

## Review of TPR COP 14 Compliance

### Partially Compliant

#### Knowledge and Understanding

B9 - Does the Fund offer pre-appointment training for new pension board members or mentoring by existing members?

Suggested action was “member training and development (T&D) be included as a standing item on the agenda where recent T&D can be discussed and reviewed, and where future training opportunities can be communicated to members.”

*Update – Training has not appeared on the agenda since June 2021 although training questionnaires were completed by Board Members Autumn 2021. An agenda item on training needs has been included for the February 2022 meeting and will be retained for future meetings.*

B12 - Have the pension board members completed the Pension Regulator's toolkit for training on the Code of Practice number 14?

*Update – With the exception of the recently appointed member, all the Board members have completed the TPR toolkit.*

#### Managing Risk

E7 - Does the Administering Authority have adequate systems, arrangements and procedures (internal controls) in place for the administration and management of the Fund and are they documented?

Recommendation relates to the documentation of processes in connect with collection of contributions following the transfer of responsibility from Capita to LBB.

*Update – Procedures for the collection and monitoring of contributions are now in place.*

#### Maintaining Accurate Members Data

F1 - Do member records record the information required as defined in the Record Keeping Regulations and is it accurate?

Relates to date improvement exercise and quality of membership date; common and conditional data scores and other data issues.

*Update – The date improvement exercise is continuing and reported quarterly to the Local Pension Board. There is a paper on data quality on the Board's February agenda. Common and conditional scores are reported quarterly, with common at 96% and Conditional at 77% as at December 2021. In addition, work is progressing to eliminate the backlog of historical leavers and again progress will be reported at the February meeting. Progress will be deemed satisfactory if data quality is adequate for the triennial actuarial valuation by 30 June 2022.*

#### Maintaining Contributions

G1 - Does the Fund have procedures and processes in place to identify payment failures?

G2 - Do those processes and procedures include a contributions monitoring record to determine whether contributions are paid on time and in full?

G3 - Do those processes and procedures include monitoring payments against the contributions monitoring record on an ongoing basis?

G4 - Are these procedures regularly reviewed to ensure they are effective?

G5 - Do the Administering Authority's processes include managing overdue contributions in line with TPR's suggested approach?

G8 - Is there a satisfactory process in place to assess the materiality of any payment failures and ensure that those which are material are reported to the Regulator within a reasonable period?

G1 to G5 & G8 relate to the documentation of the contribution collection process.

*Update – Procedures for the collection and monitoring of contributions are now in place.*

### Providing Information to Members and others

H1 - Has an annual benefit statement been provided to all active members within the required timescales?

*Update – as at 31 December 2021, 99% of deferred and 96% of active annual benefit statements have been issued. The aspect most in need of attention is historic leavers whose benefits have not been calculated.*

H7 - Is basic scheme information provided to all new and prospective members within the required timescales?

H9 - Is all other information provided in accordance with the legal timescales?

H10 - Is all other information provided in the format and methods required by law?

Re H7, H9 and H10, there were two recommendations – (1) The issuance of information to new starters should be monitored and reported on in the monthly report from WYPF. (2) The fund should also ensure that employers have processes in place to make new employees (who are eligible to join the scheme) aware of the scheme.

*Update – There is no service standard for issuing welcome letters to new members. This is currently being considered. Notification of new joiners is by way of the monthly payroll report from each employer and although there are no known issues with late notification, there is no formal reporting in place.*

### Internal Disputes Resolution

I1 - Has the Administering Authority put in place an internal dispute resolution procedure?

I3 - Does the information made available to applicants about the procedure clearly state the procedure and process to apply for a dispute to be resolved including: who it applies to, who the specified person (stage 1) is; the timescales for making applications; who to contact with a dispute; the information that an applicant must include and the process by which decisions are reached?

The observation for I1 and I2 was that the IDRP on the WYPF site was not branded for LBB and that we needed one applicable to LBB. Also that the persons responsible for stage 1 and 2 decisions should be identified.

*Update – The published IDRPs now makes reference to LB Barnet. As the procedure is standard across WYPF's clients it does not identify who will undertake the stage 1 and 2 complaints. It has been agreed that details (name of post) of the complaint reviewers will be included in the letter enclosing the policy to each member who has a complaint.*

I5 - Are the timescales in the procedure adhered to including sending an acknowledgment on receipt of an application?

The recommendation is that the WYPF monthly report should track progress of IDRPs to ensure that timescales are adhered to.

*Update – There is full monitoring of IDRPs complaints within the WYPF administration reports.*

## **Non-compliant**

### Reporting Breaches

J2 - Does the Administering Authority have appropriate procedures in place to meet their legal obligations for identifying and assessing breaches?

J3 - Are breaches being recorded in accordance with the agreed procedures?

For J2 and J3 the recommendation is that a breaches log be established, maintained and reviewed on a regular basis.

*Update – A breaches log for Barnet Pension Fund has recently been established and is currently being populated and will be included as a standing item at each Board meeting as part of the administration report.*

**End**