

MEETING

LOCAL PENSION BOARD

DATE AND TIME

TUESDAY 6TH DECEMBER, 2022

AT 6.00 PM

VENUE
VIRTUAL

[Click here for the meeting](#)

TO: MEMBERS OF LOCAL PENSION BOARD (Quorum 3)

Chair: Geoffrey Alderman

Vice Chair: Hem Savla

Stephen Ross

David Woodcock

Salar Rida

Deepani De Silva

Humayune Khalick

Substitute Members

Alice Leach Andrea Bilbow OBE

Observing

Councillor Anne Hutton – Chair of the Pension Fund Committee

In line with the Constitution's Public Participation and Engagement Rules, requests to submit public questions or comments must be on 01 December 2022 by 10AM. Requests must be submitted to Paul.frost@barnet.gov.uk

You are requested to attend the above meeting for which an agenda is attached.

Andrew Charlwood – Head of Governance

Governance Service contact: Paul Frost - 0208 359 2205

Media Relations Contact: Tristan Garrick 020 8359 2454 Tristan.Garrick@Barnet.gov.uk

ORDER OF BUSINESS

Item No	Title of Report	Pages
1.	Minutes of last meeting	5 - 8
2.	Disclosable Pecuniary interests and Non Pecuniary interests	
3.	Absence of Members	
4.	Public Question and Comments (if any)	
5.	Report of the Monitoring Officer (if any)	
6.	Members' Items (if any)	
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14.	Any other item(s) the Chairman decides are urgent	

Decisions of the Local Pension Board

8 September 2022

Members Present:-

AGENDA ITEM 1

Hem Savla (Vice-Chair)

Stephen Ross
David Woodcock
Deepani De Silva

Salar Rida
Councillor Humayune Khalick

Also in attendance

Alice Leach

1. MINUTES OF LAST MEETING

Before the minutes were considered the Vice-Chair, Hem Savla noted that the Chair, Professor Geoffrey Alderman was unwell and was not in attendance. He noted that he would therefore chair the meeting. The Vice-Chair on behalf of the Board wished the Chair a speedy recovery.

The Vice -Chair welcomed Councillor Anne Hutton to the meeting who was in attendance as an observer in her capacity at the Chair of Pension Fund Committee.

RESOLVED that the minutes of the meeting held on 23 June 2022 be agreed as a correct record.

2. DISCLOSABLE PECUNIARY INTERESTS AND NON PECUNIARY INTERESTS

None.

3. ABSENCE OF MEMBERS

None.

4. PUBLIC QUESTION AND COMMENTS (IF ANY)

None.

5. REPORT OF THE MONITORING OFFICER (IF ANY)

None.

6. MEMBERS' ITEMS (IF ANY)

None.

7. ADMINISTRATION PERFORMANCE REPORT

Members noted that the report provided information on the West Yorkshire Pension Fund pensions administration performance report for July 2022. The report included an update on the issuing of the 2022 Annual Benefit Statements and administration.

The Local Pension Board Members had the opportunity to make comment and ask questions. During the discussion the Vice-Chair noted that the Board should be kept updated with the data issues and with the volume or errors, including how they are dealt with.

Having considered the report, the Local Pension Board:

Resolved:

The Local Pension Board noted West Yorkshire Pension Fund's performance levels along with the updates on the 2022 Annual Benefit Statements, and other administration issues.

8. DATA IMPROVEMENT PLAN AND HISTORICAL LEAVERS REPORT

The Local Pension Board received the Data Improvement report. Members noted that the report provided the Local Pension Board with an update on the data improvement plan and historical leaver exercise, together with details of the data preparations for the 2022 triennial valuation.

Having considered the report, the Local Pension Board:

Resolved

The Local Pension noted the progress on the correcting of the member data and the historical leaver exercise.

9. CHAIR'S ANNOUNCEMENT

The Vice - Chair announced that he had just been informed of the sad news that the Queen had passed away. He therefore stated that all the remaining business was to be deferred until the next meeting.

The Vice -Chair invited all those in attendance to stand for a minutes silence.

10. ANY OTHER ITEM(S) THE CHAIRMAN DECIDES ARE URGENT

None.

The meeting finished at 18:35, shortly after the announcement.

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Local Pensions Board

6 December 2022

Title	Knowledge and Understanding
Report of	Executive Director of Strategy and Resources (S151 officer)
Wards	N/A
Status	Public
Urgent	No
Key	No
Enclosures	None
Officer Contact Details	David Spreckley, Head of Pensions and Treasury, david.spreckley@barnet.gov.uk

Summary

The role of the Local Pension Board is to contribute to the governance of the pension scheme by scrutinising the work of the Pension Fund Committee and making recommendations where appropriate. In this context it is important that the Board has appropriate training opportunities for it to fulfil its duties.

Officers Recommendations

The Local Pensions Board is invited to note the training options available to it (and also to the Pension Fund Committee).

The Local Pension Board are invited to:

- 1) collectively commit to undertake the mandatory training; and
- 2) endeavour to undertake the recommended training.

3) Comment on whether the training opportunities provided the Pension Fund Committee are adequate.

- 1.1 The London Borough of Barnet Pension Fund is governed by the Pension Fund Committee, scrutinized by the Local Pensions Board with support of Officers, advisors and outsourced administrators.
- 1.2 The Pension Fund Committee is a decision making body responsible for the operation of the Pension Fund, ensuring it is governed and administered effectively and is financially sustainable.
- 1.3 The Local Pension Board is an oversight body with no direct decision making powers. The Local Pension Board's primary role is to review decisions made by the Pensions Committee and hold the Committee to account. The Local Pension Board includes member and employer representation.
- 1.4 The Local Pensions Board has a regulatory duty to keep their knowledge and understanding up-to-date and to document their training. Guidance around your regulatory duties is summarised on the Pension Regulator's website linked [here](#).
- 1.5 In summary, as a Board member, you must:
 - be conversant with (ie have a working knowledge of) your scheme rules and any document recording policy about the administration of your scheme;
 - have knowledge and understanding of the law relating to pensions
- 1.6 There is no direct Regulatory requirement for the Pensions Fund Committee to undertake training beyond what is required as an elected member.
- 1.7 Issues surrounding the Pension Fund are complex and financially significant to the Council. To make effective decisions it is important that Committee members feel empowered to ask the right questions of Officers and advisors.
- 1.8 It is a priority that both the Pension Fund Committee and Local Pension Board members have access to sufficient training opportunities so that they can meet their duties.
- 1.9 To deliver on this priority we have identified 'mandatory' training – this is training that we expect Local Pension Board members to undertake to enable them to perform their duties (note that this it is a Regulatory requirement for Board members to have sufficient knowledge and understanding to carry out their duties) and 'recommended' training, which will further develop Committee members' skills.
- 1.10 The mandatory and primary training opportunities available to Board and Committee members are summarised in the table below:

Training Opportunity	Description	Approx. hours	PFC	LPB
The Pensions Regulator Trustee tool kit	Web based modular training programme with 7x 30-minute modules focused on governance	3.5	Recommended	Mandatory
Hymans' training portal	Web based training programme with 6 modules covering all aspects of operating an LGPS Fund	c10	Mandatory (within first 6-months of appointment)	Recommended (within first 6-months of appointment)
CIPFA	Day sessions developed and provided by CIPFA on various governance and topical issues	10 p.a.	Recommended	Recommended
Sustainability Training Day	Dedicated workshop / training day focusing on sustainability with a view to developing the Fund's Responsible Investment Policy	5	Mandatory	N/A
Ad-hoc training sessions held before or during committee meetings	Topical issues – Committee / Officers to make suggestions	4 p.a.	Mandatory	N/A (LPB will also receive training)
Private Reading / research	Reading papers / attending workshops and seminars as suggested by Officers and other members of the Committee	0.25 p.w. (c10 p.a.)	Recommended	Recommended
Total (First 12-months)			19 hours Mandatory 23.5 hours Recommended	3.5 hours Mandatory 30 hours Recommended

1.9 The Local Pension Board are invited to note the training options available, agree how training will be recorded and collectively commit to undertake the primary training and endeavour to undertake the recommended training.

1.10 We also note that the Board has one new full member and one new substitute member that will need to undertake the mandatory training requirements.

1.11 Training requirements will be reviewed annually.

2. REASONS FOR RECOMMENDATIONS

2.1 Issues surrounding the Pension Fund are complex and financially significant to the Council. To make effective decisions it is important that Committee members feel empowered to ask the right questions of Officers and advisors.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

3.1 None necessary for this report.

4. POST DECISION IMPLEMENTATION

4.1 Officers will establish a Trustee Training log for Board members that will be considered at each Board meeting.

4.2 Training requirements will be reviewed annually.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

5.1.1 Good knowledge and understanding of the Pension Fund will improve overall governance and operational effectiveness of the Pension Fund.

5.2 Resources (Finance and Value for Money, Procurement, Staffing, IT, Property, Sustainability)

5.2.1 Provision of Hymans' LOLA portal has a modest annual license fee.

5.3 Social Value

5.3.1 The Public Services (Social Value) Act 2012 came into force on 31 January 2013. It requires people who commission public services to think about how they can also secure wider social, economic and environmental benefits.

5.3.2 Before they start the procurement process, commissioners should think about whether the services they are going to buy, or the way they are going to buy them, could secure these benefits for their area or stakeholders.

5.3.3 The Act is a tool to help commissioners get more value for money out of procurement. It also encourages commissioners to talk to their local provider market or community to design better services, often finding new and innovative solutions to difficult problems.

5.3.4 There are no specific social value issues arising out of this report, however membership of the Pension Fund ensures the long-term financial health of contributing employees on retirement.

5.4 Legal and Constitutional References

5.4.1 There are no legal references.

5.4.2 The Council's Constitution – Article 7 – includes within the responsibilities of the Pension Fund Committee the appointment of various service providers. Monitoring is an essential element of the appointment and re-appointment process.

5.5 Risk Management

5.5.1 Risk management is central to the LGPS; which are in themselves risk management tools, managing the risk that future employer income streams will be able to meet future pensions liabilities by creating a reserve from which future liabilities will be met.

5.5.2 The Committee relies on its service providers and good performance from these will help to avoid problems.

5.6 Equalities and Diversity

5.6.1 Pursuant to the Equality Act 2010, the Council is under an obligation to have due regard to eliminating unlawful discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; advancing equality of opportunity between persons who share a relevant 'protected characteristic' and those who do not share it; and fostering good relations between persons who share a relevant 'protected characteristic' and persons who do not share it. The 'protected characteristics' are: age, disability, gender reassignment, pregnancy, and maternity, race, religion or belief, sex and sexual orientation. The Council also has regard to the additional protected characteristic of marriage and civil partnership even though this does not apply to the public-sector equality duty.

5.7 Corporate Parenting

5.7.1 Not applicable in the context of this report.

5.8 Consultation and Engagement

5.8.1 Not applicable.

5.9 Insight

5.9.1 Not applicable

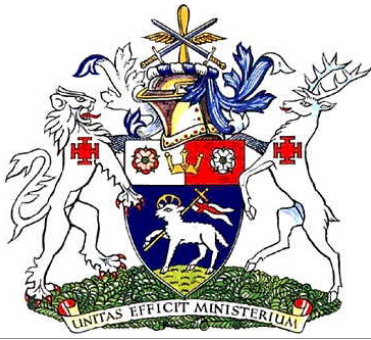
6. ENVIRONMENT CONSIDERATIONS

6.1 None

7. BACKGROUND PAPERS

7.1 Guidance around the Board's regulatory duties around Knowledge and Understanding can be accessed [here](#).

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Local Pension Board

6 December 2022

Title	Administration Performance Report
Report of	Executive Director of Strategy & Resources (S151 Officer)
Wards	N/A
Status	Public
Urgent	No
Key	No
Enclosures	<p>Appendix A – West Yorkshire Pension Fund (WYPF) Monthly Report (for October 2022)</p> <p>Appendix B - Percentage of My Portal registrations per employer</p> <p>Appendix C – Letter from Prudential regarding Lifestyle investment options</p>
Officer Contact Details	Mark Fox, Pensions Manager – 0208 359 3341
Summary	
<p>This paper provides the Local Pension Board with the West Yorkshire Pension Fund pensions administration performance report for July 2022, along with an update on the completion of the 2022 Annual Benefit Statements and administration.</p>	

Officers Recommendations

The Local Pension Board are requested to note West Yorkshire Pension Fund's performance levels along with the updates on other administration issues.

1. WHY THIS REPORT IS NEEDED

- 1.1 The efficient delivery of benefits is reliant upon effective administrative procedures being in place. It is important that this information is reviewed by the Board.
- 1.2 The report in Appendix A provides an overview of performance of the operational pensions administration service delivered by West Yorkshire Pension Fund (WYPF) up to 31 October 2022.

WYPF Performance

- 1.3 The October monthly report shows that WYPF processed **1,189** cases in October 2022 with **88.7%** of cases being completed within the agreed Service Level Agreement (SLA).
- 1.4 Workloads remain high at WYPF (at the end of October, there were nearly **2,700** outstanding items of work) primarily due to additional work resulting from the issuing of Annual Benefit Statements and the end of school years in the summer.
- 1.5 Staffing at WYPF remains an issue within the Service Centre (Admin) Team although WYPF have successfully recruited some new members to the Team recently.
- 1.6 Representatives from WYPF will be attending the meeting and this will allow Board members to raise any questions with them on WYPF performance, staffing and any other issues.
- 1.7 The LBB Pensions Team monitor WYPF performance closely and would expect that as the new staff are adequately trained, the performance should return to normal levels. However, this may take a few months as WYPF fill the vacancies in their administration team.
- 1.8 Different work types have different target completion periods and different SLAs, usually depending on the nature/priority of the item of work. These are shown in Section 1 in appendix A.
- 1.9 For most work types, the SLAs have been met. The processes that failed to meet the SLA are also shown in appendix A.
- 1.10 The number of complaints and Internal Dispute Resolution Procedure (IDRP) cases received by WYPF remains very low. There is currently one stage 1 IDRP case in progress and no stage 2 cases.

WYPF member portal

- 1.11 The number of members who have registered for the WYPF “Member Portal” is still increasing albeit slowly.
- 1.12 The figures in the WYPF report equate to **36%** of all active members, **24%** of all deferred members and **28.5%** of all pensioners
- 1.13 The Pensions Team will continue to encourage employers to get their members to register and appeal directly to members themselves, to increase the number of registrations. At an employer meeting on 24 November, we will ask employers to encourage their members to register for the portal.
- 1.14 Appendix B sets out the number of registrations for active members per employer as of 14 November 2022.
- 1.15 The facility on the portal that will allow members to run their own retirement estimates has still to be released. WYPF will provide an update at the meeting.

Prudential

- 1.16 Prudential have sent the letter in Appendix C regarding potential issues for members who invest their AVCs in lifestyle funds. These are funds where as members approach their retirement age, their AVC funds are moved automatically from fund investing in equities to funds investing in bonds and cash, thus reducing the risk of falls in the fund values just before retirement.
- 1.17 The LBB Pensions Team have not been advised of any Barnet Fund members being affected at the time of writing this paper but will update the Board at the meeting.
- 1.18 Hymans Robertson are undertaking a review of AVC providers to the Fund. This is still ongoing as additional information has been requested by Hymans to complete the review. The LBB Pensions Team will update the Board on the results of this review at the next meeting.

AVC Salary Sacrifice

- 1.19 The Council has decided to introduce a salary sacrifice arrangement for Council employees for members who are either currently paying AVC's or wish to start paying AVC's.
- 1.20 This arrangement is due to commence on 1 February 2023 and members will be given the option of making their AVC's through salary sacrifice or not.
- 1.21 Should they elect to use the salary sacrifice facility, both the member and Council will benefit from savings in National Insurance contributions.

Annual Benefit Statements (ABS)

- 1.22 As at the statutory deadline for producing statements of 31 August, **97.3%** of active members had received their ABS – meaning that 181 members were not issued with an ABS. However, 100% of deferred members’ statements were produced.
- 1.23 For the remaining statements that need to be issued, WYPF are working with employers to ensure that these statements are issued by the 31 August deadline. As of 18 November, **94** statements still need to be produced, which result from a combination of outstanding queries from employers and WYPF working on member records (to link benefits).
- 1.24 The LBB Pensions Team have decided that the non-issue of all statements on 31 August will be recorded on the Fund’s breach log and will not submitting a report to The Pensions Regulator.

Pensions Dashboard

- 1.25 WYPF have gone out to tender to find a platform provider that they will use for Pensions Dashboard. WYPF will provide an update at the meeting.
- 1.26 The start date for the pensions dashboard for LGPS schemes has now been pushed back to between April 2023 and September 2024.

“McCloud” ruling

- 1.27 The regulations for McCloud have still to be published. However, given the current estimated timescales to be compliant with the McCloud ruling, WYPF have developed an internal IT solution.
- 1.28 Further details will be provided to the Board by WYPF at the meeting.

2. REASONS FOR RECOMMENDATIONS

- 2.1 Not applicable in the context of this report.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 Not applicable in the context of this report.

4. POST DECISION IMPLEMENTATION

- 4.1 Not applicable in the context of this report.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 The Local Pension Board supports the delivery of the Council’s strategic objectives and priorities as expressed through the Corporate Plan, by assisting

in maintaining the integrity of the pension Fund by monitoring the administration and compliance of the Fund.

5.2 Resources (Finance & Value for Money, Procurement, Staffing, IT, Property, Sustainability)

5.2.1 Not applicable in the context of this report.

5.3 Social Value

5.3.1 Not applicable in the context of this report.

5.4 Legal and Constitutional References

5.4.1 The LGPS Regulations 2013 place responsibility for the local administration of pensions and other benefits under these Regulations on the administering authority, which is the London Borough of Barnet. The Local Government (Amendment) (Governance) Pension Scheme Regulations 2015 inserts regulation 106 into the Local Government Pension Scheme Regulations 2013 which requires the Council to establish a Pension Board, whose role is to assist the Council in securing compliance with legislation, regulation and best practice, including as set out in the Pension Regulator's Code of Practice to ensure the effective and efficient governance and administration of the Scheme and any connected scheme.

5.4.2 Under the terms of reference for the Local Pension Board, the role of the Board is to assist with:

- compliance with LGPS Government regulations;
- compliance with the requirements imposed by the Pensions Regulator.
- such other matters as the LGPS regulations may specify ensure the effective and efficient governance and administration
- ensure the Pension Fund's strategy and policy documents are maintained in accordance with the LGPS Regulations.
- ensure the Pension Fund's internal Risk Register is reviewed at least annually.
- review the Pension Fund's performance in complying with the requirements of the LGPS Regulations

5.5 Risk Management

5.5.1 Risk management is central to the LGPS. LGPS pension funds are in themselves risk management tools, managing the risk that future employer income streams will be able to meet future pensions liabilities by creating a reserve from which future liabilities will be met. Good governance is essential to managing the risks of the pension fund.

5.6 Equalities and Diversity

5.6.1 Pursuant to the Equality Act 2010, the Council is under an obligation to have

due regard to eliminating unlawful discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; advancing equality of opportunity between persons who share a relevant 'protected characteristic' and those who do not share it; and fostering good relations between persons who share a relevant 'protected characteristic' and persons who do not share it. The 'protected characteristics' are: age, disability, gender reassignment, pregnancy, and maternity, race, religion or belief, sex and sexual orientation, marriage and civil partnership.

5.6.2 The rules governing admission to and participation in the Pension Fund are in keeping with the public-sector equality duty. The Public Sector Equality Duty requires public authorities in carrying out their functions, to have due regard to the need to achieve the objectives set out under s149 of the Equality Act 2010. Good governance arrangements will benefit everyone who contributes to the fund.

5.7 Corporate Parenting

5.7.1 Not applicable in the context of this report.

5.8 Consultation and Engagement

5.8.1 Where relevant, consultation and engagement is discussed in the paper.

5.9 Insight

5.9.1 Not applicable in the context of this report.

6. ENVIRONMENTAL IMPACT

6.1 None

7. BACKGROUND PAPERS

7.1 None

Monthly Report

October 2022

LB Barnet Pension Fund



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1. Performance summary

Work completed

KPI's for the period - 01.10.22 to 31.10.22							
WORKTYPE	TOTAL CASES SEPTEMBER	TOTAL CASES OCTOBER	TARGET DAYS FOR EACH CASE	TARGET MET CASES	MINIUM TARGET PERCENT	TARGET MET PERCENT	AVERAGE TIME TAKEN (Days)
AVC In-house (General)	4	7	20	7	85	100	1.14
Change of Address	54	50	20	46	85	92	5.28
Change of Bank Details	8	12	20	12	85	100	1.83
Death Grant to Set Up	6	5	10	5	85	100	1
Death In Retirement	27	19	10	15	85	78.95	6.32
Death In Service	1	2	10	2	85	100	3.5
Death on Deferred	2	5	10	4	85	80	4.2
Deferred Benefits Into Payment Actual	28	49	5	46	90	93.88	1.73
Deferred Benefits Into Payment Quote	63	67	35	44	85	65.67	27.31
Deferred Benefits Set Up on Leaving	53	50	20	45	85	90	15.78
Dependant Pension To Set Up *	9	16	5	14	90	87.50	6.63
Divorce Quote	8	7	40	6	85	85.71	22.71
Enquiry	2	0					
Estimates for Deferred Benefits into Payment	3	0					
General Payroll Changes	26	20	20	20	85	100	1
Initial Letter Death in Service	27	19	10	18	85	94.74	3.58
Initial letter Death in Retirement	1	2	10	2	85	100	1
Initial letter Death on Deferred	2	5	10	5	85	100	1.2
Interfund Linking In Actual	9	6	35	4	85	66.67	22.67

Interfund Linking In Quote	16	4	35	0	85	0	69
Interfund Out Actual	65	31	35	18	85	58.06	96.9
Interfund Out Quote	65	31	35	25	85	80.65	21.13
Life Certificate received	2	0					
Monthly Posting	114	48	10	47	95	97.92	1
Pension Estimate	13	11	10	11	90	100	2.45
Pension Saving Statement	1	0					
Phone Call Received	333	466	3	451	95	96.78	1
Refund Actual	13	9	10	8	90	88.89	2.78
Refund Quote	33	13	35	12	85	92.31	12
Retirement Actual	21	25	10	25	90	100	1.04
Transfer In Actual	4	2	35	2	85	100	3
Transfer In Quote	2	1	35	1	85	100	1
Transfer Out Payment	1	1	35	1	85	100	8
Transfer Out Quote	20	16	35	16	85	100	4.25
Update Member Details	77	190	20	190	100	100	6.48
Totals	1196	1189				88.70%	
	90.51%						

Comment – The KPI for Death in Retirement was not met this month due to one case was not completed within the target days. There was a delay in getting the information back from the beneficiaries.

Comment – The KPI for Death on Deferred was not met this month due to one case was not completed within the target days. There was a delay in getting the information back from the beneficiaries.

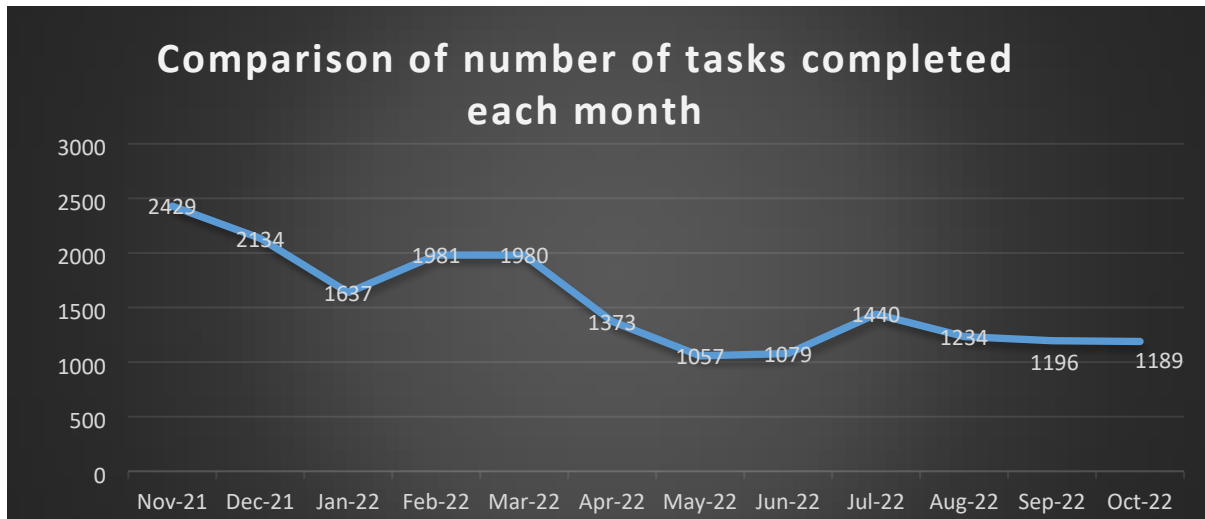
Comment – The KPI for Deferred Benefits Into Payment Quote was not met this month due to a significant increase in the requests for quotes from members. There has also been a significant increase in retirements across all funds and these have been prioritised.

Comment – The KPI for Dependant Pension to Set Up was not met this month due to two cases for child's pensions and the delay in getting information back so we could make payment. * This was previously called – Payment of Spouse & Child Benefit

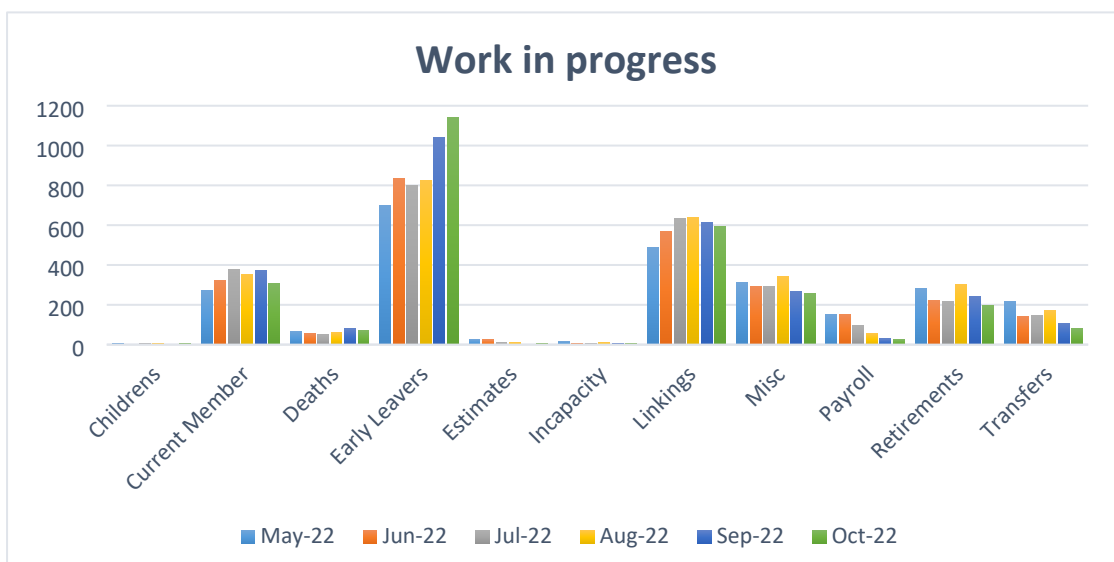
Comment -The KPI's for some of the Interfund areas of work has not been met this month due to historic cases being processed for ABS production. Employers across all funds are

currently sending in leaver notifications that have been outstanding. This has had an impact on the levels of work and has increased the numbers of linkings and interfunds out.

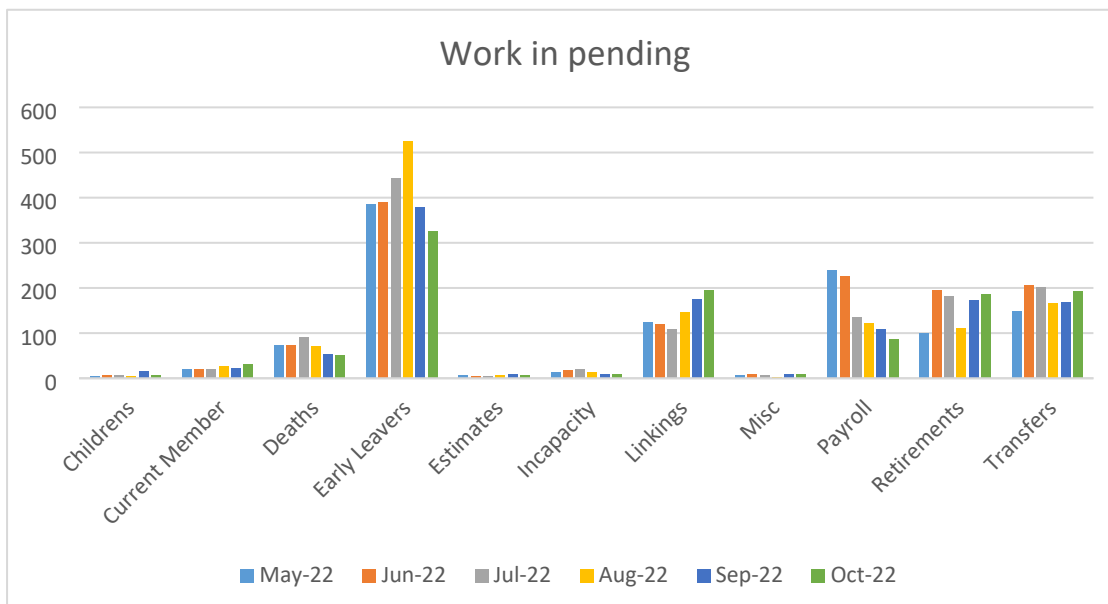
Comment - The KPI for Refund Actual has not been met this month due to one case that was not completed within the target days. The member had returned their option form to claim the refund but it was then discovered that the information that had been migrated across was incorrect and it was queried with the employer which resulted in a delay paying the refund.



2. Work in progress



	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22
Childrens	4	3	4	5	3	5
Current Member	271	324	378	354	374	306
Deaths	68	55	49	61	79	71
Early Leavers	701	836	797	825	1040	1141
Estimates	27	25	9	9	3	7
Incapacity	16	5	5	10	5	5
Linkings	489	566	633	638	613	591
Misc	311	291	294	343	267	256
Payroll	150	151	94	57	29	27
Retirements	284	222	219	302	243	195
Transfers	219	141	145	173	108	80



	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22
Childrens	5	7	6	5	16	6
Current Member	21	21	21	26	22	30
Deaths	73	73	91	71	54	50
Early Leavers	385	390	444	526	379	325

Estimates	7	4	5	6	10	7
Incapacity	13	18	20	14	10	9
Linkings	125	119	108	147	175	196
Misc	7	8	6	3	10	8
Payroll	239	225	135	122	109	87
Retirements	99	194	182	110	173	187
Transfers	148	207	202	167	169	193

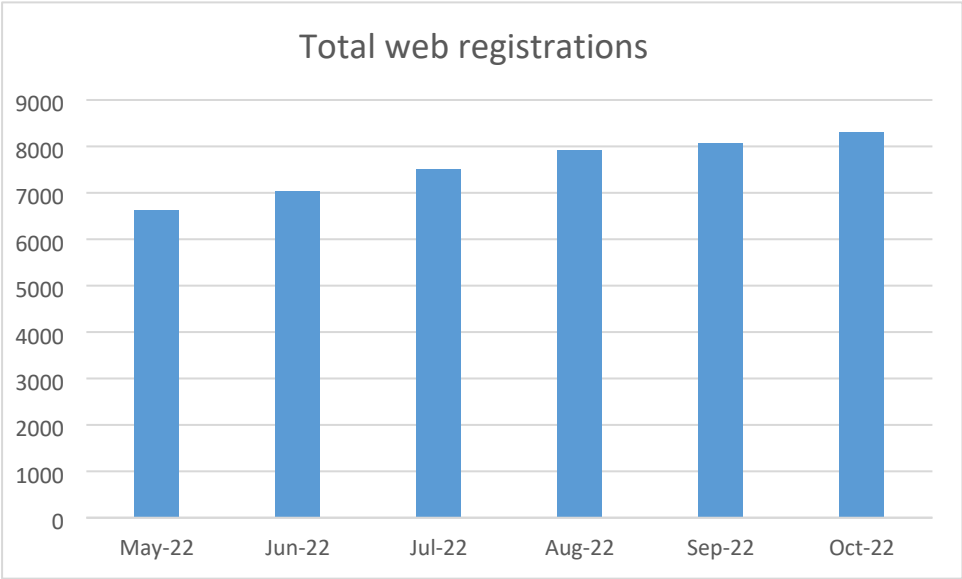
The tables above show processes grouped together and each group consists of a number of processes as shown below.

Childrens	Children's education review & children's pension age review
Current Member	Transfer in quote, changes to circumstances (breaks/hours etc.), annual allowance breach, AVC change, monthly postings mover, APC buying extra, divorce quote, query on record, waiting for documents, GMP notification
Deaths	Death in retirement, death in service, death on deferred, death grant to set up, death overpayment to recover, death notification
Early Leavers	Leaver notification, deferred benefit, refund quote, preserved refund
Estimates	Pension estimate, deferred estimate
Incapacity	Incapacity case
Linkings	Linking quote, linking actual, interfund linking quote, interfund linking actual
Misc	Member portal query, post received, phone log, age 75 approaching, enquiry needing a response, Finance Team referral
Payroll	Life certificate received, returned credit, BACS recall, 100 th birthday, Tracesmart, suspend Tier 3, update bank details, payroll changes, GMP notification
Retirements	Deferred retirement quote, retirement quote, Tier 3 ill health review
Transfers	Interfund out, transfer out, AVC transfer out

3. Member web registrations

The numbers of members signed up to member web are:

Status	Previous month	Current month
Active	3375	3430
Pensioner	2388	2557
Deferred	2305	2319
Total number	8,068	8,306



4. Administration update

a) New Academies/Schools

Completed 0

Ongoing 0

New enquiries this month - 0

b) New Admission Bodies

Completed 1

Ongoing 8

New enquiries this month – 1

Name	Start date	Current position	Date completed
Nourish Catering	01/08/2022	To be set up as an active employer. Member data provided by Nourish – 02/11/2022.	

Ongoing

Name	Start date	Current position	Last action taken	Date completed
Innovate (Blessed Dominic)	01/09/2019	Records to be updated from monthly contribution return to be able to provide data submission to Hymans. Info provided to WYPF on	Admission agreement with Legal Team for sealing as per Mark Fox – 26/07/2022. Sealing still pending as per Mark Fox – 05/09/2022. Still	

		<p>contract – 19/03/2021. Phoned contact at Innovate and sent a spreadsheet to complete – 19/07/2021. Member data provided by Innovate – 20/07/2021. Data submitted to Hymans on 01/11/2021. Assessment completed. Employer record updated to actual. Admission agreement being completed and once this is complete to pass to the Employer Relations Team and Finance as a new employer – 21/02/2022. Mark confirmed at the meeting on 03/03/2022 that the admission is in the process of being signed and would be ready soon.</p>	<p>outstanding as per Mark at meeting – 27/10/2022.</p>	
Innovate (St James)	01/08/2019	<p>Admission agreement with school for signing as per meeting with Mark – 13/09/2022. We have not received any contributions. (Note: it was noticed at the meeting with Barnet that this admission had not been</p>	<p>Still outstanding as per Mark at meeting – 27/10/2022.</p>	

		included on previous month's updates although it has been ongoing for a long time so it is included here now).		
Caterlink (Totteridge Academy)	01/08/2017	Awaiting response from Caterlink with membership data. Data requested from Chris Thomas – 04/08/2021. Member data provided by Caterlink – 23/11/2021. Data submitted to Hymans – 06/01/2022. Hymans require membership as at 31/03/2019. Contribution postings needed for this. Agreed at meeting on 03/03/2022 to e-mail Mark to confirm requirements. E-mailed Mark 14/03/2022 to confirm that we need to complete monthly contribution postings to 31/03/2019. Mark chased this up with Caterlink – 16/06/2022.	Caterlink confirmed they have submitted contributions. Queried with Finance Team 13/09/2022, chased up 19/10/2022.	
Signature Education	01/04/2021	Admissions required in respect of contracts with 5 Barnet Schools. Further	Last e-mail from Mark Fox to Signature on 11/08/2022. Mark Fox to chase up again –	

		<p>employer records have now been set up for 3 further schools. For the three original academies that transferred staff to Signature – they are still with Mark Fox for concluding admission agreements and then we can conclude our processes on these. Meeting held with Mark Fox and Signature – 28/07/2022. Further email followed this meeting. The company has gone out of business and the admissions therefore appear unlikely to proceed.</p>	<p>05/09/2022. Still outstanding as per Mark at meeting – 27/10/2022. It has been referred to the lawyers.</p>	
Tenon (St Michaels)	01/04/2021	<p>Member details sent to Mark Fox so he can issue a draft admission agreement – 16/06/2022. Admission agreement with Employer/School to sign and return as per Mark Fox – 26/07/2022. Mark Fox has chased this up again – 05/09/2022.</p>	<p>Mark confirmed the admission agreement is with lawyers to seal – 13/09/2022. Still outstanding as per Mark at meeting – 27/10/2022.</p>	

Hire-A-Pitch (Whitefield School)	01/10/2021	Member details confirmed – 02/12/2021. Employee was not in the scheme. Contacted contractor to ask about their intentions as the member who transferred was not in the scheme – 10/02/2022. Copy of the e-mail sent to Mark 03/03/2022 for him to consider the next action.	Confirmed by Mark as not proceeding – 19/10/2022.	19/10/2022
Alliance in Partnership (Osidge)	01/08/2018	Pay details received and further data submitted to Hymans – 16/02/2022. 2019 valuation position issued by Hymans. Mark F will issue the admission agreement – 28/04/2022. Member details forwarded to Mark F for inclusion in the admission agreement – 31/05/2022. Admission agreement with the employer – confirmed by Mark Fox – 12/07/2022. Mark Fox to chase up again – 05/09/2022.	With lawyers to seal – 13/09/2022. Mark confirmed he is chasing this and we will need to submit further data to Hymans for the 2022 valuation once completed – 26/09/2022. Still outstanding as per Mark at meeting – 27/10/2022. Now a cessation as at 31/07/2022.	
Enigma	01/09/2022	Admission agreement completed. Single member transferring from OCS. Enigma will continue to pay		

		the same rate as OCS and there is no Bond requirement. Will update Hymans when we have this in place – as agreed with Mark Fox at meeting – 13/09/2022.		
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c) Employers ceasing participation

Completed 3
Ongoing 7

Name	Date ceased	Current position	Last action taken	Date completed
Ashlyns	31/07/2020	Delayed by one final outstanding leaver. A meeting was held between Jo Gaffney, Mark Fox and myself to agree a way forward with Mark providing the relevant leaver information. The record was then set to deferred status so that we could run of the cessation data.	Cessation data submitted to Hymans – 13/07/2022. Cessation report not yet received as per Mark Fox – 05/09/2022. Hymans may have queries on cash flow – 13/09/2022. Confirmed as completed as per mark at meeting – 27/10/2022.	27/10/2022
Caterlink (Totteridge)	23/03/2020	Contributions not received from employer. Member data has now been received from Caterlink. Still dealing with opening position at this	Caterlink confirmed they have submitted contributions. Queried with Finance Team – 13/09/2022 and chased up – 19/10/2022.	

		point. Response received from Caterlink. Mark Fox replied with bank details for payment of contributions – 26/07/2022.		
Atlas Cleaning (St Michaels)	31/03/2021	Data to be submitted to Hymans for cessation. Members transferred to Tenon. Richard Quinn has been chasing the employer for outstanding leaver notifications – 01/06/2022.	Leaver notifications received. Three members are involved. 1. Has a retirement quote but has not yet responded. 2. Linking quote on another record. 3. Pay figure requested – 21/07/2022. No change to this situation – 26/10/2022.	
Caterlink (QE Girls School)	31/08/2021	Contributions not received. Mark Fox chasing up employer – 27/10/2021. We have also requested 3 outstanding leaver notifications – 23/11/2021. Outstanding leaver with Service Centre who are requesting outstanding postings from the employer. Final leavers being worked on – 14/03/2022. Both leavers have calculations in progress – 31/05/2022. Chased up Service Centre	Cessation data submitted to Hymans – 31/08/2022. Confirmed as concluded at the meeting – 27/10/2022.	27/10/2022

		asking for leavers to be prioritised – 22/06/2022		
Atlas Cleaning (Claremont)	31/03/2022	End of contract. Cessation process set up – 04/04/2022. Queried with employer what happened to the members, are they leavers or did they transfer to a new employer – 28/04/2022. Queried with Claremont Primary – 03/05/2022. Chased up – 22/06/2022.	Leaver notifications requested – 12/07/2022. Chased up – 05/09/2022. Issue raised re additional contributions deducted – 17/10/2022.	
Fremantle Trust (2)	30/06/2019	E-mail from Hymans saying they thought the cessation valuation had been concluded.	Hymans confirmed cessation valuation concluded in 2020 – 26/10/2022.	26/10/2022
City and County Healthcare Group	08/06/2022	Last member left. Retirement notification requested by Service Centre – 26/07/2022.	E-mail from Service Centre asking for final pay which was not included on the leaver notification – 16/08/2022. Pay figure confirmed by employer – 27/09/2022. Retirement quote prepared but not sent but further query on pay to employer – 05/10/2022.	

OCS Group UK Ltd Barnet	31/08/2022	One remaining active member TUPE transferred on – 31/08/2022. Asked where has the member transferred to and is he continuing in membership – 07/08/2022.	Now confirmed and member transferred to Enigma – 13/09/2022.	
Grasvenor Avenue Academy	31/08/2022	Academy closed.		
Alliance in Partnership (Osidge)	31/07/2022	Admission is still being concluded.		

d) Other employer work

None

e) Internal Dispute Resolution Procedure (IDRP)

Stage 1

Completed 0

Ongoing 1

Date of appeal	Reason for appeal	Current position /outcome	Last action taken	Decision due	Date decision letter sent
09/09/2022	Appeal against calculation of pension to be brought into	Acknowledged – 15/09/2022.			

	payment and reductions applied.				
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Stage 2

Completed 0

Ongoing 1

Date of appeal	Reason for appeal	Current position /outcome	Last action taken	Decision due	Date decision letter sent
12/09/2022	Period of secondment counting as separate scheme employment.	With Mark Fox to respond to the appeal.			

f) TPAS/Pensions Ombudsman

None

g) Compensation cases – October to December 2022

None

h) Member issues

- Member has requested that a payslip is sent every month and the system has been updated so this will happen. The member also requested that the title is removed from all correspondence however, this is a mandatory field on the system and the title cannot be removed from the member's record. This will be referred to Civica to see if this can be done.
- Member was not happy at the length of time it was taking to send him a deferred retirement quote. There had been some initial delays in producing the quote but then it was noticed that the member had AVCs from a SIB review but it was unclear who the AVCs were with. After further investigation and looking through previous documentation which was scanned across when we took over administration, the AVC provider was found and the AVC fund value was requested and received. The deferred quote was e-mailed and posted first class. A letter has been sent to the member to apologise for the delay in supplying the quote.
- Employer received a cost for early retirement and then changed the 'waive reductions' question on the flexible retirement notification to show No and not Yes which had previously been selected. The pension benefits have been recalculated on the revised option and a letter of explanation has been sent to the member to confirm why her pension benefits have been overpaid and a letter has been sent to the employer to explain about the overpayment to the member due to changing the retirement options.
- Member had a significant AA breach and this was due to the interfund linking. The member had a previous transfer in which had been duplicated on his record. The service history has now been corrected and the AA calculation rerun and a letter sent to the member.
- A buying extra pension letter was sent to another member via e-mail. The member e-mailed to say they had received information for another member and report a data breach. The data breach has been discussed with the member of staff who sent the e-mail and to ensure that the correct information is attached in e-mails.

i) Employer issues

None

5. Membership numbers

Membership status	ACTIVES	DEFS	PENS	BENS	PRESERVED REFUND	LVRS OPTIONS PENDING
Numbers	9475	9678	8007	1012	1233	853

Change from last month (+ / -)	+122	-33	+101	+9	+27	-15
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6. Management overview

a) Staffing update

Finance – There are currently no vacancies in the Finance Team.

Service Centre – There are currently still some Pension Officer vacancies in the Service Centre. After the recent round of recruitment, 4 candidates were offered a post. 3 will be joining the Service Centre on 28/11/2022 and the 4th candidate will be starting shortly after this once their paperwork has been finalised. The next round of interviews will begin shortly to fill the other vacancies.

Employer Relations Team – The new Employer Pension Fund Representative (EPFR), Finola Middleton started in the Employer Relations Team on 24 October 2022. The other vacant EPFR post will be advertised again but this will be in the New Year.

Technical Team - There are currently no vacancies in the Technical Team.

b) Pensions Dashboards

Everyone should be aware of the Pension Dashboard and the requirement to comply with the legislation. The LGPS SAB will be writing to all Pension Board Chairs and the letter includes the bullet points below. We have added some clarity to each bullet point:

- Working towards your staging date. The Pensions Regulator (TPR) is keen that scheme start planning now to be able to match dashboard request to scheme records and return the required information to the dashboard. You will need to understand how your provider will be able to pick out those requests which correspond to your members and ensure that they are providing information to the right individuals.

WYPF have been working with the Pensions Dashboard programme for 12 months assessing the requirements for matching, providing input to the consultation process and participating in relevant technical meetings and briefings.

Matching relies on two factors firstly the information that the individual puts into the MaPS dashboard upon which schemes can match. There are a number of mandatory fields an individual must enter and a number of optional fields. The more data the individual provides the greater the level of confidence of a match.

The second is accurate data. WYPF has a rolling 12-month programme of data quality improvement, this keeps our data quality scores at a high level. For Pensions Dashboard we are modelling our administration data against these matching criteria to establish what levels of matches we are likely to see in various scenario's. This will allow us to specifically target any data areas for any improvements, if needed.

- Ensuring the infrastructure is in place to hold and share data with the dashboard: Your administrator should be able to tell you how they are planning to connect whether through existing software providers or through some other route.

This year WYPF has upgraded its entire technology stack to be ready for the new technology that Pension Dashboard requires.


We will be working with a third party provider to provide the connection to the Pensions Dashboard Ecosystem and cloud based infrastructure. This is being procured via a formal procurement route. Viable suitable partners have been identified.

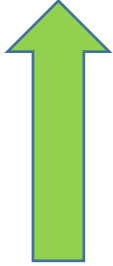
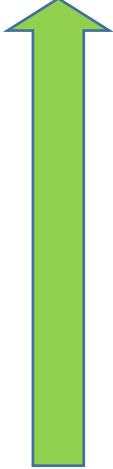
Information on the dashboard – Very simply, the information we will provide is the information included on the Annual Benefit Statement (ABS). That information will remain on the dashboard until it is replaced by the details of the ABS the following year. Or is replaced by the member leaving the service and benefit values deferred, or if they retire and benefits paid the details would be removed from the dashboard as the dashboard does not include information about pensioners.

When it is appropriate the ABS data will include remedy values and, therefore, these will be available on the dashboard.

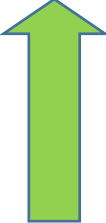

No other data will be provided, all queries and administration activities will continue as they currently do at WYPF.


7. Projects

Project	Description	Current position	Last action taken	Movement	Expected completion date
McCloud	To remove unlawful age discrimination identified in the McCloud ruling. It will provide eligible younger members with a protection equal to the protection provided to older members when the scheme was changed in 2014.	UPM have developed internal solutions for McCloud and we can largely operate independently of Civica for McCloud and we have developed some of this build internally. Civica have issued high level plans for both McCloud and Sargent. In the last set of meetings, Civica have confirmed that the build will be by persona's and development will follow persona priority. Civica are not planning to cover all persona's in the development and manual working will be required which will have an impact on our administration area.	We are currently waiting for the legislation for McCloud and the proposal plan from Civica.		Regulations to be introduced from 1 st October 2023 as per current proposal.

<p>Phase 3 (Monthly postings)</p>	<p>Move all the functionality onto to the front end website to enable Employers to process the data.</p>	<p>The penetration testing which needs to be done before MP3 is released to some employers so they can start testing has been arranged for the last week of October by Bradford IT and an external company who will do the penetration testing. It should take 2-3 days to complete this.</p>	<p>The penetration testing has been completed and 2 points were raised. They were only small and these have been completed. We can now roll this out to selected employers who the Finance Team are working with the test the functionality and take on any feedback/comments they may have.</p>		<p>2022/2023</p>
<p>Pensions Dashboard</p>	<p>Will enable individuals to access their pension information online, securely and all in one place.</p>	<p>The staging deadline for the LGPS and all other public service pension schemes will be deferred from 30 April 2024 to 30 September 2024. Schemes will be expected to meet the required standards (connection, security and technical) by 30 September 2024. They must also, by that date, be able to respond to find requests, complete matching and provide administrative and</p>	<p>The 3rd meeting with TPR was progressive and positive and the regulator has suggested the January 2023 meeting be moved to February 2023 as they are happy with our progress. The Legislation has been laid formally in Parliament which allows TPR to publish the regulations regime for Pensions Dashboard.</p>		<p>2022/2023</p>

		<p>signpost data on request. Administering authorities will need to be able to provide value data (accrued and projected values) by 1 April 2025. WYPF have established a programme for Dashboard implementation. We meet regularly with stakeholders, including software providers to ensure we are on course to be compliant with the legislation before go live day. We also regularly liaise with the TPR to ensure we are planning, resourcing and implementing correctly and meet with them every quarter.</p>			
<p>Key Performance Indicators (KPIs)</p>	<p>The KPI indicators have been developed in order to provide funds with the ability to self-assess against best practice benchmarks.</p>	<p>IT are making some coding amendments to the KPI measures and we are looking at some possible additional amendments to the UPM processes to align</p>	<p>The KPI training for Senior Pension Officers and Pension Officers took place this month. Most staff attended in person and the sessions proved useful</p>		

		the reporting periods with the KPI. We have also arranged training on the KPIs for Senior Pension Officers and Pension Officers in the middle of October.	for staff to ask questions and also make suggestions. These have been taken on-board and we are working with IT to implement changes that are needed.		Autumn 2022
Data Improvement Plan	Data falls into 2 categories – Common & Scheme Specific (also known as Conditional)	We have now received the proposal from Civica for access to the image server and they have quoted a cost of £140,000. We are now looking at alternatives to the Civica proposal. We are also developing a data quality programme through February/March 2023 as a pre-cursor to the pensions dashboard matching requirements.	Required UPM database for matching is in place and in time. We are starting the work to look at any potential saves for matching which we will start the work on this in February/March 2023.		As per Data Improvement Plan.
Website	WYPF's website has not been redesigned since the introduction of the CARE scheme in 2014. Change is needed to improve:	Designs for the new website are being drafted based on the feedback from the questionnaire. Member labs have been	The member labs have been run and we are waiting for the formal report which should be received by the end of November. This should		

	Member journeys, brand identity, diversity of media and accessibility.	arranged and provisionally booked for the last two weeks of October.	give us a clear direction of travel for the website & MyPension. The Project Team are meeting in November and will continue to meet monthly going forward to discuss the look of the website and My pension.		New website live by Q4 2022/23
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8. Regulatory update

[LGPC Bulletin 230 \(lgpslibrary.org\)](https://www.lgpslibrary.org) has now been published, please take a few minutes to read the bulletins.

SAB update

SAB responds to HM Treasury's consultation on exit payments

The SAB recently responded to HM Treasury's consultation on public sector exit payments.

Between 8 August 2022 and 17 October 2022, HM Treasury consulted on proposals introducing new controls for high exit payments. These will apply to all bodies classified as 'central government'. We covered the consultation in [Bulletin 228](#).

You can access the consultation documents and the SAB response on the non-scheme consultations page of www.lgpsregs.org.

LGPS England & Wales

LGPS statistics for 2021/22 published

On 26 October 2022, DLUHC published the [Local government pension scheme statistics](#) for England and Wales: 2021 to 2022.

Highlights include:

- total expenditure of £14.4 billion, an increase of 6.6 per cent on 2020/21
- total income of £15.9 billion, a decrease of 8.1 per cent on 2020/21
- employer contributions decreased by 24.3 per cent on 2020/21 to £7.8 billion
- employee contributions of £2.6 billion, an increase of 4.8 per cent
- the market value of LGPS funds on 31 March 2022 was £364 billion, an increase of 8 per cent
- there were 6.3 million scheme members on 31 March 2022: 2.0 million active members, 1.9 million pensioners and 2.3 million deferred members
- there were 94,724 retirements in 2021/22, an increase of 14.2 per cent compared with 2020/21.

The decrease in total income and employer contributions is common in the final year of the three-year valuation cycle. This is due to employers making early payment of contributions in the previous two years.

HMRC

Newsletter 143

HMRC published [Newsletter 143](#) on 30 September 2022.

The newsletter includes articles:

- confirming that schemes can use the pension scheme tax reference number when paying charges if they do not have a specific charge reference. HMRC had previously announced in April 2022 that schemes were unable to do so
- confirming that Government has decided against introducing a new reportable event for certain public service pension schemes from April 2023
- confirming that HMRC expects to release the event report for 2023/24 on the Managing pension schemes service in summer 2023. HMRC had previously expected to release this in spring 2023

TPR

Enforcement and prosecution policies updated

On 25 October 2022, the Pensions Regulator (TPR) published the following:

- [revised enforcement policy](#)
- [updated prosecution policy](#)
- [new enforcement strategy](#).

These aim to give clarity on what those who are subject to enforcement action can expect from TPR.

The enforcement policy sets out TPR's approach to investigating cases and any subsequent enforcement action. It is web-based and divided into standalone chapters, each with links to other relevant documents. The policy also consolidates previous policies in respect of defined benefit, defined contribution and public service pension schemes.

The prosecution policy explains how TPR will approach prosecuting workplace pension criminal offences. The policy has been brought up to date to reflect the new criminal powers in the Pensions Schemes Act 2021 and other developments. The enforcement strategy sets out the overarching aims of TPR's enforcement work (excluding automatic enrolment). It also provides an insight into the framework TPR applies when selecting cases for enforcement action.

TPR ran a consultation on the revised enforcement and prosecution policies between 4 May 2022 and 24 June 2022 and responded on 25 October 2022. You can access the consultation documents on [the consultations page of TPR's website](#).

For more information, see the [press release from TPR](#). Erica Carroll, TPR's Director of Enforcement, also published [a blog setting out the reasons for the changes](#).

Pensions dashboards

Draft guidance on deferring staging date published On 17 October 2022, the Department for Work and Pensions (DWP) published [draft guidance on applying to defer the staging deadline](#). DWP also published [a template application form](#).

The draft Pensions Dashboards Regulations 2022 propose allowing trustees / managers of a pension scheme to apply to DWP to defer their staging deadline. They set out the time limits in which to apply and the circumstances where DWP may accept applications. DWP may only agree to defer the staging deadline once for each scheme and for a period of up to 12 months.

DWP has produced the draft guidance to aid understanding of the application process. This includes:

- what DWP will consider when reviewing applications
- what evidence should be submitted to support an application
- how to apply, including a recommendation to use the template application form
- how DWP will let schemes know whether they have accepted the application and how schemes can appeal.

DWP will finalise the draft guidance once the dashboard regulations come into force.

Draft dashboard regulations laid for approval

On 17 October 2022, DWP laid a draft of [The Pensions Dashboard Regulations 2022](#) before each House of Parliament.

DWP can only make the regulations if each House approves the draft by a resolution. The House of Lords will consider the regulations on 15 November 2022. As yet, no date has been set for this to happen in the House of Commons.

DWP consulted on draft dashboard regulations between 31 January 2022 and 13 March 2022. They responded on 15 July 2022, which we covered in [Bulletin 227](#). The draft regulations laid before each House have been amended to reflect the consultation response. They have also been amended to reflect the response to the further consultation (see next article).

You can access the consultation documents on:

- the non-scheme consultations page of www.lgpsregs.org

DWP responds to further consultation on dashboards

On 17 October 2022, DWP responded to the further consultation on dashboards. This ran from 28 June to 19 July 2022, see [Bulletin 226](#) for more information.

The response confirms that the DWP will:

- give pension schemes six months' notice of the point at which pensions dashboards will be available to the public, the 'Dashboard Available Point'. This is an increase to the 90 days proposed in the consultation
- go ahead with the second proposal allowing the Money and Pensions Service (MaPS) and the Pensions Regulator (TPR) to share information about dashboards.

You can access the consultation documents on:

- the non-scheme consultations page of www.lgpsregs.org

Progress update report

On 26 October 2022, the Pensions Dashboards Programme (PDP) published its [sixth progress update report](#). The report covers:

- programme activity in the six-month period from April 2022,
- focus areas to April 2023
- updates from PDP's partners: DWP; the Financial Conduct Authority (FCA); and TPR.

To complement the report, PDP will be hosting a webinar on 3 November 2022. You can sign up for the webinar on [the registration page of the PDP's website](#)

Other news and updates

Training

LGPS Governance Conference 2023

Our recently released [conference flyer](#) contains an updated programme with confirmed speakers.

The conference will take place on 19 and 20 January 2023 at the Cardiff Marriott Hotel. You can attend the conference in person or join us online.

The conference is aimed at elected members and others who attend pension committees/panels and local pension boards. Past delegates include elected members, trades union representatives, member and employer representatives, as well as a variety of officers who attend and support committees.

You can book and view the programme using the links below. An updated programme with confirmed speakers will be published shortly. We are unable to take manual bookings.

- [book to attend in person](#)
- [book to attend virtually](#).

The booking page for all LGA events is www.local.go.uk/events.

Legislation

Statutory Instruments

[The Public Service Pensions \(Employer Cost Cap and Specified Restricted Scheme\) Regulations 2022](#) [SI 2022/787]

Useful links

[LGA Pension page](#)

[LGPS members' website](#)

[LGPS Advisory Board website](#)

[LGPS Regulations and Guidance website](#)

[LGPS Discretions](#) - lists all the potential discretions available within the LGPS

[The Timeline Regulations for Final Salary Schemes](#)

[The Timeline Regulations for the current scheme](#)

9. Scheme calendar for year commencing 1 April

January	February	March	April
Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC	Life Certificates	Life Certificates	Apply Pensions Increase Apply Care Revaluation Issue P60's (with April Payslip) Life Certificates Annual employer meeting
May	June	July	August
Active Annual Benefits Statements Life Certificates Deferred Annual Benefits Statements	Active Annual Benefits Statements Active Newsletter Life Certificates	Active Annual Benefits Statements Life Certificates	Active Annual Benefits Statements Life Certificates
September	October	November	December
Life Certificates Pension Savings Statement	Life Certificates Participate in NFI Active Newsletter tPR Scheme Returns Annual employer meeting	tPR Annual Survey Life Certificates Pensioner Newsletter Deferred Newsletter	Life Certificates

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Appendix B – Percentage of My Portal registrations per employer

Employer	Percentage of members registered
All Saints C of E Primary School	25.0%
Alma Primary	40.0%
Archer Academy	41.4%
Ark Pioneer Academy	17.7%
Ashmole Trust	29.3%
Atlas (St Michaels)	25.0%
Barnet And Southgate College	31.0%
Barnet Education And Learning Service Ltd (BELS)	68.4%
Barnet Education Arts Trust (BEAT)	100.0%
Barnet Homes	55.6%
Barnet Homes (Brooksons)	50.0%
Barnfield Primary School	30.6%
Bishop Douglass Catholic High School	39.4%
Broadfields Academy	25.4%
Brookland Infant and Nursery School	22.6%
Brookland Junior School	30.8%
Capita CSG	54.3%
Capita RE	54.2%
Caterlink (The Compton School)	75.0%
Caterlink - Holly Park School	50.0%
Childs Hill Primary Academy	28.9%
Christ Church C E Primary School	45.8%
Christs College	39.4%
Claremont Primary	35.0%
Colindale Primary School	30.2%
Copthall Academy	21.7%
Danegrove School	16.2%
Deansbrook Jun School	22.2%
Dollis Primary School	20.4%
East Barnet School	25.2%
Edgware Primary School	20.8%
Finchley Catholic High School	36.1%
Friern Barnet School	65.9%
Grasvenor Avenue Infant School	38.5%
Greenwich Leisure Limited	28.6%
HCL - Copthall School	40.0%
Hasmonean Schools MAT	41.1%
Hendon School	22.0%
Henrietta Barnet School	34.8%
Hyde School	23.1%
ISS	14.4%

Independent Jewish Day School	16.7%
J.B Riney	100.0%
JCoSS	37.2%
Kisharon Academy	31.0%
London Academy	23.5%
London Borough of Barnet	36.1%
London Borough of Barnet (Schools)	26.7%
Mapledown School	12.1%
Martin Primary School	24.7%
Mathilda Marks Kennedy Trust	47.8%
Menorah Foundation School	44.4%
Menorah High School for Girls	25.0%
Middlesex University	35.5%
Mill Hill County High	33.8%
Monken Hadley School	35.3%
Monkfrith Primary School	41.3%
NSL Ltd	54.6%
Oak Hill Academy	33.3%
Oak Lodge School	31.7%
Oakleigh School and Acorn Assessment Centre	25.8%
Olive Dining (Archer Academy)	33.3%
Osidge G.M. Primary School	19.6%
Parkfield School	50.0%
Pavilion Study Centre	14.3%
Queen Elizabeth Girls School	41.9%
Queen Elizabeth Boys School	42.9%
Queenswell Federation	60.0%
Rimon Jewish Primary School	23.1%
Rosh Pinah Primary School	23.8%
Sacks Morasha Jewish Primary School	60.0%
Saracens Academy	12.0%
St Andrew The Apostle School	22.9%
St Andrew's C of E Voluntary Aided Primary School	30.0%
St James' Catholic High School	31.3%
St Johns N20 School	36.4%
St Mary & St John Primary School	31.0%
St Mary's CEP School	42.1%
St Michael's Catholic Grammar School	32.6%
St Pauls C of E Primary School	35.0%
Summerside Primary Academy	44.4%
Sunnyfields Primary School	25.0%
The Compton School (Middlesex Learning Trust)	37.9%
The Totteridge Academy	28.3%
Underhill Infant School	32.1%

Wessex Gardens Primary School	24.1%
Whitefield Trust School	25.0%
Woodcroft School	17.0%
Woodhouse College	38.6%
Wren Academy	35.7%
Your Choice Barnet	29.4%

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LONDON BOROUGH OF BARNET
PENSIONS DEPARTMENT
HENDON TOWN HALL
HENDON
NW4 4BG

Date
14 October 2022
Our reference
NE0104225403
Scheme number
L018

Dear Sir or Madam

Pension lifestyle investment options

As you may be aware, members of the London Borough of Barnet Pension Fund have access to lifestyle investment options. These are designed to automatically change investments at pre-defined points as the member gets closer to retirement.

We've identified that some of these automatic changes haven't happened meaning affected members' fund values are incorrect. Some are lower than they should be, some are higher. Please accept our apologies for this and for any concern it may cause.

Who is affected and what action are we taking?

Not all lifestyle options and members are affected. We'll write to you again by mid November 2022 with details of those that are, and what we'll be doing to correct the situation.

As part of the rectification work additional controls are being put in place to avoid a recurrence of this mistake. We're also continuing to keep our regulators aware of the situation.

We're here to help

If you have any questions, or would like more information, please get in touch by emailing us at corporate.pension.enquiries@prudential.co.uk. Please quote your scheme number, shown above, when you contact us.

Yours faithfully

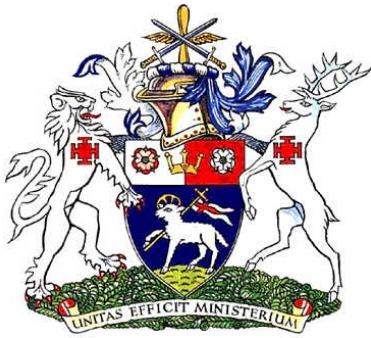
Alastair Hogg
Head of Corporate Pensions

For large print, braille or audio, please call us on 01375 304 304.

Calls may be monitored or recorded for quality and security purposes.

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Local Pension Board

6 December 2022

Title	Data Improvement Plan and Historical Leavers
Report of	Executive Director of Strategy & Resources (S151 Officer)
Wards	N/A
Status	Public
Urgent	No
Key	No
Enclosures	None
Officer Contact Details	Mark Fox, Pensions Manager – 0208 359 3341
Summary	
This paper provides the Local Pension Board with an update on the data improvement plan and historical leaver exercise.	

Officers Recommendations

The Local Pension Board are requested to note the progress on the correcting of the member data and the historical leaver exercise.

1. WHY THIS REPORT IS NEEDED

- 1.1 The presence and quality of data is a vital component to ensuring that benefits calculated and paid to pension scheme members are correct.
- 1.2 The administrators, West Yorkshire Pension Fund (WYPF), inherited data which requires correcting and updating to ensure it is up to the standard required to accurately calculate benefits and conform with the data quality requirements of The Pensions Regulator (TPR). In addition, WYPF inherited a large number of historical leavers that had not been processed.
- 1.3 WYPF produced a data improvement plan (“the plan”) to get the data up to the required levels. The LBB Pensions Team and WYPF are working together to ensure that accurate data is updated on members’ records.
- 1.4 It is important that both the data improvement plan and progress on the historical leavers is reviewed regularly by the Board.
- 1.5 A representative from WYPF will be at the meeting and will be able to provide the Board with a detailed update on their future plans for data correction.

Data Improvement Plan

- 1.6 The LBB Pensions Team (“the Pensions Team”) continue to monitor and work with WYPF on the Data Improvement Plan to correct the issues inherited. WYPF provide monthly data quality update reports to Officers, which gives the number of data items within the data improvement plan that still require updating.
- 1.7 Initially, there were initially **c28,500** data items that needed to be reviewed and updated. Whilst this number has significantly reduced, primarily because of updating data in bulk required for the issuing of Annual Benefit Statements, it is now at a stage when the work required to correct the data requires looking at individual records, which will slow down the data correction process.
- 1.8 Previously, we have advised the Board that WYPF had intended to use “character recognition” software which could have significantly reduce the number of data items outstanding in these areas. However, WYPF will no longer be proceeding to use this software due to the fees that would be charged by their system provider.
- 1.9 Following a meeting with the LBB Pensions Team, WYPF have been tasked to look at ten areas of data with the largest number of issues that need correcting. This includes updating records manually, making system corrections to ensure that the data can be updated in bulk and reviewing whether the risk of the data missing or being incorrect can be mitigated.

- 1.10 WYPF have assured the LBB Pensions Team that if benefits require to be calculated for a member, where there are data issues, these issues will be corrected before any figures are produced.
- 1.11 The LBB Pensions Team will be monitoring progress and will continue to report back to the Board.
- 1.12 WYPF also provided an update on both the common and conditional data scores These data scores are a method for measuring quantity of data and are reported to TPR in the Scheme Return.
- 1.13 A summary of progress since April 2022 of the TPR data scores is shown below (with February 2021 being the first data score being produced for the Fund by WYPF):

Month	TPR score - common	TPR score - conditional
February 2021	95.79%	41.27%
April 2022	96.69%	79.66%
May 2022	96.63%	79.31%
June 2022	96.66%	79.31%
July 2022	96.68%	78.65%
August 2022	96.60%	78.77%
September 2022	96.60%	78.88%
October 2022	96.57%	78.93%
November 2022	96.55%	78.57%

- 1.14 These figures show the presence of data held on members' records. Common data is data is needed so that a member can be uniquely identified, such as date of birth and national insurance number. Conditional data is used to calculate the member benefits, such as pensionable salary and service information.
- 1.15 The common data score is at the acceptable level for The Pensions Regulator (TPR). Conditional data does not have a score level set by TPR.
- 1.16 The figures vary slightly due to WYPF finding data issues as historical leavers are processed.

Historical Leavers

- 1.17 WYPF initially inherited **c1,500** "historic leavers. Following the work undertaken by WYPF in the 2021 Annual Benefit Statement (ABS) process, this number increased to **c1,950**.
- 1.18 As of 17 November, this number had reduced to **c780**, of which **715** are leavers who left before 1 November 2020 when WYPF took over the administration of the Fund.

- 1.19 The LBB Pensions Team will shortly contact employers again where leaver forms are still outstanding and issue fines where appropriate.
- 1.20 We are working with the council's payroll provider to get their historic leavers submitted. These have now reduced to **c400** historic leavers to process.

2. REASONS FOR RECOMMENDATIONS

- 2.1 Not applicable in the context of this report.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 Not applicable in the context of this report.

4. POST DECISION IMPLEMENTATION

- 4.1 Not applicable in the context of this report.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 The Local Pension Board supports the delivery of the Council's strategic objectives and priorities as expressed through the Corporate Plan, by assisting in maintaining the integrity of the pension Fund by monitoring the administration and compliance of the Fund.

5.2 Resources (Finance & Value for Money, Procurement, Staffing, IT, Property, Sustainability)

- 5.2.1 Not applicable in the context of this report.

5.3 Social Value

- 5.3.1 Not applicable in the context of this report.

5.4 Legal and Constitutional References

- 5.4.1 The LGPS Regulations 2013 place responsibility for the local administration of pensions and other benefits under these Regulations on the administering authority, which is the London Borough of Barnet. The Local Government (Amendment) (Governance) Pension Scheme Regulations 2015 inserts regulation 106 into the Local Government Pension Scheme Regulations 2013 which requires the Council to establish a Pension Board, whose role is to assist the Council in securing compliance with legislation, regulation and best practice, including as set out in the Pension Regulator's Code of Practice to ensure the effective and efficient governance and administration of the Scheme and any connected scheme.

5.4.2 Under the terms of reference for the Local Pension Board, the role of the Board is to assist with:

- compliance with LGPS Government regulations.
- compliance with the requirements imposed by the Pensions Regulator.
- such other matters as the LGPS regulations may specify ensure the effective and efficient governance and administration
- ensure the Pension Fund's strategy and policy documents are maintained in accordance with the LGPS Regulations.
- ensure the Pension Fund's internal Risk Register is reviewed at least annually.
- review the Pension Fund's performance in complying with the requirements of the LGPS Regulations

5.5 Risk Management

5.4.1 Risk management is central to the LGPS. LGPS pension funds are in themselves risk management tools, managing the risk that future employer income streams will be able to meet future pensions liabilities by creating a reserve from which future liabilities will be met. Good governance and data is essential to managing the risks of the pension fund.

5.5 Equalities and Diversity

5.5.1 Pursuant to the Equality Act 2010, the Council is under an obligation to have due regard to eliminating unlawful discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; advancing equality of opportunity between persons who share a relevant 'protected characteristic' and those who do not share it; and fostering good relations between persons who share a relevant 'protected characteristic' and persons who do not share it. The 'protected characteristics' are: age, disability, gender reassignment, pregnancy, and maternity, race, religion or belief, sex and sexual orientation, marriage and civil partnership.

5.5.2 The rules governing admission to and participation in the Pension Fund are in keeping with the public-sector equality duty. The [Public Sector Equality Duty](#) requires public authorities in carrying out their functions, to have due regard to the need to achieve the objectives set out under s149 of the Equality Act 2010. Good governance arrangements will benefit everyone who contributes to the fund.

5.6 Corporate Parenting

5.6.1 Not applicable in the context of this report.

5.7 Consultation and Engagement

5.7.1 Where relevant, consultation and engagement is discussed in the paper.

5.8 Insight

5.8.1 Not applicable in the context of this report.

6. ENVIRONMENTAL IMPACT

6.1 None

7. BACKGROUND PAPERS

7.4 None

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB001	Operational - disaster (Fire / flood etc)	An event occurs that would impact the ability to deliver all / parts of the pension service.	Business Continuity	The administrator has Business Continuity Procedures and Disaster Recover Plans in place. The LBB Pensions Team have been updated with the latest version of the WYPF BCP (last review - January 2020). WYPF Business Continuity and Disaster Recovery Plans may be audited by either the internal audit team of Bradford Metropolitan	5	1	5	5	1	Tolerate	The LBB Pensions Team has reviewed the latest Disaster Recovery and Business Continuity Report received from WYPF. The Pensions Team is satisfied that WYPF have appropriate measures in place. WYPF have advised that two further tests will take place in 2023.	Q2, 2023	Aug-17

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

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					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				District Council or external auditors appointed by the Bradford Council.									

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					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB002	Member data incomplete or inaccurate	<p>To fulfil legal obligations, the pension service is dependent on receiving accurate information and data from scheme employers, and for the administrator to maintain member records.</p> <p>Incomplete and/or inaccurate information/ data could lead to incorrect benefit calculations. The Pension Regulator requires all pension schemes to maintain accurate data.</p> <p>Many unprocessed new</p>	Information Governance	<p>Employer Forums' to be held biannually to support scheme employers with returning the information / data required to ensure member records are accurate</p> <p>Common data analysis is now provided monthly by WYPF monthly and is showing improvements in data presence.</p> <p>The LBB Pensions Team have received assurance from</p>	5	2	10	3	2	Treat	<p>WYPF to advise the LBB Pensions Team when employers are not providing the relevant information, appropriate action can be taken.</p> <p>The LBB Pensions Team have contacted all relevant employers with unprocessed leavers, so member benefits can be calculated, and records be updated. This is an ongoing process and will be repeated</p>	<p>Ongoing</p> <p>Ongoing</p>	Aug-17

Last Updated:18/11/2022

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					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
		<p>joiners and leavers were identified in the 2019 valuation process, along with incorrect pensionable salary and CARE for members who have two job roles.</p>		<p>Bradford City Council's Internal Audit team on controls in place on UPM for automated calculations and how WYPF processes for non-automated calculations are reviewed.</p> <p>Training sessions on providing leaver data took place in February 2022, with employers being reminded of their responsibilities and the option for the Administering</p>							<p>before the end of 2022.</p> <p>Another employer forum meeting will be held on 24 November where employers will be reminded of their responsibilities.</p>	<p>Q4, 2022</p>	

Last Updated:18/11/2022

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					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				<p>Authority to issue fines and report to TPR.</p> <p>Final cut of valuation data has been submitted by WYPF to Hymans. Work has been completed to correct most of the critical data errors identified.</p>									

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London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

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					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB003	Admin process failure or mal-administration	<p>Administration of the pension scheme should be in line with the Local Government Pension Scheme (LGPS) rules.</p> <p>Issues with the Annual Benefit Statement process and Pensions Savings Statements from previous tax years not issued in line with statutory deadlines.</p>	Statutory Duty	<p>Ongoing dialogue between Barnet and WYPF through weekly and monthly meetings</p> <p>Formal agreement in place with WYPF, including agreed SLA's.</p> <p>Authority level clearly agreed and kept up to date, including clear definition of delegated authorities and individual approval authorities.</p> <p>Scheme Event Calendar in</p>	5	2	10	2	1	Treat	<p>The LBB Pensions Team have reviewed the latest WYPF ISO9001 and ISO27001 reports on Quality Management and Information Security Management respectively, which details the controls in place at WYPF.</p> <p>This determines who can authorise and sanction large payments.</p> <p>Scheme Event Calendar in place and reviewed annually.</p>	<p>Annual</p> <p>Annual</p>	Aug-17

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

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					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				<p>place to ensure legislative / regulatory deadlines are achieved (i.e., ABS / Scheme Return etc.)</p> <p>Staff training plans in place to ensure processing in accordance with LGPS requirements</p> <p>Monthly reports by WYPF to scheme managers.</p>							<p>Any errors or issues identified by WYPF are advised to The LBB Pensions Team, on the monthly report or earlier, if deemed appropriate.</p>	Ongoing	

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London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

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PB004	Excessive charges by suppliers	The cost of running the pension scheme should not exceed the agreed budget.	Finance	Pension scheme budget agreed annually. Periodic review of suppliers.	2	1	2	2	1	Treat	Budget to be agreed annually.	Annually	Aug-17
PB005	Employer failure to pay contributions to the fund	The fund does not receive the correct amount of contributions from employers to fund employee pension liabilities, leading to a scheme deficit.	Finance	Monthly reconciliation of contribution payments received by the LBB and WYPF. Ongoing dialogue with employers around when contributions are due. LBB to monitor receipt of contributions (both on time and late).	2	2	4	2	1	Treat	The LBB Pensions Team check monthly that employers pay the correct contributions rates. New Admitted Bodies are asked to commence paying contributions as soon as possible (prior to the Admission Agreement has not been signed).	Monthly	Aug-17

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London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				<p>The LBB Pensions Team will enforce the collection of contributions and other costs from employers by threatening the use of fines and reporting to TPR, if applicable.</p> <p>Revised procedures have been implemented to improve the collection of strain cost invoices.</p>									

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London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

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					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB006	Failure of non-public sector employers	Should admitted bodies default on payments, the fund is left with additional pension liabilities.	Finance	<p>LB Barnet Pension Team monitoring of employer covenant and business strength.</p> <p>The backlog of admission agreements and bonds that increase the risk of an unrecovered shortfall are reducing.</p> <p>The LBB Pensions Team now have access to a Hymans modeller, enabling calculation of the employer's</p>	2	2	4	2	2	Treat	<p>Review all admitted bodies to ensure an appropriate bond/guarantee is in place and reporting into the Pension Fund Committee.</p> <p>The LBB Pensions Team work with both WYPF and Hymans Robertson to ensure that new Agreements are completed and signed in good time.</p>	<p>Ongoing</p> <p>Ongoing</p>	Aug-17

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				contribution rate, thus speeding up the admission process.									
PB007	Failure to interpret rules or legislation correctly	The Board does not have the level of pension knowledge to perform their role effectively.	Compliance	<p>Up to date training log in place, showing completion of training material.</p> <p>Technical advice and updates formally noted on training log.</p> <p>Training Policy drafted for approval by the Local Pensions Board.</p>	2	1	2	2	1	Tolerate	<p>No further actions required; risk has reached its target score and is being tolerated with the existing controls and mitigations in place.</p> <p>Board Training to be a standing item at each meeting with appropriate training to be arranged over the course of 2022 and beyond.</p>	N/A Ongoing	Aug-17

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

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					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB008	Appropriate personnel in place to perform in designated roles	WYPF does not comply with statutory obligations and is unable to evidence appropriate governance.	Compliance	Ensure that the personnel in key roles in relation to the administration of the Fund are suitably experienced and qualified to perform in their roles and have the appropriate authorities to ensure the administration is always executed effectively.	4	2	8	2	1	Treat	Review of roles and responsibilities of relevant individuals to ensure individuals hold appropriate authorities or there is clear escalation of issues requiring decisions. Annual appraisal reviews and setting of objectives	Ongoing Annual	Aug-17

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB009	Conflicts of interest	Decisions made may be influenced by other factors and may be subject to challenge.	Compliance	<p>Statutory Duty Pension Board awareness of legal responsibility.</p> <p>All Pension Board members to declare any conflicts and potential conflicts.</p> <p>All pension board members have completed relevant educational material.</p> <p>All conflict of interest documentation signed by all board members and recorded in conflict of</p>	3	1	3	3	1	Tolerate	No further actions required; risk has reached its target score and is being tolerated with the existing controls and mitigations in place.	N/A	Aug-17

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

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				interest register Any changes to be included with minutes at each meeting.									

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

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PB010	Admission agreements/ securities (i.e. bonds) not arranged	<p>Should an employer not be admitted to the Fund in a timely manner then employees will not be able to draw their benefits or have access to death in service benefits relating to the LGPS.</p> <p>This could result in intervention from TPR possibly resulting in a financial consequence and reputational damage to the Council.</p>	Compliance	<p>The LBB Pensions Team is working with Hymans, WYPF, HB Law and employers to improve the process for arranging for admission agreements and bonds/bond renewals to be put in place and to address the backlog.</p> <p>LB Barnet Pension Team monitoring of employer covenant and business strength.</p> <p>The backlog of admission</p>	3	2	6	2	2	Treat	<p>Review all admitted bodies to ensure an appropriate bond/guarantee is in place and reporting into the Pension Fund Committee.</p> <p>Progress continues to be made on the processing of admission agreements and bonds.</p> <p>The LBB Pensions Team are working with both WYPF and Hymans Robertson to ensure new Agreements are completed and signed promptly.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	Jan-19

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

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					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				<p>agreements and bonds are reducing.</p> <p>The LBB Pensions Team now have access to a Hymans modeller, enabling calculation of the employer's contribution rate, thus speeding up the admission process.</p>									
PB011	Commercial viability of strategic suppliers	If the commercial viability of a strategic supplier declines this could lead to operational	Business Continuity	Administration has few suppliers - WYPF, Civica (indirect),	4	1	4	4	1	Treat	As WYPF are part of a local authority, they will not go out of business. If they cease providing	Ongoing	Mar-19

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

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					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
		failings resulting in service disruption/reduction, failure to complete statutory duties and financial costs.		<p>Hymans (actuarial).</p> <p>Contract management framework, with policy and procedures for commercial activity. Contract monitoring takes place monthly with quarterly reporting to Financial Performance and Contracts Committee.</p> <p>Contract register kept under review with checks on financial status of strategic</p>							third party admin services, this will likely be over a reasonable period. This will enable The LBB Pensions Team enough time to find an alternative provider. This can be done by using the National LGPS Framework.		

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

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				suppliers. Contract management arrangements in place, including indicators to identify financial stress. Business continuity plans in place.									

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London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB012	Non-compliance with GDPR	Failure to adhere to GDPR may lead to the breach of GDPR regulations (e.g. breach of personal information), which will result in enforcement action from TPR and the ICO, resulting in financial and reputational impact on the Council.	Statutory Duty	<p>The LBB Pensions Team are required to engage with GDPR eLearning to be trained on GDPR regulations.</p> <p>WYPF staff must complete GDPR awareness training and more in-depth training if they are involved in the processing of personal data.</p>	3	2	6	2	1	Tolerate	<p>WYPF ensure that all employees responsible for handling personal data will receive appropriate training in the use and control of this data.</p> <p>The LBB Pensions Team who are responsible for sensitive personal data also receive training appropriate to their roles.</p> <p>The LBB Pensions Team will report any potential data breaches to the Council’s Data Protection Team for review and advice.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	Mar-19

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB013	Negative media exposure and member experience	<p>Negative media attention may lead to ineffective media management impacting on the reputation of the Council and impacting on staff morale.</p> <p>Member perception of the Fund may be negatively impacted due to both member experience and negative reporting of the fund in the media.</p>	Staffing and Culture	<p>Staffing and Culture Communication team to liaise with S151 Officer as and when a media enquiry arises.</p> <p>The LBB Pensions Team to provide regular communication on the Barnet Fund when changes or issues occur</p>	4	1	4	2	1	Tolerate	<p>Press releases to be shared with Local Pension Board members prior to publication (if possible).</p> <p>Member experience to be measured by satisfaction surveys and feedback by WYPF. Last results received for quarter ending 30 June 2022 received by the LBB Pensions Team in July 2022.</p> <p>The LBB Pensions Team and WYPF to discuss issues weekly.</p>	<p>Ongoing</p> <p>Every 3 months</p> <p>Ongoing</p>	Mar-19

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB014	Impact of COVID-19 and staffing issues on pensions administration	Administration processes and levels being maintained whilst administrators working from home with no detrimental effect on the payment of members benefits and general service levels.	Business Continuity	WYPF have developed their own Business Continuity plan., This is to be shared with Council The LBB Pensions Team. The LBB Pensions Team will monitor service levels through regular reports and calls with WYPF.	4	2	8	2	1	Treat	<p>The LBB Pensions Team to monitor performance levels, complaints and resourcing levels. Any major dip in levels should be raised with Senior Management at WYPF and Commercial Team at the Council.</p> <p>WYPF staff have started hybrid working arrangements.</p> <p>Recent issues with WYPF staff absences and unfilled vacancies have been discussed with senior management at</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	Apr-20

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
											WYPF and will continue to be reviewed until the LBB Pensions Team are satisfied that the risk of detrimental effect on WYPF performance has reduced.		
PB015	Cyber security	The Fund holds large amounts of personal data which can make them a target for fraudsters and criminals. Steps need to be taken to protect members which includes protecting them against the 'cyber risk'. This can be defined as the	Compliance	WYPF, as part of its Information Governance Toolkit, has adopted a Cyber Security policy which outlines how the Fund protects members' data from incidents of Cyber Crime and risk of hacking together with outlining the Fund's control	5	1	5	2	2	Treat	WYPF have provided to the LBB Pensions Team a copy of their Cyber Security report. The LBB Pensions Team have reviewed this document and are satisfied that WYPF have sufficient controls in place to minimise the risk of a cyber-	Q4, 2022	Jun-20

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
		risk of loss, disruption or damage to the fund or its members as a result of the failure of its information technology systems and processes. It includes risks to information (data security) as well as assets, and both internal risks (eg from staff) and external risks (eg hacking).		mechanisms for its pension administration software system.							incident occurring. The LBB Pensions Team to check whether the WYPF policy is updated in line with the TPR cyber security principles.	Q4, 2022	

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB016	Risk of fraud by paying pensions to ineligible individuals or fraudulent arrangements	The Fund should evaluate the various forms of fraud in relation to pensions administration and then arrange for the implementation of appropriate controls that are both proportionate and pragmatic.	Compliance	<p>WYPF run an annual pensioner existence to ensure that pensioners still alive and that pensions are being paid to the correct member.</p> <p>Pension transfer documentation sent to members contains the recommended literature from The Pensions Regulator so make members aware of “pension scams” and the administration processes to</p>	4	2	8	2	1	Treat	<p>WYPF to update the LBB Pensions Team the results of the pensioner existence exercise and where members have not responded, their pension will be suspended until the pensioner returns their certificate. Exercise commenced in October 2021. Next exercise for overseas pensioners to commence in November 2022.</p> <p>The LBB Pensions Team to review transfer documentation sent with transfer</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Q1, 2023</p>	Aug-20

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London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

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					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				<p>ensure proper checks on the receiving arrangement before making payment.</p> <p>Regulations were laid before Parliament on 8 November 2021 that intend to protect departing members from pension scams and will require trustees and other pension providers to urgently review their transfer processes and policies.</p>							<p>quotations to members and review the processes to ensure that appropriate checks are being taken to prevent transfer value payments being made to “pension scam” arrangements.</p> <p>The LBB Pensions Team to ensure that WYPF processes consider these new regulations and have requested details of all transfer payments made every six months.</p>	Ongoing	

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London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
											WYPF have confirmed that they will be signing up to TPR Pensions Pledge, which is a new initiative to: <ul style="list-style-type: none"> • raise awareness of the risks of scams • educating administrators and Boards on the best practice for due diligence around transfers • doing all they can to protect their members. 	Ongoing	

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London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

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					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB017	Effect of new pensions legislation and LGPS regulations (including the proposed increase in State Pension Age) on the provision of pension benefits to members of the Fund.	<p>New pensions legislation or updates to the LGPS regulations can influence members pension benefits within the Fund. An example would be the proposed increase in State Pension Age (SPA) currently proposed to increase from age 67 to 68 between 2044 and 2046.</p> <p>As the LGPS normal retirement age is linked to SPA, this will have an effect for members born on or after 1978.</p>	Statutory Duty	<p>The LBB Pensions Team to monitor and review updates to pensions legislation to determine the impact on members benefits.</p> <p>This will be in conjunction with WYPF, Hymans Robertson and other bodies to enable relevant communication to be sent to appropriate parties.</p>	4	2	8	2	3	Treat	The LBB Pensions Team to ensure that legislative changes are reviewed as soon as possible, so that any impact on members and employers are communicated clearly and promptly.	Ongoing	

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The Pension Administration Shared Service Risk Register

Introduction

As part of the continued collaboration between members of the Shared Service, London Borough of Barnet Pension Fund, London Borough of Hounslow Pension Fund, Lincolnshire Pension Fund and West Yorkshire Pension Fund (WYPF), this Risk Management Plan establishes the process for implementing proactive risk management as part of the overall management of the Pensions Shared Service. The purpose of risk management is to identify potential problems before they occur, so that risk handling activities may be planned and invoked as needed to mitigate adverse impacts on achieving objectives. Risk management is a continuous, forward looking process that addresses issues that could endanger the achievement of critical objectives and includes the early risk identification through the collaboration and involvement of relevant stakeholders.

The Shared Service has initially identified 13 risks which have been rated and plotted on a matrix and a risk tolerance line agreed to prioritise the risks. The risk matrix measures each risk for its likelihood and impact in terms of its potential for affecting the ability of the Shared Service to achieve its objectives.

Summary of Risks – October 2022

Risk Identification	Risk Number	Risk Name	Risk Rating
Shared Service Partners	1.	WYPF increases shared service membership	C 2
	2.	SLA not met and partner policies not maintained	D 2
	3.	Failure of Shared Service partners to consult or communicate over decisions that affect the service	D 2
Technical	4.	Failure to meet scheme regulation & pension legislation	D 2
	5.	Incorrect data/information or data/information not provided	C 2
	6.	Failure to communicate with scheme members, including disclosure regulations	D 2
	7.	Fraudulent activity by Shared Service staff, employers & scheme members	E 1
Service Delivery	8.	Funds leave Shared Service	D 2
	9.	High or increased volumes of work & legacy backlogs	B 2
Policies	10.	Pandemic, Epidemic & “Acts of God”	A 3
	11.	Software Failure	E 1
	12.	Failure of Cyber security	D 2
	13.	Failure to plan for or implement a Disaster Recovery plan	E 1

The process

Risk identification

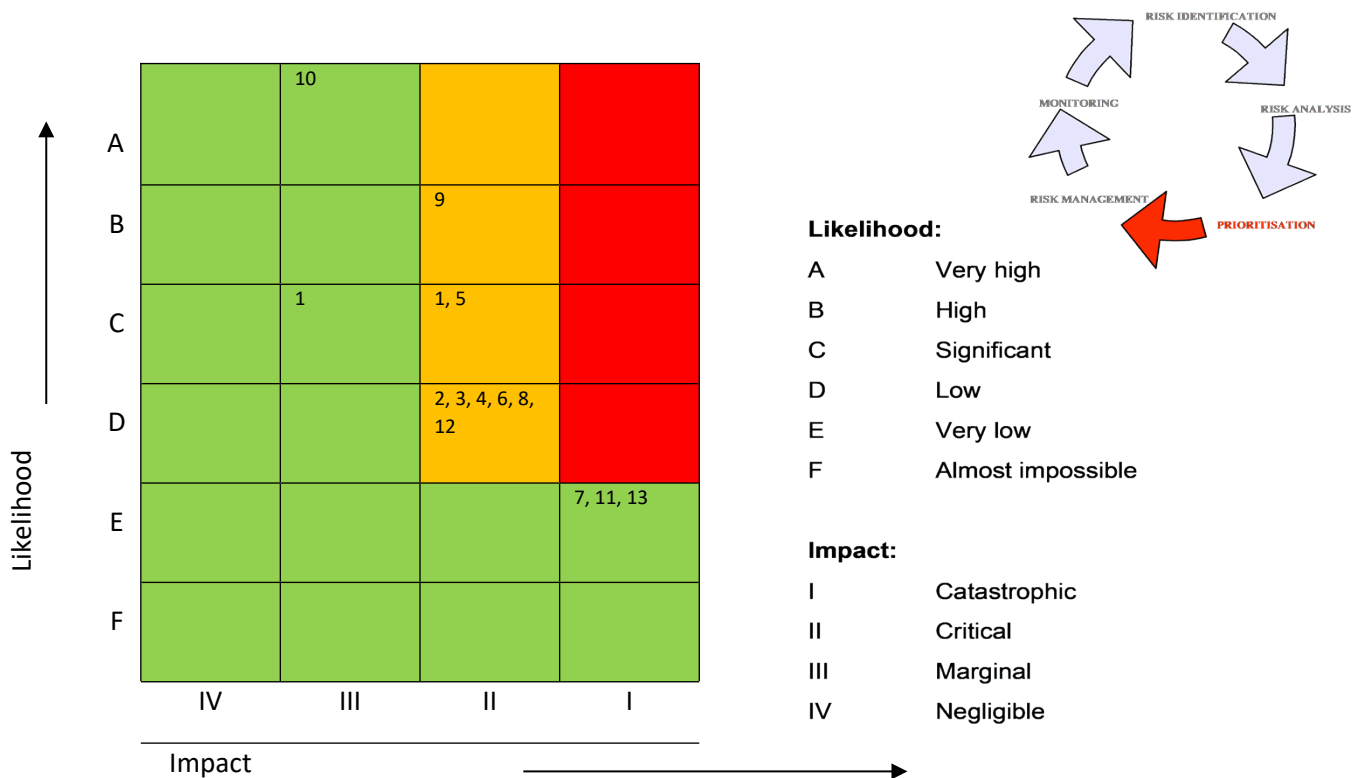
The first stage of the risk management cycle requires risk identification. This has been achieved through discussion with Key personnel at each of the Pension Funds within the Shared Service.

Risk analysis, profile and tolerance

The risks are assessed for impact and likelihood and plotted onto a matrix. The impact is measured as being negligible, marginal, critical or catastrophic. The likelihood is measured as being almost impossible, very low, low, significant, high or very high.

To determine the appetite to risk, each of the squares on the matrix are considered to decide if the Shared Service is prepared to live with a risk in that box or if it needs to be actively managed. This determines a theoretical tolerance line. Those risks above the line requiring further scrutiny and those below the line having sufficient control in place. The tolerance line is agreed at risks with a low or greater likelihood and a critical impact.

Initially 13 risks have been identified and framed into scenarios. The risks identified have been rated. The results are shown on the following risk profile and in summary on page one. These risks will be regularly assessed as part of a review process.



Risk management and monitoring

Management Action Plans (MAPs) frame the risk management actions that are required. They map out the target for each risk i.e. to reduce the likelihood, impact or both. They also include targets and critical success factors to allow the risk management action to be monitored.

The risk assessment identified that significant levels of activity are required to manage the risks. Key risks may periodically require attention and it is important that having identified risks that could have critical impact, that the when required appropriate action is undertaken. MAP's, therefore, may be agreed for any risks identified above the tolerance line.

Shared Service Risks

Risk	Rating	Risk Description & Controls in Place	Adequacy of Action and control	Required Management Action	Responsibility for Action	Critical Success Factors & KPIs	Review Frequency	Key Dates	Opportunity
1.	C 2	<p>WYPF tender for further administration clients.</p> <p>Periodically WYPF may be asked to tender for new business.</p> <p>In doing so capability and resource will be reviewed to deliver the shared service to the required standard and communicated to the Shared Service.</p>	<p>Ensure resources maintained for existing shared service members and capability demonstrated for the additional contractual obligations</p>	<p>WYPF to ensure KPI & SLA standards are met as a minimum, cost to existing Shared Service members remain value for money.</p> <p>Regular communication to Shared Service</p>	<p>WYPF to be open and transparent in communications and actions</p>	<p>Shared Service does not receive down turn in performance. Shared Service costs remain value for money</p>	Quarterly	1 April 2022	To increase knowledge and skills within Shared Service Or opportunity to hone exiting talent
2.	D 2	<p>Failure to meet minimum standards as set out in the SLA and policy documents.</p> <p>Policies written and shared with all stakeholders by all Shared Service partners</p> <p>Regular reporting and KPIs produced and discussed at regular meetings to determine if all parties meet the required standard.</p>	<p>Reporting to be provided monthly. To include work volumes, data transfer, accuracy, protection and KPI.</p> <p>Shared Service meetings held every 6 weeks and Collaboration Board meetings held quarterly at which key information relating to the administration of the Scheme(s) is provided. Ad hoc meetings can also be arranged for urgent items</p> <p>If standards not achieved reviews and amendments to service and processes may be required</p>	<p>Review and improve areas of concern. May include communications with employers and training for staff</p> <p>Policies to be reviewed and updated by shared service partners</p>	<p>WYPF for reporting. All parties to review their part of the processes and deliver minimum expected standards</p>	<p>Minimum SLA standards met.</p> <p>Satisfactory reporting, met KPIs with no data or training issues required.</p>	<p>Monthly reporting and Quarterly review</p>	1 Feb 2022	Opportunity to understand current outputs and to review and train where appropriate.
3.	D 2	<p>Failure of shared service partners to consult with each other over</p>	<p>Shared Service meetings held every 6 weeks and Collaboration Board</p>	<p>Review and share all policies.</p>	<p>Partners in agreement with or understand policy decisions</p>	<p>Satisfied partners full and efficient shared service</p>	monthly	1 Feb	Opportunity to build relationship, joined up

		<p>decisions that affect delivery of the service.</p> <p>Failure of Shared Service partners to communicate policy/decisions and to provide adequate and timely information to them</p>	<p>meetings held quarterly at which key information relating to the administration of the Scheme(s) is provided.</p> <p>Ad hoc meetings can also be arranged by any partner for urgent items</p>	<p>Communicate between partners and all employers.</p>					<p>thinking and work seamlessly as one service</p>
4.	D 2	<p>Failure to meet LGPS regulation & overriding legislation.</p> <p>Including implementation of regulation amendments, such as McCloud, and requirements of the Pension Regulator's (TPR) code of practice and compliance with DPA18 (GDPR) leading to incorrect benefits values and complaints</p>	<p>WYPF must liaise with authority bodies such as LGA, TPR, HMRC & DLUHC.</p> <p>Keep knowledge up to date through various sources such as training plans, working instructions, workflow processes, Team Briefs, internal and external training courses and events</p> <p>Ensure software updated and maintained</p> <p>Communicate & discuss with shared service partners</p>	<p>Attend webinars, seminars, conference.</p> <p>Work with software provider</p> <p>Communicate with members and employers</p>	All Shared Service	<p>Understanding, communication and implementation of statutory requirements</p> <p>Benefit values correct and no justifiable complaints</p>	Monthly	1 Oct 2022	<p>Opportunity to improve knowledge and process to deliver our statutory obligation</p>
5.	C 2	<p>Incorrect data/information or data/information not provided from any shared service partner or stakeholder or not provided in a timely manner.</p> <p>Leading to incorrect benefit values or the inability to process benefits at all and low TPR data scores.</p> <p>Data required by 19th of following month and WYPF have processes to communicate and chase stakeholders for information.</p>	<p>WYPF unable to complete processes. Time, effort and cost requesting and chasing data by WYPF.</p> <p>Data sometimes not received at all, WYPF unaware of work to process, complaints from scheme members</p>	<p>WYPF to inform Shared Service. Liaise with employers assist/train.</p> <p>Shared Service to support WYPF in this delivery even in the event of employer charge.</p> <p>Develop & implement automated processes.</p> <p>Review and where applicable amend existing processes</p>	If data not received following communication /chasing and or training shared service members to liaise with employers	<p>Shared Service and WYPF support each other, communication s clear and employers understand their responsibility and liability.</p>	Monthly	1 Feb 2022	<p>To improve data accuracy and reduce work required to collect data. Leading to better processes and improved KPIs</p> <p>Develop and introduce automation</p>
6.	D 2	<p>Failure to communicate all necessary and required information to scheme members including documents, website, emails</p>	<p>Officers keep up to date with disclosure regulations and distribute knowledge to teams accordingly via working instructions, changes to workflow processes,</p>	<p>Information always provide and accurate.</p> <p>Agreed support from Shared Service</p>	WYPF supported by Shared Service	<p>Information accurate and no complaints</p>	Quarterly	April 2022	<p>To ensure scheme information is compliant</p>

		<p>and scheme guides</p> <p>Providing information under disclosure regulations mandatory</p> <p>Failure to provide may cause misunderstanding and poor scheme member decision making.</p> <p>This may lead to complaint, investigation and sanction & loss of reputation</p>	<p>Team Brief or emails.</p> <p>Information of regulation to be understood by Shared Service and communicated to all stakeholders.</p> <p>Website, documents and scheme guides reviewed regularly</p>						
7.	E 1	<p>Fraudulent activity by Shared Service staff, employers & scheme members</p> <p>Causing overpayment of benefits, complaints, investigation, litigation, action and loss of reputation</p>	<p>Segregation of duties set out clear roles and responsibilities</p> <p>National Fraud Initiative participation and Internal audit of pensions.</p> <p>Implementation of amended transfer regulations wef 30 November 2021</p>	<p>Up to date and regular training of staff.</p> <p>Shared service share information and employers communicated too and updated with current knowledge.</p> <p>Appropriate information to members and information on website</p>	<p>All stake owners must be aware of fraud/scamming issues</p>	<p>Accurate information, timely communication. No Fraud and no complaints</p>	<p>Quarterly</p>	<p>April 2022</p>	<p>To ensure scheme information is compliant</p>
8.	D 2	<p>Risk Funds become dissatisfied and elect to leave the Shared Service partnership</p> <p>Creating additional work and need for resource to manage exit.</p> <p>Cost of Shared Service now spread across remaining members but may not provide good value for the level of service delivered.”</p>	<p>Shared Service meetings held every 6 weeks and Collaboration Board meetings held quarterly at which key information relating to the administration of the Scheme(s) is provided.</p> <p>If an exit, ensure resources maintained for existing shared service partners, costs are maintained and do not increase for remaining partners if there is an exit</p>	<p>To ensure there is not any dissatisfaction resulting in partner leaving the shared service</p>	<p>WYPF and then all partners.</p> <p>Resource adequate for exit and remaining partners. SLA, KPIs and costs reviewed, communicated and if necessary redistributed</p>	<p>Members do not leave or if leave no detrimental effect to remaining Funds</p>	<p>Quarterly</p>	<p>1 April 2022</p>	<p>Opportunity to deliver a successful service together or consolidate Shared Service membership to maintain standards upon an exit</p>
9.	B 2	<p>High or increased volumes of work & legacy backlogs</p> <p>WYPF unable to provide adequate resource to process daily work or reduce legacy backlogs.</p> <p>Performance declines, statutory deadlines missed, backlogs created/increased</p>	<p>Monthly reports to Shared Service monitoring changes to volumes and KPIs</p> <p>Review of resource, training and recruitment.</p> <p>Systems and processes reviewed and aligned with KPI reporting to continue to deliver SLA standards</p>	<p>Review all KPIs.</p> <p>Rolling recruitment programme to fill vacancies and train staff when appropriate</p> <p>Develop software and processes to deliver smarter service</p> <p>Develop and implement automation to increase productivity and free resource to</p>	<p>WYPF to review, report and communicate.</p> <p>Employer to provide accurate information in timely manner</p> <p>Supported by Shared Service partners</p>	<p>Legacy backlogs reduced, all current workload handled efficiently,</p> <p>Automation implemented in key areas</p> <p>KPI reporting consistent and accurate.</p> <p>Member experience</p>	<p>Monthly</p>	<p>1 Oct 2022</p>	<p>Opportunity to ensure resource is sufficient, improve processes and provision of software and introduce automation.</p>

		, complaints received. Monthly reporting necessary to identify potential issues and shared service partners to communicate early any variant to work, including indications from employers.		applied to critical areas such as backlogs Employer reminded/trained regarding responsibility and good data. Encouraged to inform WYPF asap of variants in workloads. Approach supported by Shared Service		maintained/imp roved			
10.	A 3	Failure to meet statutory obligations due to pandemic, epidemic and “acts of god” staff unable to travel and or are ill. Increased volumes of work and backlogs. Failure to meet statutory obligations that has potential to create new working environments and challenges in delivery of scheme administration	Ensure staff, colleagues and peers are well and able to work. Review all process and consider system development for automation. Concentrate on key areas as identified by TPR, SAB & LGA so that pensioners are paid and the most at risk treated as priority	Alternative working arrangements, including communication, WFH and virtual meetings and training. Develop and implement automation processes	WYPF & all Shared Service	Stakeholder ability to be flexible in working arrangements, including DR and ability to effectively work remotely.	Monthly	1 Oct 2022	Learn/continue to work in a different way. Develop new ways of processing and increase automation
11.	E 1	Failure of Software. Affecting data of scheme member records, benefits values and payments. Failure to meet statutory obligations Contractual obligations with software provider to run daily backups and restore system usage with SLA standards	Software backed up daily. DR to include contractual obligation of software provider. Staffed adequately trained and supported to perform manual calculations for most urgent processes. Current pensioners paid by rerun of last month payments.	Laisse with IT departments and software providers. Ensure all staff have knowledge and capability for short term workarounds. Consider alternative ways of data transfer (protected email, messages etc.) to enable employers to provide data to WYPF and WYPF to provide data to employers and scheme members.	All stakeholders	Continuity/reliability of software. Accurate data, automation and development. Ability to continue to meet statutory obligations and no justifiable complaints .	Monthly	1 Feb 2022	Opportunity to ensure software is best in class. Ensure staff have appropriate knowledge and skills to deliver manually.
12.	D 2	Failure of Cyber security. Failure to protect data and scheme members from scammers. Data breaches by staff and shared service results in member loss, complaint, sanction and loss of reputation. Mandatory Cyber security training require of all staff,	Ensure data received, sent and stored is protected, transferred and stored in compliance with DPA18 and is supported by AA IT and software provider	IT provide necessary industry protections including system daily backups and staff educated in cyber security issues Data protection retention policies & privacy notices to be shared between all stakeholders and retained by WYPF	All stakeholders to review IT and data protection provision, train staff and review	Fully trained staff. No cyber or data breaches	Daily, Monthly, Yearly	1 Feb 2022	To ensure new ways of working (WFH) are as secure, reliable, efficient and safe as office based cyber security. Staff awareness periodically updated. Data policies and stamen shared by between all data processes.

		cyber security standards as part of software providers contract.							
13.	E 1	<p>Failure to plan for or implement a Disaster Recovery plan.</p> <p>As part of WYPF business plan there should be an appropriate and effective disaster recovery (DR) plan to ensure statutory obligations are met in the event of a disaster, building fire, cyber-attack etc.</p> <p>All members of the Shared Service should also have a comparable DR.</p> <p>This would ensure all parties are aware of how they will continue to fulfil their statutory obligations in the event of a disaster and how each member should interact with the other in view of such an event.</p>	<p>The DR plan should clearly demonstrate how the business will continue to function.</p> <p>All DR plans should be shared between the shared service members and employers.</p>	<p>Ensure DR plans exist and are accessible.</p> <p>To test DR by taking down and restoring all systems.</p> <p>Ask employers if they have plans too and request a copy</p>	Shared Service and then all other stakeholders	Ability to function, communicate and meet statutory obligations in the event of a disaster.	Annually	1 Oct 2022	Opportunity to assist all stakeholders and to deliver a joined up service in the event of a disaster.

Future review and revision of risks

It is important that this work is monitored and measured and that management action plans are reassessed regularly to ensure that progress is being made and the targets can be met. In addition, each risk should be owned where possible by one or all members of the Shared Service partners to ensure that there is high level support, understanding and monitoring of the work that is required as part of the plans.

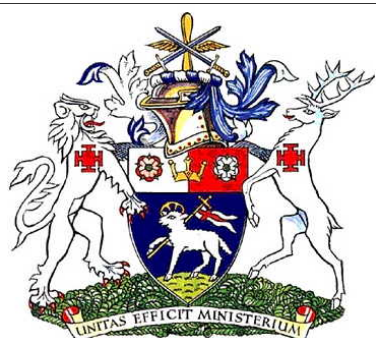
The Shared Service partners have agreed that the risk register will be added as a standing item to the Shared Service 6 weekly meetings and the timescale for re-visiting these risks in order to assess if they are still relevant and to identify new scenarios should be at the quarterly Collaboration Board.



Matt Mott

Oct 2022

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Local Pension Board

6 December 2022

Title	Decisions made by the Pension Fund Committee
Report of	Executive Director of Strategy and Resources (S151 officer)
Wards	n/a
Status	Public
Urgent	No
Key	No
Enclosures	None
Officer Contact Details	David Spreckley, Head of Pensions, david.spreckley@barnet.gov.uk - 020 8359 6264

Summary

Part of the role of the Local Pension Board is to ensure the effective governance of the Pension Fund. This role is not clearly defined but is deemed to include considering whether the decision-making processes of the Pension Fund Committee are reasonable or appropriate i.e. soundly based, consider relevant information, are consistent with the objectives and policies of the Fund and are taken after considering appropriate advice. The paper considers recent decisions by the Pension Fund Committee and summarises the rationale, the processes followed and the link with policy documents and regulations.

Officer Recommendations

That the Local Pension Board notes the procedures applied by the Pension Fund Committee when reaching decisions at recent meetings and considers any issues associated with those procedures and decisions.

1. WHY THIS REPORT IS NEEDED

- 1.1 The Board's role is to assist the administering authority in securing compliance with scheme regulations and other legislation relating to the governance and administration of the scheme and in ensuring the effective and efficient governance and administration of the LGPS for the LBB Pension Fund.
- 1.2 Part of the Board's role is to review the decision-making processes and ensure that these are soundly based, meet regulatory requirements and consider advice received as appropriate. While it is not appropriate for the Board to seek to replace its own judgments for those of the Pension Fund Committee, it is appropriate to review whether decisions have followed an appropriate process. Should the Board wish to make any comments or recommendations, these will be brought to the attention of the Pension Fund Committee.
- 1.3 Since the last Local Pension Board meeting there has been one meetings of the Pension Fund Committee where formal minutes have been published:

Meeting 11 July 2022

A link to the agenda pack and formal Minutes for the 11 July 2022 meeting is provided in Appendix A – **It is important that the Board reviews the agenda packs and formal minutes from this meeting to allow proper scrutiny to be made.**

Meeting 10 November 2022

At the time of writing this report, the formal minutes and noted decisions from the 10 November 2022 Pension Fund Committee meeting have not been finalised and so will not be covered in this report.

2. REASONS FOR RECOMMENDATIONS

- 2.1 The Local Pension Board may wish to review Pension Fund Committee decision making procedures as part of its role in assisting the administering authority on ensuring good governance.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 N/A. The paper does not propose options.

4. POST DECISION IMPLEMENTATION

- 4.1 Recommendations from the Board will be communicated to the next Pension Fund Committee meeting.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 Good management of the Pension Fund plays an essential and key role in providing assurance that the Pension Fund's financial risks are managed in an environment of sound

stewardship and control. This is in line with the aims set out in the Council's Corporate Plan, to ensure that services are delivered efficiently to get value for money for the taxpayer.

5.2 Resources (Finance and Value for Money, Procurement, Staffing, IT, Property, Sustainability)

5.2.1 None in the context of this report.

5.3 Social Value

5.3.1 There are no specific social value issues arising out of this report, however membership of the Pension Fund ensures the long-term financial health of contributing employees on retirement.

5.4 Legal and Constitutional References

5.4.1 The LGPS Regulations 2013 place responsibility for the local administration of pensions and other benefits under these Regulations on the administering authority, which is LB Barnet. The Public Service Pensions Act 2013 requires the Council to establish a Pension Board, whose role is to assist the Council in securing compliance with legislation, regulation and best practice, including as set out in the Pension Regulator's Code of Practice.

5.4.2 This paper considers the governance arrangement of the LGPS pension scheme that form part of the remit of the Local Pension Board.

5.4.3 Under the terms of reference for the Local Pension Board, the role of the Board is to assist with:

- compliance with LGPS Government regulations.
- compliance with the requirements imposed by the Pensions Regulator.
- such other matters as the LGPS regulations may specify ensure the effective and efficient governance and administration
- ensure the Pension Fund's strategy and policy documents are maintained in accordance with the LGPS Regulations.
- ensure the Pension Fund's internal Risk Register is reviewed at least annually.
- review the Pension Fund's performance in complying with the requirements of the LGPS Regulations

5.5 Risk Management

5.5.1 Risk management is central to the LGPS. LGPS pension funds are in themselves risk management tools, managing the risk that future employer income streams will be able to meet future pensions liabilities by creating a reserve from which future liabilities will be met.

5.5.2 Good governance is essential to ensuring that risks are identified and managed.

5.6 Equalities and Diversity

5.6.1 There are no Equalities and Diversity issues arising from this report.

5.6.2 Pursuant to the Equality Act 2010, the Council is under an obligation to have due regard to 1) eliminating unlawful discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; 2) advancing equality of opportunity between persons who share a relevant 'protected characteristic' and those who do not share it; and 3) fostering good relations between persons who share a relevant 'protected characteristic' and persons who do not share it. The 'protected characteristics' are: age, disability, gender reassignment, pregnancy, and maternity, race, religion or belief, sex and sexual orientation. The Council also has regard to the additional protected characteristic of marriage and civil partnership even though this does not apply to parts 2) and 3) (above) of the public-sector equality duty.

5.6.2 The rules governing admission to and participation in the Pension Fund are in keeping with the public-sector equality duty. The Public Sector Equality Duty requires public authorities in carrying out their functions, to have due regard to the need to achieve the objectives set out under s149 of the Equality Act 2010. Good governance arrangements and monitoring of the Pension Fund's managers will benefit everyone who contributes to the fund.

5.7 **Corporate Parenting**

5.7.1 N/A

5.8 **Consultation and Engagement**

5.8.1 The paper is part of the process of co-ordinating the activities of the Pension Fund Committee and Local Pension Board.

5.9 **Insight**

5.9.1 N/A.

6. **ENVIRONMENTAL IMPACT**

6.1 N/A

7. **BACKGROUND PAPERS**

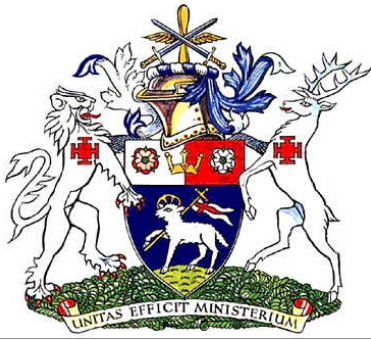
7.1 Papers and minutes of the Pension Fund Committee Meetings discussed can be located at:

[\(Public Pack\)Agenda Document for Pension Fund Committee, 11/07/2022 19:00 \(moderngov.co.uk\)](#)

Minutes for the 11 July meeting can be found from the following link:

[Agenda for Pension Fund Committee on Thursday 10th November, 2022, 6.00 pm \(moderngov.co.uk\)](#)

Some papers were exempt. If you would like to review exempt papers, please contact David Spreckley who can supply copies.



Local Pension Board

6 December 2022

Title	Pensions Scheme Risk Register
Report of	Executive Director of Strategy & Resources (S151 Officer)
Wards	N/A
Status	Public
Urgent	No
Key	No
Enclosures	Appendix A – Pensions Administration Risk Register: December 2022 Appendix B - WYPF Pension Administration Shared Service Risk Register
Officer Contact Details	Mark Fox, Pensions Manager – 0208 359 3341
Summary	
The Pensions Administration Risk Register is a standing agenda item for the Local Pension Board.	

Recommendations

That the Local Pension Board are requested to note the most recent risk register and the West Yorkshire Pension Fund (WYPF) shared service risk register.

1. WHY THIS REPORT IS NEEDED

- 1.1 It is important that the Council maintain the Pensions Risk Register to help protect members of the LGPS. The purpose of risk management is to identify potential problems before they occur, so that risk handling activities may be planned and invoked as needed to mitigate adverse impacts on achieving objectives
- 1.2 The most recent Pensions Administration Risk Register can be found in Appendix A.
- 1.3 The LBB Pensions Team will undertake a fundamental review of the administration risk register over the next six months, to consider if/how the document can be more useful to the Pensions Team and Local Pensions Board and Pension Fund Committee members (who review the register annually) from an operational perspective.
- 1.4 As previously advised to the Board, West Yorkshire Pension Fund (WYPF) have set up a shared service risk register, which establishes a risk management process across all their shared service clients. This incorporates the risks identified in the Barnet Fund's pensions administration risk register.
- 1.5 A representative from WYPF will provide an update at the meeting on the shared services risk register.

Risk Velocity

- 1.6 Risk Velocity is defined as the time to impact (i.e. an estimate of the timeframe within which a risk may occur).
- 1.7 Officers use a traffic light system to classify how risk velocity measured:
- Red – very rapid impact within a couple of days
Amber – risk may occur within a few days up to a couple of months
Green – a slow impact that may occur over several months or more
- 1.8 Officers have reviewed each of the risks on the risk register and have determined the risk velocity as follows:

Risk ID	Short Risk Title	Risk Velocity
PB001	Operational - disaster (Fire / flood etc)	Red
PB002	Member data incomplete or inaccurate	Amber
PB003	Admin process failure or maladministration	Amber
PB004	Excessive charges by suppliers	Green
PB005	Employer failure to pay contributions to the fund	Green
PB006	Failure of non-public sector employers	Green
PB007	Failure to interpret rules or legislation correctly	Green

PB008	Appropriate personnel in place to perform in designated roles	Yellow
PB009	Conflicts of interest	Green
PB010	Admission agreements / securities (i.e. bonds) not arranged	Green
PB011	Commercial viability of strategic suppliers	Green
PB012	Non-compliance with GDPR	Red
PB013	Negative media exposure and member experience	Red
PB015	Impact of pandemics on pensions administration	Yellow
PB016	Cyber security breach	Red
PB017	Risk of fraud by paying pensions to ineligible individuals or fraudulent arrangements	Yellow
PB018	Effect of new pensions legislation and LGPS regulations	Green

1.8 The Pensions Team has reviewed the Risk Velocity for each of the risks above and determined that there are no changes at present.

1.9 Updates on the administration risks are as follows:

1.9.1 **PB001** – The LBB Pensions Team has now reviewed the latest Disaster Recovery and Business Continuity Report received from WYPF. The Pensions Team is satisfied that WYPF have appropriate measures in place.

WYPF have advised that two further tests will take place in 2023.

The risk score remains at 5.

1.9.2 **PB002** – There is an employer forum meeting on 24 November 2022 where employers will be reminded of their responsibilities in relation to submitting leaver notifications and responding to WYPF on any data queries they may raise.

The LBB Pensions Team will also be contacting all employers before the end of the year regarding any historic leavers outstanding. Failure to meet deadlines imposed by the Pensions Team for leaver notifications to be submitted, will result in fines to the employer and reporting to The Pensions Regulator.

The risk score remains at 10.

1.9.3 **PB015** – WYPF have provided to the LBB Pensions Team with a copy of their Cyber Security report. The Pensions Team have reviewed this document and are satisfied that WYPF have sufficient controls in place to minimise the risk of a cyber incident occurring.

The risk score remains at 5.

2. REASONS FOR RECOMMENDATIONS

2.1 Management of risk is critical to avoiding unfavourable outcomes.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

3.1 Not applicable in the context of this report.

4. POST DECISION IMPLEMENTATION

4.1 Not applicable in the context of this report.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

5.1.1 The Local Pension Board supports delivery of Council's strategic objectives and priorities as expressed through the Corporate Plan (Barnet 2024) by assisting in maintaining the integrity of the Pension Fund by monitoring the administration and compliance of the Fund.

5.2 Resources (Finance & Value for Money, Procurement, Staffing, IT, Property, Sustainability)

5.2.1 Risks that are not mitigated or managed can have a financial penalty to the Scheme.

5.3 Social Value

5.3.1 Not applicable in the context of this report.

5.4 Legal and Constitutional References

5.4.1 The LGPS Regulations 2013 place responsibility for the local administration of pensions and other benefits under these Regulations on the administering authority, which is LB Barnet. The Local Government Pension Scheme (Amendment) (Governance) Regulations 2015 inserts regulation 106 into the Local Government Pension Scheme Regulations 2013 which requires the Council to establish a Pension Board, whose role is to assist the Council in securing compliance with legislation, regulation and best practice, including as set out in the Pension Regulator's Code of Practice to ensure the effective and efficient governance and administration of the Scheme and any connected scheme.

5.4.2 The Risk Register is a tool that assists the Board in ensuring that the Scheme has a mechanism in place to identify and review at least annually, the pension scheme administration risks

5.4.3 Under the terms of reference for the Local Pension Board, the role of the Board is to assist with:

- compliance with LGPS Government regulations.
- compliance with the requirements imposed by the Pensions Regulator.
- such other matters as the LGPS regulations may specify ensure the effective and efficient governance and administration
- ensure the Pension Fund's strategy and policy documents are maintained in accordance with the LGPS Regulations.
- ensure the Pension Fund's internal Risk Register is reviewed at least annually.
- review the Pension Fund's performance in complying with the requirements of the LGPS Regulations

5.5 Risk Management

5.5.1 Risk management is central to the LGPS. LGPS pension funds are in themselves risk management tools, managing the risk that future employer income streams will be able to meet future pensions liabilities by creating a reserve from which future liabilities will be met. Good governance is essential to managing the risks of the pension fund.

5.6 Equalities and Diversity

5.6.1 Pursuant to the Equalities Act 2010, the Council is under an obligation to have due regard to eliminating unlawful discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; advancing equality of opportunity between persons who share a relevant 'protected characteristic' and those who do not share it; and fostering good relations between persons who share a relevant 'protected characteristic' and persons who do not share it. The 'protected characteristics' are: age, disability, gender reassignment, pregnancy, and maternity, race, religion or belief, sex and sexual orientation, marriage and civil partnership.

5.6.2 The rules governing admission to and participation in the Pension Fund are in keeping with the public sector equality duty. The Public Sector Equality Duty requires public authorities in carrying out their functions, to have due regard to the need to achieve the objectives set out under s149 of the Equality Act 2010. Good governance arrangements will benefit everyone who contributes to the fund.

5.7 Corporate Parenting

5.7.1 Not applicable in the context of this report.

5.8 Consultation and Engagement

5.8.1 Not applicable.

5.9 **Insight**

5.9.1 Not applicable

6. **ENVIROMENTAL IMPACT**

None

7. **BACKGROUND PAPERS**

7.1 None

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB001	Operational - disaster (Fire / flood etc)	An event occurs that would impact the ability to deliver all / parts of the pension service.	Business Continuity	The administrator has Business Continuity Procedures and Disaster Recover Plans in place. The LBB Pensions Team have been updated with the latest version of the WYPF BCP (last review - January 2020). WYPF Business Continuity and Disaster Recovery Plans may be audited by either the internal audit team of Bradford Metropolitan	5	1	5	5	1	Tolerate	The LBB Pensions Team has reviewed the latest Disaster Recovery and Business Continuity Report received from WYPF. The Pensions Team is satisfied that WYPF have appropriate measures in place. WYPF have advised that two further tests will take place in 2023.	Q2, 2023	Aug-17

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				District Council or external auditors appointed by the Bradford Council.									

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB002	Member data incomplete or inaccurate	<p>To fulfil legal obligations, the pension service is dependent on receiving accurate information and data from scheme employers, and for the administrator to maintain member records.</p> <p>Incomplete and/or inaccurate information/ data could lead to incorrect benefit calculations. The Pension Regulator requires all pension schemes to maintain accurate data.</p> <p>Many unprocessed new</p>	Information Governance	<p>Employer Forums' to be held biannually to support scheme employers with returning the information / data required to ensure member records are accurate</p> <p>Common data analysis is now provided monthly by WYPF monthly and is showing improvements in data presence.</p> <p>The LBB Pensions Team have received assurance from</p>	5	2	10	3	2	Treat	<p>WYPF to advise the LBB Pensions Team when employers are not providing the relevant information, appropriate action can be taken.</p> <p>The LBB Pensions Team have contacted all relevant employers with unprocessed leavers, so member benefits can be calculated, and records be updated. This is an ongoing process and will be repeated</p>	<p>Ongoing</p> <p>Ongoing</p>	Aug-17

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
		<p>joiners and leavers were identified in the 2019 valuation process, along with incorrect pensionable salary and CARE for members who have two job roles.</p>		<p>Bradford City Council's Internal Audit team on controls in place on UPM for automated calculations and how WYPF processes for non-automated calculations are reviewed.</p> <p>Training sessions on providing leaver data took place in February 2022, with employers being reminded of their responsibilities and the option for the Administering</p>							<p>before the end of 2022.</p> <p>Another employer forum meeting will be held on 24 November where employers will be reminded of their responsibilities.</p>	Q4, 2022	

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				<p>Authority to issue fines and report to TPR.</p> <p>Final cut of valuation data has been submitted by WYPF to Hymans. Work has been completed to correct most of the critical data errors identified.</p>									

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB003	Admin process failure or mal-administration	<p>Administration of the pension scheme should be in line with the Local Government Pension Scheme (LGPS) rules.</p> <p>Issues with the Annual Benefit Statement process and Pensions Savings Statements from previous tax years not issued in line with statutory deadlines.</p>	Statutory Duty	<p>Ongoing dialogue between Barnet and WYPF through weekly and monthly meetings</p> <p>Formal agreement in place with WYPF, including agreed SLA's.</p> <p>Authority level clearly agreed and kept up to date, including clear definition of delegated authorities and individual approval authorities.</p> <p>Scheme Event Calendar in</p>	5	2	10	2	1	Treat	<p>The LBB Pensions Team have reviewed the latest WYPF ISO9001 and ISO27001 reports on Quality Management and Information Security Management respectively, which details the controls in place at WYPF.</p> <p>This determines who can authorise and sanction large payments.</p> <p>Scheme Event Calendar in place and reviewed annually.</p>	<p>Annual</p> <p>Annual</p>	Aug-17

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				<p>place to ensure legislative / regulatory deadlines are achieved (i.e., ABS / Scheme Return etc.)</p> <p>Staff training plans in place to ensure processing in accordance with LGPS requirements</p> <p>Monthly reports by WYPF to scheme managers.</p>							<p>Any errors or issues identified by WYPF are advised to The LBB Pensions Team, on the monthly report or earlier, if deemed appropriate.</p>	Ongoing	

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB004	Excessive charges by suppliers	The cost of running the pension scheme should not exceed the agreed budget.	Finance	Pension scheme budget agreed annually. Periodic review of suppliers.	2	1	2	2	1	Treat	Budget to be agreed annually.	Annually	Aug-17
PB005	Employer failure to pay contributions to the fund	The fund does not receive the correct amount of contributions from employers to fund employee pension liabilities, leading to a scheme deficit.	Finance	Monthly reconciliation of contribution payments received by the LBB and WYPF. Ongoing dialogue with employers around when contributions are due. LBB to monitor receipt of contributions (both on time and late).	2	2	4	2	1	Treat	The LBB Pensions Team check monthly that employers pay the correct contributions rates. New Admitted Bodies are asked to commence paying contributions as soon as possible (prior to the Admission Agreement has not been signed).	Monthly	Aug-17

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				<p>The LBB Pensions Team will enforce the collection of contributions and other costs from employers by threatening the use of fines and reporting to TPR, if applicable.</p> <p>Revised procedures have been implemented to improve the collection of strain cost invoices.</p>									

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB006	Failure of non-public sector employers	Should admitted bodies default on payments, the fund is left with additional pension liabilities.	Finance	<p>LB Barnet Pension Team monitoring of employer covenant and business strength.</p> <p>The backlog of admission agreements and bonds that increase the risk of an unrecovered shortfall are reducing.</p> <p>The LBB Pensions Team now have access to a Hymans modeller, enabling calculation of the employer's</p>	2	2	4	2	2	Treat	<p>Review all admitted bodies to ensure an appropriate bond/guarantee is in place and reporting into the Pension Fund Committee.</p> <p>The LBB Pensions Team work with both WYPF and Hymans Robertson to ensure that new Agreements are completed and signed in good time.</p>	<p>Ongoing</p> <p>Ongoing</p>	Aug-17

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				contribution rate, thus speeding up the admission process.									
PB007	Failure to interpret rules or legislation correctly	The Board does not have the level of pension knowledge to perform their role effectively.	Compliance	<p>Up to date training log in place, showing completion of training material.</p> <p>Technical advice and updates formally noted on training log.</p> <p>Training Policy drafted for approval by the Local Pensions Board.</p>	2	1	2	2	1	Tolerate	<p>No further actions required; risk has reached its target score and is being tolerated with the existing controls and mitigations in place.</p> <p>Board Training to be a standing item at each meeting with appropriate training to be arranged over the course of 2022 and beyond.</p>	N/A Ongoing	Aug-17

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB008	Appropriate personnel in place to perform in designated roles	WYPF does not comply with statutory obligations and is unable to evidence appropriate governance.	Compliance	Ensure that the personnel in key roles in relation to the administration of the Fund are suitably experienced and qualified to perform in their roles and have the appropriate authorities to ensure the administration is always executed effectively.	4	2	8	2	1	Treat	Review of roles and responsibilities of relevant individuals to ensure individuals hold appropriate authorities or there is clear escalation of issues requiring decisions. Annual appraisal reviews and setting of objectives	Ongoing Annual	Aug-17

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB009	Conflicts of interest	Decisions made may be influenced by other factors and may be subject to challenge.	Compliance	<p>Statutory Duty Pension Board awareness of legal responsibility.</p> <p>All Pension Board members to declare any conflicts and potential conflicts.</p> <p>All pension board members have completed relevant educational material.</p> <p>All conflict of interest documentation signed by all board members and recorded in conflict of</p>	3	1	3	3	1	Tolerate	No further actions required; risk has reached its target score and is being tolerated with the existing controls and mitigations in place.	N/A	Aug-17

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				interest register Any changes to be included with minutes at each meeting.									

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB010	Admission agreements/ securities (i.e. bonds) not arranged	<p>Should an employer not be admitted to the Fund in a timely manner then employees will not be able to draw their benefits or have access to death in service benefits relating to the LGPS.</p> <p>This could result in intervention from TPR possibly resulting in a financial consequence and reputational damage to the Council.</p>	Compliance	<p>The LBB Pensions Team is working with Hymans, WYPF, HB Law and employers to improve the process for arranging for admission agreements and bonds/bond renewals to be put in place and to address the backlog.</p> <p>LB Barnet Pension Team monitoring of employer covenant and business strength.</p> <p>The backlog of admission</p>	3	2	6	2	2	Treat	<p>Review all admitted bodies to ensure an appropriate bond/guarantee is in place and reporting into the Pension Fund Committee.</p> <p>Progress continues to be made on the processing of admission agreements and bonds.</p> <p>The LBB Pensions Team are working with both WYPF and Hymans Robertson to ensure new Agreements are completed and signed promptly.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	Jan-19

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				<p>agreements and bonds are reducing.</p> <p>The LBB Pensions Team now have access to a Hymans modeller, enabling calculation of the employer's contribution rate, thus speeding up the admission process.</p>									
PB011	Commercial viability of strategic suppliers	If the commercial viability of a strategic supplier declines this could lead to operational	Business Continuity	Administration has few suppliers - WYPF, Civica (indirect),	4	1	4	4	1	Treat	As WYPF are part of a local authority, they will not go out of business. If they cease providing	Ongoing	Mar-19

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
		failings resulting in service disruption/reduction, failure to complete statutory duties and financial costs.		<p>Hymans (actuarial).</p> <p>Contract management framework, with policy and procedures for commercial activity.</p> <p>Contract monitoring takes place monthly with quarterly reporting to Financial Performance and Contracts Committee.</p> <p>Contract register kept under review with checks on financial status of strategic</p>							third party admin services, this will likely be over a reasonable period. This will enable The LBB Pensions Team enough time to find an alternative provider. This can be done by using the National LGPS Framework.		

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				suppliers. Contract management arrangements in place, including indicators to identify financial stress. Business continuity plans in place.									

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB012	Non-compliance with GDPR	Failure to adhere to GDPR may lead to the breach of GDPR regulations (e.g. breach of personal information), which will result in enforcement action from TPR and the ICO, resulting in financial and reputational impact on the Council.	Statutory Duty	<p>The LBB Pensions Team are required to engage with GDPR eLearning to be trained on GDPR regulations.</p> <p>WYPF staff must complete GDPR awareness training and more in-depth training if they are involved in the processing of personal data.</p>	3	2	6	2	1	Tolerate	<p>WYPF ensure that all employees responsible for handling personal data will receive appropriate training in the use and control of this data.</p> <p>The LBB Pensions Team who are responsible for sensitive personal data also receive training appropriate to their roles.</p> <p>The LBB Pensions Team will report any potential data breaches to the Council’s Data Protection Team for review and advice.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	Mar-19

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB013	Negative media exposure and member experience	<p>Negative media attention may lead to ineffective media management impacting on the reputation of the Council and impacting on staff morale.</p> <p>Member perception of the Fund may be negatively impacted due to both member experience and negative reporting of the fund in the media.</p>	Staffing and Culture	<p>Staffing and Culture Communication team to liaise with S151 Officer as and when a media enquiry arises.</p> <p>The LBB Pensions Team to provide regular communication on the Barnet Fund when changes or issues occur</p>	4	1	4	2	1	Tolerate	<p>Press releases to be shared with Local Pension Board members prior to publication (if possible).</p> <p>Member experience to be measured by satisfaction surveys and feedback by WYPF. Last results received for quarter ending 30 June 2022 received by the LBB Pensions Team in July 2022.</p> <p>The LBB Pensions Team and WYPF to discuss issues weekly.</p>	<p>Ongoing</p> <p>Every 3 months</p> <p>Ongoing</p>	Mar-19

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB014	Impact of COVID-19 and staffing issues on pensions administration	Administration processes and levels being maintained whilst administrators working from home with no detrimental effect on the payment of members benefits and general service levels.	Business Continuity	WYPF have developed their own Business Continuity plan., This is to be shared with Council The LBB Pensions Team. The LBB Pensions Team will monitor service levels through regular reports and calls with WYPF.	4	2	8	2	1	Treat	<p>The LBB Pensions Team to monitor performance levels, complaints and resourcing levels. Any major dip in levels should be raised with Senior Management at WYPF and Commercial Team at the Council.</p> <p>WYPF staff have started hybrid working arrangements.</p> <p>Recent issues with WYPF staff absences and unfilled vacancies have been discussed with senior management at</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	Apr-20

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
											WYPF and will continue to be reviewed until the LBB Pensions Team are satisfied that the risk of detrimental effect on WYPF performance has reduced.		
PB015	Cyber security	<p>The Fund holds large amounts of personal data which can make them a target for fraudsters and criminals. Steps need to be taken to protect members which includes protecting them against the ‘cyber risk’.</p> <p>This can be defined as the</p>	Compliance	WYPF, as part of its Information Governance Toolkit, has adopted a Cyber Security policy which outlines how the Fund protects members’ data from incidents of Cyber Crime and risk of hacking together with outlining the Fund’s control	5	1	5	2	2	Treat	WYPF have provided to the LBB Pensions Team a copy of their Cyber Security report. The LBB Pensions Team have reviewed this document and are satisfied that WYPF have sufficient controls in place to minimise the risk of a cyber-	Q4, 2022	Jun-20

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
		risk of loss, disruption or damage to the fund or its members as a result of the failure of its information technology systems and processes. It includes risks to information (data security) as well as assets, and both internal risks (eg from staff) and external risks (eg hacking).		mechanisms for its pension administration software system.							incident occurring. The LBB Pensions Team to check whether the WYPF policy is updated in line with the TPR cyber security principles.	Q4, 2022	

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB016	Risk of fraud by paying pensions to ineligible individuals or fraudulent arrangements	The Fund should evaluate the various forms of fraud in relation to pensions administration and then arrange for the implementation of appropriate controls that are both proportionate and pragmatic.	Compliance	<p>WYPF run an annual pensioner existence to ensure that pensioners still alive and that pensions are being paid to the correct member.</p> <p>Pension transfer documentation sent to members contains the recommended literature from The Pensions Regulator so make members aware of “pension scams” and the administration processes to</p>	4	2	8	2	1	Treat	<p>WYPF to update the LBB Pensions Team the results of the pensioner existence exercise and where members have not responded, their pension will be suspended until the pensioner returns their certificate. Exercise commenced in October 2021. Next exercise for overseas pensioners to commence in November 2022.</p> <p>The LBB Pensions Team to review transfer documentation sent with transfer</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Q1, 2023</p>	Aug-20

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
				<p>ensure proper checks on the receiving arrangement before making payment.</p> <p>Regulations were laid before Parliament on 8 November 2021 that intend to protect departing members from pension scams and will require trustees and other pension providers to urgently review their transfer processes and policies.</p>							<p>quotations to members and review the processes to ensure that appropriate checks are being taken to prevent transfer value payments being made to “pension scam” arrangements.</p> <p>The LBB Pensions Team to ensure that WYPF processes consider these new regulations and have requested details of all transfer payments made every six months.</p>	Ongoing	

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
											WYPF have confirmed that they will be signing up to TPR Pensions Pledge, which is a new initiative to: <ul style="list-style-type: none"> • raise awareness of the risks of scams • educating administrators and Boards on the best practice for due diligence around transfers • doing all they can to protect their members. 	Ongoing	

Last Updated:18/11/2022

London Borough of Barnet Pension Fund – Pensions Administration Risk Register – December 2022

Risk ID	Short Risk Title	Long Description	Nature of Risk	Controls and mitigations in place	Residual Risk			Target Risk			Further actions		Date risk identified
					Impact	Likelihood	Risk Score	Impact	Likelihood	Response Option	Actions	Delivery due date	
PB017	Effect of new pensions legislation and LGPS regulations (including the proposed increase in State Pension Age) on the provision of pension benefits to members of the Fund.	<p>New pensions legislation or updates to the LGPS regulations can influence members pension benefits within the Fund. An example would be the proposed increase in State Pension Age (SPA) currently proposed to increase from age 67 to 68 between 2044 and 2046.</p> <p>As the LGPS normal retirement age is linked to SPA, this will have an effect for members born on or after 1978.</p>	Statutory Duty	<p>The LBB Pensions Team to monitor and review updates to pensions legislation to determine the impact on members benefits.</p> <p>This will be in conjunction with WYPF, Hymans Robertson and other bodies to enable relevant communication to be sent to appropriate parties.</p>	4	2	8	2	3	Treat	The LBB Pensions Team to ensure that legislative changes are reviewed as soon as possible, so that any impact on members and employers are communicated clearly and promptly.	Ongoing	

Last Updated:18/11/2022

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The Pension Administration Shared Service Risk Register

Introduction

As part of the continued collaboration between members of the Shared Service, London Borough of Barnet Pension Fund, London Borough of Hounslow Pension Fund, Lincolnshire Pension Fund and West Yorkshire Pension Fund (WYPF), this Risk Management Plan establishes the process for implementing proactive risk management as part of the overall management of the Pensions Shared Service. The purpose of risk management is to identify potential problems before they occur, so that risk handling activities may be planned and invoked as needed to mitigate adverse impacts on achieving objectives. Risk management is a continuous, forward looking process that addresses issues that could endanger the achievement of critical objectives and includes the early risk identification through the collaboration and involvement of relevant stakeholders.

The Shared Service has initially identified 13 risks which have been rated and plotted on a matrix and a risk tolerance line agreed to prioritise the risks. The risk matrix measures each risk for its likelihood and impact in terms of its potential for affecting the ability of the Shared Service to achieve its objectives.

Summary of Risks – October 2022

Risk Identification	Risk Number	Risk Name	Risk Rating
Shared Service Partners	1.	WYPF increases shared service membership	C 2
	2.	SLA not met and partner policies not maintained	D 2
	3.	Failure of Shared Service partners to consult or communicate over decisions that affect the service	D 2
Technical	4.	Failure to meet scheme regulation & pension legislation	D 2
	5.	Incorrect data/information or data/information not provided	C 2
	6.	Failure to communicate with scheme members, including disclosure regulations	D 2
	7.	Fraudulent activity by Shared Service staff, employers & scheme members	E 1
Service Delivery	8.	Funds leave Shared Service	D 2
	9.	High or increased volumes of work & legacy backlogs	B 2
Policies	10.	Pandemic, Epidemic & "Acts of God"	A 3
	11.	Software Failure	E 1
	12.	Failure of Cyber security	D 2
	13.	Failure to plan for or implement a Disaster Recovery plan	E 1

The process

Risk identification

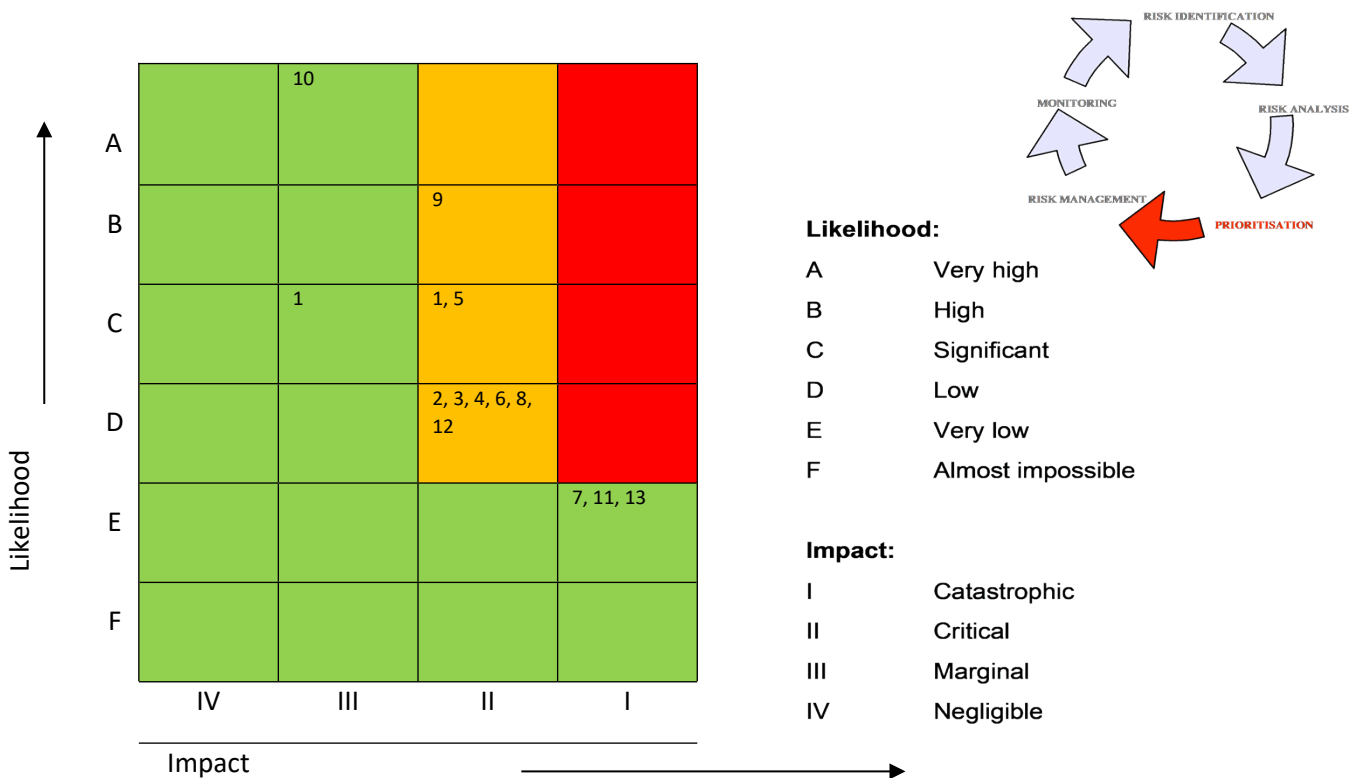
The first stage of the risk management cycle requires risk identification. This has been achieved through discussion with Key personnel at each of the Pension Funds within the Shared Service.

Risk analysis, profile and tolerance

The risks are assessed for impact and likelihood and plotted onto a matrix. The impact is measured as being negligible, marginal, critical or catastrophic. The likelihood is measured as being almost impossible, very low, low, significant, high or very high.

To determine the appetite to risk, each of the squares on the matrix are considered to decide if the Shared Service is prepared to live with a risk in that box or if it needs to be actively managed. This determines a theoretical tolerance line. Those risks above the line requiring further scrutiny and those below the line having sufficient control in place. The tolerance line is agreed at risks with a low or greater likelihood and a critical impact.

Initially 13 risks have been identified and framed into scenarios. The risks identified have been rated. The results are shown on the following risk profile and in summary on page one. These risks will be regularly assessed as part of a review process.



Risk management and monitoring

Management Action Plans (MAPs) frame the risk management actions that are required. They map out the target for each risk i.e. to reduce the likelihood, impact or both. They also include targets and critical success factors to allow the risk management action to be monitored.

The risk assessment identified that significant levels of activity are required to manage the risks. Key risks may periodically require attention and it is important that having identified risks that could have critical impact, that the when required appropriate action is undertaken. MAP's, therefore, may be agreed for any risks identified above the tolerance line.

Shared Service Risks

Risk	Rating	Risk Description & Controls in Place	Adequacy of Action and control	Required Management Action	Responsibility for Action	Critical Success Factors & KPIs	Review Frequency	Key Dates	Opportunity
1.	C 2	<p>WYPF tender for further administration clients.</p> <p>Periodically WYPF may be asked to tender for new business.</p> <p>In doing so capability and resource will be reviewed to deliver the shared service to the required standard and communicated to the Shared Service.</p>	<p>Ensure resources maintained for existing shared service members and capability demonstrated for the additional contractual obligations</p>	<p>WYPF to ensure KPI & SLA standards are met as a minimum, cost to existing Shared Service members remain value for money.</p> <p>Regular communication to Shared Service</p>	<p>WYPF to be open and transparent in communications and actions</p>	<p>Shared Service does not receive down turn in performance. Shared Service costs remain value for money</p>	Quarterly	1 April 2022	To increase knowledge and skills within Shared Service Or opportunity to hone exiting talent
2.	D 2	<p>Failure to meet minimum standards as set out in the SLA and policy documents.</p> <p>Policies written and shared with all stakeholders by all Shared Service partners</p> <p>Regular reporting and KPIs produced and discussed at regular meetings to determine if all parties meet the required standard.</p>	<p>Reporting to be provided monthly. To include work volumes, data transfer, accuracy, protection and KPI.</p> <p>Shared Service meetings held every 6 weeks and Collaboration Board meetings held quarterly at which key information relating to the administration of the Scheme(s) is provided. Ad hoc meetings can also be arranged for urgent items</p> <p>If standards not achieved reviews and amendments to service and processes may be required</p>	<p>Review and improve areas of concern. May include communications with employers and training for staff</p> <p>Policies to be reviewed and updated by shared service partners</p>	<p>WYPF for reporting. All parties to review their part of the processes and deliver minimum expected standards</p>	<p>Minimum SLA standards met.</p> <p>Satisfactory reporting, met KPIs with no data or training issues required.</p>	<p>Monthly reporting and Quarterly review</p>	1 Feb 2022	Opportunity to understand current outputs and to review and train where appropriate.
3.	D 2	<p>Failure of shared service partners to consult with each other over</p>	<p>Shared Service meetings held every 6 weeks and Collaboration Board</p>	<p>Review and share all policies.</p>	<p>Partners in agreement with or understand policy decisions</p>	<p>Satisfied partners full and efficient shared service</p>	monthly	1 Feb	Opportunity to build relationship, joined up

		<p>decisions that affect delivery of the service.</p> <p>Failure of Shared Service partners to communicate policy/decisions and to provide adequate and timely information to them</p>	<p>meetings held quarterly at which key information relating to the administration of the Scheme(s) is provided.</p> <p>Ad hoc meetings can also be arranged by any partner for urgent items</p>	<p>Communicate between partners and all employers.</p>					<p>thinking and work seamlessly as one service</p>
4.	D 2	<p>Failure to meet LGPS regulation & overriding legislation.</p> <p>Including implementation of regulation amendments, such as McCloud, and requirements of the Pension Regulator's (TPR) code of practice and compliance with DPA18 (GDPR) leading to incorrect benefits values and complaints</p>	<p>WYPF must liaise with authority bodies such as LGA, TPR, HMRC & DLUHC.</p> <p>Keep knowledge up to date through various sources such as training plans, working instructions, workflow processes, Team Briefs, internal and external training courses and events</p> <p>Ensure software updated and maintained</p> <p>Communicate & discuss with shared service partners</p>	<p>Attend webinars, seminars, conference.</p> <p>Work with software provider</p> <p>Communicate with members and employers</p>	All Shared Service	<p>Understanding, communication and implementation of statutory requirements</p> <p>Benefit values correct and no justifiable complaints</p>	Monthly	1 Oct 2022	<p>Opportunity to improve knowledge and process to deliver our statutory obligation</p>
5.	C 2	<p>Incorrect data/information or data/information not provided from any shared service partner or stakeholder or not provided in a timely manner.</p> <p>Leading to incorrect benefit values or the inability to process benefits at all and low TPR data scores.</p> <p>Data required by 19th of following month and WYPF have processes to communicate and chase stakeholders for information.</p>	<p>WYPF unable to complete processes. Time, effort and cost requesting and chasing data by WYPF.</p> <p>Data sometimes not received at all, WYPF unaware of work to process, complaints from scheme members</p>	<p>WYPF to inform Shared Service. Liaise with employers assist/train.</p> <p>Shared Service to support WYPF in this delivery even in the event of employer charge.</p> <p>Develop & implement automated processes.</p> <p>Review and where applicable amend existing processes</p>	If data not received following communication /chasing and or training shared service members to liaise with employers	<p>Shared Service and WYPF support each other, communication s clear and employers understand their responsibility and liability.</p>	Monthly	1 Feb 2022	<p>To improve data accuracy and reduce work required to collect data. Leading to better processes and improved KPIs</p> <p>Develop and introduce automation</p>
6.	D 2	<p>Failure to communicate all necessary and required information to scheme members including documents, website, emails</p>	<p>Officers keep up to date with disclosure regulations and distribute knowledge to teams accordingly via working instructions, changes to workflow processes,</p>	<p>Information always provide and accurate.</p> <p>Agreed support from Shared Service</p>	WYPF supported by Shared Service	<p>Information accurate and no complaints</p>	Quarterly	April 2022	<p>To ensure scheme information is compliant</p>

		<p>and scheme guides</p> <p>Providing information under disclosure regulations mandatory</p> <p>Failure to provide may cause misunderstanding and poor scheme member decision making.</p> <p>This may lead to complaint, investigation and sanction & loss of reputation</p>	<p>Team Brief or emails.</p> <p>Information of regulation to be understood by Shared Service and communicated to all stakeholders.</p> <p>Website, documents and scheme guides reviewed regularly</p>						
7.	E 1	<p>Fraudulent activity by Shared Service staff, employers & scheme members</p> <p>Causing overpayment of benefits, complaints, investigation, litigation, action and loss of reputation</p>	<p>Segregation of duties set out clear roles and responsibilities</p> <p>National Fraud Initiative participation and Internal audit of pensions.</p> <p>Implementation of amended transfer regulations wef 30 November 2021</p>	<p>Up to date and regular training of staff.</p> <p>Shared service share information and employers communicated too and updated with current knowledge.</p> <p>Appropriate information to members and information on website</p>	<p>All stake owners must be aware of fraud/scamming issues</p>	<p>Accurate information, timely communication. No Fraud and no complaints</p>	<p>Quarterly</p>	<p>April 2022</p>	<p>To ensure scheme information is compliant</p>
8.	D 2	<p>Risk Funds become dissatisfied and elect to leave the Shared Service partnership</p> <p>Creating additional work and need for resource to manage exit.</p> <p>Cost of Shared Service now spread across remaining members but may not provide good value for the level of service delivered.”</p>	<p>Shared Service meetings held every 6 weeks and Collaboration Board meetings held quarterly at which key information relating to the administration of the Scheme(s) is provided.</p> <p>If an exit, ensure resources maintained for existing shared service partners, costs are maintained and do not increase for remaining partners if there is an exit</p>	<p>To ensure there is not any dissatisfaction resulting in partner leaving the shared service</p>	<p>WYPF and then all partners.</p> <p>Resource adequate for exit and remaining partners. SLA, KPIs and costs reviewed, communicated and if necessary redistributed</p>	<p>Members do not leave or if leave no detrimental effect to remaining Funds</p>	<p>Quarterly</p>	<p>1 April 2022</p>	<p>Opportunity to deliver a successful service together or consolidate Shared Service membership to maintain standards upon an exit</p>
9.	B 2	<p>High or increased volumes of work & legacy backlogs</p> <p>WYPF unable to provide adequate resource to process daily work or reduce legacy backlogs.</p> <p>Performance declines, statutory deadlines missed, backlogs created/increased</p>	<p>Monthly reports to Shared Service monitoring changes to volumes and KPIs</p> <p>Review of resource, training and recruitment.</p> <p>Systems and processes reviewed and aligned with KPI reporting to continue to deliver SLA standards</p>	<p>Review all KPIs.</p> <p>Rolling recruitment programme to fill vacancies and train staff when appropriate</p> <p>Develop software and processes to deliver smarter service</p> <p>Develop and implement automation to increase productivity and free resource to</p>	<p>WYPF to review, report and communicate.</p> <p>Employer to provide accurate information in timely manner</p> <p>Supported by Shared Service partners</p>	<p>Legacy backlogs reduced, all current workload handled efficiently,</p> <p>Automation implemented in key areas</p> <p>KPI reporting consistent and accurate.</p> <p>Member experience</p>	<p>Monthly</p>	<p>1 Oct 2022</p>	<p>Opportunity to ensure resource is sufficient, improve processes and provision of software and introduce automation.</p>

		, complaints received. Monthly reporting necessary to identify potential issues and shared service partners to communicate early any variant to work, including indications from employers.		applied to critical areas such as backlogs Employer reminded/trained regarding responsibility and good data. Encouraged to inform WYPF asap of variants in workloads. Approach supported by Shared Service		maintained/imp roved			
10.	A 3	Failure to meet statutory obligations due to pandemic, epidemic and “acts of god” staff unable to travel and or are ill. Increased volumes of work and backlogs. Failure to meet statutory obligations that has potential to create new working environments and challenges in delivery of scheme administration	Ensure staff, colleagues and peers are well and able to work. Review all process and consider system development for automation. Concentrate on key areas as identified by TPR, SAB & LGA so that pensioners are paid and the most at risk treated as priority	Alternative working arrangements, including communication, WFH and virtual meetings and training. Develop and implement automation processes	WYPF & all Shared Service	Stakeholder ability to be flexible in working arrangements, including DR and ability to effectively work remotely.	Monthly	1 Oct 2022	Learn/continue to work in a different way. Develop new ways of processing and increase automation
11.	E 1	Failure of Software. Affecting data of scheme member records, benefits values and payments. Failure to meet statutory obligations Contractual obligations with software provider to run daily backups and restore system usage with SLA standards	Software backed up daily. DR to include contractual obligation of software provider. Staffed adequately trained and supported to perform manual calculations for most urgent processes. Current pensioners paid by rerun of last month payments.	Laisse with IT departments and software providers. Ensure all staff have knowledge and capability for short term workarounds. Consider alternative ways of data transfer (protected email, messages etc.) to enable employers to provide data to WYPF and WYPF to provide data to employers and scheme members.	All stakeholders	Continuity/reliability of software. Accurate data, automation and development. Ability to continue to meet statutory obligations and no justifiable complaints .	Monthly	1 Feb 2022	Opportunity to ensure software is best in class. Ensure staff have appropriate knowledge and skills to deliver manually.
12.	D 2	Failure of Cyber security. Failure to protect data and scheme members from scammers. Data breaches by staff and shared service results in member loss, complaint, sanction and loss of reputation. Mandatory Cyber security training require of all staff,	Ensure data received, sent and stored is protected, transferred and stored in compliance with DPA18 and is supported by AA IT and software provider	IT provide necessary industry protections including system daily backups and staff educated in cyber security issues Data protection retention policies & privacy notices to be shared between all stakeholders and retained by WYPF	All stakeholders to review IT and data protection provision, train staff and review	Fully trained staff. No cyber or data breaches	Daily, Monthly, Yearly	1 Feb 2022	To ensure new ways of working (WFH) are as secure, reliable, efficient and safe as office based cyber security. Staff awareness periodically updated. Data policies and stamen shared by between all data processors.

		cyber security standards as part of software providers contract.							
13.	E 1	<p>Failure to plan for or implement a Disaster Recovery plan.</p> <p>As part of WYPF business plan there should be an appropriate and effective disaster recovery (DR) plan to ensure statutory obligations are met in the event of a disaster, building fire, cyber-attack etc.</p> <p>All members of the Shared Service should also have a comparable DR.</p> <p>This would ensure all parties are aware of how they will continue to fulfil their statutory obligations in the event of a disaster and how each member should interact with the other in view of such an event.</p>	<p>The DR plan should clearly demonstrate how the business will continue to function.</p> <p>All DR plans should be shared between the shared service members and employers.</p>	<p>Ensure DR plans exist and are accessible.</p> <p>To test DR by taking down and restoring all systems.</p> <p>Ask employers if they have plans too and request a copy</p>	Shared Service and then all other stakeholders	Ability to function, communicate and meet statutory obligations in the event of a disaster.	Annually	1 Oct 2022	Opportunity to assist all stakeholders and to deliver a joined up service in the event of a disaster.

Future review and revision of risks

It is important that this work is monitored and measured and that management action plans are reassessed regularly to ensure that progress is being made and the targets can be met. In addition, each risk should be owned where possible by one or all members of the Shared Service partners to ensure that there is high level support, understanding and monitoring of the work that is required as part of the plans.

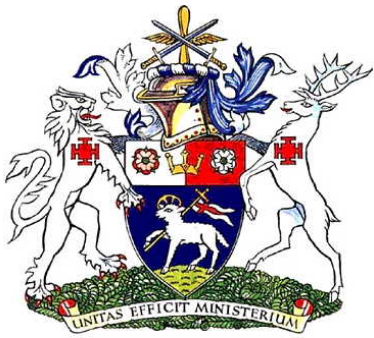
The Shared Service partners have agreed that the risk register will be added as a standing item to the Shared Service 6 weekly meetings and the timescale for re-visiting these risks in order to assess if they are still relevant and to identify new scenarios should be at the quarterly Collaboration Board.



Matt Mott

Oct 2022

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AGENDA ITEM 12

Local Pension Board

6th December 2022

Title	External Audit Update
Report of	Executive Director of Strategy and Resources (S151 officer)
Wards	All
Status	Public
Urgent	No
Key	Non-Key
Enclosures	None
Officer Contact Details	Adam McPhail, Finance Manager, 0208 359 7639 adam.mcphail@barnet.gov.uk

Summary

BDO are the Pension Fund's appointed external auditors for the 2020/21 and 2021/22 financial years. In line with International Standard on Auditing 260 (ISA 260) the Pension Fund's external auditors, BDO, should be provided with access to those charged with governance. BDO will not be attending the meeting. This report is to update the Local Pension Board on the 2020/21 audit, and on the plan for the 2021/22 audit.

Officers Recommendations

That the Local Pension Board note the update on the 2020/21 audit, and the plan for the 2021/22 audit, and to identify matters that the Board wish to bring to the attention of the auditor.

1. Why this report is needed

1.1 Under Section 151 of the Local Government Act 1972 - "...every local authority shall make arrangements for the proper administration of their financial affairs...". Additionally, in accordance with International Standard on Auditing (ISA) 260, the external auditor is required to issue detailed reports on matters arising from the audit of the council's accounts and pension fund accounts.

1.2 2020/21 External Audit Update

1.2.1 In 2021 BDO presented their audit plan for the pension fund which gave an approximate audit end date of October 2021. However, to date the 2020/21 audit report is still outstanding, with BDO still undertaking some work with West Yorkshire Pension Fund on some benefit calculations. BDO have advised that this delay is due to resource pressures present within audit firms nationally, and that extra testing is required due to the change in administrator in 2020/21.

1.2.2 Due to turnover of BDO staff over the audit, Officers have found the process very inefficient with BDO following up on responses to questions many months later and with BDO staff completing testing that was initially undertaken by other people within the BDO team, which has generated a number of questions on the BDO side.

1.2.3 BDO have assured us that the completed audit report will be ready to be signed off before the New Year.

1.2.4 Further details around the delay in the signing of the overall council accounts, and subsequently the Pension Fund Accounts can be found in the Reports Pack for the 2nd November 2022 Audit committee

<https://barnet.moderngov.co.uk/ieListDocuments.aspx?CIId=144&MIId=11061&Ver=4>

1.3 2021/22 External Audit Plan

1.3.1 Due to the delays in completing the 2020/21 audit, BDO have advised that an audit plan report is not yet available.

1.3.2 The expected start date of the 2021/22 audit is November 2022, with an audit plan expected to be presented to the Pension Fund committee in the November meeting.

1.3.3 The draft 2021/22 accounts have been published. The deadline for the publication of the accounts is 30th September 2022.

2. Reasons for recommendations

2.1 It is appropriate for the Board to be updated on the status of the 2020/21 audit, and have the opportunity to influence the testing undertaken by the auditor in the 2021/22.

3. Alternative options considered and not recommended

3.1 None- Statutory function.

4. Post decision implementation

- 4.1** None- The external auditor will report to the Board following the conclusion of the audit.

5. IMPLICATIONS OF DECISION

5.1 Corporate Priorities and Performance

- 5.1.1 A positive external audit opinion on the Pension Fund's Annual Report and Accounts plays an essential and key role in providing assurance that the Pension Fund's financial risks are managed in an environment of sound stewardship and control. This is in line with the aims set out in the Council's Corporate Plan, to ensure that services are delivered efficiently to get value for money for the taxpayer.

5.2 Resources (Finance & Value for Money, Procurement, Staffing, IT, Property, Sustainability)

- 5.2.1 This report sets out the framework for the assessment of the Pension Fund's financial reporting and management as well as value for money.

- 5.2.2 The external audit fees for 2021/22 are £35,789 (£36,170 for 2020/21).

- 5.2.3 In accordance with International Standard on Auditing (ISA) 260, the external auditor is required to issue detailed reports on matters arising from the audit of the Council's accounts and Pension Fund accounts.

- 5.2.4 The ISA 260 report must be considered by "those charged with governance" before the external auditor can sign the accounts".

5.3 Social Value

- 5.3.1 Arrangements for proper administration of financial affairs and contributing to the Pension Fund ensures that contributing members have a secured income on retirement.

5.4 Legal and Constitutional References

- 5.4.1 The Board's Terms of Reference include "ensuring the effective and efficient governance and administration of the LGPS for the LBB Pension Fund".

5.5 Risk Management

- 5.5.1 The external audit ISA 260 report highlights areas of good control and areas of weakness which need to be addressed. Failure to do so carries the risk of adverse financial and/or reputational consequences.

5.6 Equalities and Diversity

- 5.6.1 Pursuant to the Equality Act 2010, the Council is under an obligation to have due regard to 1) eliminating unlawful discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; 2) advancing equality of

opportunity between persons who share a relevant 'protected characteristic' and those who do not share it; and 3) fostering good relations between persons who share a relevant 'protected characteristic' and persons who do not share it. The 'protected characteristics' are; age, disability, gender reassignment, pregnancy, and maternity, race, religion or belief, sex and sexual orientation. The Council also has regard to the additional protected characteristic of marriage and civil partnership even though this does not apply to parts 2) and 3) (above) of the public-sector equality.

5.6.2 Ensuring the long-term financial health of the Pension Fund will benefit everyone who contributes to it. Access to and participation in the Pension Fund is open to those with and those without protected characteristics, alike, provided that the criteria set out within the relevant Regulations are met

5.7 Corporate Parenting

5.7.1 Not applicable in the context of this report.

5.8 Consultation and Engagement

5.8.1 Not required

5.9 Insight

5.9.1 Not applicable in the context of this report

6. Environmental Impact

6.1 None in the context of this report.

7. Background Papers

7.1 None.

London Borough of Barnet
Local Pensions Board - Work Programme
December 2022 – September 2023

Title of Report	Overview of decision	Report Of	Issue Type (Non key/Key/Urgent)
6 December 2022			
Administration Performance Report	To monitor the performance of the pension administration service and priorities for the new administrator.	Finance Director	Non-Key
Data Improvement Plan	To review progress against Plan	Finance Director	Non-key
Training Plan	To consider Training Needs and record Training undertaken	Finance Director	Non-key
Administration Risk Register	To review the administration risk register.	Finance Director	Non-Key
Annual Report of Scheme Auditor	To receive the annual report of the Scheme Auditor relating to the accounts to 31 March 2022.	Finance Director	Non-Key
Decisions made by the Pension Fund Committee	To approve the Pension Fund Committees decision making processes.	Finance Director	Non-Key
Triennial Valuation 2022	To review the Actuary's report on the 2022 Triennial Valuation.	Finance Director	Non-Key
01 March 2023			
Decisions made by the Pension Fund Committee	To approve the Pension Fund Committees decision making processes.	Finance Director	Non-Key

Subject	Decision requested	Report Of	Contributing Officer(s)
Review of Administration Strategy, IDRP and Breaches Policy.	To review the key administration processes in place.	Finance Director	Non-Key
TPR Code of Practice	To review the requirements of the new combined TPR Code of Practice.	Finance Director	Non-Key
AVC Review	To note outcome of review undertaken of Prudential as AVC provider	Finance Director	Non-key
Data Improvement Plan	To review progress against Plan	Finance Director	Non-key
Training Plan	To consider Training Needs and record Training undertaken	Finance Director	Non-key
Administration Performance Report	To monitor the performance of the pension administration service	Finance Director	Non-Key
Scheme Risk Register	To review the scheme risk register.	Finance Director	Non-Key
Annual Report of the Local Pension Board	To approve the annual report of the Local Pension Board to Full Council	Finance Director	Non-Key
June 2023			
Administration Performance Report	To monitor the performance of the pension administration service.	Finance Director	Non-Key
Data Improvement Plan	To review progress against Plan	Finance Director	Non-key
Training Plan	To consider Training Needs and record Training undertaken	Finance Director	Non-key

Subject	Decision requested	Report Of	Contributing Officer(s)
Administration Risk Register	To review the administration risk register.	Finance Director	Non-Key
External Audit Plan	To consider the external auditors plan for the 2022-23 Pension Fund Accounts	Finance Director	Non-Key
September 2023			
Review of Administration Strategy, IDRPs and Breaches Policy.	To review the key administration processes in place.	Finance Director	Non-Key
Data Improvement Plan	To review progress against Plan	Finance Director	Non-key
Training Plan	To consider Training Needs and record Training undertaken	Finance Director	Non-key
Decisions made by the Pension Fund Committee	To approve the Pension Fund Committees decision making processes.	Finance Director	Non-Key
Administration Performance Report	To monitor the performance of the pension administration service and priorities for the new administrator.	Finance Director	Non-Key
Administration Risk Register	To review the administration risk register.	Finance Director	Non-Key