

Public Document Pack

Date: 09 January 2019

To: MEMBERS OF THE SOUTH YORKSHIRE
LOCAL PENSION BOARD



**SOUTH YORKSHIRE
LOCAL PENSION BOARD**

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This matter is being dealt with by: Gill Richards

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Dear Member

SOUTH YORKSHIRE LOCAL PENSION BOARD
Thursday 17 January 2019

A meeting of the South Yorkshire Local Pension Board will be held at 12.30 pm on Thursday 17th January, 2019 in the Meeting Room 11, Town Hall, Barnsley, S70 2TA.

Please note the later start time of this meeting, this is to facilitate a Member Seminar in Meeting Room 14 after the Authority meeting which you are welcome to attend (unfortunately I am unable to give a definite start time for this).

A buffet will be served in Meeting Room 11 from 12 noon.

The agenda is attached.

Yours sincerely

D Terris
Clerk

Encs

Distribution: Nicola Doolan, Cllr Phillip Lofts, Kevin Morgan, Susan Ross, Nicola Simpson Jill Thompson (Chair) and Garry Warwick.

Terms of Reference

1. Compliance and Control

- 1.1 To review administrative governance and risk management processes and procedures in order to ensure they remain compliant with the Regulations and regulators Code of Practice.
- 1.2 To assist with the development and review the implementation of the Authority's various policy documents and procedures.
- 1.3 To review the actions taken in response from internal and external review agencies (such as Internal and External Audit and the Pensions Ombudsman).

2. Administration

- 2.1 To monitor and review the performance of the Scheme administration from the scheme members' and employers' perspective including making any recommendations for changes to the Pensions Administration strategy.
- 2.2 Assess the quality of service provided by the Pensions administration Service and identify nay areas for improvement.

3. Communications

- 3.1 To monitor and make recommendations as appropriate on the means and content of communication with scheme members and employers.
- 3.2 To produce an Annual Report upon the Board's activities to be submitted to the Pensions Authority.

4. Budget

- 4.1 To agree an annual budget for the operation of the Local Pension Board and submit it to the Authority for approval.

5. Reporting

- 5.1 To make such recommendations to the Authority with regard to the matters set out in these Terms of Reference as it sees fit.

SOUTH YORKSHIRE LOCAL PENSION BOARD

**THURSDAY 17 JANUARY 2019 AT 12.30 PM IN MEETING ROOM 11, TOWN HALL,
BARNSELY, S70 2TA**

AGENDA

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SOUTH YORKSHIRE PENSIONS AUTHORITY

LOCAL PENSION BOARD

4 OCTOBER 2018

PRESENT: J Thompson (Employer, Action Housing) (Chair)
G Berrett (Employer, SYP), N Gregory (Academy Representative), S Ross (Scheme Member) and G Warwick (GMB)

Officers: J Bailey (Head of Pensions Administration),
G Graham (Fund Director), M McCarthy (Deputy Clerk) and
G Richards (Senior Democratic Services Officer)

N Wilson (The Pensions Regulator)

Apologies for absence were received from N Doolan-Hamer
and K Morgan

1 WELCOME AND APOLOGIES

The Chair welcomed everyone to the meeting, including Neil Wilson from The Pensions Regulator.

Members were informed that Nicola Simpson had resigned from the Board, the Chair thanked her for her contribution to the Board's work.

Apologies were noted as above.

2 DECLARATIONS OF INTEREST

None.

3 ANNOUNCEMENTS

M McCarthy informed the Board that the Authority's chair, Cllr Sue Ellis, had been appointed to the BCPP Board as a Non-Executive Director. This was positive news as it ensured that LGPS views would be represented on the Board.

Members were informed that the Annual Fund meeting would be held on 18 October 2018 at 5.30pm at the Carlton Park Hotel in Rotherham, all members were encouraged to attend.

The Employers Forum would be held on 29 November 2018 at the Holiday Inn, Dodworth.

4 MINUTES OF THE MEETING HELD ON 7 JUNE 2018

The Whistleblowing Policy would be brought to the Board's meeting in January. Members were informed that the document could be viewed on the Authority's website.

With regard to cyber-crime insurance, A Hunt had confirmed that the Authority did not have any such policy. The insurance was cost prohibitive and had a number of policy conditions that made the insurance somewhat limited.

G Graham informed the Board that there would be an insurance policy review within the next few months where this would be looked at again.

J Bailey reassured the Board that the network had been externally tested, including penetration tests. Subject to confidentiality, the results could be shared with the Board.

N Wilson from The Pensions Regulator commented that from the Regulators' perspective, the Board did not need public indemnity insurance as it was not a decision making body.

RESOLVED: The minutes of the Board held on 7 June 2018 were agreed as a correct record.

5 PRESENTATION FROM THE PENSIONS REGULATOR

Neil Wilson from The Pensions Regulator (TPR) gave the Board a presentation. The presentation included:

- The role and responsibilities of TPR and Local Pension Boards.
- TPR's expectations.
- Governance and internal controls.
- The importance of good data
- Communication.
- Reporting a breach; and
- The need for cyber resilience.

N Wilson informed the Board that they could book further more detailed sessions from TPR through the website.

The Chair thanked N Wilson for an interesting and informative presentation.

6 WORK PROGRAMME

The Board considered its Work Programme.

G Graham commented that if the Board accepted the revised Terms of Reference, which was later on the agenda, the Work Programme would be populated further.

The aim was to avoid replication from Authority and Board meetings and to look at key thematic areas.

With regard to Internal and External audit issues the Board's role was to check that management had responded properly to any recommendations. Likewise, it was not within the Board's remit to review the Risk Register, the Board needed to be satisfied that the Authority had a Risk Register and that it was fit for purpose.

RESOLVED: The Board noted the Work programme, acknowledging that it would be developed further in the coming months.

7 LOCAL PENSION BOARD BUDGET

Members were presented with the Board's expenditure to quarter ending 26 September 2018.

RESOLVED: That the budgetary position be noted.

8 GOVERNANCE - CONSTITUTION & TERMS OF REFERENCE

The Board considered a report which made recommendations for revised Terms of Reference and formalised the Board's decision at its last meeting to reduce the Membership of the Board to ten.

Members were reminded that Section 5 of the Public Service Pensions Act 2013 defined the functions of a Pension Board as:

- (1) Scheme regulations for a scheme under Section 1 must provide for the establishment of a board with responsibility for assisting the scheme manager (or each scheme manager) in relation to the following matters.
- (2) Those matters are –
 - (a) securing compliance with the scheme regulations and other legislation relating to the governance and administration of the scheme and any statutory pension scheme that is connected with it;
 - (b) securing compliance with requirements imposed in relation to the scheme and any connected scheme by the Pensions Regulator;
 - (c) such other matters as the scheme regulations may specify.

The Pensions Regulator strongly expressed the view that the focus of the work of Local Pension Boards within the LGPS should be on issues such as performance of the administration function, data quality and compliance with Code of Practice 14, and not on investment issues and wider organisational matters.

The revised Terms of Reference, set out in Appendix A to the report, had been developed by officers in consultation with the Chair and Vice-Chair of the Board with these factors in mind.

G Graham informed the Board that the regulations under which the Local Pension Boards were established emphasised the potential conflict of interest which existed

between being a member of the Administering Authority/Pension Committee and the Local Pension Board. In South Yorkshire two trades union representatives sat on both the Authority and the Local Pension Board. This was not good practice and officers would discuss with the Trade Unions how to resolve the issue.

RESOLVED: That the Board:

- a) Recommend to the Pensions Authority the revised Terms of Reference for the Local Pension Board as set out in the Appendix to the report.
- b) Recommend to the Pensions Authority the revised membership arrangements for the Local Pension Board as set out in the report.

9 ANNUAL BENEFIT STATEMENTS - REVIEW OF THE 2018 PROCESS

A report was submitted to update members on the progress of the exercise to issue Annual Benefit Statements to active and deferred members.

Members were reminded that under the provisions of the Public Service Pensions Act 2013 each LGPS fund was required to issue an estimated Annual Benefit Statement (ABS) to every active and deferred member by 31 August of each year.

This target had not been met for the last three years due to various factors including late year-end submissions from some employers, system issues and general workload pressures.

In 2017 SYPA reported to the Pensions Regulator in May of that year, well ahead of the August deadline, that it did not expect to meet the target date. One of the main reasons cited was the workload pressures caused by preparation for the move to monthly data collection, intended to provide a long-term solution to the ABS production process. Subsequent correspondence followed and no further remedial action was taken by the Regulator.

In 2018, SYPA strengthened the level of engagement with employers in respect of the submission of year-end returns and made changes to the Administration Strategy which enabled SYPA to make a penalty charge for late year-end submissions.

Although 100% compliance was not achieved by the deadline of 11 May 2018 for receipt of year-end returns, a year-end return of 100% was received by 31 August.

The net result was that statements were issued to 44,176 members and all employers were represented amongst this number. This equated to at least 98.6% of the members recorded as being active as at 31 March 2018.

With regard to the production of ABS's for deferred members which was not reliant on the submission of year-end returns, SYPA successfully issued 100% of the ABS's to deferred members before the 31 August deadline.

The shift to monthly data collection would mean that the production of the ABS's in 2019 could commence as soon as the March monthly data had been received. This should mean that SYPA could phase the production of the ABS's over an extended period and meet the statutory deadline.

As part of the 2018 ABS exercise, members were advised that all statements from 2109 onwards would only be available online, unless a member specifically requested a paper copy.

In response to a question from a Board member, J Bailey confirmed that no complaints had been received regarding the late receipt of ABS's.

The Board and officers discussed whether the breach had been material and should be reported to the Regulator.

The Board recommended that the breach should be reported as it would show an improvement in the process.

RESOLVED – That the Board noted the progress made with the 2018 exercise and the noted the plans in place for 2019.

10 ADMINISTRATION AND EMPLOYER PERFORMANCE

J Bailey presented a report to update members on administration issues for the period 1 April 2018 to 30 June 2018.

Members were informed that, following discussions with the Chair and Vice-Chair, it had been agreed that a report would be provided on a quarterly basis on the performance of the administration team as well as the level of engagement and compliance from employers. This would allow the Board to comment on any areas where further information or explanation may be required.

The performance level during the period of 87% compared favourably with the casework performance for the 2017/18 year overall of 82%.

The report contained a table which showed the casework areas broken down by subject type according to SYPA's Customer Charter.

It was felt that some of the targets were unrealistic. J Bailey informed the Board that the statutory target for a transfer out was three months, but currently SYPA's target for this category was five days.

The administration team would consult with a selection of scheme members to assess whether the target days set out in the Customer Charter were relevant and whether members would prefer focus on other areas. The results of this would be shared with the Board.

With regard to the backlog of aggregation cases that had been on hold awaiting software development, a dedicated project team had been set up from 1 October 2018 specifically to work on the backlog of aggregation cases now that the

automated software was in place. Progress on resolving these cases would be included as part of the quarterly update.

The report contained a table which reflected the performance of the four District Councils and remaining employers in respect of retirement notifications.

With regard to monthly data collection (MDC), the Board were informed that employers were required to submit monthly returns by the 19th of the month. The table included in the report showed that in April and May there were 42 and 43 outstanding MDCs respectively. Of these, 40 were contributable to employers who used Capita payroll services.

The poor performance of Capita in respect of MDC and other ongoing areas of administration had been escalated to Capita senior management. The MDC files for employers using Capita had now been brought up to date.

RESOLVED: That the report be noted.

11 COMPLAINTS, COMPLIMENTS AND BREACH REPORTING

The Board considered a report which gave an update on reported breaches and provided details of the complaints reporting for Quarter 1.

Members were reminded that SYPA's Reporting Breaches Procedure set out that all breaches, whether material or not, should be recorded and presented to the Local Pension Board on a quarterly basis.

The Board noted that five breaches had occurred since the last Local Pension Board meeting, all of which were data related. Three of the breaches were caused by individual errors in the administration team and two were caused by errors made by employers or their payroll providers.

The nature of the breaches was set out in an Appendix to the report, and all had initially been flagged as not material; the Board were invited to review these if they did not consider the ratings or actions taken to be sufficient.

The Board requested an extra column be added to the table to show whether the breach had been reported to the Data Protection Officer.

With regard to formal complaints, there had been four within the period. All had been responded to within the three day target response time.

REOLVED – That the report be noted.

12 GUARANTEED MINIMUM PENSIONS RECONCILIATION

A report was submitted to update members on the progress of the exercise to reconcile GMP records between SYPA and HM Revenue and Customs.

The report detailed the reconciliation process, progress to date, the impact on scheme members and next steps. It was noted that that outcome of the reconciliation process would not be known until the spring of 2019.

RESOLVED- That the report be noted.

13 MEMBER LEARNING & DEVELOPMENT

It was noted that several Board members would be attending the Fundamentals training; a limited number of places had been offered to Board members on the BCPP Annual Conference in Leeds.

There would be more focus to ensure that training offered met the Board's requirements, members were asked to inform officers if they felt there were gaps in their knowledge.

With regard to GDPR training for employees, this was ongoing and being supported by Barnsley MBC. There was a possibility it could be offered to Board members in the future.

A Risk Workshop would also be arranged for Board members in the future.

14 ANY OTHER BUSINESS

The Board were informed that BCPP's Joint Committee had at its last meeting agreed in principle to allow non-voting scheme member representation on the Joint Committee.

At their next meeting in November the Committee would be considering proposals for how many scheme members would be invited to join the Joint Committee and how they would be selected. There was a possibility they would be selected from Local Pension Board members.

CHAIR

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South Yorkshire Local Pension Board – Work Programme

Agendas	4 October 2018	17 January 2019	14 March 2019	July 2019
	Minutes	Minutes	Minutes	Minutes
	Work Programme	Work Programme	Work Programme	Work Programme
	Budget	Budget	Budget	Budget
	Presentation from the Pensions Regulator		Cycle of Meetings	Board's Annual Report
	Governance	Data Quality	Annual Review of Constitution & Terms of Reference	
	Annual Benefit Statements – Review of the 2018 Process	BCPP Joint Committee – Scheme Member Representations		
	Administration & Employer Performance	Administration & Employer Performance	Administration & Employer Performance	Administration & Employer Performance
	Complaints, Compliments & Breach Reporting	Complaints, Compliments & Breach Reporting	Complaints, Compliments & Breach Reporting	Complaints, Compliments & Breach Reporting
	Member Learning and Development		Member Learning and Development	
	Guaranteed Minimum Pensions Reconciliation Update			

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**SOUTH YORKSHIRE PENSIONS AUTHORITY
LOCAL PENSION BOARD EXPENDITURE TO Q/E 17/01/19**

Agenda Item 6

	ORIGINAL OUTTURN	REVISED OUTTURN	ACTUAL OUTTURN	2018-19 VARIANCE	Note
LOCAL PENSION BOARD					
Travel, Accommodation and Subsistence	3,500	2,500	598	1,902	1
Training/Conferences	8,000	5,000	2,170	2,830	1
Professional Advice/Other	3,500	2,500	1,222	1,278	2
	15,000	10,000	3,990	6,010	

1. Expenditure has been minimal against this budget as the Local Pension Board has only incurred travel expense claims, subsistence and training expenses at 09 January 2019

2. Professional Indemnity Insurance expenditure plus LPB meeting costs.

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SOUTH YORKSHIRE PENSIONS AUTHORITY

LOCAL PENSION BOARD

17 January 2019

Report of the Head of Pensions Administration

DATA QUALITY AND IMPROVEMENT

1) Purpose of the Report

To update members on the initial measurement of data quality provided to the Pensions Regulator and set out a draft Data Quality Improvement Plan.

2) Recommendations

Members are recommended to note the initial data quality scoring and are invited to comment on the proposed Data Quality Improvement Plan.

3) Background Information

- 3.1 The Pension Regulator's Code of Practice 14 detailing the governance and administration of public sector pension schemes notes under section 138 that "*Schemes should continually review their data and carry out a data review exercise at least annually. This should include an assessment of the accuracy and completeness of the member information held.*"
- 3.2 The importance of maintaining good quality data in order to ensure effective administration of the pension scheme is not a new concept of course. The in-house IT team at SYPA developed a Data Analysis and Reporting Tool (DART) many years ago to analyse the data held on the pensions administration database and identify areas for improvement and this tool is routinely used by the administration teams within SYPA. DART has proved successful as a data analysis tool and has in fact been purchased by a number of other LGPS funds nationally to support their own data improvement plans.
- 3.3 Until now, the DART tool had been used primarily to run a series of validation reports but over the forthcoming months it will be developed further to enable SYPA to accurately measure specific data fields on an ongoing basis. This will provide the basis for calculating an overall data quality score (see below).

4. **Data Quality Score – The Pensions Regulator**

4.1 In 2018/19, LGPS funds were for the first time required to report to the Pensions Regulator on the quality of **common** and **conditional** (scheme-specific) data in the submission of the annual Scheme Return.

4.2 **Common** data are basic data items which are used to identify scheme members and are defined by the Regulator. These consist of:-

National Insurance number; Surname; First Name or Initials; Sex; Date of Birth; Retirement Age; Last status event; Address including Postcode; Start Date; Membership Status

4.3 **Conditional** (scheme-specific) data is not defined by the Regulator but is data which is key to running the scheme and meeting legal obligations. In general terms for the LGPS this will be data such as membership details, pensionable pay, employer name, contributions, etc. The Scheme Advisory Board (SAB) were hoping to reach a national consensus for the LGPS on the specific data fields which should make up the measurement of conditional data but this was not possible to achieve in time for the 2018/19 Scheme Return. SAB are hoping to develop further guidance in this area in time for the next Return.

4.4 SYPA measured its common and conditional data using a combination of DART reports and existing guidance in this area and the scores submitted for the 2018/19 Return were as follows:-

Common Data 2018/19:	96%
Conditional Data 2018/19:	87%

As indicated above, the measurement of conditional data is subjective for each LGPS fund and no comparative statistics have yet been published but informal discussions amongst funds suggest that SYPA scores are favourable in comparison with other LGPS funds. A survey conducted by one software supplier in the LGPS administration market suggested an overall level around 80%, though this would have represented only a small group of funds.

5. **Data Quality Improvement Plan**

5.1 The guidance from the Regulator suggests that schemes should review their data at least once a year and, if there are any issues, put an improvement plan in place to address them.

5.2 **Appendix A** sets out the proposed Data Quality Improvement Plan for SYPA based primarily on the outcomes of the data scoring exercise conducted for the Scheme Return.

- 5.3 *Section 1* of the Improvement Plan focuses on Common Data. In line with other LGPS funds, the largest issue in respect of common data is the lack of a current address for deferred members. Historically, funds have tended to carry out tracing exercises for “lost” members as deferred members approach retirement. However, the Regulator’s Code of Practice 14 sets out that “*schemes should attempt to make contact with their scheme members and, where contact is not possible, schemes should carry out a tracing exercise to locate the member and ensure that their member data are up to date.*”
- 5.4 The use of an external tracing agency will have cost implications and, where possible, SYPA will be looking to engage with other funds in carrying out any address tracing exercise with a view to increasing purchasing power in the open market.
- 5.5 *Section 2* of the Plan focuses on Conditional Data. The nature of this data means that much of the cleansing will need to be carried out through manual intervention by internal teams and the work is therefore scheduled over a reasonable time scale to incorporate within existing resources.
- 5.6 *Section 3* identifies a number of areas that, although not specifically measured by the Regulator, SYPA have identified as requiring improvement and development in order to improve the overall quality of data held on the administration system. It is anticipated that Section 3 will be further developed over time.
- 5.7 The Data Quality Improvement Plan is intended to be a working document and it is proposed that an update on progress be brought to the Board every six months.

7) Implications and risks

- Financial – Poor quality data can have an indirect impact on funding during the valuation cycle through more cautious actuarial assumptions being made on missing/unknown data.
- Legal – None.
- Diversity – None.
- Risk – Poor quality data increases the risk of inaccurate calculation of benefits and/or delay to members receiving their correct entitlements.

Officer Responsible: Jason Bailey
Post: Head of Pensions Administration

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Background papers used in the preparation of this report are available for inspection at the offices of the Authority in Barnsley.

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Conditional Data

Reference	Data Category	Description	Number of Errors	Status (Active, Deferred, Pensioner)	Action Required	External dependency?	Target Date for Completion	Data Impact	Progress to Date	Current RAG Status
COND1	Pension Input Amounts	Missing Pension Input Amounts for last scheme year.	5,267	ACTIVE	Update missing pay from outstanding EOY Returns in bulk; investigate and manually correct certain individual records; change leavers to correct status.	Partial	Jul-19	High	Task being handled as a bulk exercise by Technical Team.	
COND2	Pensionable Pay record	9 Different error types. Generally relate to pay records inconsistent with expected entries.	290	ACTIVE	Manually investigate and correct records.	No	Jul-19	Medium	Task allocated to relevant operations team.	
COND3	APC/AVC record	Missing/inconsistent date relating to additional conts record.	33	ACTIVE	Manually investigate and correct records.	No	Dec-19	Low	Task allocated to relevant operations team.	
COND4	Working Hours	Part-time hours shown are inconsistent/ missing.	235	ACTIVE	Manually investigate and correct records.	No	Dec-19	Low	Task allocated to relevant operations team.	
COND5	Contributions	Contribution rates missing or dates invalid.	222	ACTIVE	Manually investigate and correct records.	No	Dec-19	Low	Task allocated to relevant operations team.	
COND6	GMP record	GMP data inconsistent with remainder of record.	379	ACTIVE	Manually investigate and correct records.	No	Dec-19	Low	Task allocated to relevant operations team.	
COND7	Transfer In	6 error types. Generally transfer records inconsistent with expected entries.	184	ACTIVE	Manually investigate and correct records.	No	Jul-19	Medium	Task allocated to relevant operations team.	
COND8	Service History	16 error types. Generally employer/service details missing or inconsistent.	248	ACTIVE	Manually investigate and correct records.	No	Jul-19	Medium	Task allocated to relevant operations team.	
Total No. of Errors			6,858							

Total No. of Records	54,760
Overall Data Score Reported to Regulator 2018	87.5%

Last Updated	07-Jan-19
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Other Data Issues

Reference	Data Category	Description	Numbers	Status of Member	Action Required	External Dependency?	Target Date for Completion	Data Impact	Progress to Date	Current RAG Status
OD1	Unprocessed leavers (excluding aggregation cases)	All members who have left the scheme before retirement to be processed on to correct status.	TBC	Deferred/Frozen Refund	Individually process all leavers on to correct status.	Partial - leaver forms needed from employers for some cases.	Jul-19	Impact on actuarial assumptions for valuation if records not processed. Risk of missing annual deferred statements	Ongoing allocation of cases to operational teams.	Yellow
OD2	MyPortal Registration	Employers to provide email addresses for all active members. Scheme members to sign up to online registration.	6,000 out of 55,000 members (11%) registered	Active	Chase all employers not yet to provide email addresses. Communications campaign to encourage all active members to sign up to portal.	Yes - scheme members need to take enrolment action.	Ongoing	No data impact but scheme members will not be able to view their Annual Benefit Statement if not registered.	All Employers have been requested to provide email addresses for active members. Communications campaign due to start once new portal live in February	Green
OD3	Aggregation Cases	Bulk backlog exercise reported on separately.	c5,500 cases to process	Various	Offer option to aggregate benefits for multiple employments and process according to response/non response	Partial - response needed from scheme members once contacted.	31-Mar-19	Impact on actuarial assumptions for valuation if records not processed. Risk of missing annual deferred statements	7,100 cases completed to date since backlog project commenced.	Yellow

Last Updated	07-Jan-19
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SOUTH YORKSHIRE PENSIONS AUTHORITY

LOCAL PENSION BOARD

17 January 2019

Report of the Fund Director

BORDER TO COAST PENSION PARTNERSHIP JOINT COMMITTEE – SCHEME MEMBER REPRESENTATION

1) Purpose of the Report

To make the Board aware of the arrangements agreed by the Border to Coast Joint Committee in order to secure scheme member representation.

2) Recommendations

Members are recommended to:

- a) **Note the arrangements being made to respond to the request by the Border to Coast Joint Committee in relation to scheme member representation.**
-

3) Background Information

3.1 The Border to Coast operating company which manages the investment pool into which the Authority's investment assets are being gradually transferred is overseen by a Joint Committee made up of the Chairs or Vice Chairs of the 12 participating pension funds. In line with guidance issued by the Scheme Advisory Board the Joint Committee has considered and agreed to the inclusion of a scheme member representative as an observer within its membership, with provision for a standing substitute member.

3.2 The Joint Committee wishes to draw this observer from amongst the scheme member representatives on the 12 Local Pension Boards. Consequently a request has been received for a maximum of one nomination from each Local Pension Board to be provided by the end of January. Should there be more than one nomination an election will be held using the Single Transferable Vote mechanism. It is required that nominations be agreed by each Board's scheme member representatives and that one of those representatives should be nominated to cast the Fund's vote should an election be required. No requirements in relation to how the decision about which candidates to

support are laid down but the expectation is that this will be done by discussion amongst the scheme member representatives.

3.3 Arrangements have been made for the Chair of the Local Pension Board to facilitate a meeting of the scheme member representatives on the rising of this meeting of the Board in order to consider whether South Yorkshire should nominate an individual and to agree arrangements for the casting of the Fund's vote should that be required.

4) Implications and risks

- Financial – There are no financial implications arising from the appointment of a scheme member representative in this way as any expenses incurred in attending meetings etc will be met from the Joint Committee's own budget.
- Legal – There are no legal implications arising from this as the Joint Committee has the power within its constitution to co-opt non-voting members.
- Diversity – There are no apparent diversity issues.
- Risk – There are no risk issues for the Authority in regard to this process.

George Graham
Fund Director

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Background papers used in the preparation of this report are available for inspection at the offices of the Authority in Barnsley.

SOUTH YORKSHIRE PENSIONS AUTHORITY

LOCAL PENSION BOARD

Report of the Head of Pensions Administration

17 January 2019

ADMINISTRATION AND EMPLOYER PERFORMANCE

1) **Purpose of the Report**

To update Members on administration issues for the period 1 July 2018 to 30 September 2018 (Quarter 2).

2) **Recommendations**

Members are recommended to consider the contents of the report with a view to commenting on performance and indicating any areas that they may wish to receive further information on in future reports.

3) **Background Information**

3.1 Following discussions with the Chair and Vice Chair of the Local Pension Board, it was agreed that a report would be provided on a quarterly basis on the performance of the administration team as well as the level of engagement and compliance from employers. This is intended to provide Board members with a greater degree of transparency to contribute to an increased focus on administration issues (whether from SYPA or from employers) and will hopefully allow the Board to comment on any areas where further information or explanation may be required.

3.2 At this stage, this report includes much of the detail provided to the Corporate Planning and Governance (CP&G) Board. The CP&G Board focuses on its audit function and, whilst this is also an important element of the Local Pension Board's work, the Local Board also has a unique representation of scheme member and employer interests and may be able to contribute to identifying any areas where SYPA should be focusing their efforts to improve administrative efficiency and customer service. As such, the theme of this quarterly administration report may evolve over time.

4) **Staff Changes**

4.1 One member of the Doncaster District Office (part-time) retired early in September and one Team Manager from the Member Services team in the Regent Street

Office retired at the end of September, the latter after an impressive 41 years' service.

- 4.2 The vacant Team Manager post is being covered on a temporary 'acting up' basis up to 31 March 2019 following an open selection process, pending a wider review of the pensions administration function. It is not anticipated this will materially impact performance and the cost saving from this vacancy will contribute to funding investment in a new online portal which is currently being implemented. The new portal will be designed to improve the scheme member experience as well as contributing to efficiency improvements.
- 4.3 The vacant District Office post will be supported by other areas of the administration function pending the outcome of the review referred to above.

5) **Administration Team Performance**

- 5.1 Under the standard reporting protocol the casework performance of the Administration team for Quarter 2 was as follows:

Work Category	Number completed	In Time	Performance
Priority	1259	1121	89%
Non-Priority	14553	11751	81%
Overall	15812	12872	81%

- 5.2 The overall performance level of 81% is an obvious reduction from last quarter (86%) but this was anticipated because of the requirement (for the final time) to process all the Year End returns in preparation for the issue of Annual Benefit Statements.
- 5.3 The overall performance level of casework completed, however, does not provide a detailed picture of the type of work that is being completed and how successfully. For this reason, we have reviewed the casework areas covered by our Customer Charter and set out a summary of performance against these areas.
- 5.4 The table below shows the casework areas broken down by subject type according to our charter. Priority areas are deaths and retirements. For comparison purposes the equivalent figures for 2017-18 are also shown.

Case Type	Target Days	Numbers Completed	Numbers In Time	Q2 Performance	Performance 2017-18
PRIORITY CASES					
Formal Complaint	3	4	4	100%	89%
Pensioner Death	4	309	284	92%	81%
Deferred Pensioner Death	4	24	17	71%	34%
In Service Death	4	10	5	50%	22%
Retirements	5	912	819	90%	87%

NON PRIORITY CASES					
Divorce Proceedings	5	72	52	72%	71%
Transfer Out	5	116	82	71%	44%
General Enquiry	5	739	620	84%	91%
Transfer In	7	161	73	45%	40%
New Joiners	5	1997	1203	60%	89%
Early Leavers	See Below	1116	894	80%	87%
Preserved Benefits	20	1017	806	79%	64%
Refund of Contributions	9	99	88	89 %	91%
Re-employed Pensioner	7	0	0	N/A	NA
Overall		6576	4939	75%	83%

5.5 Despite the introduction of new controls and work queues and the oversight of the Performance Manager this quarter's performance on Priority work (and non-priority work) was always destined to dip because of the other prioritisation of resource onto the Year End exercise.

5.6 The LGPS in general, and SYPA in particular following last year's breach and self-reporting letter, were acutely aware of the Regulator's scrutiny on Funds' performance in relation to the issuing of Annual Benefits Statements this year. Accordingly, non-priority casework performance had to be sacrificed to some extent in order to meet the Authority's statutory duty of issuing statements by 31 August. A separate report regarding the Annual Benefit Statements for 2018 was presented to the Board in October 2018.

6) Outstanding work

6.1 The table below of 'outstanding work' was presented as part of the Q4 report for 2017/18.

Work Outstanding at 31 March 2018

Active Cases	Pending	Awaiting Software Updates	Total
3919	6125	5395	15439

Key

Active Cases	Able to be processed
Pending	Case is in progress but awaiting further information – usually from scheme member or employer
Awaiting Software Update	Purposely on hold awaiting a software development to be released in September 2018 that will permit efficient processing

6.2 As promised in the last report, the software tool that was introduced over the summer to handle the complex “aggregation” cases has now enabled the provision of more accurate reporting of the true levels of these outstanding cases. The table below confirms that there are a total of 7,828 cases to be processed, which is a significant increase on the estimated volumes previously reported but does serve to provide the complete picture.

Active Cases	Pending	Awaiting action following Software Updates	Total
4380	7877	7828	20085

6.3 A dedicated project team was established from 1 October 2018 specifically to handle the processing of the “aggregation” cases. It is anticipated that this will be a six month project and progress will be reported to the Board quarterly.

7) Employer Performance against their SLAs

7.1 As Members are aware employers are required to meet the following target standards for the submission of casework related information:

- New Starter (56 days)
- Early Leaver (56 days)
- Retirement with immediate entitlement to benefits (28 days)
- Death in Service (14 days)

Members are also aware that the requirement to submit documentation for the first two categories (New Starters and Early Leavers) has now been removed, at least in part, as a result of the introduction of MDC processing.

7.2 The table below therefore reflects only the performance of the four District Councils and remaining employers in respect of retirement notifications. Members will note the overall general improvement in performance by employers.

Employer	Cases	Pass	Fail	Performance Q2
Barnsley MBC	8	7	1	88%
Doncaster MBC	42	39	3	88%
Rotherham MBC	28	22	6	79%
Sheffield CC	63	55	8	87%
Councils Total	141	123	18	87%
Other Employers	222	187	35	84%
All Employers Total	363	310	53	85%

7.3 **Monthly Data Collection (MDC).** Members are aware that MDC was introduced from 1 April 2018 to improve the overall efficiency of the administration of the LGPS at SYPA – both for employers and for the administration team. Employers are required to submit monthly returns by the 19th of the month following the pay period

7.4 The tables below show the number of returns received, summarised according to whether the monthly return is submitted by an in-house team or an outsourced payroll provider. Members may recall the previous “teething problems” with MDC for April and May 2018 where there were 43 employers who had not submitted a monthly data file. In the main, these were employers who used Capita as their outsourced payroll provider.

7.5 It is positive to note that some of the earlier submission issues with Capita in particular have now been resolved following SYPA intervention and all monthly returns have now been received satisfactorily for April, May and June.

June-18	Number of returns expected	Returns received	Outstanding	% Success Rate
Employers using external payroll providers	359	359	0	100%
Employers with single use/in house system	109	109	0	100%
Total Active Employers in SYPA Fund	468	468	0	100%

July-18	Number of returns expected	Returns received	Outstanding	% Success Rate
Employers using external payroll providers	362	361	1	99%
Employers with single use/in house system	108	107	1	99%
Total Active Employers in SYPA Fund	470	468	2	99.6%

August-18	Number of returns expected	Returns received	Outstanding	% Success Rate
Employers using external payroll providers	367	363	4	98.9%
Employers with single use/in house system	104	99	5	95.2%
Total Active Employers in SYPA Fund	471	462	9	98.1%

- 7.6 An issue has been identified with one employer that was previously performing well but has now failed to submit a return for the last two months. Contact was made with that employer, (and the others who had failed to submit a return in August), to establish what problems they are experiencing and what assistance they might need to recover the position. An automatic reminder system has also been put in place to prompt any employers who have not submitted a return by the deadline each month.
- 7.7 **Future Developments.** Now that MDC has been embedded as business as usual with employers, it is timely to review how SYPA can expand the use of the monthly collection process to improve process efficiency for employers and for SYPA. Currently, the member data by the MDC process is used to update member records but the monthly pay over of contributions by employers is handled by a separate process. This inevitably involves a requirement for reconciliation which can potentially be time consuming for employers and for SYPA.
- 7.8 SYPA are working to develop the MDC process to enable the monthly files to drive the collection of contributions **via direct debit** and achieve a more integrated outcome by removing the requirement for separate reconciliations. We are working with Audit colleagues to ensure that the appropriate controls are in place for such a process enhancement and employers will be consulted on the proposed change in due course.

8. Staffing issues impacting on work and performance

- 8.1 Sickness absence statistics for the reporting period are shown in the table below. The previous quarter's figures are shown for comparison purposes in the second table.

1st July 2018 to 30th September 2018

Period	Certified	Uncertified	Overall
July	2.7%	1.1%	3.7%
August	3.8%	0.5%	4.2%
September	2.9%	0.1%	3.0%
Total	3.1%	0.6%	3.7%

1st April 2018 to 30th June 2018

Period	Certified	Uncertified	Overall
April	2.8%	1.1%	4.0%
May	4.2%	0.4%	4.6%
June	3.4%	1.0%	4.3%
Total	3.5%	0.8%	4.3%

8.2 Certified sickness absence reduced slightly in comparison to the previous quarter, mainly as a result of some previous long-term absences coming to an end. Unfortunately, there are now two further cases of long-term absence for unrelated conditions. The fact that the two employees involved are both part-time does mitigate the impact on the overall statistics but there is still an impact on performance.

9. **GMP Reconciliation update**

9.1 The Board may recall an update was provided at the last Board meeting on the progress made with the ongoing reconciliation exercise. Members may recall that an independent provider, ITM, had been contracted to manage the remainder of Stage 2 of the reconciliation process which includes completing the reconciliation for active members as well as handling responses from HMRC in respect of queries previously raised for deferred and pensioner members.

9.2 At the time of producing this report, ITM had submitted the final batch of reconciliation queries to HMRC by the deadline of 31 October 2018. **Appendix A** shows the latest project update provided by ITM in December 2018. As indicated, the project is primarily on hold pending responses from HMRC to the reconciliation queries submitted to them for resolution. It is not anticipated that HMRC will respond for three or four months. The Board will be updated on any future progress.

10. **Implications**

- **Financial** - potential financial penalties for employers failing certain service standards under the Authority's Pensions Administration Strategy.
- **Legal** - None
- **Diversity** - None
- **Risk** - Poor performance from employers increases the likelihood of a poorer service to members from the Administration team which in turn increases the potential for complaints and risk to reputation

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Background papers used in the preparation of this report are available for inspection from the offices of South Yorkshire Pensions Authority

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*Project Update for the South
Yorkshire Pensions Authority
GMP Reconciliation – Active
Members*

Sarah Millson
5 December 2018



South Yorkshire Pensions Authority / GMP Stage 2 Reconciliation

Project Manager (ITM & Client):	Sarah Millson and Jason Bailey
Project Sponsor (ITM & Client):	Maurice Titley and Jason Bailey
Today's date:	5 December 2018
Overall RAG status:	Green
Project start date:	1 October 2018
Planned completion date:	31 March 2019
Estimated completion date:	31 March 2019
Predicted variance:	None currently foreseen

Project commentary

RAG description	<p>All the standard project actions have been run and queries raised with HMRC. These are detailed in this report along with the chart to show the changes in the reconciliation status since the baseline.</p> <p>The proposal and advice files produced as a result of the standard actions have been sent to the SYPA team together with the results of the GMP Value Reconciliation.</p> <p>Two of the HMRC query files submitted on 1 November have been rejected by HMRC. ITM has appealed against the decision and requested that both files are reinstated and dealt with by the clerical team as being small files received between 1 and 4 November. HMRC issued a communication regarding the acceptance of small files on 30 November.</p> <p>The project will now pause until HMRC replies are received in 2019.</p>
Concerns to be resolved by the project	None at this time.

Project dashboard – 5 December 2018

Status	Reconciled					Proposal		Unreconciled			Out Of Scope
	No GMP liability	Exact match	Within tolerance	Accept HMRC	Accept admin	Proposal made to client	Proposal made to HMRC	Awaiting data from client	Awaiting data from HMRC	Further review	N/A record
Active	26,359	412	339	4,095		524		11	7,500		14,740
Deferred Post GMP Age	183	4	5	19	4	4	2		92		2,192
Deferred Pre GMP Age	8,003	39	259	522	94	86	439	2	3,872		45,440
Pensioner Post GMP Age	938	39	137	470		24		27	1,288		35,905
Pensioner Pre GMP Age	722	5	77	660		23		26	546		3,873
Widow(er)									6		4,284
Unlinked dependant											1,919
Total on admin	36,205	499	817	5,766	98	661	441	66	13,304		108,353
Other admin (members with no liability)					508		645		310		72,074
HMRC only									406		7,619
Total reported cases	36,205	499	817	5,766	606	661	1,086	66	14,020		188,046
Baseline position	24,195	55	273						305	51,155	171,785

Notes to accompany the reconciliation status table:

Reconciled

- No GMP liability – GMP is zero on both the administration and HMRC records.
- Exact match – GMP on the administration and HMRC records reconciles exactly.
- Within tolerance – the difference between the administration and HMRC GMP is less than the tolerance level set. Provisional tolerance is £2p.w.
- Accept admin – a decision has been made by the client to accept the admin position, or a response from HMRC confirms that they agree with the admin position (usually for a case where there is no GMP liability)
- Accept HMRC – the HMRC position is accepted where a specific decision is taken by the client or where the only option is to accept the HMRC GMP value. For example, an active member of the scheme with no or a limited contracted-out earnings history where it would not be possible to calculate a GMP to compare with the HMRC figure. In this scenario the HMRC GMP would be accepted.

Proposals

- Proposal made to client – members where bulk analysis suggests that either the admin or HMRC data should be accepted and a decision from the client is required.
- Proposal made to HMRC – queries raised with HMRC where we have provided information to show that the member has no further liability in the scheme and HMRC should accept the admin data.

Unreconciled

- Awaiting data from client – results of bulk analysis e.g. On Admin, not on HMRC where a review of member files is required to resolve a query that cannot be dealt with by the extraction of data from the administration extract.
- Await data from HMRC – this encompasses all queries raised with HMRC and the 'Error Code 5' members where full data still needs to be provided. ITM will automatically raise an HMRC query spreadsheet for the members identified as part of the baseline production as the project initiated by HMRC to supply corrected data is behind schedule.
- Further review – all members who will be dealt with as part of the population reconciliation e.g. improving the linking between the HMRC and admin membership. Once the population reconciliation concludes the remaining members in the category will form part of the GMP Value Reconciliation, where mismatches between the GMP amounts held by HMRC and Admin are investigated in more detail.

Out of Scope

- Record Not Applicable – includes the following:
 - Members with no liability under the scheme and no corresponding record on the HMRC data (transfers out, refunds)
 - Members with pre 6 April 1978 service only or post 5 April 2016 service only
 - Member with no liability status but another liability record is already linked to an HMRC record
 - Originally unlinked dependant records that are subsequently matched to a corresponding first life record
 - HMRC records initially not matched to admin that subsequently are
 - HMRC records that HMRC come to withdraw, e.g. original Error Code 5 cases that HMRC acknowledge have no surviving spouse

A summary is provided in relation to the following categories in the status column of the reconciliation table:

- Other Admin (members with no liability) – all members recorded on the admin data with a status of 'no liability' and no spouse in payment, e.g. refund, transfer out, full commutation, deceased with no widow(er) together with child pensioners and deceased dependants.
- HMRC only – cases where HMRC have a contracted-out liability recorded, but where no admin record was initially (or still) matched to it. Some of these members will be dealt with as we work through multiple record issues, with any outstanding cases being dealt with under the 'On HMRC, not on Admin' project action where a bulk query will be raised with HMRC asking for further information (e.g. employer details) to enable any further analysis to be carried out.

HMRC queries (SRS)

HMRC queries

HMRC Batch Ref	Topic	Number of queries	Queries Logged with HMRC	Expected reply date
1292	Type 5 - Was in Scheme	175	25 October 2018	18 March 2019
1290	Type 5 - Not in Scheme	129	25 October 2018	18 March 2019
1291	Baseline - Not in Scheme	2	25 October 2018	1 March 2019
1288	On HMRC Not Admin - Pass 1 - NIS Automation	327	25 October 2018	Automated - 4 January 2019 Clerical - 25 March 2019
1289	On HMRC Not Admin - Pass 1 - Not in Scheme	2	25 October 2018	18 March 2019
1304	On Admin Not HMRC - Pass 1 - WIS Automation	7342	29 October 2018	Automated - 31 January 2019 Clerical - 5 April 2019
1305	On Admin Not HMRC - Pass 1 - Was in Scheme	11	29 October 2018	1 April 2019
1303	On Admin Not HMRC - Pass 1 - Multiples	1324	29 October 2018	Automated - 31 January 2019 Clerical - 5 April 2019
1356	Multiple Admin Record Matching - WIS Automation	157	31 October 2018	Automated - 31 January 2019 Clerical - 5 April 2019
1364	Preserved Refunds - Not in Scheme	453	31 October 2018	1 April 2019
1376	Transfers Out - Not in Scheme	267	31 October 2018	1 April 2019
1379	Refunds - Not in Scheme	551	31 October 2018	1 April 2019
1397	On Admin Not HMRC - Pass 2 - Multiples	604	1 November 2018	Automated - 31 January 2019 Clerical - 5 April 2019
1405	GMP Value Reconciliation - End Date	16	1 November 2018	Automated - 4 January 2019 Clerical - 5 April 2019
1406	GMP Value Reconciliation - Multiples	89	1 November 2018	Rejected Appeal raised with HMRC
1407	GMP Value Reconciliation - 2R Liability Part Period Automation	454	1 November 2018	Automated - 20 December 2018 Clerical - 11 March 2019
1408	GMP Value Reconciliation - Start Date	319	1 November 2018	Automated - 3 January 2019 Clerical - 5 April 2019
1409	GMP Value Reconciliation - 2R Liability Part Period Automation	3	1 November 2018	Automated - 2 December 2018 Clerical - 11 March 2019
1410	GMP Value Reconciliation - Total GMP	77	1 November 2018	Rejected Appeal raised with HMRC
1437	GMP Value Reconciliation - Start Date, End Date	33	5 December 2018	TBC
1438	On Admin Not HMRC - Pass 2 - Was in Scheme 2677	2,677	5 December 2018	TBC

HMRC query responses

HMRC Batch Ref	Topic	Number of queries raised	Number of queries replied to	Response received from HMRC

File reviews/proposals

Batch	Topic	Date issued	Number of queries	Comments
1	On Admin not HMRC – Pass 1	5 December 2018	92	Unable to query with HMRC. Proposal to reconcile based on issue type
2	Value Reconciliation File Reviews and Proposals	5 December 2018	634	Refer to report and member level spreadsheet

Client Advice

Batch	Topic	Date issued	Number of members	Comments
1	On Admin not HMRC – Pass 1	5 December 2018	48	Corrected NI Nos
2	Preserved Refunds	5 December 2018	165	Aggregation/CEP under payment threshold
3	Refunds	5 December 2018	69	CEP under payment threshold
4	Deceased Members	5 December 2018	109	Deceased after contracting out ceased
5	Bulk Transfer Out	5 December 2018	1	Possible transfer
7	Value Reconciliation – Client Advice	5 December 2018	5,699	Refer to report and member level spreadsheet

Decisions required

Decision required	Members affected	Date raised
<p>In order to efficiently reconcile the GMP values it is recommended that a tolerance is set. If the difference between the HMRC GMP value and the administration GMP value is less than this tolerance then the HMRC GMP value should be accepted with no further review being required. A widely accepted industry standard for this tolerance is £2pw. This is assessed with the administration GMP values revalued to the same effective date as for the data provided by HMRC.</p> <p>The grounds to challenge the HMRC GMP record are limited, often requiring the production of payroll records for the period of GMP accrual (78/79 to 96/97) which in most circumstances is not possible. Acceptable challenges to the HMRC GMP values normally relate to differences in the GMP revaluation basis or rate and the omission of transferred-in GMP.</p> <p>817 members currently have HMRC GMP values that do not exactly match the administration GMP value but fall within this £0.01pw to £2pw tolerance. This number is likely to change as further cases are reconciled against HMRC data during the course of the project.</p> <p>ITM will progress the GMP reconciliation on the basis that the £2pw tolerance has been agreed, however this can be altered if confirmed otherwise.</p>	817	30 November 2018

Progress reporting


Project progress

Planned last period and achieved	<ul style="list-style-type: none"> ▶ Creation of baseline statistics to confirm the initial number of discrepancies to be investigated ▶ Requested data from HMRC for Error Code 5 members ▶ On HMRC Not Admin – Pass 1 ▶ On Admin Not HMRC – Pass 1 ▶ Internal Transfer ▶ Multiple HMRC Record Matching ▶ Multiple Admin Record Matching ▶ Deceased Members ▶ HMRC Queries – Preserved Refunds ▶ HMRC Queries – Bulk Transfer Outs ▶ HMRC Queries – Transfers Out ▶ HMRC Queries – Full Commutations ▶ HMRC Queries – Refunds ▶ HMRC Queries – Other No Liability ▶ On HMRC Not Admin – Pass 2 ▶ On Admin Not HMRC – Pass 2 ▶ GMP Value Reconciliation Analysis
Not planned last period but achieved	▶ None for this period
Planned last period but not achieved	▶ None for this period
Reasons for exceptions	▶ None for this period

Planning

Task and milestones planned next period	▶ Project pause until 2019
Items added to the project plan	▶ None required

Key risks and issues

Risk	RAG status	Mitigation	Status
HMRC response times are currently stated to be around three to four months.		ITM will monitor HMRC's performance and inform the Council if there is any change that could impact delivery.	Open

SOUTH YORKSHIRE PENSIONS AUTHORITY

LOCAL PENSION BOARD

17 January 2019

Report of the Head of Pensions Administration

REVIEW OF BREACHES, COMPLAINTS and COMPLIMENTS

1) Purpose of the Report

To update members on the latest available record of reported breaches and provide details of the complaints reporting for Quarter 2.

2) Recommendations

Members are recommended to:-

- note the latest available breaches summary and comment on any further reporting requirements or actions
 - note the revised reporting summary of complaints received and comment on any further requirements
-

3. Background Information – Breach Reporting

3.1 At the last meeting of the Local Pension Board on 4 October 2018, members approved the breach summary report but requested additional information be included on the following:-

- Whether a breach had been specifically reported to the Data Protection Officer (DPO)
- Whether any wider process changes/improvement actions were identified as a result of the breach

3.2 **Appendix A** provides a record of all breaches that have occurred since the last Board meeting and now includes the additional information requested above.

3.3 It should be noted that the DPO will routinely receive an annual report of all data breaches and the breaches log indicates if any breach was considered sufficiently material that a specific report be issued to the DPO. There were no such material breaches in the reporting period to the end of December 2018.

4. Complaints Reporting – Quarter 2

- 4.1 A description of complaints received in the previous quarter has been routinely provided to the Board. The Board were particularly interested in understanding whether any complaints received were indicative of a wider process issue which needed review/improvement.
- 4.2 Taking these comments into account, the complaint summary has been provided in a revised format and this is set out in **Appendix B**. In addition to other data, this revised summary indicates whether any wider procedural or improvement action was identified as a result of a complaint having been received.
- 4.3 It should be noted that, for Quarter 2, two of the four complaints were the responsibility of the administration team and resulted in procedural change. The remaining two complaints were outside of SYPA control.

5. Implications and risks

- Financial – None.
- Legal – None.
- Diversity – None.
- Risk – None.

Officer Responsible: Jason Bailey
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Background papers used in the preparation of this report are available for inspection at the offices of the Authority in Barnsley.

SYPA Record of Breaches

Year	Ref	Date Identified	Type of Breach (e.g. personal data, contributions, criminal activity, etc)	Description	Action Taken in Response to Breach	Possible Impact (Red/Amber/Green)	Date Reported to Local Pension Board or Authority	Reported to Pensions Regulator or other statutory body (e.g. ICO)?	Reported to Data Protection Officer?	Details of any follow up actions taken/required or wider implications	Breach Open/Closed
2018/19	17	01/10/2018	Personal Data	Employer had provided incorrect address details for two Members (A) and (B) with identical surname - addresses were reversed. Expression of Wish details for Member (A) were therefore sent to Member (B)	Both Members notified of error and raised no further concerns.	Green	17/01/2019 (LPB)	NO	NO	Employer was notified of their error and asked to correct. Personal Details removed from Expression of Wish acknowledgement.	Open pending any Board comments
2018/19	18	05/10/2018	Personal Data	Pension statement relating to Member (A) was enclosed with correspondence issued to scheme member (B) in error. Statement for (A) was forwarded to Member (B).	Member (B) dissatisfied but raised no complaint.	Green	17/01/2019 (LPB)	NO	NO	Project underway to move letter production to direct (hybrid) mail which will reduce risk of this recurring.	Open pending any Board comments
2018/19	19	15/11/2018	Personal Data	<i>Information relating to more than one member sent to Employer but they incorrectly distributed it to all members</i>	<i>For Employer</i>	<i>Green</i>	<i>17/01/2019 (LPB)</i>	<i>NO</i>	<i>NO</i>	<i>None identified as employer issue.</i>	<i>Open pending any Board comments</i>

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COMPLAINT SUMMARY

Quarter 2

Reference	Complainant	Nature of Complaint	Response issued within target response time?	Responsible party	Follow up actions required/taken?
C1	Active Member	Delay in updating member's record following bulk transfer from an employer in a different LGPS fund (West Yorks to SYPA)	YES	SYPA Pensions Admin	All other scheme members impacted by bulk transfer were identified, membership records updated and statements issued .
C2	Active Member	Identical complaint to C1 - different member	YES	SYPA Pensions Admin	All other scheme members impacted by bulk transfer were identified, membership records updated and statements issued .
C3	Deferred Member	No past years deferred benefit statements received by member whose pension rights were transferred in bulk to SYPA	YES	Former LGPS Fund	None required
C4	Active Member	Contributions had ceased being deducted from member's pay but SYPA had not picked this up sooner.	YES	Employer	None required. An error made by the employer would previously have only been identified follow year-end but movement to monthly data collection should now highlight any such errors made much sooner. This is ultimately an employer responsibility.

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