reports from them. We have some concerns around the lower use of service level agreements (SLAs) for in-house administrators (43%) compared to those administered by a third party (86%), and the low use of penalties where contractual terms or service standards are not met (14% of schemes). As part of our work on 21st century trusteeship and governance, we will clarify our expectations in this area and set out good practice on working with administrators.

Member communications

Public service schemes must provide annual benefit statements to active members by a specific deadline, generally 31 August. The statements provide members with a view of the pension they have built up to date and enable them to effectively plan or make decisions about retirement.

Only 43% of respondents reported that all their members received their statements on time. Overall 21% of members did not receive their statements on time. This aligns with our experience – the failure to issue annual benefit statements accounted for the majority of breach of law reports relating to public service pension schemes in 2016.
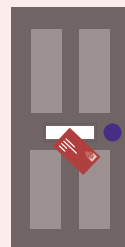
21%
of members did not receive their annual benefit statements on time

The reasons for this are often complex, including issues with IT systems, poor data, and difficulties associated with introducing career average benefits. Through our case work, we identified some lessons and best practice tips for issuing statements, which we set out in a 2016 quick guide that can be viewed at www.tpr.gov.uk/ps-comms.

We recognise that public service pension schemes faced challenges meeting their new duties initially. However, we expect schemes to have made significant progress by now. We expect member outcomes, in particular the proportion of members who receive their statements on time, to improve dramatically. Our tolerance for schemes' shortcomings, particularly in the areas identified in this report, is reducing.

Taking action

Scheme managers should be aware that we are more likely to move to use of our enforcement powers this year. We have, and will, take enforcement action where scheme managers have not taken sufficient action to address issues or meet their duties. Consistent with our compliance and enforcement policy (found at www.tpr.gov.uk/strategy), we will publish reports of our regulatory activities (including enforcement activity) to encourage higher standards.

Public service governance and administration survey
Summary of results and commentary

The Pensions Regulator

Public service governance and administration survey 2016

Research report

Prepared for The Pensions Regulator
By OMB Research

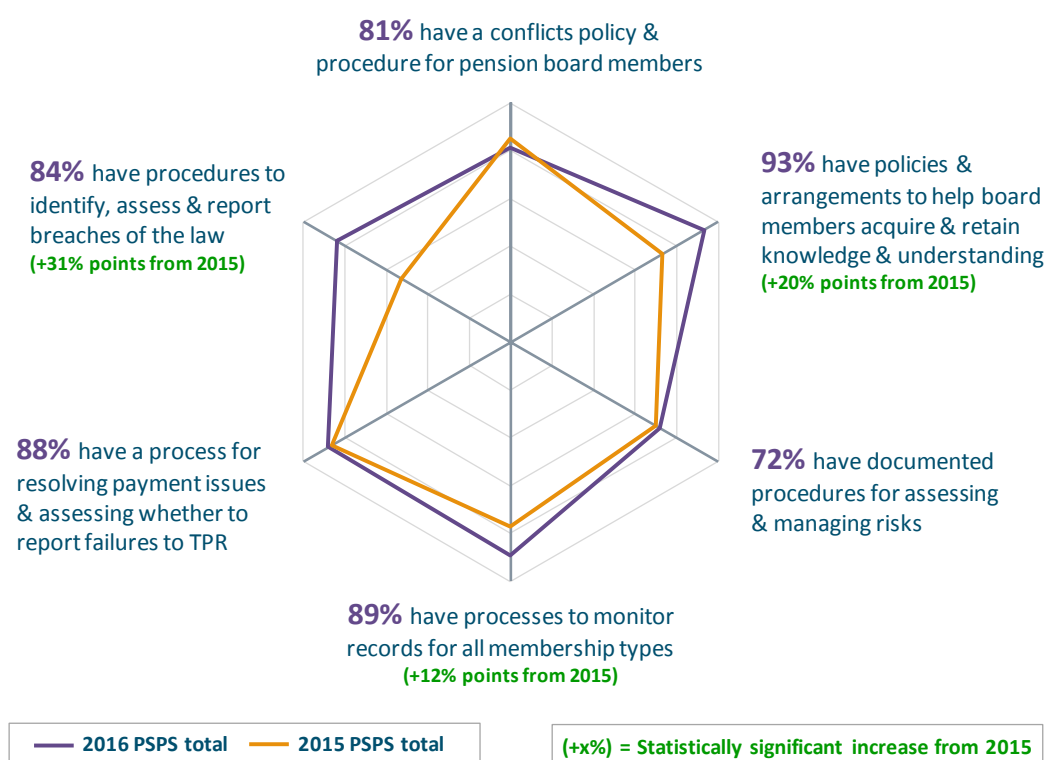# Contents

1.   Executive summary

1.1   Key processes

The results of the survey showed that schemes were making progress in establishing the processes that The Pensions Regulator (TPR) regards as key in supporting compliance with legal requirements and meeting TPR standards. These processes were less likely to be in place in locally administered Firefighters' and Police schemes.

Figure 1.1.1 shows scheme performance against six key processes in 2015 and 2016.

The greatest improvement was seen in the proportion of schemes with procedures in place to identify, assess and report breaches of the law (84%, compared to 53% in 2015).

Figure 1.1.1 – Schemes' performance on key processes

81% have a conflicts policy & procedure for pension board members

84% have procedures to identify, assess & report breaches of the law **(+31% points from 2015)**

93% have policies & arrangements to help board members acquire & retain knowledge & understanding **(+20% points from 2015)**

88% have a process for resolving payment issues & assessing whether to report failures to TPR

72% have documented procedures for assessing & managing risks

89% have processes to monitor records for all membership types **(+12% points from 2015)**

— 2016 PSPS total   — 2015 PSPS total

(+x%) = Statistically significant increase from 2015

There were also statistically significant increases in the proportion of schemes with arrangements to help board members acquire and retain the necessary knowledge and understanding, and the proportion with a process in place to monitor records for accuracy and completeness (increases of 20 percentage points and 12 percentage points respectively).

1

A minority of Police (26%) and Firefighters' schemes (32%) reported having all six key processes in place, compared to two-thirds of Local Government schemes (68%) and nearly all Other schemes (91%).

1.2   Managing risk

Risk management processes and registers were not consistently used across the public service pension scheme landscape.

Around three-quarters of schemes had documented procedures for assessing and managing risks (72%) and had a risk register (70%). Schemes which met these standards accounted for approximately 90% of all memberships.

Records and governance were named by schemes as top risk.

Schemes identified their top risks to good governance and administration as the quality of records (36%) and poor governance (29%). Funding/ investment was also identified as a top risk (34%) owing to the relatively large proportion of Local Government schemes (52%) citing this.

1.3   Administrator controls

Attendance at meetings and provision of reports by administrators was widespread, but penalties were rarely applied where terms or standards were not met.

The majority of schemes indicated that administrators attend regular meetings with the scheme manager or pension board (84%) and that they deliver regular reports (78%).

A range of other processes were used to manage and monitor administrators, including the use of performance metrics in contracts or SLAs (67%), reviews by independent auditors (66%) and the provision of independent assurance reports (30%). The use of SLAs was notably less likely where schemes were administered in-house (43% compared to 83% where administered by another public body and 98% where administered by a commercial third party).

Penalties were infrequently used, with 14% of schemes imposing these if contractual terms or service standards were not met.

1.4   Data

A significant minority of schemes were not conducting regular data reviews. Most schemes had identified data issues but few had implemented a data improvement plan.

Over three-quarters (79%) of schemes had undertaken a data review in the previous 12 months. A further 9% had done so less recently, 3% had never done so and 9% were unsure as to whether the scheme had ever carried out a review.

Just over half (53%) of schemes had identified issues in their most recent data review.

2

Approaching a fifth (18%) of schemes had implemented a data improvement plan. A third (35%) had identified issues but not instigated an improvement plan, and a similar proportion (35%) had not identified any issues in their latest review.

Nearly half of schemes reported that their employers did not regularly provide good data as a matter of course.

Just over half (55%) of schemes reported that at least 90% of employers consistently provided timely, accurate and complete data.

1.5   Communications

Less than half of schemes sent members their Annual Benefit Statement (ABS) by the statutory deadline.

Less than half (43%) of schemes reported that all active members received their ABS on time. The mean proportion of members receiving their ABS by the deadline was 79%. This proportion was lowest among members of smaller schemes (a mean of 54% among those with less than 1,000 members). Almost a fifth (19%) of schemes reported that none of their members were provided with their ABS on time.

1.6   Resolving issues and reporting breaches

An estimated 8,000 complaints were made to public service schemes in the last year, amounting to 0.1% of all memberships.

The top types of complaints made to schemes were ill health retirement disputes (31%), delays in benefit payments (30%) and incorrect estimates of benefits (27%).

A significant minority of schemes did not have processes to identify and report breaches of the law. Overall two in five schemes had recently identified breaches, with half of these reporting a breach to TPR.

Most public service schemes (84%) had procedures in place to identify and assess breaches of the law, and report these to TPR if required.

In the previous 12 months 42% of schemes had identified breaches, and half of this group (21% of all schemes) had reported these to TPR.

The most commonly cited causes for breaches of the law were failure of employers to provide timely, accurate or complete data (60%), systems or process failure/issues (43%) and late or non-payment of contributions (13%).

1.7   Improving scheme governance and administration

The largest perceived barriers to improving scheme governance related to resourcing, legislation and employer compliance.

Resourcing (29%), the volume of legislative change and complexity of scheme regulations (28%) and employer compliance (20%) were the most widely identified barriers.

Improved scheme governance and administration was driven by a better understanding of standards and risks.

Improvements made to governance and administration in the last 12 months were mainly attributed to improved understanding of underlying standards and the action expected by TPR (69%), and improved understanding of the risks facing the scheme (57%).

1.8   TPR products and engagement

TPR products were widely used and well-regarded.

The majority of respondents had used the TPR website (81%) and the code of practice (77%). Perceptions of these products were overwhelmingly positive, with 97% finding the website useful and 99% finding the code useful.

TPR was generally felt to be effective at improving standards in public service pension schemes.

Overall 82% of schemes judged TPR to be fairly or very effective at improving standards of governance and administration. Only 1% of schemes perceive TPR as not effective.

2.   Introduction

The Public Service Pensions Act 2013 and the Public Service Pensions Act (Northern Ireland) 2014 (together, the 2013-2014 Acts) introduced new requirements for the governance and administration of certain public service pension schemes. Scheme managers must run their schemes according to these legal requirements, which generally came into force on 1 April 2015.

The 2013-2014 Acts also gave TPR an expanded role to regulate the governance and administration of these public service pension schemes from 1 April 2015. TPR's code of practice for the governance and administration of public pension service schemes (the PSPS code) sets out the standards of conduct and practice it expects of those responsible for public service schemes, as well as practical guidance about how to comply with the legal requirements. The code came into force on 1 April 2015.

TPR's expanded role covers schemes established or reformed as a result of the Acts in respect of eight public service workforces. Where schemes are locally administered TPR treats each part as a separate scheme, forming a total universe of 210 new or reformed schemes. TPR also regulates relevant connected legacy (closed) schemes. Between them these schemes cover over 16.5 million memberships.

A survey was undertaken in 2015 to assess how schemes were meeting the new requirements, and the standards to which they were being run. The 2016 survey aimed to provide a further assessment of performance, understand barriers to improvement, and delve deeper into the top risks of record-keeping, internal controls and communications.

3.   Methodology

As with the 2015 survey, a self-completion approach was adopted for the following reasons:

- the large amount of data to collect would have made a telephone interview very long and burdensome for respondents
- it was anticipated that many respondents would need to do some checking/verification in order to answer the questions accurately; and
- the range of information requested meant that it was important to allow more than one person at the scheme to contribute

However, in contrast to the 2015 survey (where data was collected via an interactive pdf) an online survey platform was used. This reduced the volume of missing data by allowing respondents to be automatically routed through the relevant survey questions depending on their previous responses.

Owing to the nature and the amount of information required, a carefully structured research approach was necessary, giving respondents early warning of the kinds of information that we were seeking to collect and allowing them to devote an appropriate amount of time and effort to providing accurate and reliable information, liaising with colleagues if needed. Therefore, a multi-stage approach was adopted:

- **Stage 1** – Pre-notification emails were sent by TPR to scheme managers and the chairs of pension boards to explain the nature of the research, introduce OMB Research and notify schemes that their participation would be requested.
- **Stage 2** – OMB sent a tailored invitation email to each scheme manager contact. This contained a unique survey URL and a link to a pdf version of the questionnaire (for reference when compiling information prior to completion).
    - o   Any undelivered emails were re-sent once TPR had verified the correct email address.
    - o   In the case of referrals, sample details were updated so that the most appropriate scheme representative was contacted going forward.
- **Stage 3** – OMB sent a further two tailored reminder emails to schemes that had either not started the survey or had partially completed it.
- **Stage 4** – OMB executives undertook a phase of on-going telephone chasing. These calls ensured that the invitation email had been received, confirmed the identity of the most appropriate individual to complete the survey, and encouraged schemes to take part (including offering alternative methods of completion such as email return of a hard copy, recording responses over the phone, etc).

The approach was supported by other TPR communications and engagement (including promotion by key stakeholders such as scheme advisory boards).

3.1   Sampling

The sample for this research was extracted from TPR's scheme registry database. The target audience were the scheme managers of open public service schemes, namely the relevant government department/public body, fire and rescue authority, police pension authority or local administering authority.

Scheme managers were asked to work with the pension board chair to complete the survey and, where necessary, seek input from colleagues with specialist knowledge related to some aspects of their scheme.

Where scheme managers have responsibility for connected legacy schemes, we treated their responses as applying to all schemes for which they are responsible.

3.2   Fieldwork

All surveys were completed between 31 October 2016 and 23 December 2016.

188 of the 210 public service pension schemes completed the survey, equating to a 90% response rate, and covering 98% of all memberships (new/reformed schemes and connected schemes).

Table 3.2.1 - Interview numbers and universe profile

Scheme type	Interviews	Schemes		Memberships[1]	
		Universe	Survey coverage	Universe	Survey coverage
Other	11	11	100%	10,250,219	100%
Firefighters	50	51	98%	100,572	99%
Local Government	92	102	90%	5,960,190	95%
Police	35	46	76%	379,891	76%
Total	**188**	**210**	**90%**	**16,690,872**	**98%**

61% of the surveys were submitted in response to the initial email and reminders, with the remainder completed during the telephone chasing phase.

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[1] Membership figures refer to 2015 and connected schemes

3.3   Respondent profile

Scheme managers (the relevant government department/public body, fire and rescue authority, police pension authority or local administering authority) contributed to 77% of completed surveys (and directly completed it in 66% of cases). Only 28% were completed with input from the pension board chair, although other board members were involved in a further 21%. Half (49%) of the surveys involved consultation with the scheme administrator.

Table 3.3.1 - Respondent role

Respondent role	Completed by	Consulted with	Total (involved)
Scheme manager (or employee of)	66%	11%	**77%**
Pension board chair	3%	25%	**28%**
Pension board member	7%	13%	**21%**
Administrator	14%	35%	**49%**
Other	6%	10%	**15%**
Unknown (did not answer question)	3%	-	-

3.4   Analysis and reporting conventions

Throughout the report results are reported at an aggregate level for all respondents and by 'type': Local Government, Firefighters', Police and Other[2] schemes. Schemes are grouped in this way to reflect the different workforces, governance structures, funding methods and employer profiles.

To ensure that results are representative of all public service pension schemes, the data throughout this report is shown weighted. **Scheme** data has been weighted based on the number of public service schemes of each type. **Membership** data has been weighted based on the total number of memberships in each scheme type.

Where relevant, comparable results from the 2015 PSPS survey have been included. Although data was reported **unweighted** in the published 2015 report, weights have been retrospectively applied to this data to ensure direct comparability with the 2016 results. For this reason, the 2015 results reported here may not exactly match those in the published 2015 report.

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[2] Centrally administered unfunded schemes excluding those Local Government, Firefighters and Police schemes which are centrally administered

4.   Research findings

4.1   Scheme governance

Overall, 81% of schemes had a conflicts policy and procedure for board members, with these schemes covering 94% of public service pension scheme memberships.

Figure 4.1.1 - Proportion of schemes that had a conflicts policy and procedure for pension board members
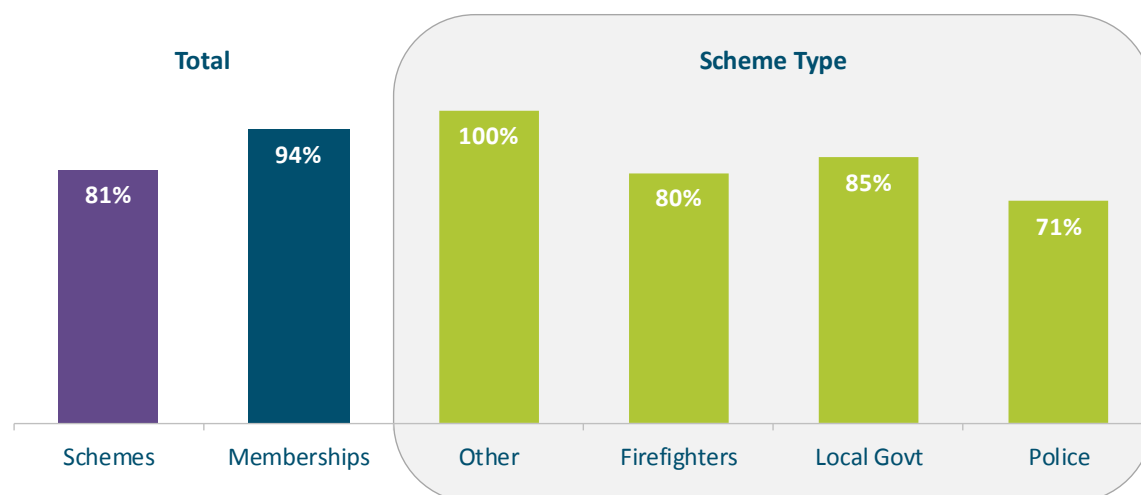
Base: All respondents (Base, Don't know, Did not answer question)
Schemes (188, 7%, 3%), Memberships (188, 3%, 1%), Other (11, 0%, 0%), Fire (50, 6%, 4%), LG (92, 7%, 2%), Police (35, 11%, 6%)

The likelihood of having a conflicts policy and procedure was highest among Other schemes (100%) and lowest among Police schemes (71%). Incidence also increased with scheme size; 96% of schemes with over 100,000 memberships had a conflicts policy compared to 87% of those with 30,000-100,000 memberships and 77% of those with less than 30,000 memberships.

In comparison to findings from 2015 there has been no change in the proportion of schemes with a conflicts policy and procedure.

Table 4.1.1 - Proportion of schemes that had a conflicts policy and procedure for pension board members - Time series

	Total schemes	Scheme Type			
		Other	Firefighters	Local Govt	Police
PSPS Survey 2016	81%	100%	80%	85%	71%
PSPS Survey 2015	85%	100%	79%	87%	86%
% Change	-4%	+0%	+1%	-2%	-15%

Although the proportion of Police schemes with a conflicts policy and procedure fell (from 86% in 2015 to 71% in 2016), this change is not statistically significant, largely due to low base sizes among this group. The

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2016 survey achieved much wider coverage of Police schemes (76% surveyed compared to 49% in 2015), with a greater proportion of the smaller schemes taking part. This could account for the above change, and other large differences between the 2015 and 2016 results for this group.

Just over four-fifths of schemes had a register of interests (85%), and this was the case for all 11 Other schemes. Police schemes were comparatively less likely to have this in place (74%).

Figure 4.1.2 - Proportion of schemes that had a register of interests
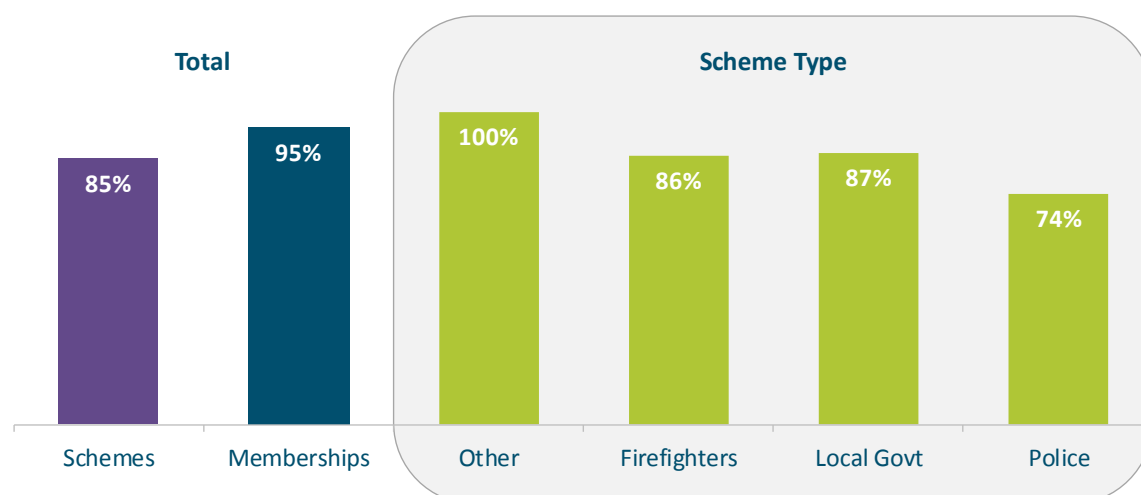
Base: All respondents (Base, Don't know, Did not answer question)
Schemes (188, 4%, 2%), Memberships (188, 2%, 1%), Other (11, 0%, 0%), Fire (50, 4%, 0%), LG (92, 5%, 2%), Police (35, 3%, 6%)

The proportion of schemes with a register of interests was also highest among larger schemes, with every scheme of over 100,000 memberships having one in place.

There has been a significant change over time in the proportion of schemes with a register of interests, from 75% in 2015 to 85% in 2016. This was mostly driven by Firefighters' schemes, where the proportion with a register of interests increased by 29%.

Table 4.1.2 - Proportion of schemes that had a register of interests – Time series

	Total schemes	Scheme Type			
		Other	Firefighters	Local Govt	Police
PSPS Survey 2016	85%	100%	86%	87%	74%
PSPS Survey 2015	75%	92%	57%	77%	86%
% Change	+10%	+8%	+29%	+10%	-12%

Police schemes were the only group for which this proportion decreased (from 86% in 2015 to 74% in 2016), though this change is not statistically significant.

Overall, 93% of schemes (covering 97% of memberships) had developed policies and arrangements to help board members acquire and retain the knowledge and understanding they require.

Figure 4.1.3 - Proportion of schemes that had developed policies and arrangements to help pension board members acquire and retain the knowledge and understanding they require
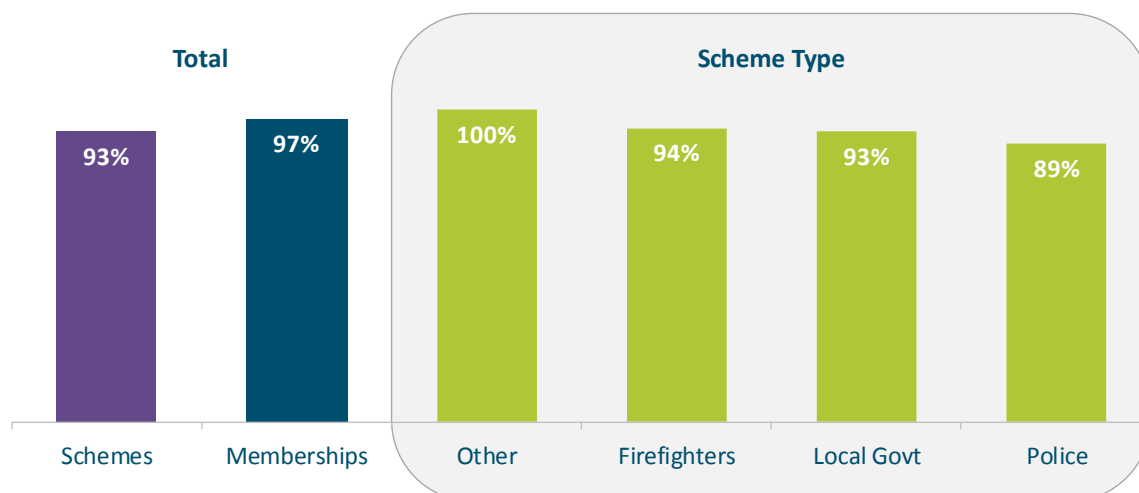
Base: All respondents (Base, Don't know, Did not answer question)
Schemes (188, 2%, 2%), Memberships (188, 0%, 1%), Other (11, 0%, 0%), Fire (50, 2%, 0%), LG (92, 1%, 2%), Police (35, 3%, 6%)

There were no significant differences by scheme type. However, schemes administered in-house were less likely to have developed these policies and arrangements (88%) than those administered externally (97%).

Since 2015 there has been a significant increase (+20%) in the proportion of schemes that had developed policies and arrangements to improve board members' knowledge and understanding. This was driven by a large increase among Firefighters' schemes, from just over a third (36%) in 2015 to almost all (94%) of these schemes in 2016.

Table 4.1.3 - Proportion of schemes that have developed policies and arrangements to help pension board members acquire and retain the knowledge and understanding they require - Time series

	Total schemes	Scheme Type			
		Other	Firefighters	Local Govt	Police
PSPS Survey 2016	93%	100%	94%	93%	89%
PSPS Survey 2015	73%	92%	36%	85%	82%
% Change	**+20%**	**+8%**	**+58%**	**+8%**	**+7%**

Over three-quarters (78%) of scheme managers attended pension board meetings, and half had other face-to-face meetings with the board.

**Table 4.1.4 - Interaction between the scheme manager and pension board**

	Total		Scheme Type			
	Schemes	Member-ships	Other	Fire-fighters	Local Govt	Police
Base: All respondents	*188*	*188*	*11*	*50*	*92*	*35*
The scheme manager attends pension board meetings	78%	89%	91%	72%	89%	57%
The pension board has face-to-face meetings with the scheme manager	50%	55%	55%	52%	58%	31%
The pension board submits written reports to the scheme manager	34%	45%	55%	28%	28%	49%
The scheme manager commissions advice from the pension board	31%	38%	45%	36%	26%	31%
Other	22%	26%	27%	26%	24%	11%
Don't know	3%	1%	0%	2%	1%	9%
Did not answer question	2%	1%	0%	0%	2%	3%

The majority of scheme managers for Other (91%) and Local Government (89%) schemes attended pension board meetings. This proportion was lowest among Police schemes (57%).

Just under three-quarters (72%) of scheme managers attended every pension board meeting, with 17% never attending.

Figure 4.1.4 - Frequency of scheme manager attendance at pension board meetings
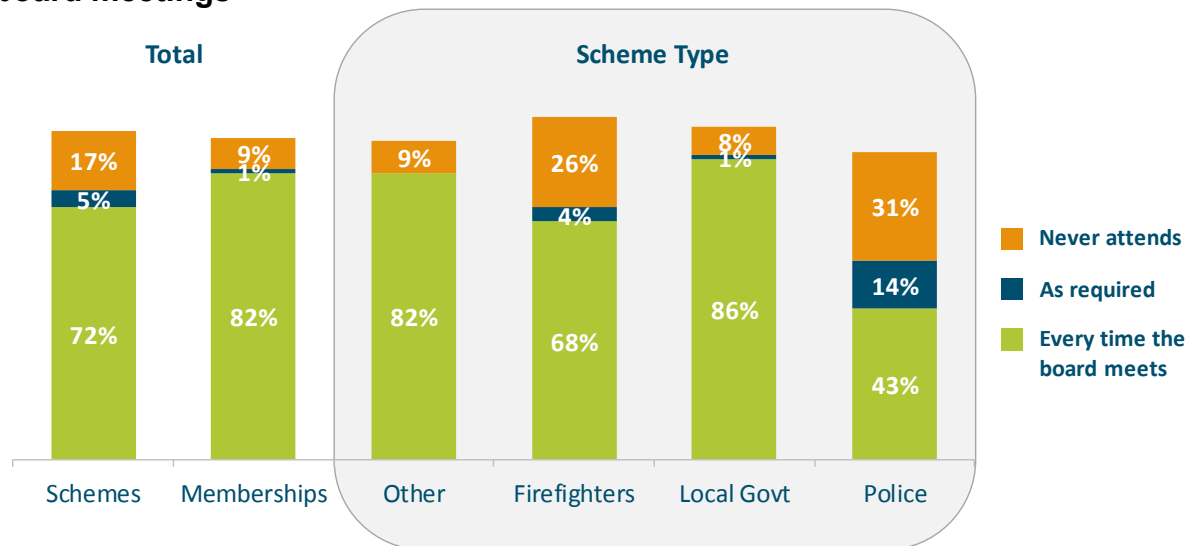
Base: All respondents (Base, Don't know whether attends, Did not answer question, Did not answer whether attends board meetings)
Schemes (188, 3%, 2%, 2%), Memberships (188, 1%, 6%, 1%), Other (11, 0%, 9%, 0%), Fire (50, 2%, 0% 0%), LG (92, 1%, 2%, 2%), Police (35, 9%, 0%, 3%)

Firefighters' and Police schemes were most likely to report that the scheme manager never attended board meetings (26% and 31% respectively).

Schemes were asked to evaluate the pension board's ability to guide and advise the scheme manager on four different aspects using a 1-10 scale (where 1 was 'very poor' and 10 was 'very good').

In general, Firefighters' schemes had the lowest perception of the board's abilities (a mean score of 6.4 across all aspects). Police schemes had a comparatively higher estimation (a mean of 7.8 across all aspects) especially in terms of the board's ability to advise on scheme regulations (8.0) and to address poor standards (8.0).

Table 4.1.5 - Pension board's ability to guide and advise the scheme manager - Mean ratings

	Total		Scheme Type			
	Schemes	Member-ships	Other	Fire-fighters	Local Govt	Police
Base: All respondents	*188*	*188*	*11*	*50*	*92*	*35*
Identify where there are poor standards or non-compliance with legal requirements	7.3	7.5	7.6	6.6	7.5	7.7
Set out recommendations on addressing poor standards or non-compliance with legal requirements	7.3	7.7	7.9	6.6	7.4	7.7
Advise on scheme regulations, governance and administration requirements set out in legislation, and standards expected by TPR	6.7	7.1	7.5	5.5	6.6	8.0
Take or secure actions to address poor standards or non-compliance with legal requirements	7.4	7.7	7.9	6.9	7.3	8.0
Average pension board rating (across all four aspects)	**7.2**	**7.5**	**7.7**	**6.4**	**7.2**	**7.8**

4.2   Managing risk

Almost three-quarters (72%) of schemes (covering 90% of memberships) had documented procedures for assessing and managing risk. Other and Local Government schemes were most likely to have such procedures in place (91% and 92% respectively), while Firefighters' and Police schemes were least likely (44% and 51% respectively).

Figure 4.2.1 - Proportion of schemes that had documented procedures for assessing and managing risk
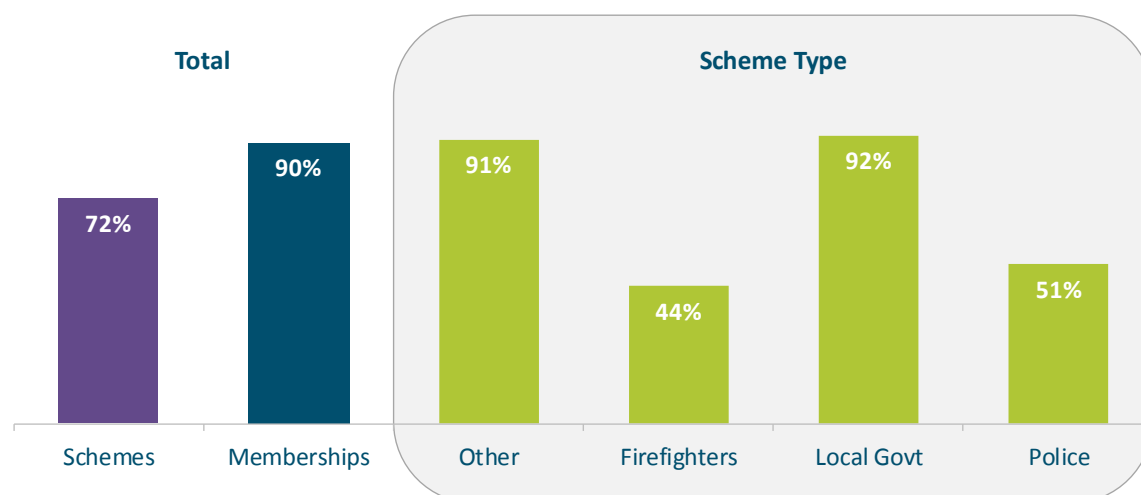
Base: All respondents (Base, Don't know)
Schemes (188, 10%), Memberships (188, 2%), Other (11, 0%), Fire (50, 16%), LG (92, 4%), Police (35, 20%)

The likelihood of having documented risk procedures increased with scheme size (ranging from 57% of those with less than 1,000 memberships to 92% of those with over 100,000 memberships). Schemes administered in-house were also significantly more likely than those administered externally to have these procedures (83% and 56% respectively).

When comparing findings from 2016 and 2015, there has been little overall change in the proportion of schemes that have documented risk procedures.

Table 4.2.1 - Proportion of schemes that had documented procedures for assessing and managing risk - Time series

	Total schemes	Scheme Type			
		Other	Firefighters	Local Govt	Police
PSPS Survey 2016	72%	91%	44%	92%	51%
PSPS Survey 2015	70%	100%	36%	79%	82%
% Change	+2%	-9%	+8%	+13%	-31%

However, Local Government schemes were significantly more likely to have procedures for assessing and managing risk than was the case in 2015 (an increase of 13%). Police schemes were significantly less likely to (a decrease

of 31%), which likely reflects the broader coverage of police schemes in this survey rather than a drop in the presence of these processes across the police scheme population.

More than two-thirds (70%) of schemes had a risk register, and these schemes covered 90% of all memberships. The majority (91%) of Other and Local Government schemes had a risk register, with this less likely to be the case among Police and Firefighters' schemes (51% and 38% respectively).

Figure 4.2.2 - Proportion of schemes that had a risk register
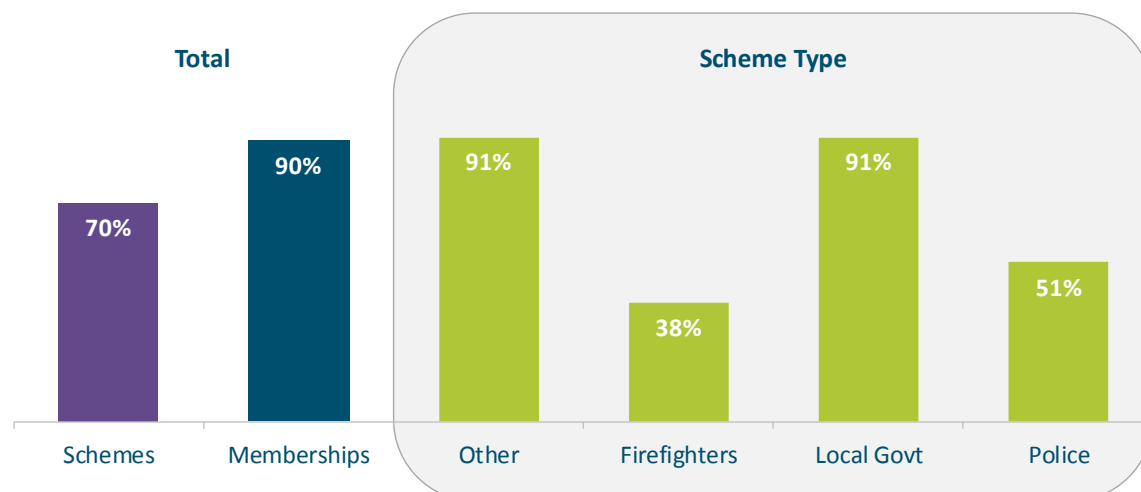
Base: All respondents (Base, Don't know)
Schemes (188, 5%), Members (188, 1%), Other (11, 0%), Fire (50, 8%), LG (92, 3%), Police (35, 9%)

The likelihood of having a risk register increased with scheme size (42% of those with less than 1,000 memberships up to 96% of those with over 100,000 memberships). Schemes administered in-house were also more likely to have a risk register than those administered externally (78% and 61% respectively).

When comparing results between 2016 and 2015, there were no statistically significant changes at the total level. Although significantly fewer Police schemes had a risk register than in 2015 (51% in 2016 compared to 82% in 2015), this is likely to be due to the more comprehensive survey coverage of this group in 2016.

Table 4.2.2 - Proportion of schemes that had a risk register - Time series

	Total schemes	Scheme Type			
		Other	Firefighters	Local Govt	Police
PSPS Survey 2016	70%	91%	38%	91%	51%
PSPS Survey 2015	76%	100%	36%	91%	82%
% Change	**-6%**	**-9%**	**+2%**	**+0%**	**-31%**

Schemes were asked to what extent risk management procedures contributed to establishing new or revised internal controls. The majority (94%) reported that these procedures had at least some influence, with a quarter (26%) stating that this contribution was significant.

There were no significant differences by scheme type.

Figure 4.2.3 - Extent to which risk management procedures have contributed to establishing new or revised internal controls
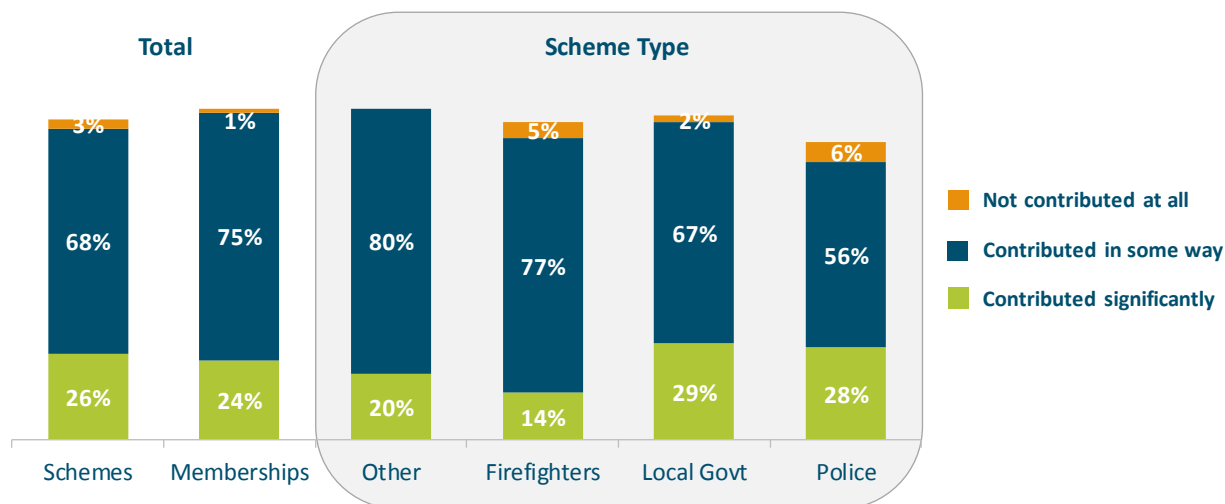
Base: All with documented procedures for assessing/managing risk (Base, Don't know)
Schemes (135, 3%), Memberships (135, 1%), Other (10, 0%), Fire (22, 5%), LG (85, 1%), Police (18, 11%)

These findings were broadly consistent with comparative results for trust-based schemes. In the 2015 Trustee Landscape Quantitative Research[3] 17% of schemes reported that these procedures had contributed significantly to their internal controls, 70% that they had contributed in some way and 10% that they had not contributed at all.

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[3] http://www.thepensionsregulator.gov.uk/docs/trustee-landscape-quantitative-research-2015.pdf

All schemes with a risk register were asked to identify the top three governance and administration risks on their register. This was captured verbatim and the responses were then coded into broad themes for ease of analysis and interpretation.

The quality of records was the most commonly identified risk (36% of schemes), followed by funding or investment concerns (34%) and poor governance (29%).

Figure 4.2.4 - Top governance and administration risks on register *(Top mentions: 5%+)*

Records	Funding / investment Top Risk: LG	Poor/ineffective governance Top Risk: Police	Securing compliance with legislation Top Risk: Fire	Employer compliance
36%	34%	29%	23%	23%

| Recruitment, training, retention of staff & know how	Failure of internal controls	Systems Top Risk: Other	Administrator failure	Resourcing
19%	18%	18%	13%	11%
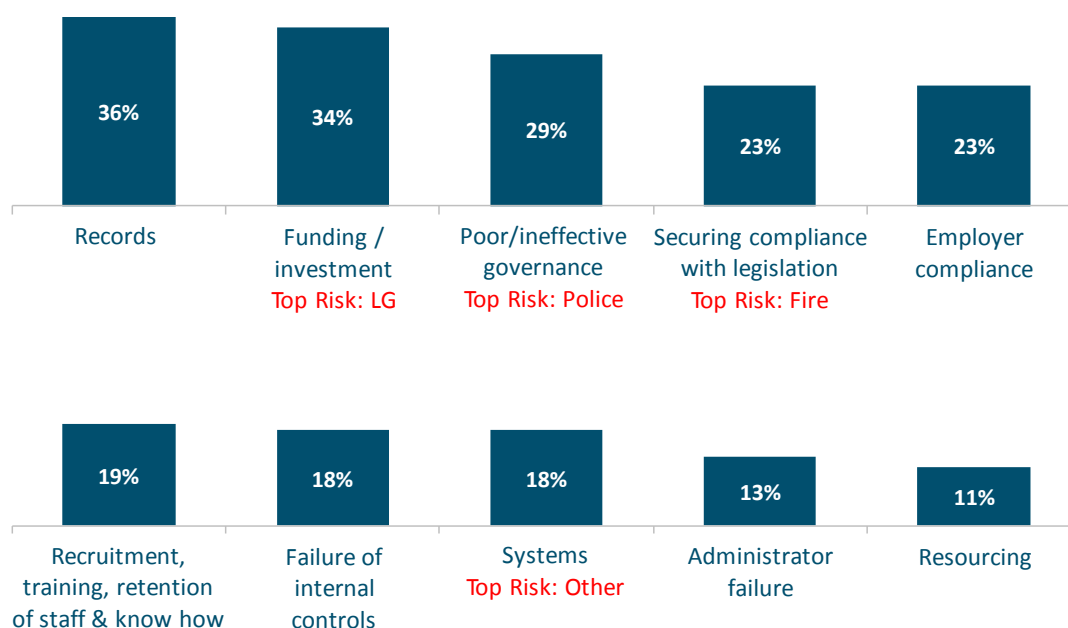
Base: All schemes with a risk register (131)

The most widespread risks differed by scheme type. Funding or investment concerns was the top risk for Local Government schemes (52%), poor governance for Police schemes (39%), securing compliance with legislation for Firefighters' (47%) and systems issues for Other schemes (50%).

4.3   Administrator controls

Overall there was an equal split between schemes that were administered in-house (47%) and those where the administration was outsourced (46%). Among those that were administered externally, similar proportions used other public bodies (23%) and commercial third parties (22%).

Figure 4.3.1 - Scheme administration
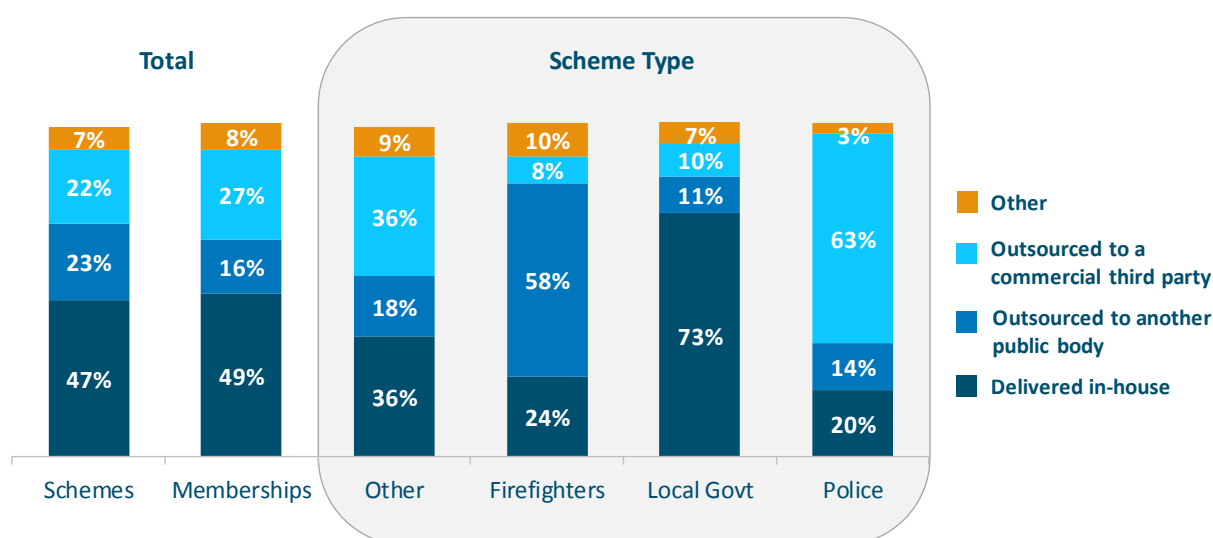
Base: All respondents (Base)
Schemes (188), Memberships (188), Other (11), Fire (50), LG (92), Police (35)

There was some variation by scheme type. Three-quarters (73%) of Local Government schemes undertook scheme administration in-house, whereas Other, Firefighters' and Police schemes were comparatively more likely to outsource this (55%, 66% and 77% respectively). Specifically, Police schemes were most likely to outsource the administration to a commercial third party (63%).

When looking at scheme administration by size, larger schemes were significantly more likely to have in-house administration than smaller schemes. Three-quarters (77%) of schemes with over 100,000 memberships had administration services in-house, compared to a third (38%) of those with less than 1,000 members.

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Schemes use a range of methods to monitor the performance of their administrators. The most common were administrators attending regular meetings with the scheme manager/board (84%) or delivering regular reports to the scheme manager/board (78%).

Provision of independent assurance reports and the application of penalties was less common (30% and 14% respectively). The exception to this was Other schemes, where 55% of administrators provided assurance reports and 45% applied penalties where contractual terms or service standards were not met.

Table 4.3.1 - Monitoring/managing the performance of administrators

	Total		Scheme Type			
	Schemes	Member-ships	Other	Fire-fighters	Local Govt	Police
Base: All respondents	*188*	*188*	*11*	*50*	*92*	*35*
Administrators attend regular meetings with scheme manager or board	84%	78%	73%	82%	88%	80%
Administrators deliver regular reports to scheme manager or board	78%	88%	91%	74%	85%	63%
Performance metrics are set out in contracts or SLAs	67%	78%	91%	64%	55%	89%
Independent auditors review performance	66%	84%	91%	52%	74%	57%
Administrators provide independent assurance reports	30%	44%	55%	30%	28%	26%
Penalties are applied where contractual terms or service standards are not met	14%	32%	45%	12%	11%	14%
Other	13%	16%	18%	16%	14%	6%

Schemes administered in-house were less likely to use service-level agreements (SLAs) than those administered externally (43% compared to 83% of those administered by another public body and 98% of those administered by a commercial third party). Schemes administered by commercial third parties were also more likely to impose penalties than those with other administration arrangements (38%).

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4.4   Data

The majority of schemes had processes in place to monitor administration and record keeping. This ranged from 95% with processes to monitor the payment of contributions to 88% with processes for resolving payment issues and assessing whether to report failures to TPR.

Table 4.4.1 - Proportion of schemes with administration and record keeping processes in place

	Total		Scheme Type			
	Schemes	Member-ships	Other	Fire-fighters	Local Govt	Police
Base: All respondents	*188*	*188*	*11*	*50*	*92*	*35*
To monitor records for all membership types on an ongoing basis to ensure they are accurate and complete	89%	91%	91%	88%	90%	86%
With employers to receive, check and review data	90%	98%	100%	76%	96%	89%
For monitoring the payment of contributions	95%	94%	91%	88%	100%	94%
For resolving contribution payment issues and assessing whether to report payment failures to TPR	88%	93%	91%	68%	97%	91%

There was little variation in the prevalence of these processes by scheme type. However, Firefighters' schemes were the least likely to have processes to monitor data with employers and for resolving contribution payment issues (76% and 68% respectively).

Just over half (55%) of schemes reported that at least 90% of employers provided timely, accurate and complete data as a matter of course.

Figure 4.4.1 - Proportion of employers providing timely, accurate and complete data as a matter of course
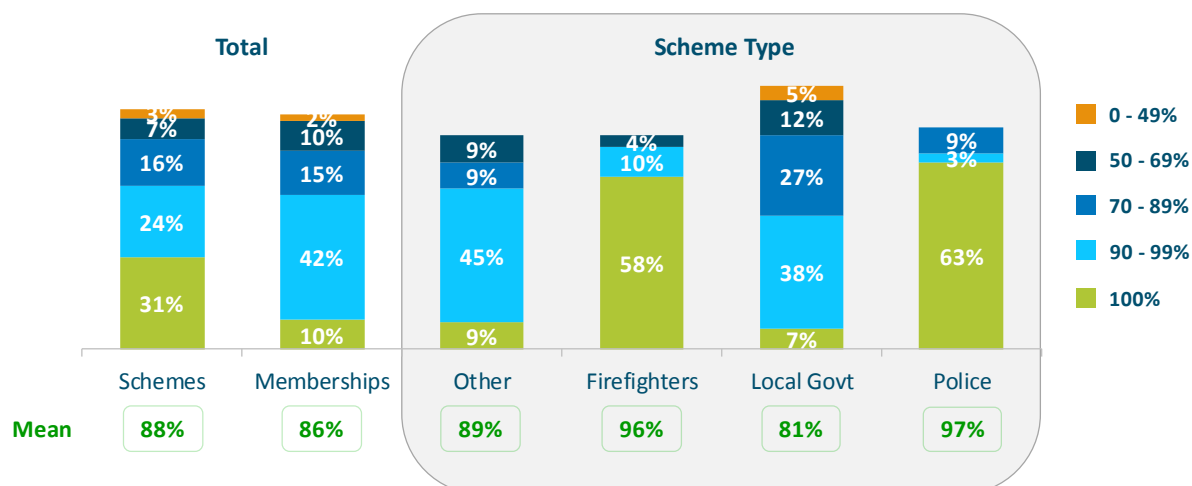
Base: All respondents (Base, Not applicable, Don't know, Did not answer question)
Schemes (188, 1%, 17%, 1%), Memberships (188, 0%, 16%, 6%), Other (11, 0%, 18%, 9%), Fire (50, 4%, 24%, 0%), LG (92, 0%, 11%, 0%), Police (35, 0%, 23%, 3%)

Reflecting the fact that they are single employer schemes, the mean proportion of employers providing timely, accurate and complete data was highest for Firefighters' and Police schemes.

When comparing results between 2016 and 2015, there has been very little change, with most employers reported as providing consistently good data.

Table 4.4.2 - Proportion of employers providing timely, accurate and complete data as a matter of course - Time series

	Total schemes	Scheme Type			
		Other	Firefighters	Local Govt	Police
PSPS Survey 2016	88%	89%	96%	81%	97%
PSPS Survey 2015	86%	92%	100%	76%	100%
% Change	**+2%**	**-3%**	**-4%**	**+5%**	**-3%**

Overall, 88% of schemes had carried out a data review. The majority (79%) of schemes had done so in the last year, and these schemes covered 93% of all memberships.

Only 3% of schemes had never conducted a data review. Although 9% did not know if or when they had done so, the vast majority of these were third party administered (84% of this group).

Figure 4.4.2 - Most recent data review
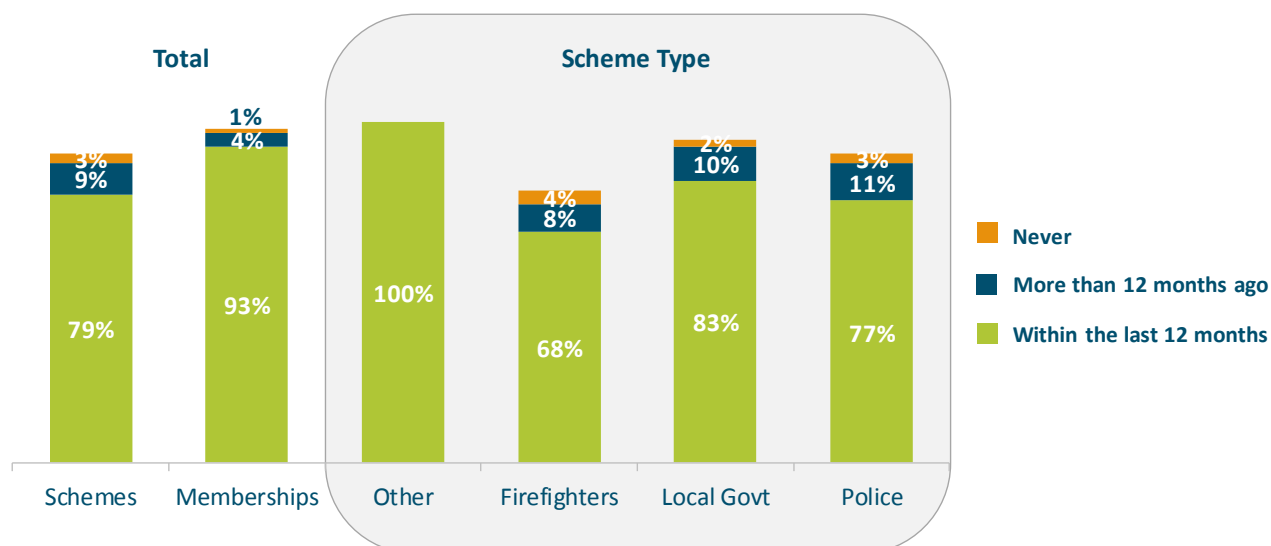
Base: All respondents (Base, Don't know)
Schemes (188, 9%), Memberships (188, 2%), Other (11, 0%), Fire (50, 20%), LG (92, 5%), Police (35, 9%)

When comparing results between 2015 and 2016, although there was an overall increase in the proportion of schemes reviewing data in the last 12 months, this difference is only statistically significant among Other schemes (increasing from 58% in 2015 to 100% in 2016).

Table 4.4.3 - Proportion of schemes that had carried out a data review in the last 12 months - Time series

	Total schemes	Scheme Type			
		Other	Firefighters	Local Govt	Police
PSPS Survey 2016	79%	100%	68%	83%	77%
PSPS Survey 2015	70%	58%	50%	77%	77%
% Change	**+9%**	**+42%**	**+18%**	**+6%**	**+0%**

Among those schemes that had reviewed their data, in almost three-quarters (72%) of cases this covered data collected both before and after the Public Service Pensions Acts came into force in April 2015. Police schemes were the least likely to have reviewed data collected both before and after April 2015, with three-fifths (61%) having done so.

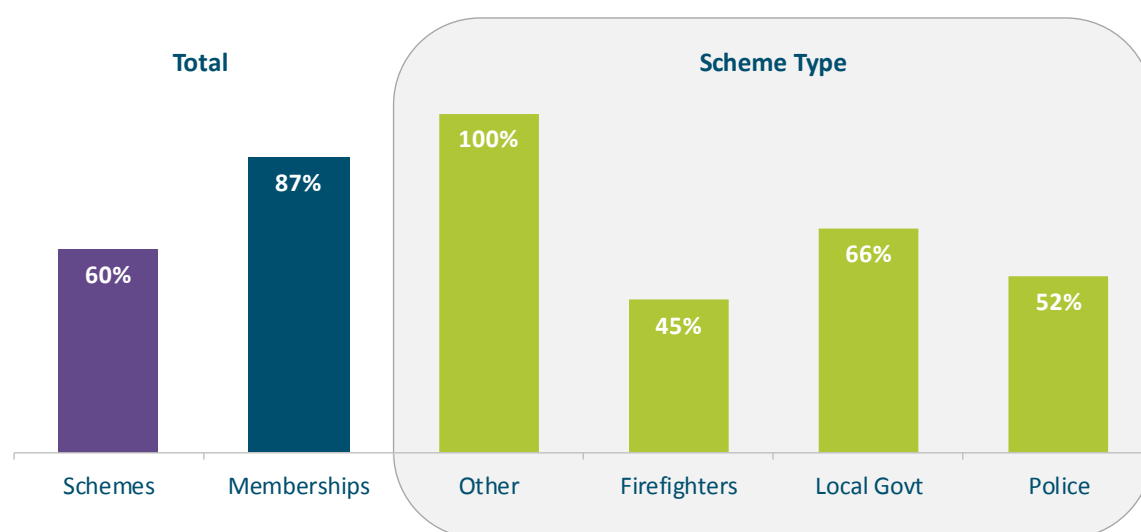**Figure 4.4.3 - Coverage of data review**
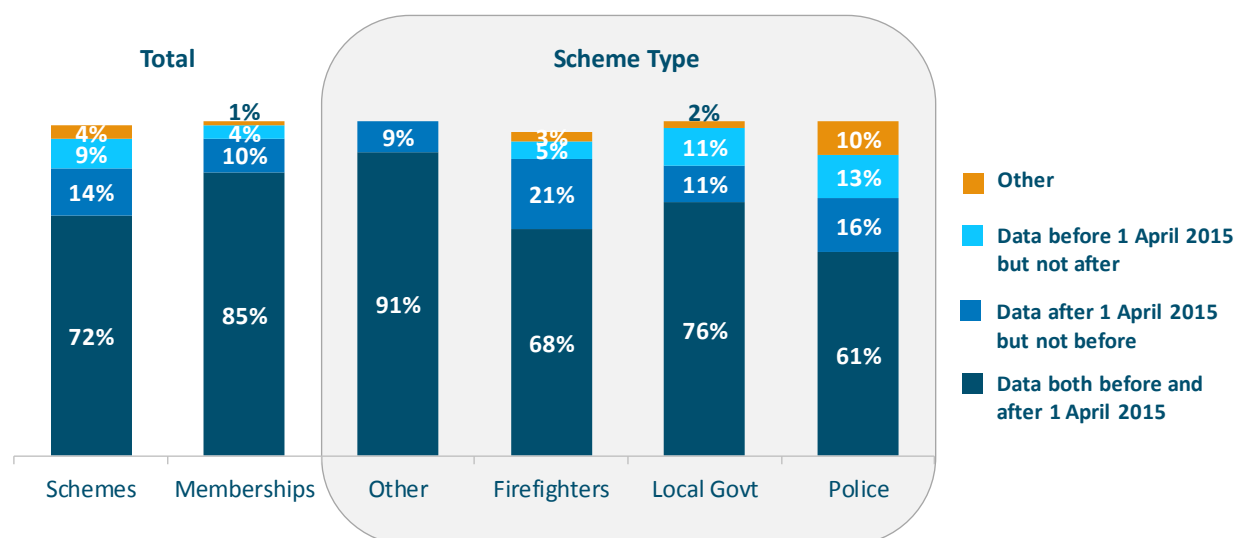
Base: All that have carried out data review (Base, Don't know)
Schemes (165, 1%), Memberships (165, 0%), Other (11, 0%), Fire (38, 3%), LG (85, 0%), Police (31, 0%)

Two-fifths (60%) of schemes that had carried out a data review identified issues or problems while doing so (which represents 53% of the total number of schemes in the survey). While all 11 'Other' schemes had identified issues, less than half (45%) of Firefighters' schemes had done so.

Figure 4.4.4 - Proportion of schemes where most recent data review exercise identified any issues or problems

Base: All that have carried out data review (Base, Don't know)
Schemes (165, 3%), Memberships (165, 1%), Other (11, 0%), Fire (38, 3%), LG (85, 1%), Police (31, 10%)

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Schemes that had identified issues during their data review were also asked what actions they had taken in response. The most widespread action was a data cleansing exercise (69%), and a third (34%) had instigated a data improvement plan (equating to 18% of all schemes).

Table 4.4.4 - Actions to address issues identified

	Total		Scheme Type			
	Schemes	Member-ships	Other	Fire-fighters	Local Govt	Police
Base: All identifying issues during review	*100*	*100*	*11*	*17*	*56*	*16*
Data cleansing exercise	69%	78%	82%	53%	68%	81%
Address chasing exercises	40%	45%	45%	35%	43%	31%
Additional validation checks	37%	50%	55%	29%	38%	31%
Pensioner existence checks	37%	51%	55%	18%	43%	25%
Further/improved member communications (eg reminding members to check their records are up to date)	35%	37%	36%	35%	38%	25%
Data improvement plan put in place/updated	34%	56%	64%	6%	38%	31%
Other	32%	36%	36%	24%	38%	19%

Firefighters' schemes were least likely to have put a data improvement plan in place (6% of those identifying issues, equating to 2% of all Firefighters' schemes).

Schemes that had more rigorous processes for managing administrators were also more likely to have implemented a data improvement plan.

- 40% of those that had SLAs or contracts setting out performance metrics had a data improvement plan (compared to 21% of other schemes).
- 49% of those where the administrator provided assurance reports had an improvement plan (compared to 27% of other schemes).
- 44% of those that used independent auditors to review provider performance had an improvement plan (compared to 10% of other schemes).

For almost half (48%) of schemes with a data improvement plan, the end date for this plan was 2017 (typically March). A fifth (18%) had an end date in 2018, and a small minority had an end date of 2016 or 2019.

The majority (83%) of schemes with a data improvement plan said this covered data collected both before and after 1st April 2015.

4.5   Communications

A fifth (19%) of schemes reported that in 2016 less than half of their active members received their annual benefit statement by the statutory deadline. In almost all of these cases, the scheme indicated that no members received it on time.

Figure 4.5.1 - Proportion of active members receiving their annual benefit statement by the statutory deadline
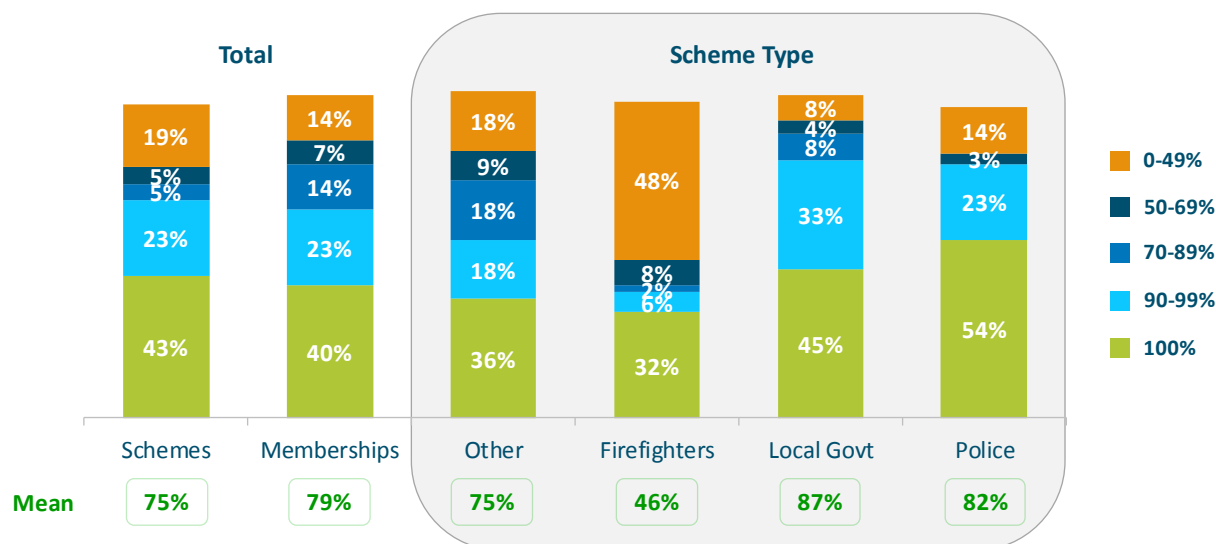
Base: All respondents (Base, Don't know)
Schemes (188, 4%), Memberships (188, 1%), Other (11, 0%), Fire (50, 4%), LG (92, 3%), Police (35, 6%)

Members of Firefighters' schemes were the least likely to receive their annual benefit statement on time; 48% of these schemes said that less than half of members received this by the statutory deadline.

Schemes were also asked whether they did anything to assess and, where necessary, improve the effectiveness of their member communications. Over two-thirds (70%) reviewed relevant innovations in technology, and a slightly lower proportion sought feedback from member representatives and had a communications plan (63% in each case). Overall, a third of schemes researched the views of their members (33%) and a quarter (27%) conducted an annual communications review.

Table 4.5.1 - Ensuring effective communications

	Total		Scheme Type			
	Schemes	Member-ships	Other	Fire-fighters	Local Govt	Police
Base: All respondents	*188*	*188*	*11*	*50*	*92*	*35*
Review relevant innovations in technology that could improve member access to communications, including interactive tools	70%	82%	82%	46%	84%	63%
Seek feedback from the pension board's member representatives	63%	80%	91%	68%	62%	54%
Have a communications plan	63%	71%	64%	42%	87%	31%
Research the views of members	33%	49%	55%	18%	42%	26%
Conduct an annual communications review	27%	43%	45%	12%	40%	11%
None of these	4%	1%	0%	8%	1%	9%
Don't know	3%	0%	0%	6%	0%	6%

Local Government and Other schemes were most likely to review innovations in technology (84% and 82%). The former were also most likely to have a communications plan (87%) and the latter to seek feedback from the board's member representatives (91%).

Smaller schemes were comparatively more likely to report that they had none of the procedures mentioned (10% of schemes with less 5,000 memberships, compared to none of those with over 30,000 memberships)

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4.6   Resolving issues

The table below uses the survey data to estimate the total number of complaints received by public service schemes, and presents this as a proportion of all memberships. Overall, an estimated 8,000 complaints were made to public service schemes in the last year, amounting to 0.10% of all memberships.

Table 4.6.1 - Estimated total complaints received

	Total schemes	Scheme Type			
		Other	Firefighters	Local Govt	Police
Total complaints	8,011	5,450	155	1,969	437
Share of complaints	100%	68%	2%	25%	5%
Share of memberships	100%	57%	1%	40%	3%
Complaints as % of memberships	0.10%	0.05%	0.17%	0.04%	0.19%

In terms of the types of complaints received, the most common were ill health retirement disputes (31%), delays in benefit payments (30%) and incorrect estimates of benefits (27%).

Table 4.6.2 - Top types of complaints received

Top Mentions (5%+)	Total schemes	Scheme Type			
		Other	Fire-fighters	Local Govt	Police
Base: All that received complaints	*132*	*10*	*28*	*75*	*19*
Ill health retirement disputes	31%	20%	14%	44%	11%
Delays in payment of benefits	30%	30%	18%	36%	26%
Incorrect estimate of benefits	27%	50%	11%	25%	42%
Transfer issues	22%	30%	18%	21%	26%
Poor communication	21%	30%	21%	19%	26%
Inaccurate data	11%	0%	7%	15%	11%
Employer performance (ie not sending data in timely fashion)	10%	0%	0%	17%	0%
Spousal benefits	7%	10%	11%	7%	5%
Pension overpayment and recovery	7%	0%	14%	7%	0%
Making allowance pensionable	5%	0%	18%	1%	5%

There was some variation by scheme type in this respect. Complaints made to Other and Police schemes most frequently related to incorrect estimates of benefits (50% and 42% mentioned this as a top complaint). In contrast, Local

Government complaints were more likely to relate to ill health retirement disputes (44% of these schemes mentioned this as a top complaint).

Overall, around two in every five complaints entered the Internal Dispute Resolution (IDR) process (a mean of 43%).

**Figure 4.6.2 – Mean proportion of complaints that entered the IDR process**
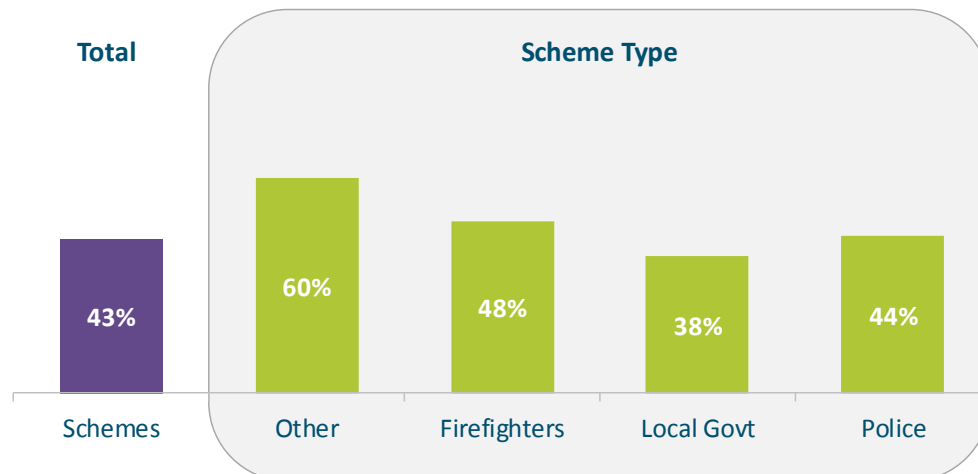
Base: All respondents (Base)
Schemes (188), Other (11), Fire (50,), LG (92), Police (35)

When analysed by type of scheme, the mean proportion of complaints that entered the IDR process was 60% for Other schemes, 48% for Firefighters', 44% for Police and 38% for Local Government.

4.7   Reporting breaches

The majority (84%) of schemes had procedures in place to identify and assess breaches of the law, and report these to TPR if required. This equates to 96% of all memberships being in a scheme with these procedures.

Figure 4.7.1 - Proportion of schemes that had procedures in place to allow the scheme manager, pension board members and others to identify and assess breaches of the law, and report these to TPR if required
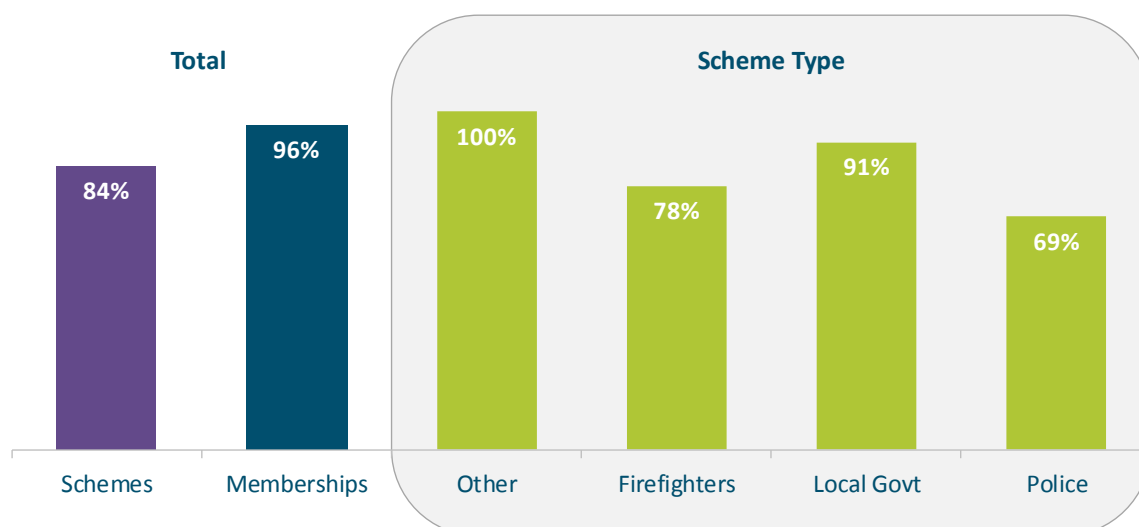
Base: All respondents (Base, Don't know)
Schemes (188, 8%), Memberships (188, 1%), Other (11, 0%), Fire (50, 10%), LG (92, 2%), Police (35, 20%)

All 11 Other schemes had breach identification procedures in place, compared to 69% of Police schemes.

When comparing results from 2016 and 2015, there has been a significant increase in the proportion of schemes with processes in place to identify and assess breaches, from 53% in 2015 to 84% of in 2016. This increase was apparent for all scheme types apart from Police.

Table 4.7.1 - Proportion of schemes that had procedures in place to allow the scheme manager, pension board members and others to identify and assess breaches of the law, and report these to TPR if required - Time series

	Total schemes	Scheme Type			
		Other	Firefighters	Local Govt	Police
PSPS Survey 2016	84%	100%	78%	91%	69%
PSPS Survey 2015	53%	67%	36%	51%	73%
% Change	**+31%**	**+33%**	**+42%**	**+40%**	**-4%**

Just over two–fifths (42%) of schemes had identified breaches of the law in the last year. Breach identification was most prevalent among Other schemes (64%) and least widespread among Police schemes (11%).

Figure 4.7.2 - Proportion of schemes that had identified any breaches of the law in the last 12 months
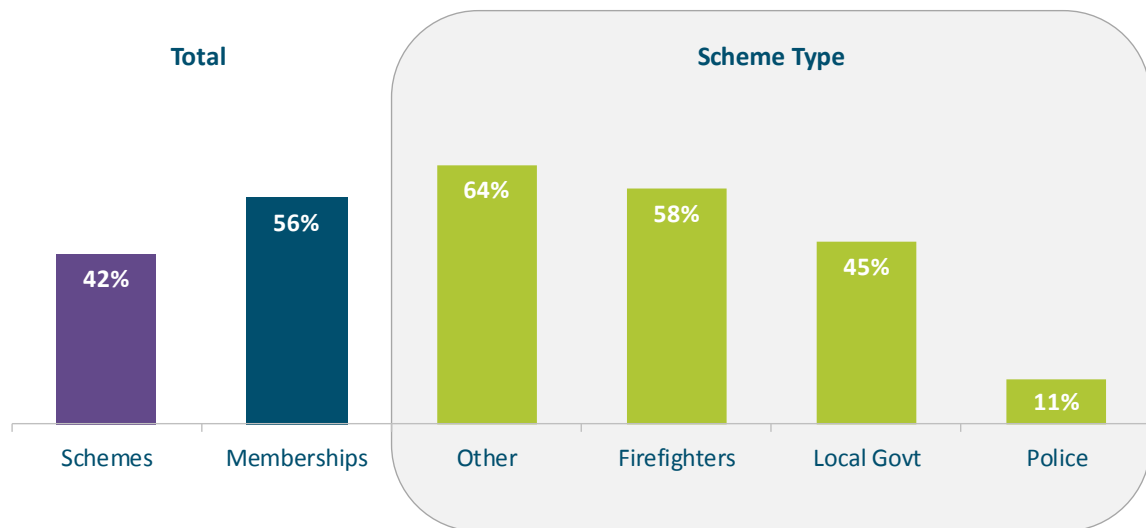
Base: All respondents (Base, Don't know, Did not answer question)
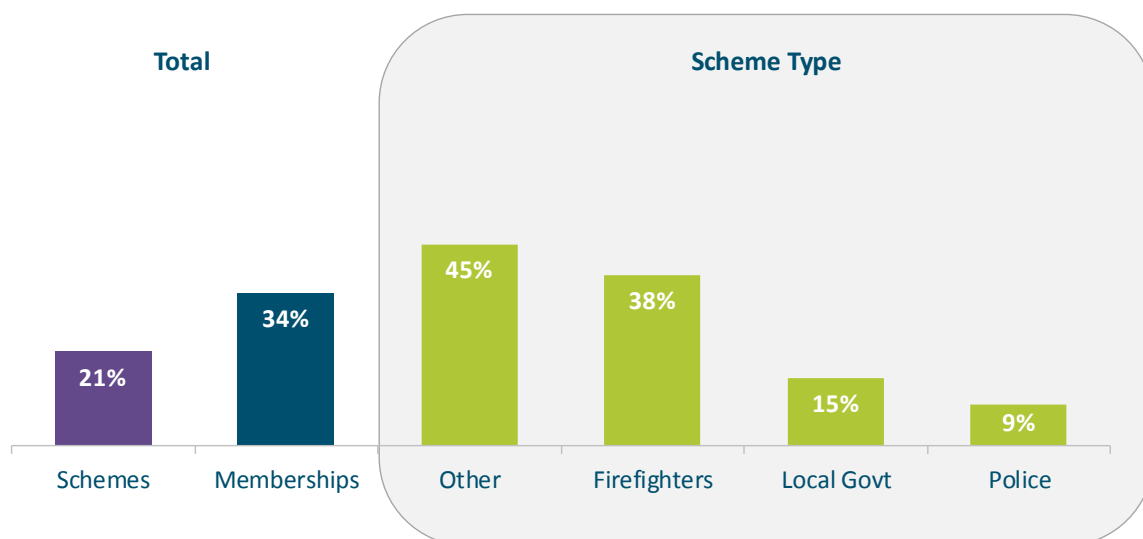Schemes (188, 2%, 1%), Memberships (188, 0%, 0%), Other (11, 0%, 0%), Fire (50, 2%, 0%), LG (92, 1%, 1%), Police (35, 3%, 3%)

Schemes that did not have processes in place to identify breaches were significantly less likely to have found any breaches in the last 12 months (25%, compared to 45% of those that had procedures in place).

Despite there being no notable differences in the proportion with breach identification procedures, schemes administered by commercial third parties were less likely to have found breaches in the last 12 months (16%, compared to 52% of those administered in-house and 47% of those administered by another public body).

Overall, 21% of schemes had reported breaches to TPR in the previous year. This equates to half of the 42% that had identified any breaches.

Figure 4.7.3 - Proportion of schemes that had reported any breaches to TPR as they thought they were materially significant

Base: All respondents (Base, Don't know if breaches, Did not answer question)
Schemes (188, 2%, 1%), Memberships (188, 0%, 0%), Other (11, 0%, 0%), Fire (50, 2%, 0%), LG (92, 1%, 1%), Police (35, 3%, 3%)

Police schemes were least likely to have reported breaches (9%), but this is linked to the fact that just 11% had identified any such breaches. When calculated as a proportion of all those identifying breaches, Police schemes were in fact most likely to have reported them (75% compared to 71% for Other, 66% for Firefighters' and 34% for Local Government).

Table 4.7.3 – Summary: Proportion of schemes identifying and reporting breaches

	Total schemes	Scheme Type			
		Other	Firefighters	Local Govt	Police
Proportion of schemes identifying breaches	42%	64%	58%	45%	11%
Proportion of schemes reporting breaches to TPR	21%	45%	38%	15%	9%
Proportion of breaches reported	**50%**	**71%**	**66%**	**34%**	**75%**

When breaches were identified, they were most commonly attributed to employer failings in providing accurate data (mentioned by 60% of schemes) or to issues with the schemes' systems or processes (mentioned by 43%).
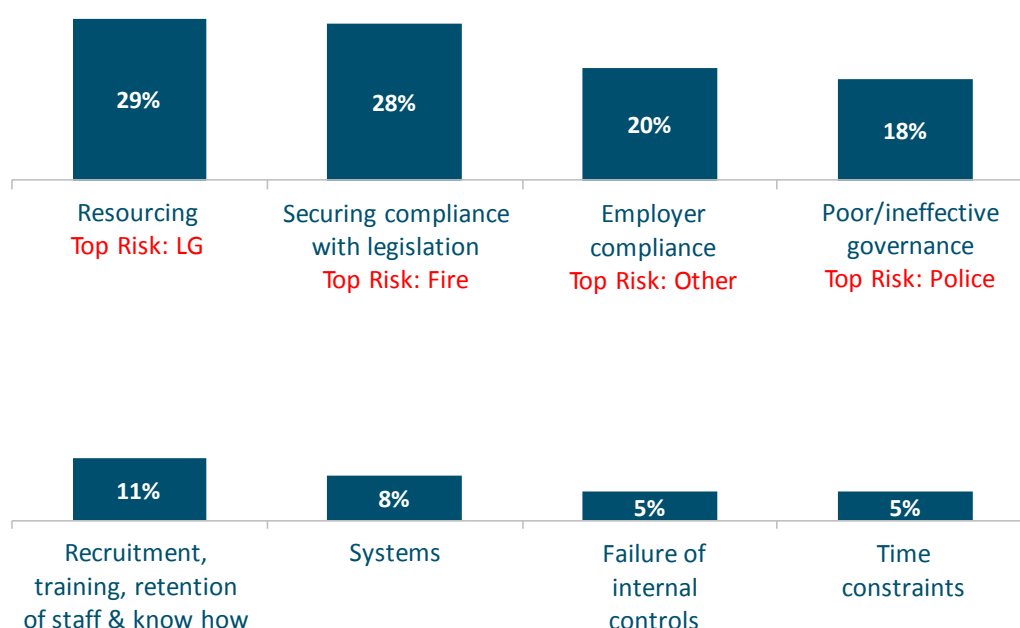
Table 4.7.4 - Causes of breaches identified

Top Mentions (2%+)	Total		Scheme Type			
	Schemes	Member-ships	Other	Fire-fighters	Local Govt	Police
Base: All identifying breaches of the law	*81*	*81*	*7*	*29*	*41*	*4*
Failure of employers to provide timely, accurate or complete data	60%	62%	57%	41%	73%	50%
Systems or process failure or issues	43%	50%	57%	55%	34%	25%
Late/non-payment of contributions	13%	16%	14%	0%	22%	0%
Management of transactions (eg errors or delays in payment of benefits)	11%	16%	14%	0%	20%	0%
Failure to maintain records or rectify errors	9%	3%	0%	10%	10%	0%
Lack of knowledge and understanding	9%	3%	0%	10%	10%	0%
Capacity issues	5%	1%	0%	10%	2%	0%

## 4.8	Addressing governance and administration issues

All schemes were asked to identify the top three barriers to improving their scheme governance and administration. This was captured verbatim and the responses were then coded into broad themes for ease of analysis and interpretation.

The most commonly identified barriers were limited resources (29%), the volume of legislative change and complexity of schemes (28%) and issues with employer compliance (20%).

Figure 4.8.1 - Barriers to improved governance/administration
(Top mentions: 5%+)

29%	28%	20%	18%
Resourcing Top Risk: LG	Securing compliance with legislation Top Risk: Fire	Employer compliance Top Risk: Other	Poor/ineffective governance Top Risk: Police

11%	8%	5%	5%
Recruitment, training, retention of staff & know how	Systems	Failure of internal controls	Time constraints

Base: All schemes (188)

The most commonly identified barriers differed by scheme type. Resourcing was the top risk for Local Government schemes (39%), volume of legislative change and scheme complexity for Firefighters' (23%), employer compliance for Other (45%) and poor or ineffective governance for Police schemes (23%).

Overall, 15% of schemes reported they faced no barriers to improving their governance and administration. This was most likely to be the case among the smallest schemes (29% of those with less than 1,000 memberships) and those administered by a commercial third party (27%).

Schemes that had identified barriers to improving governance and administration were asked what steps they were currently taking to address those barriers. The most commonly reported actions were increased capacity, resource planning or specialist knowledge (26%), or improvements to systems/software (25%).

Table 4.8.1 - Addressing barriers

	Total		Scheme Type			
	Schemes	Member-ships	Other	Fire-fighters	Local Govt	Police
Base: All identifying barriers	*149*	*149*	*11*	*36*	*81*	*21*
Increasing capacity/resource planning/specialist knowledge	26%	17%	9%	17%	33%	19%
Systems/software improvements	25%	40%	45%	11%	30%	19%
Employer engagement/training	18%	32%	36%	8%	25%	0%
Increase board size/training/engagement	17%	9%	9%	39%	9%	19%
Business/improvement plan/review	10%	4%	0%	14%	12%	0%
Introducing employer/member self service	7%	14%	18%	3%	7%	5%
Other	44%	50%	55%	47%	42%	43%
Did not answer question	5%	8%	9%	0%	5%	10%

All schemes were asked to what they would attribute any improvements made to their governance and administration in the last 12 months. The strongest reported drivers were an improved understanding of TPR's requirements (69%) and of the risks facing the scheme (57%). There were relatively few differences by scheme type.

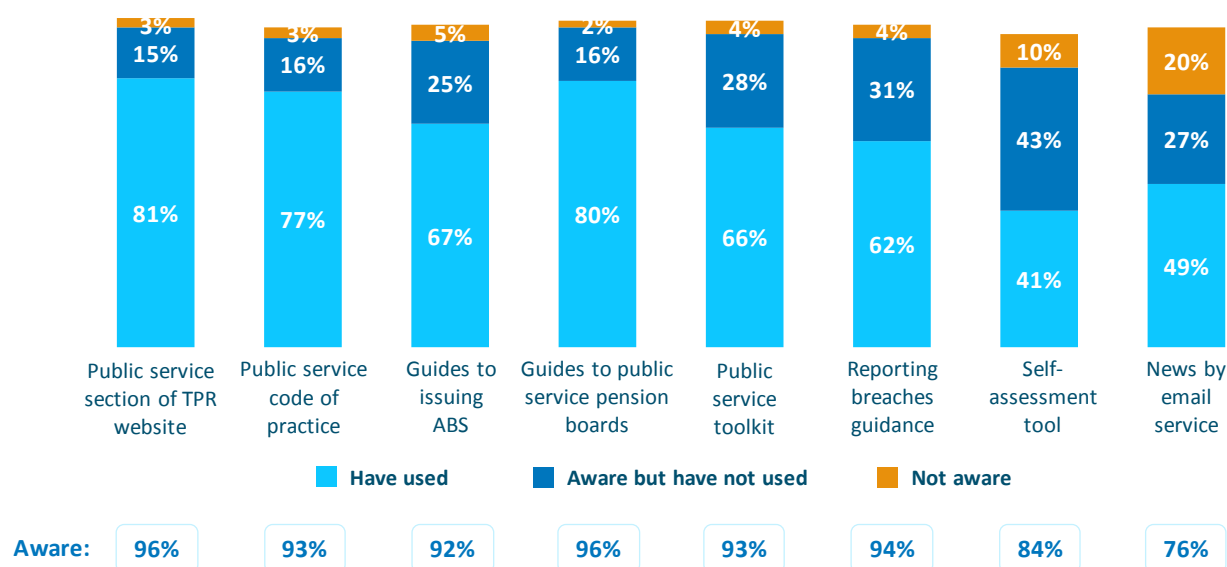**Figure 4.8.2 - Drivers of improvements to governance and administration**
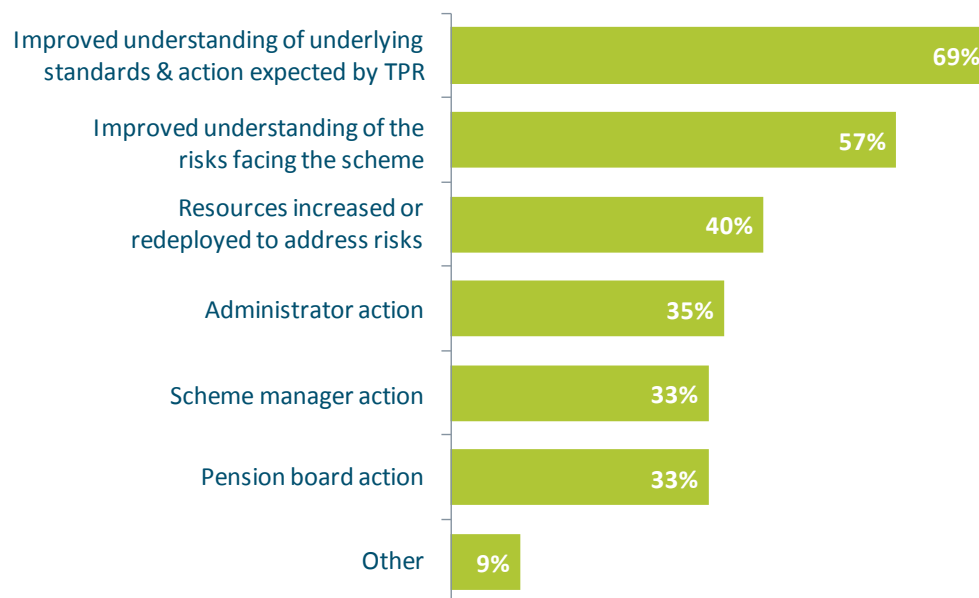
Base: All respondents (Base, Don't know, No improvements made)
Schemes (188, 8%, 1%)

4.9   TPR products and perceptions

All respondents were asked about their awareness and use of various relevant TPR products. Awareness was over 90% for each product, with the exception of the news by email service (76%) and the self-assessment tool (84%).

The most widely used products were the public service section of the website (81%), the guides to public service pension boards (80%) and the public service code of practice (77%).

Figure 4.9.1 - Use of TPR products

	Public service section of TPR website	Public service code of practice	Guides to issuing ABS	Guides to public service pension boards	Public service toolkit	Reporting breaches guidance	Self-assessment tool	News by email service
Not aware	3%	3%	5%	2%	4%	4%	10%	20%
Aware but have not used	15%	16%	25%	16%	28%	31%	43%	27%
Have used	81%	77%	67%	80%	66%	62%	41%	49%
Aware:	96%	93%	92%	96%	93%	94%	84%	76%

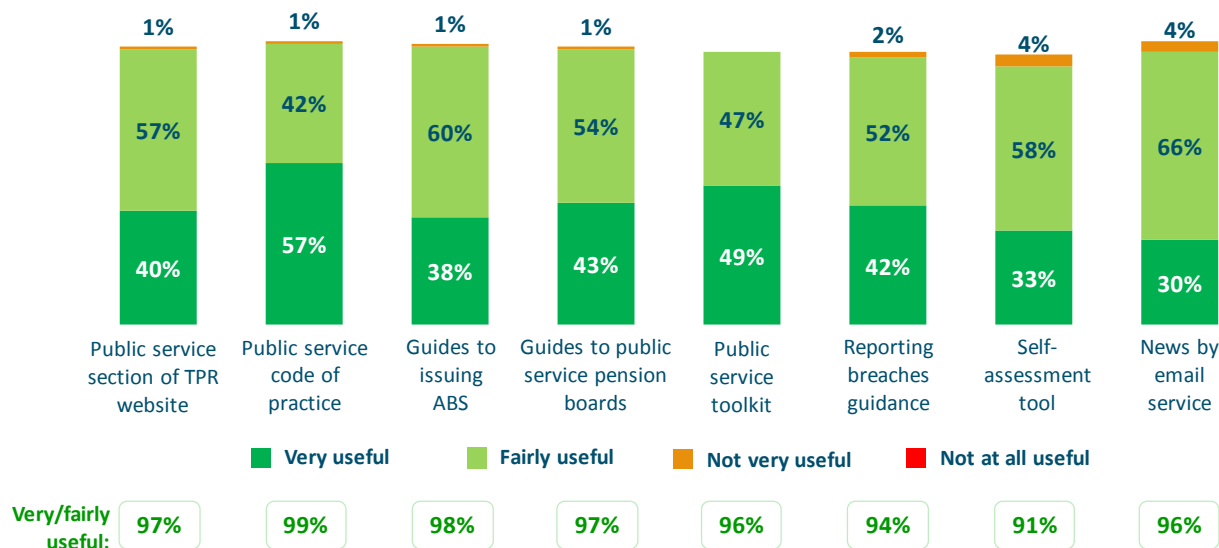Base: All respondents (Base, Don't know, Did not answer question)
TPR website (188, 1%, 0%), Code of practice (188, 2%, 1%), Guides to issuing ABS (188, 2%, 1%), Guides to public service pension boards (188, 0%, 2%), Public service toolkit (188, 2%, 1%), Reporting breaches guidelines (188, 1%, 2%), Self-assessment tool (188, 4%, 2%), News by email (188, 3%, 2%)

TPR products were most widely used by respondents from Other schemes (91%-100% across all products), but those from Police schemes were typically less engaged (23%-77% across all products). Respondents from larger schemes with more than 30,000 memberships were also more inclined to use these resources.

Respondents were also asked to rate the usefulness of these products. Perceptions were overwhelmingly positive, with no more than 4% of users judging any of the products to be not very/not at all useful.

The public service code of practice was rated most highly in this respect, with 99% of those that had used it finding it useful, including 57% who described it as very useful.

Figure 4.9.2 - Perceptions of TPR products

Base: All using each product (Base, Don't know, Did not answer question)
TPR website (154, 1%, 2%), Code of practice (148, 0%, 1%), Guides to issuing ABS (127, 2%, 0%), Guides to public service pension boards (151, 2%, 1%), Public service toolkit (126, 3%, 1%), Reporting breaches guidelines (120, 3%, 1%), Self-assessment tool (79, 4%, 1%), News by email (94, 0%, 0%)

Although the majority of schemes (84%) did not suggest any specific products they would like TPR to provide that it does not currently offer, 1 in 10 (10%) proposed additional/enhanced guidance or processes.

Overall, 80% of respondents had visited TPR's website, and over half (54%) had done so in the last month. In contrast, a fifth (19%) had never visited it.

While Other scheme respondents were most likely to have visited the website recently (73% in the last month), 46% of respondents from Police schemes had never done so.

**Figure 4.9.3 - Frequency of visiting TPR website**
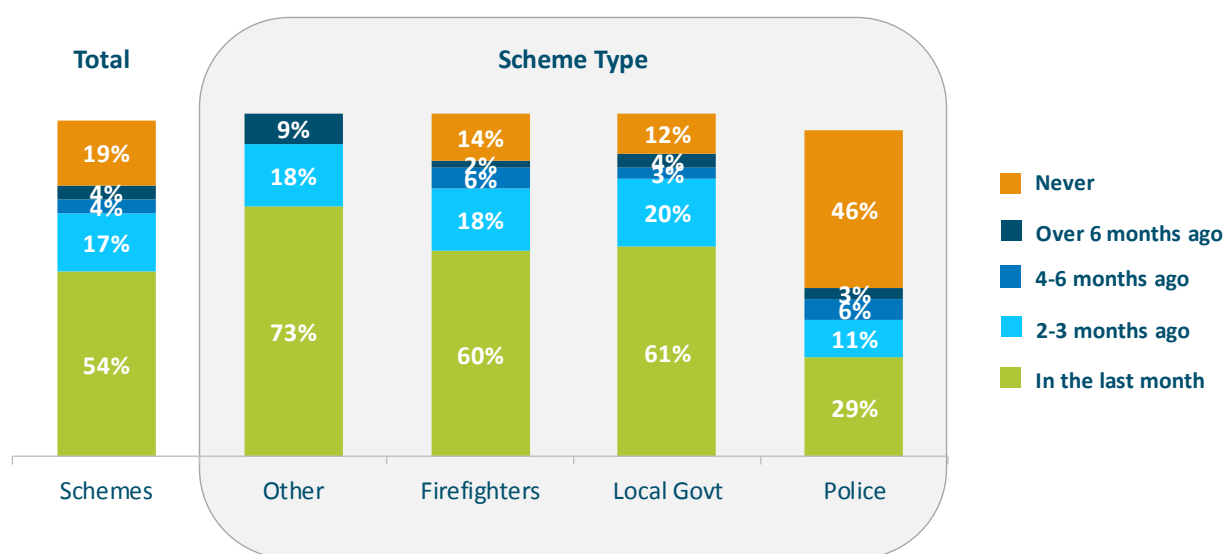
Base: All respondents (Base, Don't know/can't remember, Did not answer question)
Schemes (188, 1%, 1%), Other (11, 0%, 0%), Fire (50, 0%, 0%), LG (92, 0%, 0%), Police (35, 3%, 3%)

Among those who had visited TPR's website, a fifth (19%) said they got 'everything' they wanted, and 60% got 'most' of what they wanted. Satisfaction was lowest for Other schemes, where almost half (45%) of respondents felt that they only got 'some' of what they wanted.

**Figure 4.9.4 - Satisfaction with TPR website**
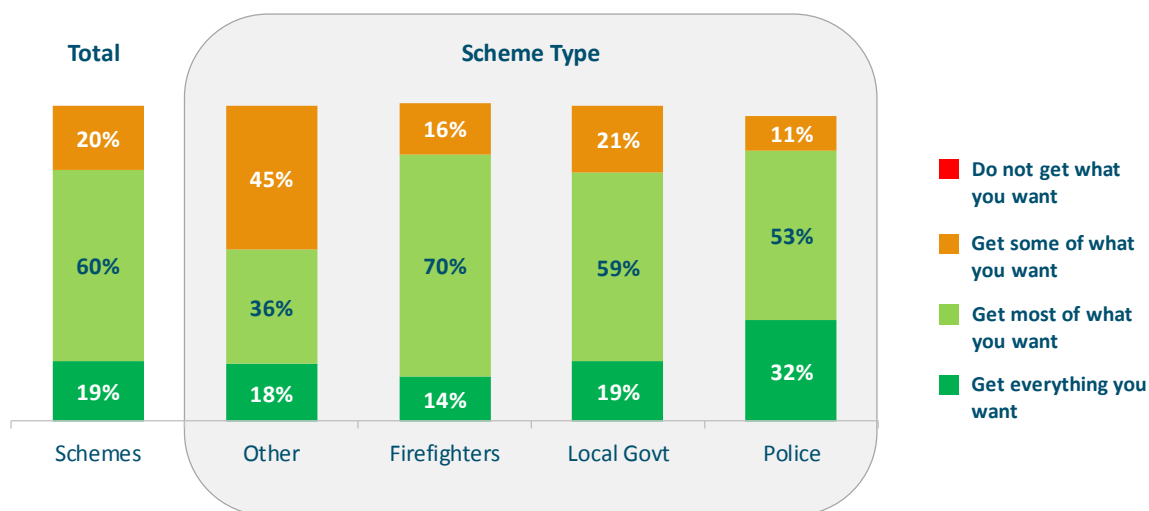
Base: All that have visited TPR's website (Base, Don't know, Did not answer question)
Schemes (154, 1%, 1%), Other (11, 0%, 0%), Fire (43, 0%, 0%), LG (81, 1%, 0%), Police (19, 0%, 5%)

When asked for their perceptions of TPR, schemes were most likely to agree that the organisation is 'informative' (85%) and least likely to agree that it is 'straightforward' (63%).

Figure 4.9.5 - Overall perceptions of TPR
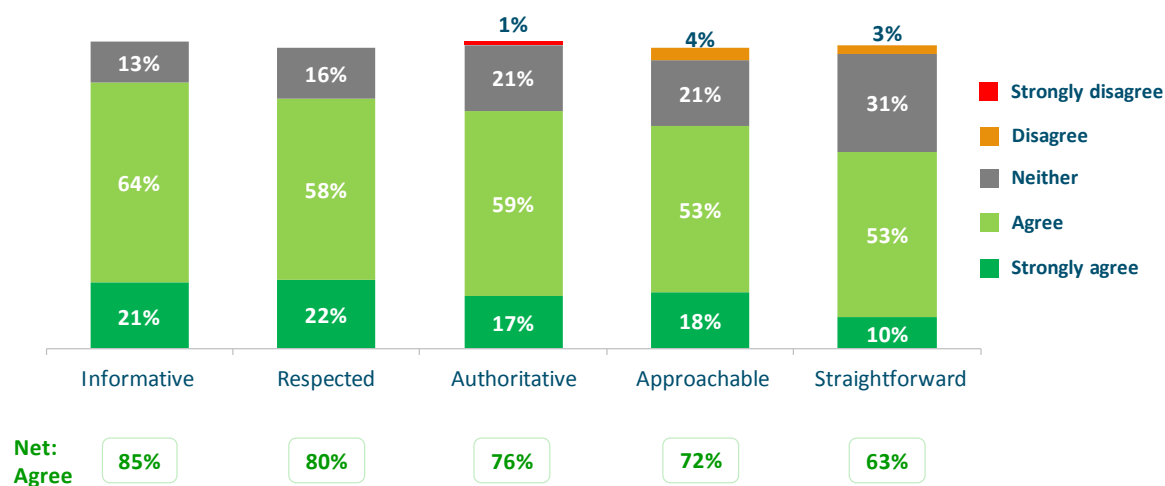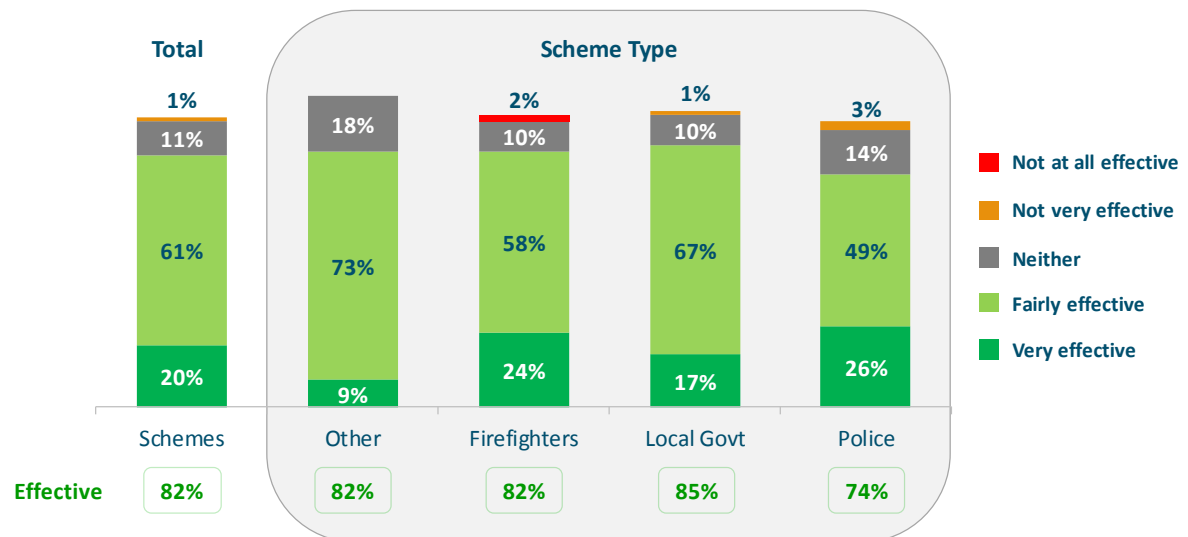

Base: All respondents (Base, Don't know)
Schemes (188, 2-4%)

Police schemes tended to have the least positive perception of TPR, ranging from 74% agreeing it is 'respected' to 54% agreeing it is 'straightforward'.

Schemes that had reported breaches of the law were among the most likely to see TPR as 'informative' (93%), 'approachable' (90%) and 'straightforward' (76%).

Overall, 82% of schemes judged TPR to be effective (either 'very' or 'fairly') at improving standards in governance and administration in public service pension schemes. While few schemes judged TPR to be ineffective, Police schemes were somewhat less positive than other public service schemes (74% rating TPR as effective).

Figure 4.9.6 - TPR effectiveness

Base: All respondents (Base, Don't know)
Schemes (188, 5%), Other (11, 0%), Fire (50, 6%), LG (92, 4%), Police (35, 9%)

RISK REGISTER

identify the Risk	How To Respond? System in Place to Deal with the Consequence	Monitor Effective Measure	Assess the Likelihood	Risk Rating
Computer system failure at payroll compliance date.	Pay the previous month Pension from the file id with adjustments for death or part period payments. If notification that system will not be available or when upgrade is going through at compliance date. Trial pay run can be used as actual if testing fails.	BACS transmission reports	Low	High
Failure to process BACS	Internal process for ensuring that BACS has been sent.	Payroll Practitioner operates process	Low	High
Payment made to ineligible pensioner.	Annual Certificate of identity process in place.	Payroll & Pensions Manager	Low	Low
Fraud in Payroll office.	Reconciliation with report from payroll system and Excel spreadsheet balance each month	Reconciliation completed by Senior Payroll Officer. Balances done monthly. Payroll processes i.e. starters and leavers double checked monthly payroll signed off each month by Senior Payroll officer.	Low	High
Insufficient resource to enable function to meet requirements of Pension	Structure and staffing of function under ongoing review	Reports to Pension Board indicate effectiveness of function	Med	Low

Regulator.				
Failure to produce Annual Benefit Statement	Report to TPR. Keep scheme members and pension board informed of issue.	Reports to Pension Board indicate effectiveness of function	Med	High
Successful legal challenge by FBU to Transitional Regulations	Pension and Payroll section will need to undertake work to amend pension contributions for members depending on final agreed resolution	Reports to Pension Board. Potential emergency Pension Board meeting to confirm action to be taken.	Low	High

Local Pension Board Training

22nd August 2017

AGENDA
Layden House, Farringdon, London

10.30 am	**Introduction and Objectives**
10.40 am	**Group Discussion**
	'What training do individuals need to be effective Pension Board Members?' **'What do you think are the responsibilities of a Pension Board Member?'**
11.00 am	**Introduction to the Firefighter Pension Schemes**
11.30 am	**Firefighters' Pension Fund**
11.40 am	**Quiz & Refreshment Break**
11.50 am	**Scheme Membership**
12.20 pm	**The Pension Regulator**
12.50 pm	**LUNCH**
13.20 am	**Background to Governance**
13.45 pm	**Roles and Responsibilities of a Pensions Board**
14.15 pm	**Pension Board Next Steps**
14.45 pm	**Scheme Benefits**
15.00 pm	**Current and Future Issues**
15.20 pm	**Feedback and Quiz answers**
15.30 pm	**Close**

WEST MIDLANDS FIRE AND RESCUE AUTHORITY

Pension Board
WORK PROGRAMME 2017/18

Date of Meeting	Item	Responsible Officer	Completed
2017			
6 February 2017	Minutes of the Pension Board held on 11 July 2016	Democratic Officer	
		Democratic Officer	
	Minutes of the Extraordinary Pension Board held on 25 October 2016		
		Democratic Officer	
	Minutes of the Audit Committee held on 14 November 2016		
		Democratic Officer/Pension Board	
	Terms of Reference - Update Consideration of Annual Report Consideration of future Membership		
		Democratic Officer/ Pension Board	
	Take action to make sure your scheme records Are up to date Legal Duty to Publish information about Pension Board		
		Pension Board/ Adviser	
	The Pension Regulator Public Service Governance Survey 2016		

	Firefighters Pension Scheme Chairs Update - Invitation to Malcolm Eastwood to attend a future Pension Board	Democratic Officer	
	Update from Annual Pension Conference	Kal Shoker/ Adviser	
	Pension Section Supporting Information	Pension Adviser	
	Risk Register Update - Control, Records Communications	Pension Adviser	
	Pension Board Activity Log 2016/17	Democratic Officer	
	Pension Board Draft Work Plan 2016/17 – 2017/18	Democratic Officer	
27 March 2017	Audit Committee	Chair to attend	
9 May 2017	Minutes of Pension Board held on 6 February 2017 Minutes of the Audit Committee held on 27 March 2017 Update on Work to prevent delay in issue of Annual Statements	Democratic Officer	
12 June 2017	Audit Committee	Chair to attend	

20 July 2017	Minutes of the Pension Board held on the 6 February 2017		
	Minutes of the Pension Board held on 9 May 2017		
	To review an example of an Annual Benefit Statement		
	Pension Section Supporting Information		
	Consideration of Annual Pension Board Report 2016/17		
	Approval of Reporting Breaches Procedure		
	Approval of Amended Terms of Reference		
	Consideration of future Membership of Pensions Board		
	Results from Public Service Survey		
	Standing Items		
	Risk Register Update		
	Activity Log - 2017/18		
	Pension Board Work Programme 2017-18		

4 September 2017	Audit Committee	Chair to attend to present Minutes	
19? February 2018	Dates to be Confirmed Minutes of 20 July 2017 Standing Items		
26 March 2017	Audit Committee	Chair to attend to present Minutes	
16? July 2018	Dates to be Confirmed Minutes of February 2018 Standing Items		
September 2018	Audit Committee	Chair to attend to present Minutes	
	2018/19		
February 2019			
July 2019			

WEST MIDLANDS FIRE AND RESCUE AUTHORITY

Pension Board
Activity Log 2016/17

Date	Activity	Undertaken by	Action Completed
2016			
August 2016	Breach of Pension Regulations	Paul Gwynn	Urgent Pension Board
September 2016	Regional Pension Board Training (H&W)	Kal Shoker Andy Dennis	
October 2016	Attendance at Annual Pension Conference, London	Paul Gywnn Kal Shoker	Report to Pension Board 6 Feb 2017
25 October 2016	Extraordinary Meeting of the Pension Board re failure to issue Annual Benefit Statement in time	Pension Board	See Minutes of Audit Committee 14/11/16
14 November 2016	Report to Audit Committee on Breach of Regulations	Pension Board	See Minutes of Audit Committee 14/11/16
December 2016	The Pension Regulator – Publishing Scheme Information Firefighters (England) Scheme Advisory Board Chairs Update	Pension Board February 2017 Circulated to all Members	
21 December 2016	The Pension Regulator - Public Service Governance Survey 2016	Completed by Adviser	

[IL0: UNCLASSIFIED]

6 February 2017	Pension Board Meeting		
9 May 2017	Pension Board Meeting Review of progress towards production of Annual Benefit Statement to meet the deadline		