



**DEVON &
SOMERSET**
FIRE & RESCUE SERVICE

LOCAL PENSION BOARD

Date of Meeting: Wednesday 30 October 2019, at 3.00 pm in Meeting Room E,
The Hub, Service Headquarters

A G E N D A

ITEM NO.	ITEM TITLE
1.	<u>Apologies</u>
2.	<u>Conflict of Interest Declaration</u>
3.	<u>Notes</u> (Pages 1 - 6) of the last meeting held on 8 August 2019 attached.
4.	<u>Review of Actions</u> (Pages 7 - 12) Review of Actions of previous meeting attached.
5.	<u>Training Log Update</u> (Pages 13 - 14) Updated training log attached.
6.	<u>Correspondence Update</u> (Pages 15 - 16) Log of correspondence received since last meeting attached.
7.	<u>Scheme Manager Update</u> (Pages 17 - 32) Paper attached.
8.	<u>Key Performance Indicators</u> To discuss position on development of LPB dashboard.
9.	<u>Risk Register</u> Verbal update.
10.	<u>TPR Self-Assessment</u> (Pages 33 - 38) To note update self-assessment (attached) completed in September 2019.
11.	<u>TPR Annual Survey</u> To agree arrangements for review of survey return.

ITEM NO.	ITEM TITLE
12.	<p><u>LPB Work Programme (Pages 39 - 40)</u> Attached. To review items for LPB meeting scheduled for 18 March 2020.</p>
13.	<p><u>Date of Next Meeting</u> 15.00hours, Wednesday 18 March 2020 in Room E (The Hub), Service Headquarters.</p>

Board Membership

*Scheme Manager
Representatives:*

Mike Pearson
 Amy Webb
 Cllr George Wheeler
 (Vacancy)

*Scheme Member
Representatives:*

Andy Hallam
 James Leslie
 Peter Redbourn
 Ben Redwood

Other Attendees:

Steve Pope (Delegated Scheme Manager)
 Caroline Gourlay (Rewards & Benefits Manager)
 Steve Yates

Agenda Item 3

LOCAL PENSION BOARD
8 August 2019

Present:

Scheme Manager Representatives

Mike Pearson (MP) – Chair
Amy Webb (AW)
Cllr. George Wheeler (GW)

Scheme Member Representatives

Andy Hallam (AH)
Peter Redbourn (PB)

Also in attendance

Steve Pope (SP) – Delegated Scheme Manager
Caroline Gourlay (Rewards and Benefits Manager)

Apologies:

Bob Walker (BW) (Scheme Member representative)

MIN NO.	ITEM TITLE	ACTION BY
LPB/19/26	<u>Conflict of Interest Declaration</u> No conflicts of interest were declared.	
LPB/19/27	<u>Notes</u> The Notes of the meeting held on 29 May 2019 were AGREED .	
LPB/19/28	<u>Matters Arising</u>	
	LPB/19/28a <u>Process for Local Pensions Disputes (Note LPB/19/21(f))</u> SP advised that there was still an outstanding action to post the Internal Disputes policy on the website.	SP
	LPB/19/28b <u>Scheme Manager Update (Note LPB/19/24)</u> SP clarified that: <ul style="list-style-type: none">• the reference to the training allowance for USAR (item 4.1.4) was in relation to a High Court Decision;• further updates on the matters in the Scheme Manager's report for the last meeting were provided in the Scheme Manager's report to this meeting. (See also Note LPB/19/32 below)	
LPB/19/29	<u>Review of Actions</u> CONSIDERED latest iteration of the Board Action Log. MP had updated this following the management meeting in July and had added a RAG status indicating: Green – either in progress and on track (or not started or due to start);	

MIN NO.	ITEM TITLE	ACTION BY
	<p>Amber – the issue was behind schedule or there was a marginal delay in starting work;</p> <p>Red – the work had not started and/or there were serious problems or delays.</p> <p>With regard to the outstanding “red” items:</p> <ul style="list-style-type: none"> • Risk register: SP was working through refinements. The target was to take to the latest iteration of the risk register to the next monthly management meeting in September; • Performance measures: AW, assisted by Procurement, was developing an appropriate suite of key performance indicators for use by the Board; • Abatement: SP advised that a report was still awaited from WYPF to enable each case to be assessed. This would also feature as part of the Scheme Manager’s Update to this meeting; • Data extraction from HR: this would also feature as part of the Scheme Manager’s Update to this meeting <p>Progress against each of the above issues would be discussed at the next monthly management meeting.</p> <p>(See also Note LPB/19/33 below).</p>	<p>SP</p> <p>AW</p>
LPB/19/30	<p><u>Training Log Update</u></p> <p>The latest iteration of the training log indicated that all Board Members were 100% complete on training. While there was no prescribed national refresh frequency for training, the locally agreed frequency was two years.</p>	
LPB/19/31	<p><u>Correspondence Update</u></p> <p>The latest correspondence log was noted.</p>	
LPB/19/32	<p><u>Scheme Manager Update</u></p> <p>SP introduced Caroline Gourlay (Rewards and Benefits Manager) to the Board.</p> <p>The Scheme Manager update as circulated for the meeting was considered. This covered:</p> <ul style="list-style-type: none"> • surveys and annual returns; • pension communications; • specific pension projects; • breach issues. <p><i>Surveys and Annual Returns</i></p> <p>The Benchmarking Survey from Scheme Advisory Board sought information on the cost and quality of pension administration services provided.</p> <p>It was anticipated that feedback on the completed survey would form part of Scheme Advisory Board (SAB) annual conference in September, at which attendance formed part of CPD for Board members.</p>	

MIN NO.	ITEM TITLE	ACTION BY
	<p><i>Pensions Communications</i></p> <p>The Annual Benefits Statements had been key area for communications. The Service had been delayed in providing the year end data to the West Yorkshire Pension Fund (WYPF) which had agreed an extension for the Service to provide the required data. This data had now been manually prepared and provided to WYPF and statements had now gone into production and should be issued within the next week. In order to create a more automated approach, a report from the Service payroll system was being developed.</p> <p>The Board recorded its appreciation for the work of the HR team in providing the data to WYPF.</p> <p>Work was still ongoing for the production of Annual Benefit Statements for those in the Modified Scheme by WYPF. WYPF had indicated that these statements would not be completed by the deadline of the 31 August and this was across all clients. However, WYPF was working on a new system approach which would resolve this for future years.</p> <p>In relation to the Annual Allowance, the Service was looking to make staff aware in promotion letters of the potential for breaching the annual allowance. The Service had already identified and offered training sessions for staff who could be affected.</p> <p><i>Project areas</i></p> <p>Pensionable pay for allowances: SP had circulated a spreadsheet on existing allowances and some where no determination had yet been made. This would feature elsewhere on the agenda for the meeting.</p> <p>Transition Protection Judgement: an application to the Supreme Court for a further right of appeal had been rejected. The matter would therefore be referred back to the Employment Tribunal for remedy but it was anticipated this could take up to two years.</p> <p>Abatement: A number of staff pensions had not been correctly abated and WYPF were undertaking further checks on this. It had been clarified that abatement rules would apply to people retiring and being re-employed by Red One Ltd. SP would check why abatement did not, apparently, apply to the 2015 Scheme and advise members of the LPB accordingly.</p> <p>Two Pensions: Some individuals had had more than one pension split applied. WYPF had identified the individuals and had put revised figures in place. There were still outstanding cases to be addressed.</p> <p><i>Reporting breaches</i></p> <p>The Pensions Regulator had written to advise that it did not intend to take any enforcement action over the reported breach arising from the late publication of the Annual Benefits Statement. Additionally, the issue relating to two [split] pensions had been identified as representing a breach, but there was a question on whether the breach was reportable. The Scheme Manager would work through breach flow chart, together with using the SAB template and guidance, to assess if a reportable breach. An update on this would be reported to the next Board meeting.</p>	<p>SP</p> <p>SP</p>

MIN NO.	ITEM TITLE	ACTION BY
	<p><i>Other issues</i></p> <p>One IDRPF dispute was still outstanding but a date had been set to hear this. Quality of Service provided: The latest WYPF report (for July) was circulated.</p> <p>This indicated good performance against most of the Key Performance Issues (KPIs) with the exception of the KPI on deferred benefits set up on leaving. WYPF would be looking to improve performance against this KPI.</p> <p>It was AGREED to invite WYPF to attend the next Board meeting on 30 October 2019 or a subsequent meeting, depending on availability.</p> <p>Appointment of LPB members: There had been only one expression of interest for the Scheme Member vacancy, but the individual concerned was awaiting the outcome of another issue prior to committing to joining. In the event that this did come to fruition, the trades unions had indicated that they could provide candidates.</p> <p>SP advised that the aim was to have the appointment secured by the next Board meeting.</p> <p>PR advised that he was prepared to stay on as a Board member until advised otherwise.</p> <p>MP commented that this still two left two vacancies (one Scheme Manager and one Scheme Member), for which an advertisement would need to be placed for the external Scheme Manager representative.</p> <p>(See also Note LPB/19/33 below).</p>	<p>SP</p>
<p>LPB/19/33</p>	<p><u>Pensionable Pay</u></p> <p>SP circulated a spreadsheet identifying areas where decisions on pensionability had been reached and three areas where decisions were still required:</p> <ul style="list-style-type: none"> • Special Activity Allowance: the payment was not calculated in accordance with ordinary rate of pay and consequently failed to satisfy all of the Blackburne principles. For this reason, the Board considered that this allowance should not be pensionable; • Specialist Rescue Additional Responsibility Allowance: The Grey Book stipulated that this allowance was not pensionable. Additionally, the allowance did not satisfy the Blackburne principles for a pensionable benefit. (AW did not agree as she felt this was part of their role). Accordingly, the consensus of the Board was that this should not be pensionable; • Dog Handlers Allowance: SP circulated a document setting out what was expected from the role. AW sought clarification on whether this was for work undertaken. SP confirmed that this was for the welfare of the dog at home i.e. was not work done in the performance of the duties of the role. An additional 10% of basic pay was already payable for undertaking the role. SP referred to the Medway case history which required the activity to be both regular and in ordinary course of duties in fulfilling contractual requirements. 	

MIN NO.	ITEM TITLE	ACTION BY
	<p>SP advised the additional 10% was to cover activity that is associated with the care of the dog at home and voluntary standby during rota and leave. The consensus of the Board was that this failed to meet all of the Blackburne principles and consequently was not pensionable. SP referred to the Medway case history which required the activity to be both regular and in ordinary course of duties in fulfilling contractual requirements. SP advised the additional 10% was to cover out of hours activities. The consensus of the Board was that this failed to meet two of the three Blackburn principles and consequently was not pensionable</p> <p>AGREED that SP discuss these allowances with the Representative Bodies on the basis that they be non-pensionable.</p>	SP
LPB/19/34	<p><u>TPR Self-Assessment</u></p> <p>MP suggested that the Board might wish to undertake either an annual or twice yearly refresh using the Pension Regulator’s self-assessment tool. This would require participation by both Scheme Manager and Scheme Member representatives. The time commitment would be approximately two hours before the end of September.</p> <p>AGREED that both AH and PR be invited to participate in the self-assessment refresh.</p>	MP
LPB/19/35	<p><u>LPB Roles and Responsibilities</u></p> <p>CONSIDERED document as circulated by MP.</p> <p>The document was AGREED subject to the addition of the word “Local” before Pension Board.</p>	MP
LPB/19/36	<p><u>LPB Work Programme</u></p> <p>CONSIDERED document as circulated by MP aimed at shaping the agenda for future meetings.</p> <p>The Work Programme was AGREED subject to the addition of an annual meeting with West Yorkshire Pension Fund.</p>	MP
LPB/19/37	<p><u>Date of Next Meeting</u></p> <p>30 October 2019 at 15:00hours.</p>	

The Meeting started at 3.00 pm and finished at 5.00 pm

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LPB Action Log 2019-10-08 - Open Actions

Date Raised	Source	Action Lead	Status	Pension Work Activity	Action	Comments	RAG
09/05/2018	Board	Steve Pope	In progress	Risk Management	Risk Register To develop a risk register	<p>SP had reviewed risk registers from Staffordshire and Cheshire FRS - this had also been discussed at the WYPF quarterly meeting.</p> <p>09/11/18: SP had developed a risk register and would be revising following AW's comments.</p> <p>08/04/19: LPB workshop held on 04/04/19 to review/further develop the risk register. Revised risk register to be on agenda for LPB meeting on 25 April.</p> <p>29/05/19: Board requested that revised RR be circulated ahead of next meeting.</p> <p>19/07/19: SP not yet made revisions following workshop on 4/4. SP to bring to monthly meeting on 12 Sept.</p> <p>12/09/19: Deferred to Oct monthly meeting.</p> <p>27/09/19: To be taken to LPB on 30 Oct so can report as complete in TPR survey (due Dec)</p> <p>08/10/19: Key part of TPR survey - SP working to get this ready for LPB on 30 Oct</p>	R
14/02/2019	Board	Amy Webb	In progress	Performance Measures	KPIs Performance measures as identified in the contract to be considered in terms of data collection and reporting. AW to work with Procurement and an update to be provided at the April 25 meeting	<p>08/04/19: KPIs in contract documentation had been circulated. SP to report progress in Scheme Manager's update to LPB on 25 April.</p> <p>29/05/19: WYPF report KPIs do not align to KPIs in the contract. SP discussing with Procurement ... possible standards KPIs for use by WYPF User Group?</p> <p>19/07/19: Action with AW. Procurement contact off at present AW to pick up next month.</p> <p>08/10/19: AW been trying to get hold of WYPF but no response. Will be raised at LPB on 30 Oct.</p>	R
18/02/2019	DAP Report	Steve Pope	In progress	LPB Governance and Effectiveness	LPB Website - IDRPs details No clear reference on the Pensions Board webpage to the local process to be followed relating to pensions disputes.	<p>08/04/19: This was not referenced on the WYPF website.</p> <p>29/05/19: WYPF website includes guidance on IDRPs but DSFRA website does not.</p> <p>19/07/19: DSFRA website still to be updated with IDRPs details.</p> <p>12/09/19: Still to be done</p> <p>27/09/19: CG to update DSFRA website to include reference to IDRPs and link to DSFRA policy/procedure and link to guidance on WYPF website</p> <p>08/10/19: Website updated. ACTION CLOSED</p>	G
18/02/2019	Board	Steve Pope	In progress	Administration and Compliance	Split Pension SP would identify any individuals who received a split pension and may have been paid an incorrect sum by WYPF. Clarity would be sought from WYPF to ensure they held enough data to rectify any errors encountered by the individuals.	<p>08/04/19: One individual had been identified to date with the payment since being corrected. A conversation had been held with WYPF. SP would consider whether this was a reportable breach.</p> <p>29/05/19: If assessment of whether this is a reportable breach is amber SP to arrange meeting to discuss or discuss via email.</p> <p>19/07/19: Waiting on WYPF to get report to us.</p> <p>12/09/19: WYPF has been chased for report.</p> <p>08/10/19: Report received - don't need to reclaim amounts from pensioners but FRA has had to make repayment to pension fund £150k (for which we will get top up). IDRPs due to meet to consider claims for compensation - legal advice pending.</p>	A

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Agenda Item 4

LPB Action Log 2019-10-08 - Open Actions

Date Raised	Source	Action Lead	Status	Pension Work Activity	Action	Comments	RAG
18/02/2019	Board	Steve Pope	In progress	LPB Governance and Effectiveness	Scheme Member Representative Appointment SP to undertake an advertisement and recruitment process for the position of a Scheme Member Representative on the Board (PR's position)	08/04/19: This would be advertised on the Service website, Facebook page and other notable Facebook Groups. This would be concluded by the next FRA meeting on the 07 June, training would then be attended by the individuals on the 18 June. 11/07/19: One request received for further information. Clarification of PR intention to re-apply required. 19/07/19: SP to respond to person who requested information - MP to contact PR. 12/09/19: PR has confirmed he will stay one so have two vacancies. Three RBs offering nomination plus one other individual. SP to undertake process to select two of the four. 08/10/19: Two vacancies, three interested parties. SP progressing	A
29/05/2019	Board	Steve Pope	In progress	Administration and Compliance	Abatement - Incorrect application of rules A number of pensioners not had abatement applied when should have done. SP to work with WYPF to establish extent of the issue and information required.	19/07/19: Waiting for report from WYPF so HR can provide information on each case allowing them to be assessed by AW. 12/09/19: Information received from WYPF on each case; advice obtained from LGA; meeting scheduled with AW and MP to discuss resolution. 08/10/19: Meeting held and agreed to repay fund and write to DCC seeking compensation. SP to provide to comments to AW so AW can get letter off.	A
29/05/2019	Board	Steve Pope	In progress	Administration and Compliance	MHR data extraction - Manual file Data extraction from MHR system preventing data being supplied to WYPF for ABS production. Manual file being produced.	19/07/19: Manual file sent to WYPF on 5 July, WYPF posting data to member records and will assess any issues arising. Until then cannot assess whether ABS deadline can be met. 06/08/19: SP reported that WYPF was confident that all ABS would be produced by 31 Aug deadline. 12/09/19: Deadline for ABS met other than for those in Modified Scheme. 08/10/19: All data provided - ACTION CLOSED	G
29/05/2019	Board	Steve Pope	In progress	Administration and Compliance	MHR data extraction - Automated solution Data extraction from MHR system preventing data being supplied to WYPF for ABS production. Long-term automated solution being worked on by MHR and SP.	19/07/19: Automated report produced and being tested by our HR team once relevant data from WYPF available. 12/09/19: Pension ref numbers being added to payroll data that will enable report to be linked to WYPF records. Further checks to be undertaken. 08/10/19: Itrent report in place, tested and automation designed around any gaps. 98% complete	G
07/06/2019	FRA	Mike Pearson	In progress	LPB Governance and Effectiveness	Scheme Manager Representative Appointment MP to conduct recruitment of external SME to act as Scheme Manager rep.	19/7/19: Desk top research undertaken into similar roles on other LPBs. Recruitment process to be conducted during Aug/Sept. 12/09/19: Advert not produced yet. 08/10/19: Advert being drafted	A
07/06/2019	FRA	Mike Pearson	In progress	LPB Governance and Effectiveness	LPB Website - Board Members Pensions page on website to be updated to reflect change in number of Board members and changes in appointments.	19/07/19: Change to number of members still outstanding. Change to appointments pending outcome of the two processes. 12/09/19: Appts not yet made. 08/10/19: Website updated to reflect increase in Board members and shows where vacancies are. New appointments will be updated once made. ACTION CLOSED	G
19/07/2019	Scheme Manager	Steve Pope	In progress	Administration and Compliance	Split Pension SP to work through breach flow chart to assess if a reportable breach.	08/08/19: Reported to LPB that issue been identified as representing a breach, but there was a question on whether the breach was reportable. SP to work through breach flow chart, together with using the SAB template and guidance, to assess if a reportable breach. Update to be reported to the next Board meeting. 12/09/19: SP to discuss recommendations with AW and MP 08/10/19: SP view is it is reportable and will submit report to TPR	G

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LPB Action Log 2019-10-08 - Open Actions

Date Raised	Source	Action Lead	Status	Pension Work Activity	Action	Comments	RAG
08/08/2019	Board	Mike Pearson	Completed	LPB Governance and Effectiveness	TPR Self-Assessment refresh Refresh to be completed during September. AH and PR to join MP and SP to complete this.	13/08/19: Meeting set for 27 September 27/09/19: Self-assessment refresh completed with commentary added to provide evidence that supports assessment. ACTION CLOSED	G
14/08/2019	Chair	Mike Pearson	Pending	Training	New LPB Member Induction Induction programme for new LPB members (two scheme member and one scheme manager) to be developed once appointments made and TNA completed.	12/09/19: SP made enquiries for new member training. SP to check interest with LGA if other nominees in SW for local training. 08/10/19: LGA has no other planned courses. SP to check interest with other SW FRAs	G
06/09/2019	SAB	Steve Pope	Pending	Administration and Compliance	Raising Data Standards GAD request for FRAs to consider/review where improvements to the member data held/provided for valuations could be focussed to enable more data to be included for the 2020 valuation.	12/09/19: Assessment of DSFRS position in hand. 08/10/19: WYPF been asked to advise on data gaps	G

LPB Action Log 2019-10-08 - Completed Actions

Date Raised	Source	Action Lead	Status	Pension Work Activity	Action	Comments	Date Closed
24/01/2018		Steve Pope	Completed	GDPR Compliance Assurance for WYPF	To provide written assurance to the Board as soon as possible on plans relating to GDPR Compliance, and for this to be included in the next Scheme Manager update (PB/18/4/d)	Steve Pope: SP to seek further input from Sarah Bailey and from WYPF on GDPR. Update: Yunus Gajra (WYPF) provided and updated at the LPB meeting on the 09/05 and discussed WYPF's compliance with GDPR and the Data Protection Act.	09/05/2019
24/01/2018	Board	All LPB	Completed	Training	LPB Members Training All members and officers involved with the administration of Pensions to have undertaken all seven modules on the Pension Regulator Toolkit by the 18 April 2018 (PB/18/4/g)	15/02/19: BW confirmed his training was still to be completed. 08/04/19: Board requested that he complete the e-learning modules as soon as possible. 29/05/19: BW to try and complete on duty weekend in June. 19/07/19: CG has completed the e-learning modules. CG and GW attended LGA annual wrap up training on 18 June. 08/08/19: BW no longer LPB member so all members have now completed training. - ACTION CLOSED	08/08/2019
09/05/2018		All LPB	Completed	Annual Report	Any comments on the LPB Annual report were to be sent to HS	No comments received.	15/05/2019
09/05/2018		Amy Webb	Completed	LPB Governance and Effectiveness	AW would commission Devon Audit Partnership to undertake an audit of the Board, the timing of this would be dependent on other actions.	(PB/18/16/b) This would be scheduled for the end of the financial year 18/19.	30/05/2019
09/05/2018		Steve Pope	Completed	WYPF	SP to ensure the correct contact addresses were provided for TPAS and The Pension Ombudsman	HS to ensure contact addresses were added to the website	30/05/2019
09/05/2018		All LPB	Completed	Annual AGM	Any Board members wishing to attend the Firefighters' Pensions AGM would advise HS		30/05/2019
09/05/2018		Steve Pope, Amy Webb and Andy Hallam	Completed	LPB Governance and Effectiveness	SP, AH and AW to review the Local Government Association Survey and The Pensions Regulator Survey; challenging the Boards self-assessment update. (PB/18/16/a)	Meeting scheduled for the 15 August, diary commitments have prevented this from being earlier.	30/06/2019
09/05/2018	Board	Mike Pearson	Completed	Terms of Reference	LPB roles and responsibilities MP would review the documentation relating to roles and responsibilities and where this information had been published (PB/18/15).	08/04/19: Not progressed beyond the initial desk top review. If not completed for LPB meeting on 25 April, target would be to complete for meeting on 25 July 2019. 19/07/19: Target for Board meeting on 8 August 22/07/19: Draft roles and responsibilities on agenda for 8 Aug 08/08/19: Roles and responsibilities document agreed by LPB - ACTION CLOSED	08/08/2019
09/11/2018		Mike Pearson	Completed	Terms of Reference	MP to contact members of the board about quorum - in the event of non-consensus MP will be take a paper to the Authority on the 14th December.	15/02/19: Discussed at LPB meeting where it was agreed to ask the Authority to increase Membership to 8 with quorum set at 50% to include at least one rep from each side.	15/02/2019
09/11/2018	Board	Mike Pearson	Completed	Work Programme	LPB Work Programme MP to work alongside HS to create a skeleton programme of work. This will determine the dates for the next meetings.	08/04/19: Not progressed beyond the initial desk top review. If not completed for LPB meeting on 25 April, target would be to complete for meeting on 25 July 29/05/19: Discussion at Board - SAB has guidance? 19/07/19: Target for Board meeting on 8 August 22/07/19: Draft work programme on agenda for 8 Aug 08/08/19: Work programme agreed by LPB - ACTION CLOSED	08/08/2019

LPB Action Log 2019-10-08 - Completed Actions

Date Raised	Source	Action Lead	Status	Pension Work Activity	Action	Comments	Date Closed
18/02/2019	DAP Report	Mike Pearson	Completed	Board Governance	Attendance at meetings to be considered in 2019, in relation to the effectiveness of the Board and the impact of cancelled meetings on Board business. Source; Devon Audit Partnership report	The issue of meeting attendance had been identified internally and was reviewed at the February 2019 meeting.	18/02/2019
18/02/2019	DAP Report	Mike Pearson/Steve Pope	Completed	Scheme Manager	Appropriate cover and contingency arrangements should be established for the Scheme manager. Source; Devon Audit Partnership report	As well as providing resilience, additional capacity could be created. The employer reps and scheme manager will consider cover arrangements in their regular meetings and work plan for 2019.	18/02/2019
18/02/2019	DAP Report	Mike Pearson	Completed	Board Governance	TPR guidance (code of practice) in relation to governance, record-keeping, internal controls and member communications should continue to be reviewed by the DSFRA Pension Board and management, and actions agreed with a view to bringing all self-assessed TPR areas to 'Green'.	TPR Guidance is considered regularly and monitored via the population of surveys and monitoring. Clear records will be maintained.	18/02/2019
18/02/2019		Hannah Singleton	Completed	Risk Management	Arrange a workshop for Steve Pope to discuss the Risk Register with Board Members	Workshop arranged for Thursday 04 April at 11:00. Facilitated by SP	19/02/2019
18/02/2019	DAP Report	Mike Pearson	Completed	Agenda Publication	An opportunity Pension Board agendas, papers, minutes and decisions (and other related documentation) to be published by DSFRS. Source; Devon Audit Partnership report	Agenda, papers and minutes are now prepared using ModernGov so will be published from April 2019. S	30/04/2019
18/02/2019	DAP Report	Mike Pearson	Completed	LPB Governance and Effectiveness	Future iterations of the Pension Board annual report could include detail on the number of retirements, new starters, membership numbers and 'opt out' numbers, as well as reference to statutory breaches (even if nil) and areas of identified good practice, as referred to within the Board terms of reference.	29/05/19: For 2019/20 Annual Report. Action closed	29/05/2019
18/02/2019	Board	Mike Pearson	Completed	LPB Governance and Effectiveness	FRA to be approached by the Board with a proposal to increase the Board membership to 8 and an alteration to the quorum to 50% (minimum one from each side)	29/05/19: On FRA agenda for 7 June 07/06/19: FRA approved changes. Action closed.	07/06/2019
18/02/2019	DAP Report	Mike Pearson	Completed	Training	An annual training plan to be considered but must be proportionate to the role of Pension Board members	29/05/19: New members to the Board - LGA doing some thing on this? Consider CPD, perhaps using TPR modules? 19/07/19: CPD via attendance at Annual Pension Conference and workshops as may be arranged during the year. Action closed	19/07/2019
19/02/2019		Hannah Singleton	Completed		A Scheme Member Representative would be invited to the Monthly Pension meetings held with AW, SP and MP. The meetings would go ahead regardless of attendance of the Scheme Member Representative. HS to arrange.		19/02/2019
29/05/2019	Board	Amy Webb	Completed	Administration and Compliance	AW to seek clarification of statutory rules for abatement of pension payments where former employees working for Red One.	24/06/19: AW spoken with both HMRC and LGA Pensions. Both confirm that unless individuals legitimately working as a contractor, pension abatement would apply because ROL a wholly owned subsidiary of the FRA. Action closed	24/06/2019
08/08/2019	Board	Steve Pope	Completed	Administration and Compliance	Abatement rules for 2015 scheme SP would check why abatement did not, apparently, apply to the 2015 Scheme and advise members of the LPB accordingly.	12/09/19: CG provided clarification of regs. To be circulated to Board. ACTION CLOSED	12/09/2019
08/08/2019	Board	Steve Pope	Completed	LPB Governance and Effectiveness	WYPF attendance at LPB meeting SP to invite WYPF to attend the next Board meeting on 30 October 2019 or a subsequent meeting, depending on availability.	12/09/19: WYPF confirmed attendance. - ACTION CLOSED	12/09/2019
08/08/2019	Board	Steve Pope	Completed	Administration and Compliance	Pensionable Pay SP to discuss with the Representative Bodies the allowances considered by the LPB on the basis that they be non-pensionable.	12/09/19: SP passed position to RBs, awaiting response. - ACTION CLOSED	12/09/2019

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Local Pension Board – Training Log

Updated September 2019

	Conflicts of interest	Managing risk and internal controls	Maintaining accurate member data	Maintaining member contributions	Providing information to members and others	Resolving internal disputes	Reporting breaches of the law
<u>Scheme Manager Reps</u>							
Mike Pearson	November 2017	May 2018	May 2018	November 2017	November 2017	May 2018	November 2017
Amy Webb	November 2017	November 2017	November 2017	November 2017	November 2017	November 2017	November 2017
Councillor George Wheeler	October 2018	October 2018	October 2018	October 2018	October 2018	October 2018	October 2018
<u>Scheme Member Reps</u>							
Andy Hallam	May 2018	May 2018	May 2018	May 2018	May 2018	May 2018	May 2018
Peter Redbourn	February 2018	February 2018	February 2018	February 2018	February 2018	February 2018	February 2018
<u>Support Officers</u>							
Steve Pope	January 2018	January 2018	January 2018	January 2018	January 2018	January 2018	January 2018
Caroline Gourlay	July 2019	July 2019	July 2019	July 2019	July 2019	July 2019	July 2019
Dan Heard	January 2018	January 2018	January 2018	January 2018	January 2018	January 2018	January 2018

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DEVON & SOMERSET FIRE & RESCUE AUTHORITY LOCAL PENSIONS BOARD

Updated Pension Correspondence Log – Correspondence received and circulated since last LPB meeting

Date	Description	Purpose	Source	Document
9 September 2019	FPS Bulletin 23 – August 2019	Information Only	Local Government Association	 FW FPS Bulletin 23 - August 2019.msg
30 September 2019	FPS Bulletin 24 – September 2019	Information Only	Local Government Association	 FPS Bulletin 24 - September 2019.msg

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DEVON & SOMERSET FIRE & RESCUE AUTHORITY

LOCAL PENSIONS BOARD

DATE OF MEETING	30 October 2019
SUBJECT OF REPORT	SCHEME MANAGER UPDATE
REPORT AUTHOR	Head of Human Resources
EXECUTIVE SUMMARY	This report provides a summary of current pension matters both nationally and locally which have required input from the Service. This report should also be considered in conjunction with the regular monthly Bulletins which are issued by the Firefighters' Pensions Advisory Board.

1. INTRODUCTION

- 1.1. This is the update report from the Devon & Somerset Fire & Rescue Authority (the Authority) delegated Scheme Manager for the Authority's Local Pension Board (LPB). The Scheme Manager is defined as being the Fire and Rescue Authority under The Firefighters' Pension Scheme (England) Regulations 2014. However, the Scheme Manager may delegate any functions under these Regulations. The Authority has set out in the Discretions Policy where decisions will need to be taken by the Authority. However, the day-to-day managing and administering of the pension schemes and any statutory scheme that is connected with them, is delegated to the Head of Human Resources.
- 1.2. The LPB provides a number of functions as set out in the Terms of Reference, which include: assisting the Scheme Manager to ensure compliance with the relevant regulations and the efficient and effective management of the pension administration; advising on member communications; and monitoring complaints.
- 1.3. This report provides a summary of current pension matters both nationally and locally and further updates will be provided at subsequent LPB meetings.

2. PENSION SURVEYS & ANNUAL RETURNS

- 2.1. Since the last meeting of the LPB in August 2019, the results of the Firefighter Pension Scheme (FPS) Administration Benchmarking Review have been released. The review was commissioned by the Scheme Advisory Board (SAB) and was undertaken by AON. The main recommendations were presented at the LGA Fire Pensions Conference in September and the summary slides can be found as an Appendix to this report.
- 2.2. Nick Gannon, Policy lead for the Pension Regulator (TPR) has confirmed that its annual survey will be available for completion in November & December 2019 and he highlighted the importance of having a risk register in place together with procedures for assessing and managing risk.

3. PENSION COMMUNICATIONS

Annual Benefit Statements

- 3.1. There is a legal requirement to provide an Annual Benefit Statement (ABS) to all active members by no later than the 31 August each year, i.e. those who are in pensionable service with the Devon & Somerset Fire & Rescue Service (the Service). This requirement is set out in the Public Service Pensions Act 2013.
- 3.2. At the last LPB meeting, it was reported that although the majority of ABS statements would be produced within the statutory deadline of the 31st August there was a delay with the FPS 2006 Modified Scheme. In 2018 a specific problem had been encountered with these statements, relating to the transfer of data from the Service's previous pension administrator to West Yorkshire Pension Fund (WYPF). This year the delay has been across all clients. WYPF had expected to produce the Modified Scheme statements by the 31 August, with an automated approach developed for future years. In late August, however, WYPF reported that whilst it had been seeking to provide coding for the pension system (Civica) so that the calculations could be produced, the complexity of the coding resulted in this not being possible in sufficient time to produce the statements by the 31 August deadline. Consequently, the calculations had to be undertaken manually.

- 3.3. WYPF has confirmed that the statements have been produced and should have been with the scheme members during week commencing 14 October 2019. This breach of the statutory requirements is one which is reportable to the Pension Regulator.
- 3.4. WYPF has confirmed that in future the modified scheme members will get an automated ABS similar in style to the standard ABS issued to other members of staff. This shows the benefits at:
- age 55 for protected members
 - the end of the next month for protected members who are over age 55 at the ABS date
 - age 55 and 60 for taper and unprotected members

This additional information has been very well received by scheme members rather than the basic ABS provided in 2018. For the longer term, WYPF has also confirmed that the revised coding will also have an automated retirement calculation which will speed up the processing and increase the accuracy of the figures provided to scheme members for estimates and retirements.

- 3.5. The last Scheme Manager's report noted that there had been an ongoing issue for the Service affecting the automatic production of monthly pension data from the iTrent payroll system required for the production of ABS information. The report has now been reconfigured and some automated checking processes built, which means this problem has now been resolved. Reports covering the missing months from April 2019 are now being produced for submission to WYPF.

Annual Allowances

- 3.6. An Annual Allowance factsheet has been produced, along with a table which highlights where a promotion could potentially take an employee over the threshold for Annual Allowances.
- 3.7. The table has been prepared in a way which will enable ease of refresh following future pay reviews and reference to the table will be added to the Service's promotion letters. The factsheet will be added to the intranet and referred to in future promotional offer letters.

WYPF My Pension Portal

- 3.8. Configuration and testing continues on the online My Pension Portal. WYPF had intended to launch the enhanced site during August 2019 but this has been delayed and they are now aiming for the end of November. WYPF advises that, when launched, the site will need further work to add in the Fire calculations.

4. PENSION PROJECTS

Pensionable Pay for Allowances

- 4.1. At the last LPB meeting in August it was reported that the Head of HR and HR Rewards & Benefits Manager had attended the LGA Pensionable Pay workshop on 18 July 2019 where the Head of HR had presented, from a practitioners perspective, on the Service's experiences in decision making and implementation of pensionable pay. As a follow-up to this workshop the LGA commissioned its legal advisors to provide advice on corrective action and retrospective payments. The Head of HR attended a small working group to give input on legal advice received by the SAB which would need to decide whether the advice would be circulated to all fire and rescue services.

- 4.2. At the August meeting, the Scheme Manager sought input from the LPB on whether three additional payments made by the Service should be pensionable. The LPB recommended an approach to each of the three additional payments consistent with the Blackburne principles. This approach was then discussed with the Service FBU Secretary who had previously registered pensionable pay as a matter of dispute. While the Service FBU Secretary was satisfied with the recommendations from the LPB, the Regional FBU representative still has concerns regarding the Day Crewing Rent Allowance (which had previously been determined as non-pensionable). It is intriguing that the Regional FBU representative should take this position since the previous national FBU advice had been that this allowance was not pensionable and from a Service perspective this matter is now closed.
- 4.3. There has been one new allowance considered since the last LPB meeting - payments in relation to a Crewing Pool. The crewing pool is a bank of staff voluntarily contracted to provide operational cover at stations when required and perform other work activities whilst there. This operational support mechanism is managed by the Operational Resource Centre (ORC) as a central function. The key consideration here is that opting to participate in the crewing pool is purely voluntary and as such is not considered as pensionable pay.

Transition Protection Judgement

- 4.4. There has been no change to the situation on to the Transitional Protection Judgement since the last report, when the Board was advised that the Supreme Court had denied the Government permission to appeal the Court of Appeal's judgement that transitional provisions introduced to the reformed judges and firefighters pension schemes in 2015 gave rise to unlawful age discrimination.
- 4.5. Amar Pannu, Head of Police & Firefighter's Pensions at the Home Office, presented at the LGA Fire Pensions Conference. Amar confirmed that the Government will be engaging with the Employment Tribunal and employer and member representatives, as well as the devolved administrations, to help inform its proposals to the Tribunal for remedy.
- 4.6. Amar indicated that the Home Office would be producing a factsheet on this subject which it intend to distribute in October 2019. Amar also highlighted that there were difficulties to address including that for some active members reverting to the previous scheme could mean that they were worse off in terms of scheme benefits. There was also the ongoing requirement for pensions to be sustainable as originally set out in the Hutton review.

Abatement

- 4.7. As a reminder, the general abatement rule is that on re-employment the salary paid for the new employment added to the pension in payment (plus inflation) cannot be more than the member's salary (plus inflation) at the point they retired. If there is an excess then the pension in payment will be abated to bring the level back in line with the salary at retirement. There is no age limit on abatement, and this continues for the full period of re-employment by a fire authority in any capacity. When the re-employment ends, the pension will be reinstated to the full amount.
- 4.8. It was previously reported that a number of staff had been identified that should have been abated but had not been. The Service has fully investigated the circumstances around these cases and the interpretation that the previous pension administrator applied. It appears that there have been cases where the pension has been abated but then re-instated when pensioners had reach normal pension age, i.e. 55 for the 1992 scheme.

4.9. The Service's previous pension administrator applied this approach based on a 2009 CLG circular for what was termed 'inter-service'. However, this circular does not have any statutory status and is not endorsed by the Home Office as a policy position. On the basis of research undertaken, it would appear that under such circumstances the Service can make these unabated pensionable payments under the regulations, but in doing so the Authority must transfer a sum equivalent to the abatement amount to its firefighter pension account. The Service has now reinstated the pension abatement to those staff who continue to be re-employed. A further problem was identified with a member of staff who retired but re-joined the Service in a support role and had not been abated. The Service will need to put in steps to ensure that there are adequate checks to ensure that this does not happen again.

4.10. The Pension Fund account has been reimbursed for the full amount of the abatement that was not applied and the Director of Finance and Resourcing has written to the previous pension administrator requesting that the issues referred to in paragraph 4.9 above and 4.11 below are remedied.

Two Pensions

4.11. It was noted previously that WYPF was reviewing pensioners who had entitlement to two pensions which is colloquially known as a "split pension". This was because the Service's previous pension administrator had applied more than one pension split where this was advantageous to the retiree, when in fact only a single split pension should have been applied. It is also now recognised that equivalent indexing should be applied to the first pension and this was not always the case.

4.12. WYPF has completed the analysis on 43 such cases relating to the Service. There were 4 cases where multiple splits had been applied and a further 12 cases where the indexing has not been applied. For all of those affected, there had been underpayments and WYPF has made the necessary corrections. There was one case where a small overpayment had been made and this has been corrected going forward. This misapplication of the Scheme is considered as a breach of the law and one that it is reportable to the Pension Regulator.

5. REPORTING BREACHES OF LAW

5.1. Within the LPB Reporting Breaches Procedure, Section 70 of the Pensions Act 2004 (the Act) is referenced. This requires that, where a person has reasonable cause to believe that:

- (a) A duty which is relevant to the administration of the scheme in question, and is imposed by virtue of an enactment or rule of law, has not been or is not being complied with; and
- (b) The failure to comply is likely to be of material significance to the Regulator in the exercise of any of its functions

then they must give a written report on the matter to the Regulator as soon as is reasonably practicable.

5.2. Paragraph 3.2 above refers to the delay in the modified pension Annual Benefit Statements and this will be a reportable breach to the Pension Regulator. The same applies to the Two Pensions matter referred to in paragraph 4.11.

6. INTERNAL DISPUTE RESOLUTION

- 6.1. Within the Firefighters' Pension Scheme formal complaints are made via the Internal Disputes Resolution Procedure. There have been no new complaints under this procedure since the last Local Pension Board meeting.
- 6.2. There is one live case at Stage 2 which has been heard by Authority Members. A final decision on this is still awaited.
- 6.3. Information concerning the Internal Disputes Resolution process has been added to the Service web page along with links to the information on the WYPF website.

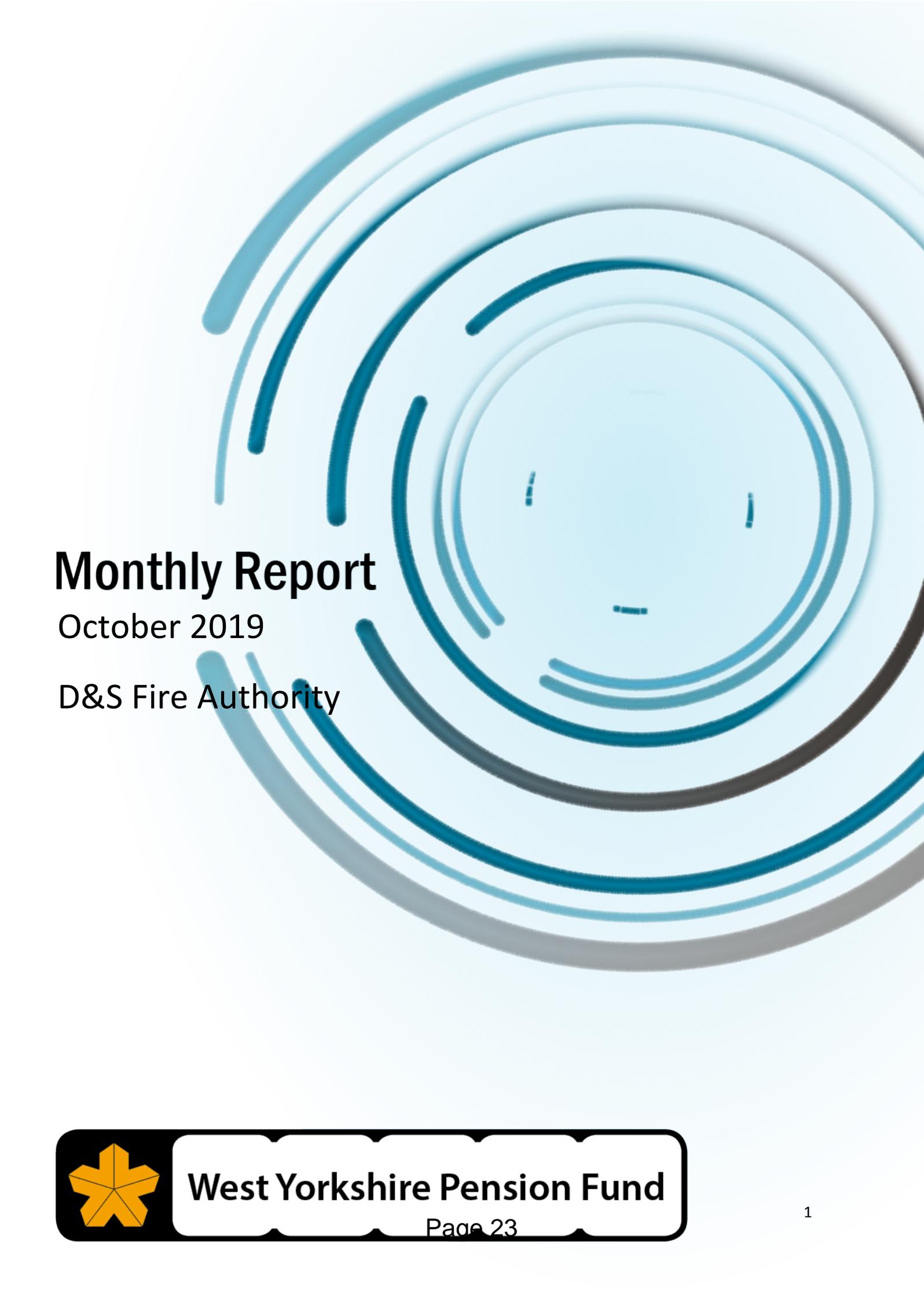
7. PENSION ADMINISTRATOR QUALITY OF SERVICE

- 7.1. The client service that WYPF provides continues to be to an excellent standard and it is recognised that WYPF is working hard to ensure that clients receive the best possible service.
- 7.2. In terms of the administration functions and the monthly reporting from WYPF (see Appendix A), the reporting does not currently align with that agreed under the contract and there would be a benefit from including performance trend lines in the monthly reports. The Director of Finance and Resourcing has been seeking to discuss with WYPF the performance measures used but has experienced difficulty in getting feedback from the WYPF Business Development Manager.
- 7.3. Since the last report, discussions have been held with WYPF which has agreed to feedback on the KPIs agreed under the contract to ensure that:
 - (a) all agreed KPIs are reported;
 - (b) it will be made clear where indicators will only be reported by exception (e.g. rare cases); and
 - (c) consideration is given to the use of performance trend analysis to add further value to the report.
- 7.4. The Scheme Manager recently contacted the call-line with queries concerning the modified pension scheme, which can be very complicated for active members because of the various options. It was interesting to experience the assistance that an employee would receive in that there was only one pension advisor with sufficient knowledge to answer the specific questions and this advisor was not available at the time of the call.

8. RECRUITMENT OF LPB MEMBER REPRESENTATIVES

- 8.1. Since the last meeting, James Leslie and Ben Redwood have been appointed to the two Scheme Member vacancies on the Local Pension Board. The new representatives are warmly welcomed onto the Board and their induction will now be arranged to ensure that they are able to fulfil their role.

STEVEN POPE
Head of Human Resources



Monthly Report

October 2019

D&S Fire Authority



West Yorkshire Pension Fund

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Prepared by:

Yunus Gajra

Business Development Manager

Tel: 01274 432343

Mobile: 07582105760

Email: Yunus.gajra@wypf.org.uk

West Yorkshire Pension Fund

Aldermanbury House

4 Godwin Street

Bradford

BD1 2ST

www.wypf.org.uk

Follow WYPF on Twitter www.twitter.com/wypf_lgps

Follow WYPF on Facebook www.facebook.com/westyorkshirepensionfund



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1. Regulations/Fire Scheme Update

1.1 SAB Bulletin

Please take a few minutes to read the Firefighters' Pension (England) Scheme Advisory Board Bulletin (Link to Bulletin 24 below) and take any action required.

[Bulletin 24](#)

1.2 McCloud

The case management hearing at the Employment Tribunal is scheduled for 18th December. This should provide a timeline of events of what needs to happen and when.

1.3 Valuation 2020

GAD have confirmed that the valuation specification will remain the same as for 2016 but there will be some additional information required relating to remedy cases.

For FRA's the main thing is to ensure that the Month 12 return is as accurate as possible as these pay figures will be supplied to GAD.

2. Member Issues

None

3. Administration Update

3.1 Annual Benefit Statements

The production of the RDS Modified ABS has commenced and that the statements should be with the scheme members this week.

3.2 Pension Savings Statements

Pension Savings statements have been issued to members who have breached the Annual allowance, before the deadline of 6 October.

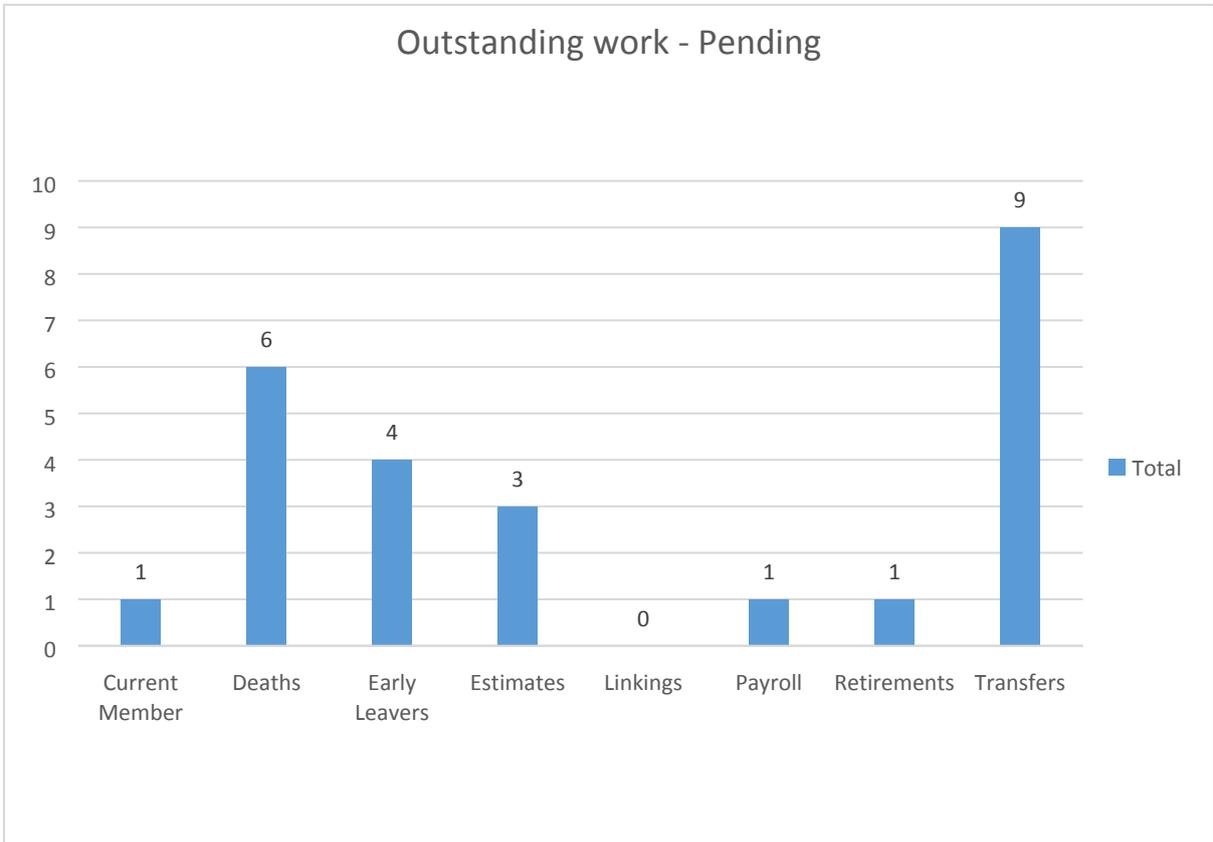
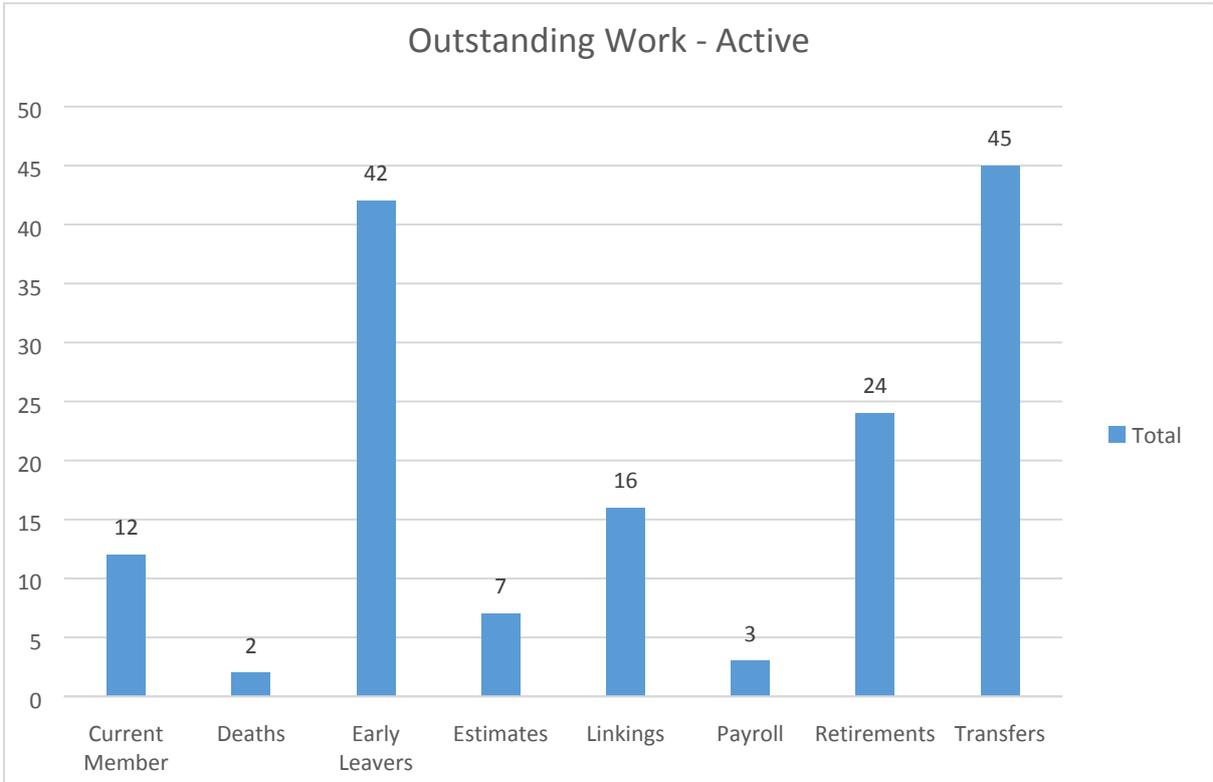
4. Key Performance Indicators

4.1 Completed processes

D&S Fire (1 to 30 September 2019)						
WORKTYPE	TOTAL CASES	TARGET DAYS FOR EACH CASE	TARGET MET CASES	MINIUM TARGET PERCENT	TARGET MET PERCENT	AVERAGE DAYS TAKEN
Deferred Benefits Set Up on Leaving	15	10	11	85	73	28
Pension Estimate	18	10	17	85	94	5
Pension Set Up Payment of Lump Sum	6	3	6	85	100	1
Retirement Actual	6	10	6	85	100	1
Set Up New Spouse Pension	1	5	1	85	100	1
Change of Address	2	20	2	85	100	1
General Payroll Changes	10	20	10	85	100	1
Age 55 Increase to Pension	1	20	1	85	100	11
Enquiry Fire	1	5	0	85	0	10
Death Grant Nomination Form Received	18	20	16	85	89	6
Initial letter Death in Retirement	3	5	3	85	100	1
Death in Retirement	3	5	3	85	100	1

* Deferred Benefits Set Up on Leaving – Other urgent work meant that these were low priority although members were informed that we had received leaver notifications and we would contact them with details of benefits in due course.

4.2 Work in Progress



5 Member Web Registrations

The number of members signed up to member web are:

Status	Number
Active	88
Pensioner	137
Pensioner Ex-Spouse	0
Beneficiary Ex-Souse	4
Deferred Ex-Spouse	0
Deferred	33

6. Calendar of Events

January	February	March	April
Life Certificates HMRC Event Reporting Payment of Unauthorised Lump Sum and Scheme Sanction Charge to HMRC	Life Certificates Review of DWP benefits for Injury cases GAD Data Collection Spreadsheet?	Life Certificates	Apply Pensions Increase Apply Care Revaluation Issue P60's Life Certificates Pensioner Newsletter
May	June	July	August
Roll out of Monthly Postings Life Certificates	Active Newsletter Life Certificates Issue Deferred Annual Benefits Statements	Life Certificates Issue Deferred Annual Benefits Statements Issue active Annual Benefits Statements	Issue active Annual Benefits Statements Life Certificates
September	October	November	December
Pension Estimates Assumption Exercise Life Certificates Pension Savings Statement	Life Certificates Participate in NFI tPR Scheme Returns	tPR Annual Survey Life Certificates	IAS19 Data capture exercise for Actuaries Life Certificates

7. Membership Numbers

Scheme	ACTIVES	DEFS	PENS	BENS	PRESERVED REFUNDS	LVRS OPTNS PENDING
Devon and Somerset Fire (1992 Scheme)	95	61	906	158	1	0
Devon and Somerset Fire (2006 Scheme)	45	419	207	13	9	2
Devon and Somerset Fire (2006/RDS Scheme)	58	93	67	0	0	0
Devon and Somerset Fire (2015 Scheme)	1387	336	14	6	5	7
Devon and Somerset Fire (2015/RDS Scheme)	43	2	0	0	0	3
TOTAL	1628	911	1194	177	15	12

D&S Local Pension Board - TPR Self-Assessment Summary 2019-09

Dec-16 Nov-17 Apr-18 Aug-18 Oct-18 Sep-19 **Commentary/Evidence**

Governing your scheme							
1. Have you clearly defined and recorded the roles & responsibilities of the pension board?	Amber	Amber	Green	Green	Green	Green	Roles and Responsibilities agreed by LPB 8 Aug 2019. Need to be published on website.
2. Have you published information about the pension board and ensured it is kept up to date?	Amber	Green	Green	Amber	Green	Green	Website live but membership needs to be updated and number of Members and training to reflect 2019 conference attendance and slides.
3. Do you have policies and arrangements in place to help pension board members acquire and retain the requisite knowledge and understanding?	Amber	Amber	Green	Green	Green	Green	Arrangement in place and all members tasked with completing the e-learning on TPR website. The requirement to undertake personal training is defined in the Terms of Reference
4 (a) Do you use training Plans for your pension board?	Amber	Amber	Amber	Green	Green	Green	Completion of TPR eLearning modules when first joining. Attending at least one LGA organised event per year. Communications table created to assist with clarity of communications. Sept 2019 - LGA developing CPD accredited courses which will be included in development plans once available
4 (b) Do you use individual training needs analysis for your pension board?	Amber	Amber	Amber	Amber	Amber	Amber	Oct 2018 - No, apart from requirement to undertake TPR eLearning and initial LGA training. Sept 2019 - ACTION: a) Steve Pope to assess TPR tool for TNA b) re-assess this area once LGA training materials (CPD accredited etc.) produced
4 (c) Do you use training logs for your pension board?	Red	Amber	Green	Green	Green	Green	Training log updated on completion of e-learning modules. Sept 2019 - Training log will be expanded to include LGA accredited courses once available.
5. Do you have a conflicts policy and procedure for pension board members?	Red	Green	Green	Green	Green	Green	Yes - and is a standing item at start of each LPB agenda.

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Agenda Item 10

D&S Local Pension Board - TPR Self-Assessment Summary 2019-09

	Dec-16	Nov-17	Apr-18	Aug-18	Oct-18	Sep-19	Commentary/Evidence
6. Do you have a register of interests (or equivalent)?	Red	Green	Green	Green	Green	Green	Yes

D&S Local Pension Board - TPR Self-Assessment Summary 2019-09

Dec-16 Nov-17 Apr-18 Aug-18 Oct-18 Sep-19 **Commentary/Evidence**

Managing Risks and Issues							
1. Do you have procedures in place for assessing and managing risk?	Red	Amber	Amber	Amber	Amber	Green	Draft RR produced, to be considered at the LPB. The procedure is currently informal. Sept 19 - Review of RR and internal controls now part of LPB work programme.
2. Do you have a risk register?	Red	Amber	Amber	Amber	Amber	Amber	Draft has been produced and to be reviewed at September management meeting Sept 2019 - Not progressed. TPR survey due in at end Dec 19 so target is to get RR completed by LPB meeting on 30/10/19
3. Where you have outsourced services, do you ensure that providers demonstrate that they have internal controls in place?	Amber	Green	Green	Green	Green	Green	Procurement process identified quality controls.
							WYPF report and KPIs
							External Auditors undertake annual review
4. Do you have a service level agreement, or equivalent, in place with your scheme administrators, whether in house or outsourced?	Green	Green	Green	Green	Green	Green	Service level agreement in place between the Service and West Yorkshire Pension Fund
5. Are your internal dispute resolution arrangements clearly communicated to members and others?	Amber	Green	Green	Green	Green	Green	WYPF website includes guidance on IDRP and DSFRS website has link to WYPF but no specific guidance about IDRP. Sept 19 DSFRS website to be updated to include link to WYPF guidance on IDRP.
6. Do you have procedures in place identify, assess and report breaches of the law?	Red	Green	Green	Green	Green	Green	Reporting breaches procedure in place and breaches have been reported

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D&S Local Pension Board - TPR Self-Assessment Summary 2019-09

Dec-16 Nov-17 Apr-18 Aug-18 Oct-18 Sep-19 **Commentary/Evidence**

Administration							
1. Do you have a process in place to ensure that information is provided to TPR as required (e.g. through the scheme return)?	Green	Green	Green	Green	Green	Green	TPR returns are completed by delegated scheme manager as part of business as usual
2. Do you have processes in place to monitor scheme records for all membership types on an ongoing basis and ensure they are accurate and complete?	Green	Green	Green	Green	Green	Green	Processes are established through SLA and KPIs with the WYPF
3. Do you have controls in place to ensure that you employer(s) provides timely, accurate and complete data?	Green	Green	Green	Green	Green	Green	Monthly reconciliations in place. Sept 19 - Looking to establish LPB dashboard of KPIs that will provide assurance on data accuracy
4. When did you last carry out a data review exercise?	Green	Green	Green	Green	Green	Green	March 2018 when the Pension Administrator transferred over. Need to check the SLA with WYPF Sept 19 - Data issues are identified as part of ABS process. P&C team regularly keep data accuracy under review as part of BaU including interaction with WYPF
5. Where you have identified poor quality or missing data, do you have an improvement plan to address issues?	Green	Green	Green	Amber	Amber	Green	Issues are reported through the monthly report to management from WYPF. Data issues arose from the change in scheme administrators. Scheme Manager is checking with WYPF on their plans for remedial action. Sept 19 - Previous issues resolved. Where issues are identified plans are put in place to address as quickly as possible
6. Do you have processes in place for monitoring scheme contribution, resolving issues and assessing whether to report payment failures to TPR?	Green	Green	Green	Green	Green	Green	Finance department monthly procedures

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D&S Local Pension Board - TPR Self-Assessment Summary 2019-09

	Dec-16	Nov-17	Apr-18	Aug-18	Oct-18	Sep-19	Commentary/Evidence
7. Have you reviewed your processes for issuing annual benefit statements to ensure they are fit for purpose?	Green	Green	Green	Green	Green	Green	Moved to new provider April 2018 and are satisfied with their arrangements – will be reviewed annually against national template Sept 19 - Processes have been reviewed. Issues from 2019 ABS manual production of data are being addressed and an automated approach is being developed for 2020
8. Have you taken steps to ensure that member communications are clear, accurate and easily accessible?	Amber	Green	Green	Green	Green	Green	Procurement process reviewed communications – SLA Sept 2019 - WYPF website is easy to use and find information and provide helpline. Internal communication via Shout Out e.g. early retirement seminars and guidance on annual allowance

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Devon and Somerset Fire and Rescue Authority - Local Pension Board Work Programme 2019 - 2021 v1.01

Theme	Activity	SI	15-Feb-19	29-May-19	08-Aug-19	30-Oct-19	18-Mar-20	24-Jun-20	16-Sep-20	09-Dec-20	17-Mar-21	23-Jun-21	15-Sep-21	08-Dec-21
Administration	ABS Feedback					X			X				X	
Administration	Correspondence	Y	X	X	X	X	X	X	X	X	X	X	X	X
Administration	Scheme Manager's Report	Y	X	X	X	X	X	X	X	X	X	X	X	X
Administration	WYPF attendance at LPB meeting					X			X				X	
Administration	Confirmation website up to date	Y				X	X	X	X	X	X	X	X	X
Governance	Annual Report							X				X		
Governance	Appointments to the Board		X				X				X			
Governance	LPB Work Plan				X			X				X		
Governance	Review of Breaches		X											
Governance	Review ToR						X				X			
Governance	Roles and Responsibilities				X									
Governance	TPR Annual Survey Return						X				X			
Governance	TPR Annual Survey Review					X			X				X	
Risk and Assurance	KPIs	Y	X	X	X	X	X	X	X	X	X	X	X	X
Risk and Assurance	LPB Action Log	Y	X	X	X	X	X	X	X	X	X	X	X	X
Risk and Assurance	LPB Audit Report		X											
Risk and Assurance	Risk Register		X			X		X		X		X		X
Risk and Assurance	TPR Self Assessment		X		X		X		X		X		X	
Risk and Assurance	Annual review of internal controls						X				X			
Training	Annual Training Needs Analysis					X			X				X	
Training	Induction for new members					X			X				X	
Training	Training Log	Y	X	X	X	X	X	X	X	X	X	X	X	X

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