

Draft Improvement Notice

LGPS – London Borough of Barnet Superannuation Fund
c/o Ms Anisa Darr
Director of Finance
London Borough of Barnet
North London Business Park
Oakleigh Road South
London
N11 1NP

Issue date: tbc

Notice number: C98061965/1

Pension Scheme: LGPS London Borough of Barnet Superannuation Fund **(the Fund)**

PSR: 10123044

Scheme Manager: London Borough of Barnet **(the Scheme Manager)**

Improvement Notice

Issued under section 13 of the Pensions Act 2004 (PA04)

In relation to the duty imposed by section 249B PA04 in relation to internal controls

The Pensions Regulator (TPR) is of the opinion that the Scheme Manager has failed to comply with duties imposed on it under section 249B PA04.

The Scheme Manager is required to establish and operate adequate internal controls to ensure the Fund is administered in accordance within the requirements of the law. It does not appear to TPR that the Scheme Manager has complied with this requirement.

Direction: steps required to comply with this Improvement Notice

- (1) The Scheme Manager must by **31 August 2019** have implemented monthly monitoring of contributions and be able to demonstrate that an analytical review is being undertaken in line with the actions agreed in the March 2019 Internal Audit Report carried out by the Fund (the Report). **By this date** the Scheme Manager must have demonstrated to TPR that it has implemented a series of checks on the data received in End of Year Certificates, in line with the agreed action in the March 2019 Internal Audit Report, and that the checks have been carried out. These actions relate to parts 1b and 1d of the Report.
- (2) The Scheme Manager must by **31 August 2019** take all steps necessary to ensure it has completed the first two phases of the Conditional Data Cleanse Plan it provided to TPR on 4 January 2019.
- (3) The Scheme Manager must by **31 August 2019** have taken all steps necessary to implement and operate adequate internal controls to provide accurate annual benefit statements for financial year 2018/19. This will be evidenced by the Scheme Manager demonstrating that a process is in place to test the quality of calculations used to populate annual benefit statements; that the process was utilised; and that corrections were made where calculation errors were identified. This also relates to action 6b of the March 2019 Report.

TPR's expectations

If the Scheme Manager completes the above steps before **31 August 2019** it is expected to notify TPR. The Scheme Manager's notification should demonstrate how it has complied with the steps listed above to comply with their legal obligations in respect of the provision of benefit information statements.

If the Scheme Manager does not complete the steps outlined above by 31 August 2019, it is also expected to notify TPR of that fact by the deadline of

6 September 2019. The Scheme Manager must also provide an explanation to TPR of the reasons for the failure to comply, together with the actions it intends to take to issue outstanding benefit information statements. This should include timeframes.

TPR also expects that the Scheme Manager will continue to review its internal controls and put in place an appropriate action plan to safeguard against the risk of a future breach of the obligations contained in section 249B PA04.

Failure to comply with this Improvement Notice

If the Scheme Manager fails to comply with this Improvement Notice without reasonable excuse, the Pensions Regulator may issue a penalty under s.10 of the Pensions Act 1995 and/or take other action. The maximum penalty where for failing to comply with an Improvement Notice is **£5,000 for individuals and £50,000 in any other case**.

If you need help to comply with your obligations, contact us by:

- phone on 0345 600 0707, Monday to Friday 9am to 5:30pm
- email at exchange@thepensionsregulator.gov.uk

Further information

Our guidance in relation to the requirements of the Public Service Pensions Act 2013, contained in Code of practice 14: Governance and administration of public service pension schemes, and our Compliance and Enforcement Policy can be found at:

<https://www.thepensionsregulator.gov.uk/-/media/thepensionsregulator/files/import/pdf/compliance-policy-public-service-pension.ashx>

<https://www.thepensionsregulator.gov.uk/-/media/thepensionsregulator/files/import/pdf/code-14-public-service.ashx?la=en&hash=1E2B3D6A11A93E4C6C1334DF9D6A82186E0F07A6>

Yours sincerely

[Name]

[Job Title]