



Shropshire Council
Legal and Democratic Services
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

Date: 9 November 2017

**Committee:
Pensions Board**

Date: Friday, 17 November 2017

Time: 10.00 am

Venue: Oswestry Room, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

You are requested to attend the above meeting.
The Agenda is attached

Claire Porter
Head of Legal and Democratic Services (Monitoring Officer)

Members of Pensions Board

Liz Furey – Employer Rep
Pat Hockley – Pensioner Rep
Mike Morris – Pensioner Rep (Chairman)
Philip Ingle – Employer Rep

Your Committee Officer is:

Michelle Dulson Committee Officer

Tel: 01743 257719

Email: michelle.dulson@shropshire.gov.uk

AGENDA

1 Apologies

2 Declarations of Conflicts of Interest

Members are reminded that they should declare any interests which may lead to conflicts of interest in the subject area or any specific agenda item of this meeting. A conflict of interest is defined as a financial or other interest which is likely to prejudice a person's exercise of functions as a member of the Pension Board. It does not include a financial or other interest arising merely by virtue of that person being a member of the LGPS.

3 Minutes of the previous meeting (Pages 1 - 4)

The Minutes of the meeting held on 7 July 2017 are attached for confirmation, marked 3.

Contact: Michelle Dulson (01743) 257719

4 Public Question Time

To receive any questions from the public, notice of which has been given.

5 Administration and Regulatory Updates (Pages 5 - 20)

Report attached, marked 5.

Contact: Debbie Sharp (01743) 252192

6 Update on Investment Strategy and implementation including transition to the Central Pool

7 LGPS Central update

8 Responsible Investment

To receive a presentation from Michael Marshall, Responsible Investment Officer (approx 11am).

9 Pensions Committee Updates - Exempt reports to be discussed in exempt session of the meeting.

To highlight any papers/reports arising from the recent Pensions Committee meeting which may of relevance to the Board.

Please click on the link below to access the reports considered by the Pensions Committee at its last meeting on 22 September 2017.

<http://shropshire.gov.uk/committee-services/ieListDocuments.aspx?CId=260&MIId=3449&Ver=4>

10 Update on Breaches of LGPS Regulations (Pages 21 - 22)

Report attached, marked 10.
Contact: Rebecca Clough (01743) 254457

11 Update on Implementation of the Markets in Financial Instrument Directive (MiFID 11)

12 Fund Administration Policies (Pages 23 - 38)

Report attached, marked 12.
Contact: Rebecca Clough (01743) 254457

13 Future Training Requirements

14 Date of Next Meeting

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Committee and Date

Pensions Board

17 November 2017

PENSIONS BOARD

**Minutes of the meeting held on 7 July 2017 in the
Oswestry Room, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND
10.00 - 11.45 am**

Responsible Officer: Michelle Dulson
Email: michelle.dulson@shropshire.gov.uk Tel: 01743 257719

Present

Liz Furey – Employer Rep
Pat Hockley – Pensioner Rep
Mike Morris – Pension Rep (Chairman)

1 Apologies

1.1 No apologies were received.

2 Declarations of Conflicts of Interest

2.1 No conflicts of interest were declared.

3 Minutes of the previous meeting

3.1 Paragraph 3.1 – Outline of the Institutions for Occupational Retirement Provision Directive 11 (IORP11)

It was confirmed that this item was still on the radar and progress would be reported to a future meeting.

3.2 Paragraph 3.2 – Pension Related Complaints

It was confirmed that the stage 2 appeal was still ongoing and an update would be provided at the next meeting.

3.3 Paragraph 9.2 – Overview of Ill-Health Retirements

In response to a query it was confirmed that there was a list of Independent Registered Medical Practitioners (IRMP) for employers to choose from, all qualified in Occupational Health Medicine. The three tiers of ill-health benefits were discussed and it was confirmed that Tier 3 was short term, up to three years (with a review after 18 months), whilst Tiers 1 and 2 were permanent with no enhancement to benefits.

3.4 **RESOLVED:**

That the Minutes of the meeting held on 10 February 2017 be approved and signed by the Chairman as a correct record. **Page 1**

4 Public Question Time

4.1 No public questions were received.

5 Pensions Committee Updates

5.1 The reports considered by the Pensions Committee at its meeting on 23 June 2017 had been received by the Board.

5.2 The Head of Treasury and Pensions updated the Board in relation to a presentation received by the Committee from Aon Hewitt which gave an overview of the Shropshire Pension Fund Investment Strategy, the current investment types and future strategies that may be followed, including equity protection strategies.

5.3 Turning to the Pensions Administration Monitoring report, and in response to a query, the Pensions Communications Officer updated the Board in relation to the year-end reconciliation. She confirmed that queries were still being raised on the year-end reconciliation but that work had just begun in preparation for the Annual Benefit Statements for Members.

5.4 In response to a query, the Pensions Communications Officer explained that the spike in the number of telephone calls received and users visiting the website in April 2017 was partly due to P60's and Payslips being sent out together with year-end queries from employers, both which tend to generate a lot of queries. Also, the team had been publicising the website to Members which was another reason for the increased website usage. The Pensions Communications Officer reported that the top three website uses were Pension Benefits, the Employment area and payslips. She agreed to report the top 10 website uses to future meetings.

5.5 In response to a query in relation to overpayments, the Pensions Communications Officer agreed to report back to the Board once the work had been completed and once further guidance had been received.

5.6 In response to a query, the Pensions Communications Officer explained that the number of procedures completed in April and June 2017 were down due to a backlog of deferred benefit statements. A review was currently being undertaken to ensure there were sufficient resources within the team.

6 LGPS Central Update

6.1 The Head of Treasury and Pensions provided the Board with an update on the progress that had been made by LGPS Central. LGPS Central was progressing well towards the deadline of 1 April 2018. Its structure had been approved by the Pensions Committee and Full Council. The Regulatory Business Plan had been approved by all Heads of Finance, the Programme Board and the Shareholder Forum. The estimated net savings to Shropshire Council were £37million.

6.2 The Head of Treasury and Pensions confirmed that a non-executive Chairman and a Chief Executive Officer had been appointed along with two non-executive

Directors. The rest of the Management Team were to be appointed by the Chairman and CEO.

- 6.3 It was reported that the application for authorisation by the Financial Conduct Authority was due to be submitted in early July. The Risk Management Framework had been agreed as had the cost sharing principles. In conclusion, the Head of Treasury and Pensions informed the Board that the LGPS Central was on target and ahead of some other pooled schemes.

7 Administration and Regulatory Updates

- 7.1 The Board received the report of the Pensions Administration Manager – copy attached to the signed Minutes - which provided Members with the latest administration and regulatory updates affecting the local Government Pension Scheme. The Pensions Communications Officer took Members through the main points of the report and answered a number of queries.
- 7.2 The Pensions Communications Officer drew attention to the new LGPS administrator website which had recently been launched, guidance for which was attached at Appendix A to the report. She updated the Board in relation to progress with the Pensions Dashboard Project and confirmed that further updates would be provided as the project developed.
- 7.3 Turning to the Data Review, the Pensions Communications Officer informed the Board that initial feedback for the pilot had just been completed and that it was hoped to present the results for the next quarter to the next meetings of the Pensions Committee and Pensions Board.
- 7.4 In relation to tracing members with no current address, the Pensions Communications Officer reported that two preferred suppliers had been identified and it was hoped that this work would begin in the next couple of weeks.
- 7.5 Finally, the Pensions Communications Officer updated the Board in relation to Data Security. It was hoped that by moving the Pension Administration System onto a larger virtual server, provided by the Council, recovery resilience would be strengthened. She informed the meeting that currently 76% of cyber threats were diverted away, with the other 24% getting through.

7.6 **RESOLVED:**

That the contents of the report be noted.

8 Breaches of LGPS Regulations

- 8.1 The Board received the report of the Pensions Communication Officer – copy attached to the signed Minutes – which informed Members of breaches of the LGPS regulations affecting the Shropshire County Pension Fund.
- 8.2 The Pensions Communications Officer explained that all potential breaches were recorded on the breaches log and reported quarterly to the Pensions Committee.

Most breaches related to employers not having a discretions policy or scheme contributions and/or data not being submitted on time. Each breach recorded was reported to the employer with most employers engaging with the fund to ensure the breach did not happen again.

8.3 RESOLVED:

That the contents of the report be noted.

9 Scheme Advisory Board Survey

9.1 The Pensions Communications Officer drew Members attention to the Scheme Advisory Board Survey which had to be completed by 28 July 2017. She agreed to pre-populate the survey with the parts that she could complete before emailing to Members for completion and either submitting on line or returning to herself.

10 Future Training Requirements

10.1 The Pensions Communications Officer drew Members' attention to an on-site LGA training programme that was being arranged. She agreed to email Members with the proposed dates in order to ensure all Members were available. Members would also be asked to list the most relevant six topics, in order of relevance.

11 Date of Next Meeting

11.1 It was agreed that the next meeting would be held on Friday 1 December 2017.

NB. The meeting scheduled for 1 December 2017 was subsequently rearranged to Friday 17 November 2017.

Signed (Chairman)

Date:



<u>Committee and date</u> Pensions Board 17 November 2017 10.00am

<u>Item 5</u> <u>Public</u>

Administration and regulatory updates

Responsible Officer Debbie Sharp

Email: debbie.sharp@shropshire.gov.uk

Tel: 01743 254457

1. **Summary**
The report provides Pension Board Members with the latest administration and regulatory updates affecting the Shropshire County Local Government Pension Scheme (LGPS).
2. **Recommendations**
Pension Board Members are asked to note the contents of this report.

REPORT

3. **Risk Assessment and Opportunities Appraisal**
 - 3.1 **Risk Management**
By ensuring the guidance and legislation mentioned in this report is followed and adhered to risks to the Fund are minimised.
 - 3.2 **Human Rights Act Appraisal**
The recommendations contained in this report are compatible with the Human Rights Act 1998.
 - 3.3 **Environmental Appraisal**
There is no direct environmental, equalities or climate change consequence of this report.
 - 3.4 **Financial Implications**
Currently there are no direct financial implications arising from this report.
4. **Local Pension Board Survey**
 - 4.1 On 31 May 2017, the Scheme Advisory Board (SAB) commenced a survey of local pension boards. The survey was undertaken to contribute to a review of the new governance arrangements introduced in 2015 and to establish what is working well about local pension boards and what could be improved or done differently.

- 4.2** The survey was planned initially to run until 28 July but was extended to 29 September due to a lack of responses received. The survey was shared with the chairs of the Pensions Committee and the Board.
- 4.3** Since the survey closed the SAB Secretariat have been collating the results and are due to present a full analysis for the next meeting of the SAB being held on 16 November 2017. The results will be shared with both the Pensions Committee and the Pensions Board when available. In the meantime, the findings on some of the key issues have been shared by the SAB's Investment, Governance and Engagement Sub Committee at their meeting on the 16 October 2017, see **Appendix A**. Full meeting information can be found here:
<http://www.lgpsboard.org/index.php/sub-comms/meetings>
- 4.4** Pension Board Chair Mike Morris completed the survey on behalf of the Shropshire County Pension Fund. The survey response can be requested from the Pensions Team.
- 5. Scheme Advisory Board (SAB) consultation on academies objectives**
- 5.1** The SAB have recently undertaken a consultation on the development of options for academies. The consultation was open to all interested parties and closed on 29 September 2017.
- 5.2** The proposed draft objectives that the SAB were seeking views upon are as follows:
- Protect the benefits of scheme members through continued access to the LGPS
 - Ring fence local taxpayers and other scheme employers from the liabilities of the academy trust sector
 - Improve the efficiency and effectiveness of administrative practices
 - Increase the accuracy and reliability of data
- 5.3** However, in achieving the objectives, the SAB do not believe the changes should:
- Significantly alter cashflow at the fund level
 - Significantly alter assets at the pool level
- 5.4** The SAB Secretariat will prepare a report for the next SAB meeting to be held on 16 November 2017. Once Shropshire County Pension Fund is in receipt of this report, it will be shared with the Pensions Board.
- 6. Auto Enrolment - Transitional Delay**
- 6.1** For any employers in the LGPS who used auto enrolment transitional delay, this period came to an end on 30th September 2017. An anomaly of transitional delay means that an employer cannot automatically enrol an eligible jobholder who opted out more than 12

months before the transitional delay assessment date of 1 October 2017. Shropshire County Pension Fund has notified employers of this date and referred them to the transitional delay guidance on The Pension Regulator's website.

7. Changes to Early Retirement Strain costs

- 7.1** Following completion of the actuarial valuation of the Shropshire County Pension Fund as at 31 March 2016, the Fund, following the advice of the Actuary, has decided to review the factors currently underlying the calculation of Early Retirement Strain costs.
- 7.2** The factors currently used in the Early Retirement Strain costs calculation tool were last updated following the 2013 actuarial valuation. The review which has now taken place will increase strain costs by 5% in relation to an early retirement. Although employer strain costs will increase slightly, paying the higher amount reflects more closely the underlying funding cost of an individual retirement. It therefore means that there is less chance of these costs giving rise to additional deficits (and additional deficit contributions) at the next actuarial valuation due to take place in 2019.
- 7.3** The increase to the factors is scheduled to take effect from 1 January 2018. Employers participating in the Fund have been informed.

8. Pension Saving Statements

- 8.1** Pensions Saving Statements are issued each year to any members of the Shropshire County Pension Fund who have exceeded the Annual Allowance Limit.
- 8.2** In September 2017, 38 LGPS statements were issued to members who breached the Annual Allowance limit over the previous Pension Input Period for 2016/17.
- 8.3** All Scheme members are made aware of the Annual Allowance and Lifetime Allowance Limits through regular newsletters, the Fund's website and email updates.

9. Annual Benefit Statements

- 9.1** The Annual Benefit Statements for 2017 were issued to all active members as at 31 March 2017 by the regulatory deadline of the 31 August. The statements for both active and deferred members were issued electronically via the Funds secure website area 'My Pension Online'. For members who had opted out of electronic communication they received a paper copy of their statement. Only 279 active members and 357 deferred members requested a paper statement.
- 9.2** As at the 31 October the Fund had 36.2% of active members and 28.7% deferred members registered for 'My Pension Online'. It has

been reported in the pension's media by Hymans Robertson Ltd that a 20% member sign up rate is average across Pension companies. A number of member 1-2-1 sessions and group presentations have been organised at employer workplaces to encourage further take up of the online area.

10. Exit Payment Reform

- 10.1** The Government have confirmed that a fresh consultation on draft regulations governing the exit payment cap and exit payment recovery is due to take place in autumn 2017. This would potentially mean an implementation for both reforms in the first half of 2018, subject to sufficient parliamentary time being found.
- 10.2** It is understood that the Government are looking to progress the reform of exit payments in local government. However, the exact details and timing for this reform is not yet known.
- 10.3** Shropshire County Pension Fund employers have been kept informed about the proposed exit payment reform and this latest update was communicated to employers in September 2017.

11. New Data Protection Regulations

- 11.1** On 25 May 2018 the EU's General Data Protection Regulation (GDPR) comes into force containing new standards for the protection of individual's personal data in the European Economic Area.
- 11.2** In July, the LGPC Secretariat circulated a handout commissioned from Squire Patton Boggs to provide a brief overview of the new requirements and the steps which local authority pension funds should be taking to prepare for GDPR coming into force. This handout can be found in **Appendix B**.
- 11.3** GDPR is an area that is getting increased attention across the LGPS and there are a number of crucial questions where there are different views, in particular:
 - a) the implications of GDPR for LGPS funds, and
 - b) the work that needs to be undertaken to ensure administering authorities are fully compliant by 28 May 2018.
- 11.4** At Fund level, officers have attended a training a course on the new regulations and a workshop to discuss the work required to be compliant by the time the regulations come into force. Further training is planned for December 2017. Furthermore, officers have met with Shropshire Councils Information Governance Officer to discuss the Councils GDPR plan and how this can help the Fund become GDPR compliant from May 2018.

11.5 The Fund also has representation on a national GDPR working group, led by the LGA to help Funds with their GDPR responsibilities including a plan to produce sample documentation. The LGA are also seeking a legal view on a number of specific questions that have been raised about GDPR in respect of the LGPS and it is understood this will be shared with Funds once available.

11.6 Under the new regulations, the Administering Authority, as a Public Body, may be required to appoint a Data Protection Officer (DPO). The DPO is expected to be appropriately qualified and should report directly to the senior management at the authority. The DPO will be the contact person in the organisation for questions related to processing of personal data in respect of the LGPS fund, as well as the rest of the Administering Authority's functions. It will need to be decided by the Scheme Administrator whether the Fund is covered by the Councils DPO or whether it needs its own.

12. Administration topics covered at Pensions Committee on the 22 September 2017

12.1 In addition to this report the Pensions Board are advised to note the Pensions Administration Report to pension committee on 22 September 2017 which included updates on;

- Performance and Team statistics for the Pension Administration Team
- Contracted Out Reconciliation exercise
- Data Accuracy

13. Top 10 website pages

13.1 As requested in the July 2017 Pensions Board meeting the Fund's website top 10 pages visited are reported below. These are the pages which have been visited the most, so far, in 2017/18.

13.2 These statistics apply from 1st April 2017 to the 31st October 2017:

1. Homepage
2. My Pension Online- are you pension smart?
3. View your payslips online
4. Forms and Guides
5. Paying In
6. Employer
7. Frequently Asked Questions
8. Contributions
9. About the Scheme
10. Left but no benefits paid

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)

Administration and Regulatory Update – Pensions Board Meeting 7 July 2017
Pensions Administration Monitoring Report – Pensions Committee 22 September 2017

Cabinet Member (Portfolio Holder)

NA

Local Member

NA

Appendices

Appendix A – Local Pension Board Survey – Preliminary Findings
Appendix B - GDPR handout

Investment, Governance and Engagement Sub Committee

Item 7 – Paper D

Local Pension Board Survey – Preliminary Findings

1.1 As agreed by the Board, a survey to establish the effectiveness of local pension boards in the local government pension scheme was launched on the 26th May 2017. A copy of the survey which ran until the 29th September 2017 can be found at <http://lgpsboard.org/index.php/board-publications/board-surveys>.

1.2 The open survey was sent to the Chairs of local pension boards and pension committees. In addition, administering authorities were asked to publicise the survey locally on their web site.

1.3 LGPC bulletin 160 published at the end of July included a reminder to administering authorities that the survey was open to local pension board employer and employee representative members.

1.4 A total of 76 responses were received. A full analysis of the survey responses will be prepared for consideration by the Board on the 16th November but in the meantime, the findings on some of the key issues is included at Annex 1.

Recommendation – that the committee notes the preliminary findings and tasks the Secretariat to prepare the full analysis in draft form to share with committee members before the end of October.

Annex 1

LOCAL PENSION BOARD SURVEY – PRELIMINARY FINDINGS

1. Type of Respondent (Total = 76)

Local Pension Board Chair	-	42 (55%)
Employer Representative	-	4 (5%)
Employee Representative	-	11 (14%)
Pensions Committee Chair	-	14 (18%)
Pension Fund Manager	-	3 (4%)
Pensions Officer	-	2 (4%)

2. First meeting held

Jan – June 2015	-	8 (11%)
July – Dec 2015	-	57 (80%)

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Jan – June 2016	-	3 (4%)
July – Dec 2016	-	2 (3%)
Jan – June 2017	-	0
July – Dec 2017	-	1 (2%)

3. Planned frequency of meetings per annum

1	-	0
2	-	22 (29%)
3	-	12 (16%)
4	-	41 (54%)
5	-	0
6	-	1 (1%)

4. Number of meetings held to date

Less than 4	-	4 (5%)
4	-	3 (4%)
5	-	11 (15%)
6	-	8 (11%)
7	-	13 (18%)
8	-	15 (21%)
9	-	14 (19%)
10	-	1 (3%)
11	-	2 (3%)
12	-	0
13	-	1 (3%)

5. Number of Employer Representative members

2	-	22 (31%)
3	-	21 (30%)
4	-	22 (31%)
5	-	2 (2%)
6	-	4 (6%)

6. Number of Employee Representative members

2	-	21 (29%)
3	-	24 (33%)
4	-	22 (31%)
5	-	2 (3%)
6	-	3 (4%)

7. How was the Chair of the Board appointed?

Board members	-	33 (44%)
Scheme manager	-	16 (21%)
Recruited competition	-	19 (25%)
Other	-	7 (10%)

8. Is the Chair of the Board remunerated?

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Yes	-	21 (37%)
No	-	36 (63%)

9. Are any other Board members remunerated?

Yes	-	14 (21%)
No	-	53 (79%)

10. Are expenses paid to Board members?

Yes	-	62 (87%)
No	-	9 (13%)

11. Is facility time given to Board members?

Yes	-	50 (74%)
No	-	18 (26%)

12. Is there a written constitution?

Yes	-	57 (75%)
No	-	19 (25%)

13. How do you rate the written constitution (1 to 10)

1	-	3
2	-	1
3	-	1
4	-	2
5	-	15
6	-	4
7	-	6
8	-	8
9	-	15
10	-	20

14. Does the Board have a terms of reference?

Yes	-	74 (100%)
No	-	0

15. How do you rate the terms of reference? (1 to 10)

1	-	1
2	-	0
3	-	2
4	-	1
5	-	2
6	-	2
7	-	7
8	-	12
9	-	22
10	-	25

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16. Does the Board have a conflict of interest register?

Yes	-	72 (97%)
No	-	2 (3%)

17. How do you rate the conflict of interest register? (1 to 10)

1	-	0
2	-	0
3	-	0
4	-	1
5	-	12
6	-	3
7	-	11
8	-	8
9	-	16
10	-	23

18. Does the Board have a register of breaches of the law?

Yes	-	62 (88%)
No	-	8 (12%)

19. How do you rate the register of breaches of the law? (1 to 10)

1	-	2
2	-	0
3	-	0
4	-	1
5	-	22
6	-	2
7	-	6
8	-	8
9	-	14
10	-	19

20. Does the Board have a risk register?

Yes	-	62 (87%)
No	-	9 (13%)

21. How do you rate the risk register?

1	-	2
2	-	0
3	-	3
4	-	0
5	-	14
6	-	2
7	-	8
8	-	14
9	-	12
10	-	18

Investment, Governance and Engagement Sub Committee

22. Is there a Knowledge and Understanding programme?

Yes - 70 (95%)

No - 4 (5%)

23. How do you rate the Knowledge and Understanding programme?

1 - 0

2 - 0

3 - 0

4 - 1

5 - 8

6 - 6

7 - 4

8 - 21

9 - 19

10 - 15

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Why Is Data Protection So Important?

Pension schemes necessarily hold and process significant amounts of personal data relating to members. As a matter of good governance, it is important that member data is safeguarded. There is already a legal obligation on LGPS fund Administering Authorities to keep member data secure, but new legislation will come into force in May 2018 that will have a significant impact on the obligations of Administering Authorities and the potential financial penalties if they get it wrong.

The GDPR and LGPS Administering Authorities

The General Data Protection Regulation (GDPR) will have direct effect throughout the EU from 25 May 2018. It applies to all EU member states and provides a single EU legal framework for the processing of individuals' data. The maximum potential fine for breaching the GDPR will be €20 million (or 4% of global turnover if higher). The government has confirmed that, despite Brexit, the GDPR will be enforceable in the UK from May next year.

Administering Authorities are responsible for the personal data held by their LGPS funds, meaning the GDPR changes are relevant to them. Every pensions team should be actively planning how to ensure compliance with the GDPR.

Administering Authorities must demonstrate compliance with the GDPR in relation to their LGPS fund. They should be able to show in a meaningful way that both the overall governance structure for data protection compliance and the individual policies and procedures relating to data processing are compliant.

Who Needs to Know?

This document is relevant to anyone working in data protection/compliance or supporting an LGPS fund, and aims to highlight the main steps that Administering Authorities will need to consider in complying with the GDPR in relation to their LGPS funds. Where an authority has already implemented general GDPR compliance processes, or has them in the pipeline, the steps we have set out can be tailored to work in conjunction with or in addition to those processes.



The GDPR – Actions for Administering Authorities

1. Maintain Records of Data Processing

It will become a mandatory requirement for Administering Authorities who employ more than 250 people, or who process sensitive personal data (about members' health or family circumstances), to maintain records of all personal data processing activities. The records may have to be presented to the Information Commissioner's Office (ICO) on demand.

Action for Administering Authorities

- Audit the current position and identify any gaps in compliance.
- Take steps to ensure all personal data processing activities are recorded.

2. Review Data Security Measures and Assess Adequacy

The GDPR retains the current obligation to have appropriate technical and organisational data security measures in place, but also provides that certain specific measures (such as encryption) should be used "where appropriate".

It also requires that processes incorporate "privacy by design and default", i.e. compliance with the GDPR needs to be integrated into all data processing and should be the default setting on all privacy arrangements.

Action for Administering Authorities

- Develop a compliance plan to ensure appropriate technical and organisational data security measures are in place both at the authority and with any third party service provider.
- Review existing applications and processes that involve the use of personal data and ensure they are secure.
- Implement a policy to ensure that data is only stored for the minimum period necessary.
- Consider whether data encryption should be used, especially for sensitive personal data such as health data.
- Default settings (for example, on member portals) must be configured to automatically provide data security.

3. Update Service Provider Contracts

The GDPR requires new content to be inserted into all service and data sharing agreements that govern the use of personal data. It also imposes direct liability on such service providers for data protection compliance.

Action for Administering Authorities

- Work with current service providers and any other third party that receives data from the LGPS fund, e.g. actuaries/auditors, to amend the contractual provisions as necessary to comply with the GDPR.
- Do not agree to any revised contract without first obtaining proper advice that it does not impose additional obligations on the authority/the fund.
- Ensure that the contractual terms applying to all new appointments are compliant with the GDPR.
- Ensure that any third party administrator maintains adequate records.



4. Revise and Update Privacy Notices and Consider Whether Member Consent Is Required

The GDPR requires additional content to be included in all privacy notices regarding how personal data will be used by data controllers. A data controller is any organisation that makes decisions on how personal data is to be processed and for which purposes, so will include the Administering Authorities of an LGPS fund. Data controllers must tell anyone whose personal data they collect what information is held, how it is used, who it may be shared with and what safeguards are in place.

The GDPR also makes it more difficult to obtain valid consent for the use of personal data – consents must be fully informed, specific, unambiguous and freely given by way of a statement or clear affirmative action by the member.

In addition, there is a specific obligation to retain proof of consent.

Action for Administering Authorities

- Review and resend all member privacy notices in order to comply with the GDPR.
- Review consents the authority relies on to justify the processing of personal data.
- Consider new or revised consent to data processing by the fund.
New joiner information may need to be updated.
- Clear records of all privacy notices and consents must be kept.

5. Establish a Breach Management Process

The GDPR requires data breaches involving any risk to individuals to be reported to the ICO “without undue delay”, and within 72 hours of becoming aware of the breach in any case. The report must contain details of the breach, including the number of individuals affected, the likely consequences and the steps being taken to address/mitigate the breach.

Affected individuals must also be notified directly if the breach is a “high risk” to their rights and freedoms.

Action for Administering Authorities

- Establish an effective data breach response plan that ensures any breach is addressed and assessed for the obligation to notify and that the relevant ICO report and any member notifications can be made in a timely fashion.

6. Appoint a Data Protection Officer (DPO)

As public bodies, Administering Authorities may be required to appoint a DPO. The European data protection authorities recommend that a DPO is appointed even if an organisation is not required to have one under the GDPR. The DPO is expected to be appropriately qualified and should report directly to the senior management at the authority. The DPO will be the contact person in the organisation for questions related to processing of personal data in respect of the LGPS fund, as well as the rest of the Administering Authority’s functions.

Action for Administering Authorities

- Appoint a suitably qualified DPO, if your organisation is required to have one. This could be the Authority’s appointed general DPO, if there is one, provided that person meets the criteria.
- Where Administering Authorities share pension services, one DPO could be appointed to more than one authority in respect of their LGPS funds.



7. Ensure Processes Are in Place to Cater for the New Individual Rights

The GDPR introduces new rights for individuals, including the right of data portability, the right to restrict processing, the right to object to processing, the right to object to direct marketing and the right to be forgotten – i.e. the right to have one's personal data deleted.

Action for Administering Authorities

- Identify which of the new rights may be exercised by members.
- Establish procedures to ensure that the new rights can be exercised.

8. Carry Out Data Protection Impact Assessments (DPIA)

DPIAs must be carried out in relation to all "high risk" processing. This is where there is a high risk to rights and freedoms, for example, extensive profiling of individuals using automated processing or large scale processing of sensitive personal data (e.g. medical information). The European data protection authorities recommend to carry out DPIAs as good practice and to demonstrate accountability for processing personal data.

Consultation with the ICO may be required prior to processing in relation to high risk processing in certain circumstances.

Action for Administering Authorities

- Assess whether any use of personal data would be classified as "high risk" under the GDPR and, if so, carry out a DPIA.

Checklist

1. Create and maintain records of data processing.
2. Review data security measures and assess compliance.
3. Update service provider contracts.
4. Revise and update privacy notices and consider whether member consent is required. If yes, assess whether it meets the GDPR requirements.
5. Establish or update a data breach management process.
6. Appoint a Data Protection Officer (DPO).
7. Ensure processes are in place to cater for the new individual rights.
8. Consider if a Data Protection Impact Assessment (DPIA) is required and, if so, carry one out.

Contacts



Clifford Sims

Partner
T +44 207 655 1193
E clifford.sims@squirepb.com



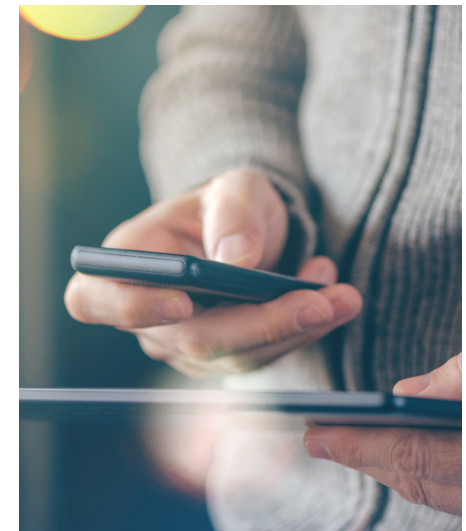
Kirsty Bartlett

Partner
T +44 207 655 0298
E kirsty.bartlett@squirepb.com



Elizabeth Graham

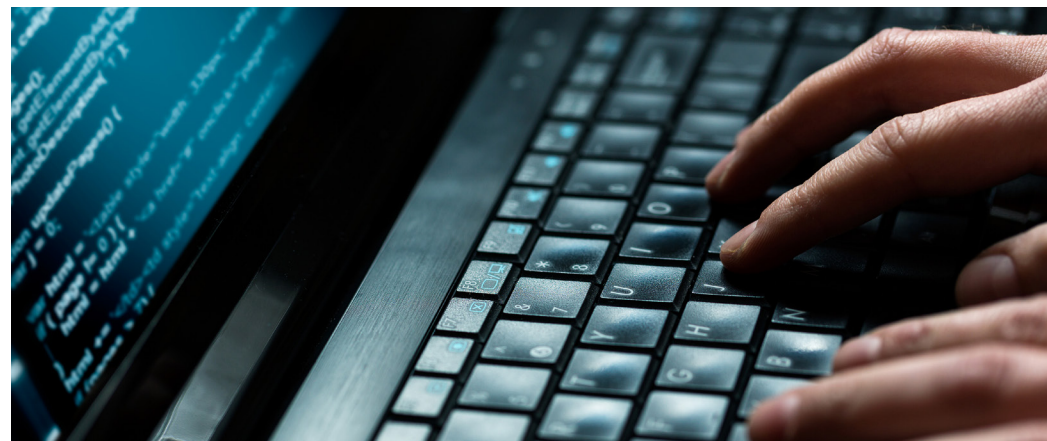
Partner
T +44 113 284 7494
E elizabeth.graham@squirepb.com



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<u>Committee and date</u> Pensions Board 17 November 2017 10.00am

<u>Item 10</u> <u>Public</u>

Breaches of LGPS Regulations

Responsible Officer Rebecca Clough
Email: rebecca.clough@shropshire.gov.uk Tel: 01743 254457

1. **Summary**
The report provides Pension Board Members with the latest Breaches of LGPS regulations affecting the Shropshire County Pension Fund.
2. **Recommendations**
Pension Board Members are asked to note the contents of this report

REPORT

3. **Risk Assessment and Opportunities Appraisal**
 - 3.1 **Risk Management**
By ensuring the guidance and legislation mentioned in this report is followed and adhered to risks to the Fund are minimised.
 - 3.2 **Human Rights Act Appraisal**
The recommendations contained in this report are compatible with the Human Rights Act 1998.
 - 3.3 **Environmental Appraisal**
There is no direct environmental, equalities or climate change consequence of this report.
 - 3.4 **Financial Implications**
Currently there are no direct financial implications arising from this report.
4. **Recording and reporting of breaches**
 - 4.1 Section 70 of the Pensions Act 2004 imposes a requirement on the following persons to report a breach of law:
 - a trustee or manager of an occupational or personal pension scheme;
 - a member of the pension board of a public service pension scheme;
 - a person who is otherwise involved in the administration of such an occupational or personal pension scheme;
 - the employer in relation to an occupational pension scheme;
 - a professional adviser in relation to such a scheme; and
 - a person who is otherwise involved in advising the trustees or managers of an occupational or personal pension scheme in relation to the scheme.

- 4.1 When deciding whether a breach is likely to be of material significance to the Pensions Regulator, the cause, effect, reaction to and wider implications of the breach should all be considered and, if a breach has occurred that is deemed material, it should be reported to the Pensions Regulator.
- 4.2 Any potential breaches by the Administration Team or Fund Employers' are recorded on the Breaches Log and reported quarterly to Pension's Committee through an exempt paper. Pension Board members receive a copy of this paper for discussion at each Board meeting, however an annual update can be provided at the end of each financial year.
- 4.3 Reference should be made to Item 8 'Breaches of the LGPS regulations' report which was presented to the Pensions Board in July 2017. Largely, the breaches recorded and shared with the Pensions Committee up until in 30th June 2017 were due to employers Scheme contributions and/or data not being submitted on time or the employer not submitting a Discretions Policy.
- 4.4 So far in 2017/18 year to 30th September 2017 there were 5 employers who appeared on the breaches log with a total of 5 or more breaches for late payment of contributions and/or submission of accompanying data. Of these employers 4 shared the same payroll provider and the breaches were mostly related to an ongoing issue with setting up on the data transfer system. This issue was resolved in August. The fifth employer has been contacted and the Fund is continuing to work with them to improve their practices.
- 4.5 Breaches in relation to outstanding leavers forms related to 22 individual breaches recorded over this quarter from 3 different employers. All 22 breaches were resolved once reported to the employer.
- 4.6 No breach has yet been assessed as material and therefore none have needed to be reported to the Pensions Regulator.

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)

Pensions Committee Meeting 17 March 2017 Record of Breaches Report (Exempt paper)

Pensions Committee Meeting 23 June 2017 Record of Breaches Report (Exempt paper)

Pensions Board Meeting 7 July 2017 Breaches of the LGPS Regulations

Pensions Committee Meeting 22 September 2017 Record of Breaches Report (Exempt paper)

Cabinet Member (Portfolio Holder)

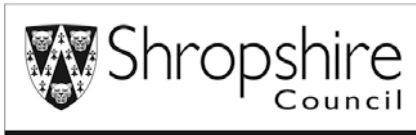
NA

Local Member

NA

Appendices

NA



<u>Committee and date</u> Pensions Board 17 November 2017 10.00am

<u>Item 12</u> <u>Public</u>

Fund Administration Policies

Responsible Officer Rebecca Purfit

Email: rebecca.purfit@shropshire.gov.uk

Tel: 01743 254457

1. **Summary**
The report provides Pension Board Members with information on the Administration Policies of the Shropshire County Pension Fund.
2. **Recommendations**
Pension Board Members are asked to note the contents of this report.

REPORT

3. **Risk Assessment and Opportunities Appraisal**
 - 3.1 **Risk Management**
By ensuring the guidance and legislation mentioned in this report is followed and adhered to risks to the Fund are minimised.
 - 3.2 **Human Rights Act Appraisal**
The recommendations contained in this report are compatible with the Human Rights Act 1998.
 - 3.3 **Environmental Appraisal**
There is no direct environmental, equalities or climate change consequence of this report.
 - 3.4 **Financial Implications**
Currently there are no direct financial implications arising from this report.
4. **Administration Policies**
 - 4.1 The Public Service Pensions Act 2013 introduced the framework for the governance and administration of public service pension schemes and provides an extended regulatory oversight by the Pensions Regulator. The guidance issued by the Pensions Regulator states:

'Pension board members must be conversant with their scheme rules, which are primarily found in the scheme regulations, and documented administration policies currently in force for their pension scheme.'

Being 'conversant' means having a working knowledge of the scheme regulations and policies, so that pension board members can use them effectively when carrying out their duties.'

- 4.2 Board members have previously been made aware of the policy documents adopted by the Fund which can be found on the website www.shropshirecountypensionfund.co.uk
- 4.3 It is a regulatory requirement under the Local Government Pension Scheme rules to have certain policies in place. The administration policies currently in use by the Fund are:
- Administration Strategy Statement
 - Communications Policy Statement
 - Governance Compliance Statement
 - Reporting Breaches Policy
 - Termination Funding Policy
 - Training Policy
- 4.4 All Fund administration policies have been agreed by the Pensions Committee and the most up to date versions are on the Fund's website. Each policy sets the Fund's approach for securing compliance with Regulations.
- 4.5 The Pension Regulators survey from 2016 last year – asked all public service pension schemes to assess how they were being run. Results were released in May 2018, **Appendix A**. The top risks identified in The Pensions Regulators 2016 survey were:
- Governance
 - Internal controls
 - Record keeping
 - Member communications
- 4.6 The Fund undertook its own compliance review earlier in the year which was shared with the Pensions Board. Some of the areas highlighted in the review as requiring work have already been tackled in projects set up this year such as the Data Accuracy report. Internal Controls are now being looked at. Regularly reviewing all of the above policies forms part of good governance, as they are the Funds formal recording of a lot of its internal controls.
- 4.7 In the coming months the Administration Team will be reviewing its Policies and their compliance against all codes /regulatory requirements and how they are measured. An action plan of any improvements will be put in place and any changes in Policies will be drafted and circulated to Employers for consultation. This area of review has already been communicated with Scheme employers at a meeting held on the 9th November.

5. New Employer Events Policy

- 5.1 A new policy is currently being drafted called an 'Employer Events Policy'. This will replace the current 'Terminations Funding Policy' with a more comprehensive policy that will cover the various 'life stages' of an employer within the Fund. It will summarise the events that could affect employers whilst in the Fund and the possible outcomes from the events right up until an employer withdraws from the Fund. There are more employers in the Fund, coming and going, resulting from increased services being outsourced and re-let. There are also an increasingly number of Academy schools joining Multi Academy Trusts and this policy aims to outline the setup of these type of organisations within the Fund.
- 5.2 Within the new policy there will also be some changes to how exit payments are calculated. A consultation will be undertaken with employers and a draft copy of the policy, when available, will be shared with the Pensions Board.
- 5.3 In terms of documented policies, the Pension Regulators Code of Practice 14 states the following are examples of administration policies the regulator expects to be documented and with which a Pensions Board must have a working knowledge:
- **Conflicts of interest** - This is covered within Shropshire Council's Constitution.
 - **Record-keeping** - Covered in a Record Keeping compliance document held by the Administration team, **Appendix B**.
 - **Internal dispute resolution** – Process covered in the LGPS Regulations 2013 (a guide covering appeals is on the Fund's website)
 - **Reporting breaches** - covered in the Reporting Breaches Policy held on the Fund's website.
 - **Maintaining contributions to the scheme** – Covered in the LGPS Regulations 2013 and further expanding on in the Pensions Administration Strategy, held on the Fund's website.
 - **The Terms of Reference of the Pensions Board** – Published on the Fund's website.
 - **Risk assessments / management and risk register policies for the scheme** – The Risk Register is annually updated and taken to Pensions Committee. Pension Board members receive copies of Committee reports.
 - **Scheme booklets, announcements and other key member and employer communications, which describe scheme policies and procedures** – All Scheme communication such as scheme guides and newsletters are held on the Fund's website and the Fund's communication responsibilities outlined in the Communications Policy Statement held on the Fund's website.

- **Statements of policy about the exercise of discretionary functions** – Where the Fund has made a policy on the discretionary functions it is entitled to under the regulations these can be found in the Governance Compliance Statement held on the Fund's website.
- **Statements of policy about communications with members and scheme employers** – Held in the Communications Policy Statement on the Fund's website.
- **The pension administration strategy** – Held on the Fund's website.
- **Any admission body policies** – The Fund does not hold this type of policy but does have a Termination Funding Policy which is set to be replaced with an 'Employers Events Policy' as mentioned in this report.

5.4 The Regulator also states that if Pension Board members of a funded scheme (e.g local government schemes) members should also have a working knowledge of other documented policies such as investment governance.

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)

Pensions Board Meeting 10 February 2017 – Areas to be considered for work plan

Cabinet Member (Portfolio Holder)

NA

Local Member

NA

Appendices

Appendix A – TPR survey results 2017

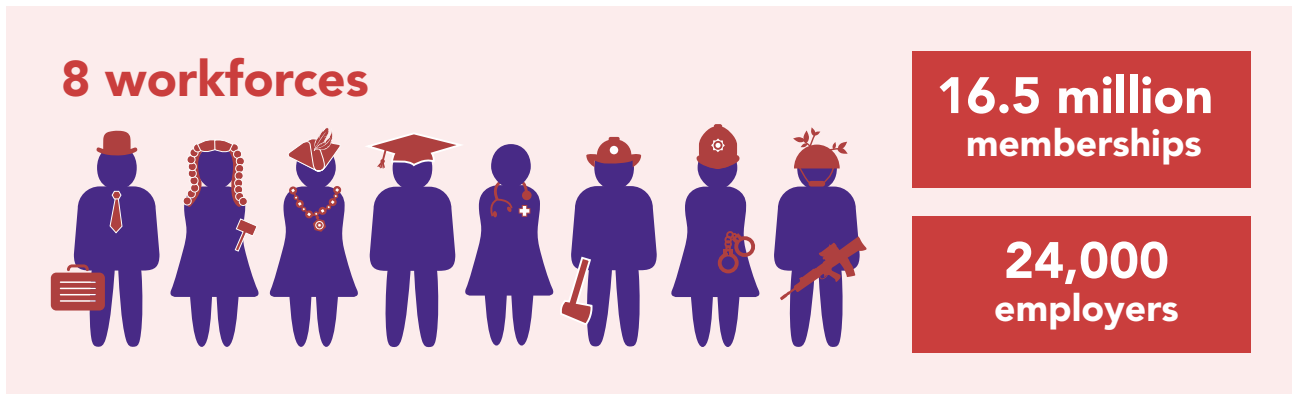
Appendix B – Record Keeping Matrix

Public service governance and administration survey

Summary of results and commentary

Background

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



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

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

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



Scheme governance

Good governance is essential to pension schemes delivering good member outcomes. This is a key focus for us, as set out in our recent discussion paper on 21st century trusteeship and governance, which can be read at www.tpr.gov.uk/21c-trustee.

Public service pension schemes are governed differently to other occupational pension schemes. They do not have trustees. Instead the overall management and/or administrative responsibility for the schemes sits with scheme managers. Scheme managers are supported by pension boards, which assist them in complying with their legal duties.

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

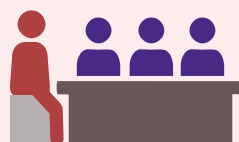
Pension board members have a key role to play in supporting scheme managers. We expect scheme managers to use this resource, and for pension boards to take an active role in identifying risks and driving forward improvements, in particular in those areas set out below: record-keeping, internal controls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

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

- ▶ 23% of survey responses were completed without involving the scheme manager, who is ultimately accountable for most of the legal requirements. The pension board chair was involved in only 28% of survey responses, and other pension board members in only 21%.
- ▶ Over a quarter (27%) of scheme managers do not attend pension board meetings regularly, and 17% never attend.
- ▶ Our discussions with scheme managers, pension boards and other stakeholders have highlighted some gaps in understanding the roles and responsibilities of various parties involved in public service pension schemes, particularly pension boards.



77%
of survey responses
involved scheme
manager



28%
of survey responses
involved pension
board chair



17%
of scheme managers never attend
pension board meetings

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

Record-keeping

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

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

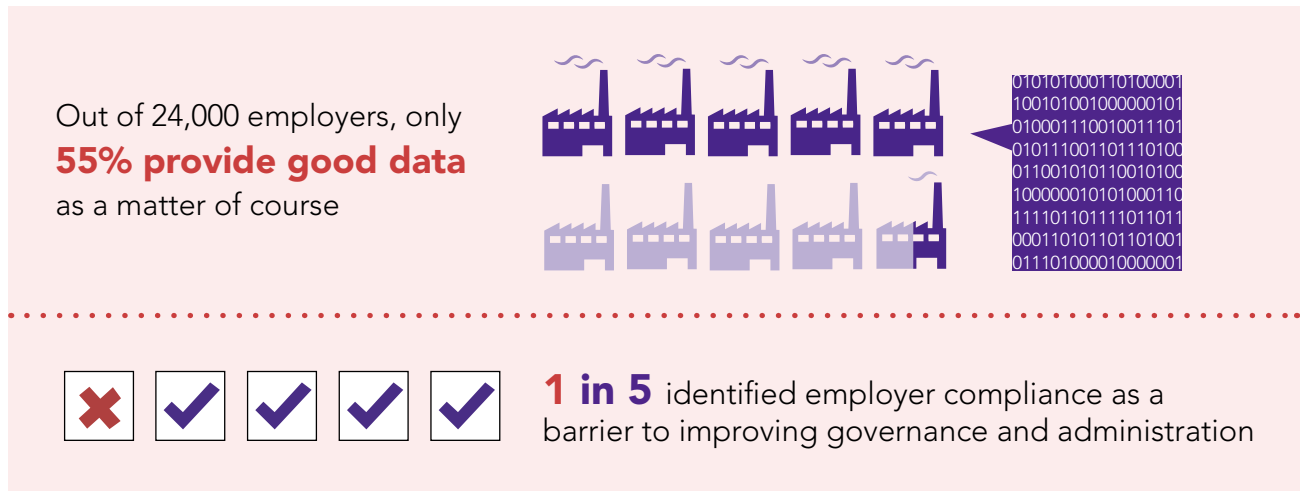


We have made our expectations clear. All schemes should do an annual data review, and put a plan in place to put things right if required:

- ▶ While most schemes (79%) had completed a review in the last year, the survey raises concerns about how effective these data reviews are. Over a third (35%) of schemes that had completed a review did not identify any issues, which is questionable in such large and complex schemes.
- ▶ The survey shows that only 18% of schemes had put an improvement plan in place. In addition, the improvement plans we have seen are of varying quality.

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

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



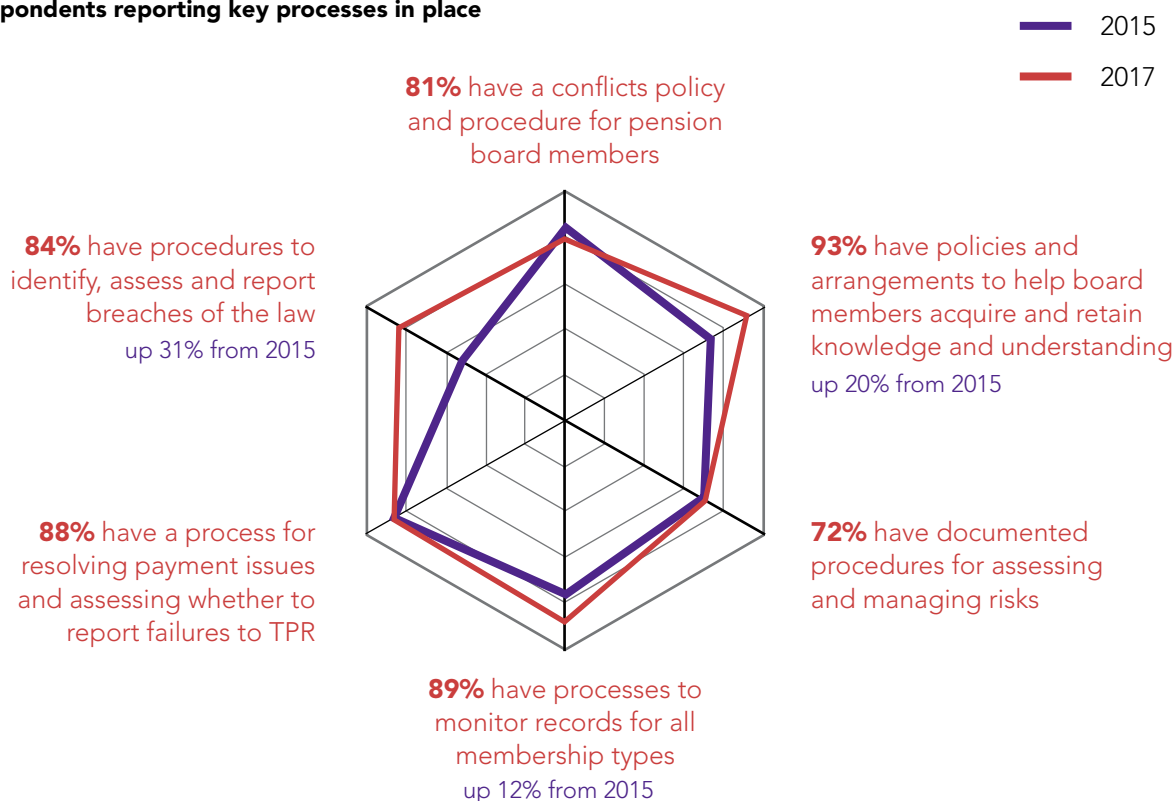
The survey also highlights that the quality of data provided by employers remains an issue – only 55% of employers provide good data as a matter of course. 23% of respondents identify employer compliance as a top risk, and 20% as a barrier to improving the governance and administration of their scheme.

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

Internal controls

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

Respondents reporting key processes in place



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

However, some concerning gaps remain:

- ▶ 28% of schemes could not confirm they had risk processes in place and 30% are potentially operating without a risk register.
- ▶ Though scheme managers, pension board members and other parties have a duty to report breaches of the law to us in certain circumstances, 16% of schemes could still not confirm if they had processes in place to do so.

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

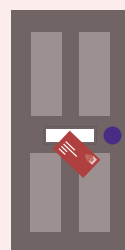
Across the landscape we will continue to promote our existing educational material, in particular our internal controls checklist and example risk register (www.tpr.gov.uk/ps-risk) and guidance on reporting breaches (www.tpr.gov.uk/ps-breaches). Where we open cases, we will work with the schemes involved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

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

Member communications

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

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



21%
of members did not receive their annual benefit statements on time

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

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

Taking action

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

Public service governance and administration survey

Summary of results and commentary

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The Pensions
Regulator

Shropshire County Pension Fund - Record Keeping Matrix

The Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014 requires Shropshire County Pension Fund to keep specific data about members of the Local Government Pension Scheme. The information which must be kept is outlined in regulations 4 to 6 of the above regulations is listed below.

Data held	Where held	Responsible Officer	Internal controls	Review period
Records of member and beneficiary information				
Name of member/beneficiary	Altair (Member Record)	CM	Report	6 months
Date of birth of member/ beneficiary	Altair (Member Record)	CM	Report	6 months
Gender of member/beneficiary	Altair (Member Record)	CM	Report	6 months
Last known postal address of member/beneficiary	Altair (Member Record)	CM	Report	6 months
Member identification	Not used. NI number is member identification			
National Insurance number/ number in the Scheme	Altair (Member Record)	CM	Report	6 months
Active/deferred/pensioner members: <ul style="list-style-type: none"> • Date on which member joins and leaves the Scheme • Details of members employment including: <ul style="list-style-type: none"> i) The period of pensionable service in that employment ii) The amount of pensionable earnings in each year of that employment 	Altair (Member Record)	CM	Report	Annually at year end
Formula used for calculating member/beneficiary benefits	Altair (Background Tables)	CM	Office Procedure	Annually
The percentage to be applied to member benefits in revaluation each year	Altair (Member Record)	CM	Office Procedure	Annually or as required
Any increase to be applied to the pensioner/beneficiary benefit each year	Altair (Background Tables)	CM	Office Procedure	Annually
Any information relevant to calculating any reduction attributed to a pension debit	Altair (Member Record)	HT	Office Procedure	As required
Records of transactions				
Employer/member contributions in relation to each active member	Spreadsheet on vdrive/Altair for	CM	Office Procedure	Monthly

Page 35

	employers using iconnect			
Payment of pensions and benefits including date of payment and in some cases: <ul style="list-style-type: none"> Name and address of the person to whom payment was made Reason for payment 	Resource link/Altair	DS	Office Procedure	Annually
Any movement or transfer of assets from the scheme to any person including: <ul style="list-style-type: none"> Name and address of the person to whom the assets were moved/transferred The reason for that transfer (bulk only) 	Vdrive	DS	Office Procedure	Annually
Receipt or payment of money or assets in respect of a transfer of members into or out of the scheme including: <ul style="list-style-type: none"> Name of the member Terms of the transfer Name of the scheme into or out of which the member has been transferred Date of the transfer, date of receipt or payment of money or assets 	Altair	HT	Office Procedure	Monthly
Payments made to any member who leaves the scheme, other than on a transfer including: <ul style="list-style-type: none"> Name of the member Date of leaving Members entitlement at that date Method used for calculating any entitlement under the scheme How that entitlement was discharged 	Altair	HT CM	Office Procedure Year-end return	Monthly Return
Payments made to any employer participating in the scheme	Samis	DS	Annual Report	Annually
Any amount due to the scheme which has been written off in the schemes accounts	Treasury Team	JB	Office Procedure	Annually
Any other payment to the scheme including name and address of the person from whom it is received and where a payment is made in respect of a member, the name of the member	Treasury Team	JB	Office Procedure	Monthly
Records of pension board meetings and decision including: <ul style="list-style-type: none"> Date, time and place of meeting Names of all members of the pension board invited Name of any person who attended the meeting and the capacity in which each attended 	All agendas and minutes are recorded at www.shropshire.gov.uk under committee services.	JB	Governance Compliance Statement & Terms of reference	Bi-annually

<ul style="list-style-type: none"> Any decisions made at the meeting 				
Code of practice no.14 – Governance and administration of public service pension schemes				
Point 129. of the Pensions Regulator Code of Practice states that employers should understand and passed the following data to the Fund when a member: <ul style="list-style-type: none"> Joins or leaves the scheme Changes their rate of contributions Changes their name, address or salary Changes their member status, and Transfers employment between scheme employers 	Altair	CM	Office Procedure	Monthly

Document last reviewed: January 2016

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