

# Public Document Pack

Date: 17 July 2019

To: MEMBERS OF THE SOUTH YORKSHIRE  
LOCAL PENSION BOARD



**SOUTH YORKSHIRE  
LOCAL PENSION BOARD**

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Barnsley  
South Yorkshire  
S70 2HG

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This matter is being dealt with by: Gill Richards

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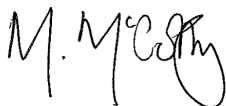
Dear Member

**SOUTH YORKSHIRE LOCAL PENSION BOARD**  
**Thursday 25 July 2019**

A meeting of the South Yorkshire Local Pension Board will be held at 10.00 am on Thursday 25th July, 2019 in Meeting Room 11, Town Hall, Barnsley, S70 2TA.

The agenda is attached.

Yours sincerely



Martin McCarthy  
Deputy Clerk

Encs

**Distribution:** Cllr Tony Damms, Nicola Doolan-Hamer, Rob Fennessy, Andrew Gregory, Nicola Gregory, Cllr Tosh McDonald, Kevin Morgan, 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 any 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 25 JULY 2019 AT 10.00 AM IN MEETING ROOM 11, TOWN HALL,  
BARNSELEY, S70 2TA**

## **AGENDA**

	<b>Item</b>	<b>Page</b>
1	Welcome and Apologies	
2	Declarations of Interest	
3	Announcements	
4	Minutes of the meeting held on 18 April 2019	1 - 6
5	Membership and Chairing Arrangements	7 - 12
6	South Yorkshire Local Pension Board Annual Report 2018/19	13 - 20
7	Quarterly Administration Update	21 - 50
8	Review of Breaches, Complaints and Appeals	51 - 66

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## SOUTH YORKSHIRE PENSIONS AUTHORITY

### LOCAL PENSION BOARD

**18 APRIL 2019**

PRESENT: J Thompson (Employer, Action Housing) (Chair)

R Fennessy (South Yorkshire Police), N Gregory (Academy Representative), P Lofts (Employer BMBC), K Morgan (Unite), G Warwick (GMB) and A Brown (Barnsley MBC)

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

Apologies for absence were received from N Doolan-Hamer

#### 1 WELCOME AND APOLOGIES

The Chair welcomed everyone to the meeting. She also expressed the Board's thanks to Sue Ross, who had recently resigned from the Board due to work commitments, for all her hard work over the years.

Apologies were noted as above.

#### 2 DECLARATIONS OF INTEREST

None.

#### 3 ANNOUNCEMENTS

Members were reminded that the Border to Coast Pensions Partnership (BCPP) Joint Committee had voted to allow just one Scheme member representative, from one of the 12 Local Pension Boards, to sit on the Committee as an observer. After a recent election process Nicholas Wirz, the Vice-Chair of Tyne and Wear Local Pension Board, had been elected to the Committee and had attended his first meeting in March.

BCPP were arranging a meeting of Local Pension Board Chairs in May; discussions would be needed on how South Yorkshire would be represented at the meeting.

J Bailey informed the Board that efforts were ongoing to recruit to the vacant positions on the Board. The next steps were to advertise more widely and approach the employers for their assistance.

**4     MINUTES OF THE MEETING HELD ON 17 JANUARY 2019**

With regard to minute 8, G Warwick started that there was still disappointment that BCPP Joint Committee had only appointed one Scheme member representative to the Board. He was continuing to press at Scheme Advisory Board level to take the matter further.

RESOLVED: That the minutes of the meeting held on 17 January 2019 be agreed as a true record.

**5     ARRANGEMENTS FOR CHAIRING THE LOCAL PENSION BOARD**

A report was considered which allowed the Board to consider future options for the chairing of the Board.

Members were reminded that at the last meeting of the Board, both the Chair and the Vice-Chair had stepped down part-way through their term due to changes in circumstances and work pressures.

This now gave the Board the opportunity to decide on future options for chairing the Board.

Members were informed the options for filling the role of Chair were:

- a)     For the Chair to alternate between employer and Scheme member representatives after each three-year appointment cycle (the current arrangement).
- b)     To appoint an independent non-voting Chair.

Members noted that the current arrangements worked in a situation where there was stability among the membership of the Board. However, for various reasons membership of the Board had become less stable recently and this could create the risk of relatively frequent changes in Chair which would lead to further instability.

The alternative would be to appoint an independent Chair who would not have a vote. Depending on the way in which an appointment was made and the number of meetings the cost of this could be between £5,000 and £10,000. G Graham informed the Board that four funds within BCPP had independent Chairs, in each case the individuals were retired senior local government officials. The feedback from the funds was that the arrangements they had in place were considered (principally because of the individual appointed) to have improved the overall performance of the Board.

The Board discussed both options at length, recognising the benefits that the right independent Chair could bring to the Board, but G Warwick believed strongly that the Chair must be a member of a body that was elected on behalf of a particular group of people i.e. a Scheme member or employer representative of the Fund.

M McCarthy commented that there were two strong arguments, both with their own merits but it was a difficult decision to make when the Board was not at full strength, and suggested officers made another concerted effort to recruit to the Board before the Annual Meeting in July.

N Gregory questioned whether the Chair had to rotate between an employer and a scheme member as, if not, this would add more flexibility.

G Graham commented that it was normal practice for the Chair to rotate but that it was a decision for the Board.

The Chair remarked that it was a difficult decision with valid comments on both sides, but did not think the Board was in a position to make the decision at the moment.

The Fund Director suggested deferring the decision to the Annual meeting in July, when hopefully the Board would be at full membership and amending the Constitution to remove the rotation requirements.

G Warwick questioned who would attend the BCPP meeting with Local Pension Board Chairs in May if the decision was deferred.

As acting Chair, J Thompson agreed to attend.

RESOLVED:

- i) That the decision around chairing arrangements for the Board be deferred to the Annual meeting in July.
- ii) That the Authority be asked to agree to amend the Board's Constitution to remove the requirement for rotation.

## 6 BUDGET

Members considered the Board's expenditure to 4 March 2019.

The Fund Director remarked that, as time had moved on since the preparation of the report, there had been no additional significant spend.

The Chair questioned whether the appointment of an independent Chair would impact the budget.

The Fund Director replied that it would but the cost of an independent Chair could be accommodated within the current budget.

RESOLVED: That the budgetary position be noted.

## 7 CYCLE OF MEETINGS

The Board considered the Authority's cycle of meetings for 2019/2020.

The Fund Director informed the Board that the Investment Board and the Corporate Planning and Governance Board had been abolished and replaced with an Audit Committee and a Staffing, Appointments and Appeals Committee; most business would now be conducted at Authority meetings.

The abolition of the two Boards had freed up space in the calendar to hold seminars which would deliver training or be focused on topical issues. The first one would be held at the offices of BCPP in Leeds and would cover investment related matters.

A detailed programme had been developed, including external events, some of which were aimed at Local Pension Board members. The programme would be circulated to members after today's meeting.

Member learning and development was high on the Pensions Regulator's priorities and members would be encouraged to attend as many of the events as practicable.

The Fund Director reminded the Board that The Pensions Regulator had developed an online toolkit aimed at public sector funds and asked that members complete this if they had not already done so.

The Authority was also developing an online reading room which would be available in the new financial year and would contain a section specifically for Local Pension Board members.

G Graham invited all members to the new member induction on 6 June 2019 which would be open to all as a refresh.

RESOLVED: That the report be noted.

## 8 REVIEW OF PENSIONS ADMINISTRATION

A report was considered which updated the Board on administration issues for the period 1<sup>st</sup> October 2018 to 31<sup>st</sup> December 2018.

The Head of Pensions Administration acknowledged that the information was now out of date but assured members that the new meeting cycle would ensure more timely information.

Members were informed that there had been two senior staff resignations in the period. Both posts had been replaced internally on an acting-up basis pending a wider review of all administration teams.

Priority casework was up to 94% during the quarter, although overall performance had shown a slight drop to 80% due to the commencement of the aggregation project.



J Bailey informed the Board that the Authority had agreed to a revised set of administration standards which included a change in target days in certain areas to make them more achievable.

Work had progressed well on the aggregation project with over 6,000 cases completed. The remainder would be dealt with as 'business as usual'.

Work was ongoing to progress the workflow tool to monitor employer performance to the 'go live' stage. This would enable greater scrutiny and provide assurance that SYPA was providing employers with the necessary tools and support they needed. The results would be reported on from Quarter 1.

The Board noted that Monthly Data Collection was going well and it was hoped to commence distributing Annual Benefit Statements to Scheme members as early as May or June.

Absence had showed a slight reduction during the period. A Brown suggested that showing absence as a percentage of days lost per full time employee would be a better way of presenting the figures. J Bailey agreed to look into this.

The Board discussed the results of the CIPFA Benchmarking Club survey and how to address areas where SYPA could make improvements.

With regards to the changes in the District Offices members were assured that there would still be a SYPA presence in these offices.

RESOLVED: That the report be noted.

## 9 REVIEW OF BREACHES, COMPLAINTS & COMPLIMENTS

A report was considered which updated the Board on the record of reported breaches and provided details of complaints reporting for Quarter 3.

Members noted the one reported breach and six complaints as detailed in the appendices to the report.

G Warwick remarked on the small number of breaches and complaints and asked that the Board's compliments be passed on to Authority staff.

RESOLVED: That the report be noted.

## 10 REVIEW OF EMPLOYER SURVEY

A report was submitted which updated the Board on the outcome of the employer survey which had been issued to all employers in the Fund.

The survey was intended to gauge current levels of satisfaction and assist SYPA to identify areas where employers may need more support.

The survey was issued on 17 December 2018 and ran until 21 February 2019; a total of 89 responses were received which equated to approximately 20% of the employers.

Employers were invited to comment on their level of satisfaction in several key areas, the response to which were detailed within the report.

The results provided a reasonable level of overall assurance the SYPA was meeting the needs of employers. The employers were also asked what they thought could be done to improve the administration service and what could SYPA do to assist the employers with the service they provided to their employees. The answers and SYPA's responses were contained in an appendix to the report.

It was clear from the responses that the new workflow tool would assist the employers with some of their concerns when it goes live in the near future.

With regard to the guide on the Monthly Returns process, responses suggested that the guide was well used but there were areas for improvement, including the use of plain English. The responses would be used to support a review of the Monthly Returns guide by the Data Team in the next few months.

Employers were asked to comment on the value of existing training and also their views on types of training methods they would prefer.

The results indicated that employers would favour a variety of training methods, though the increased use of written guides was something that employers wanted to see.

RESOLVED: That the report be noted.

## 11 ANY OTHER BUSINESS

R Fennessy informed the Board that South Yorkshire Police Pension Board had completed the Pensions Regulator's online self-assessment tool for public service pension schemes and had found it very useful. He suggested that the Board should go through the exercise.

The Head of Pensions Administration agreed to look into the matter.

J Thompson informed the Board that she was unable to attend the annual CIPFA/Barnet Waddingham conference for Local Pension Boards at the end of June in London and asked if any other member was available to attend. The link to the conference would be emailed to members after the meeting.

CHAIR

# Agenda Item 5



SOUTH YORKSHIRE  
PENSIONS AUTHORITY

<b>Subject</b>	<b>Membership and Charing Arrangements</b>	<b>Status</b>	For Publication
<b>Report to</b>	Local Pensions Board	<b>Date</b>	25 July 2019
<b>Report of</b>	Fund Director and Clerk		
<b>Equality Impact Assessment</b>	Required	Attached	No
<b>Contact Officer</b>	George Graham Fund Director	<b>Phone</b>	01226 772887
<b>E Mail</b>	ggraham@sypa.org.uk		

## **1 Purpose of the Report**

- 1.1 To approve changes to the membership of the Board and determine arrangements for Chairing the Board.
- 

## **2 Recommendations**

- 2.1 Members are recommended to:
- Support the proposed changes to the composition of the Board set out in paras 5.2 to 5.5 and the consequent changes to the constitution of the Board.**
  - Note the appointment of the following Board Members**
    - Cllr Tosh McDonald (Doncaster MBC) Employer**
    - Cllr Tony Damms (Sheffield CC) Employer**
    - Andrew Gregory, Scheme Member**
  - Identify whether a member of the Board wishes to undertake the role of Chair for a term of three years from this meeting in line with the role description at Appendix A.**
  - Note the intention of the Scheme Manager, in the event of a member of the Board wishing to undertake the role of Chair to appoint an independent adviser to assist the Board and specifically the Chair with its work.**
  - Note the intention of the Scheme Manager should no member of the Board be willing to undertake the role of Chair to appoint an independent chair.**
- 

## **3 Link to Corporate Objectives**

- 3.1 This report links to the delivery of the following corporate objectives:

## **Listening to our stakeholders**

To ensure that stakeholders' views are heard within our decision making processes.

An active and engaged membership of the Board provides an additional route for ensuring that the Pensions Authority is aware of stakeholder views.

## **Effective and Transparent Governance**

To uphold effective governance showing prudence and propriety at all times.

It is important that the Pensions Authority as Scheme Manager take steps to ensure that the Board operates in an effective way and the proposals set out in this report set out to achieve this objective.

### **4 Implications for the Corporate Risk Register**

- 4.1 The actions outlined in this report seek to address the risk contained in the corporate risk register that the degree of instability in the membership of the Board impacts on its effectiveness in fulfilling its role leading to the risk of intervention by the Pensions Regulator.

### **5 Background and Options**

- 5.1 Previous reports to the Board have provided the opportunity to consider the composition and membership of the Board and the arrangements for the Chair. This report provides a further update following consultations with the District Councils and the resignation of a further Board Member.

#### *Membership*

- 5.2 Following the recent resignation of Jill Thompson as a retired/deferred member representative the current membership of the Board is as follows:

Employers	Scheme Members
Cllr Tosh McDonald, Doncaster MBC*	Gary Warwick, GMB
Cllr Tony Damms, Sheffield CC*	Nicola Doolan-Hamer, Unison
Nicola Gregory, Minerva Learning Trust	Kevin Morgan, Unite
Rob Fennessy, SY Police	Andrew Gregory*
Vacancy – see Section 5.5	Vacancy – see Section 5.4

- 5.3 Those members marked \* have been appointed by the Pensions Authority as Scheme Manager since the last meeting following recent recruitment activity.
- 5.4 In terms of the remaining vacancies it is recommended that the Board support an amendment to the Constitution which will allow the remaining Scheme Member vacancy to be filled by any scheme member. The current arrangement where the vacancy is selected from the pensioner and deferred membership has proved a bar to recruitment and there does not appear to be any objective reason why an active member could not equally represent all category of members in a meaningful way.

- 5.5 The employer vacancy has previously been seen as representing smaller employers. However engagement with smaller employers has failed to identify any candidate with an interest in the role. It is therefore proposed to identify a senior HR/Finance manager from one of the District Councils to fill this position for a three year term. This will bring an additional and welcome operational perspective to the work of the Board. The recommendations at the head of this report provide for this course of action.

#### *Chairing Arrangements*

- 5.6 At its last meeting the Board indicated a strong desire that the Chair should come from amongst its members rather than being an independent. However, at that stage no member was prepared to undertake the role.
- 5.7 A role description for the Chair is attached at Appendix A and members of the Board are invited to consider whether any of them would be prepared to undertake the role for a term of three years (this term is proposed in order to provide the Board with some stability and continuity following a period of considerable instability). Should a member be prepared to undertake the role the Pensions Authority as scheme manager propose to appoint an Independent Adviser to the Board in order to ensure that the work of the Board is not being inadvertently driven by officers thus compromising the important degree of independence and distance that is central to providing effective scrutiny. The Adviser would work closely with the Chair in framing the agenda and work programme for the Board and act as a mechanism for providing the Pensions Authority with assurance that the Board is operating effectively.
- 5.8 Should no member of the Board wish to take on the role of Chair then the Pensions Authority as Scheme Manager will take steps to appoint an independent chair with the aim of having them in place for the next meeting of the Board. Whichever route is taken (independent adviser or independent chair) then steps will be taken to involve representatives of the Board in the appointment process.

## **6 Implications**

- 6.1 The proposals outlined in this report have the following implications:

Financial	Any costs incurred in relation to either an independent adviser or chair can be accommodated within the budget available to the Board.
Human Resources	
ICT	None apparent
Legal	
Procurement	

**George Graham**

**Sarah Norman**

**Fund Director**

**Clerk**

<b>Background Papers</b>	
<b>Document</b>	<b>Place of Inspection</b>

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## Local Pension Board – Role of Chair

### Role Specification

Through your position as Chair of the Pension Board you will review the decisions and actions of the Scheme Manager (SYPA) in relation to the governance, operation and management of the South Yorkshire Pension Fund, in order to ensure compliance with all relevant legislation and any requirements of the Pensions Regulator.

There is a particular focus in this role in scrutinising the effective administration of the scheme and ensuring the Board is encouraging continuous improvement in efficiency and service to scheme members.

### Main Duties and Responsibilities

As the Chair you will be expected to:

- Commit to undertake the role for a period of at least 3 years;
- Have capacity to attend four Local Pension Board meetings and at least one Authority meeting as well as training as required;
- Ensure the Board delivers its purpose as set out in the Boards Term of Reference;
- Actively ensure the Board members meet their requirements around knowledge and understanding as set out in the Pensions Regulator guidance.
- Liaise with the Authority on the requirements of the Board and the agenda for each Board meeting;
- Ensure that meetings are productive and effective and that opportunity is provided for the views of all Board members to be expressed and considered;
- Seek to reach consensus and where necessary ensure decisions are properly put to a vote;
- Scrutinise Local Pension Board papers, lead discussions and provide advice and guidance to the Board;
- Write reports on the performance of the Board and related matters as required.

## **Person Specification - Chair**

To be considered, you must be able to demonstrate that you have the qualities, skills and experience to meet all the essential criteria for appointment, specifically:

### **Knowledge**

- Possess knowledge and understanding of the pensions industry and the law relating to pensions;
- Have a good knowledge of public sector pensions and the capacity/ability to undertake additional learning specifically with regards to the Local Government Pension Scheme (LGPS);
- A working knowledge of the administration of the scheme;
- Ability to understand and interpret complex financial matters affecting the LGPS.

### **Leadership**

- Be a strong leader with good judgement who can influence outcomes in an effective manner;
- Have the ability to represent the views of the LGPS members/employers to the Pension Board as appropriate;
- Have proven leadership skills with the ability to chair meetings.

### **Communication and Team working**

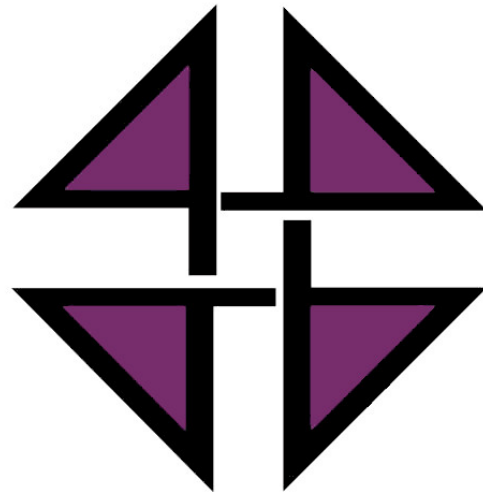
- Have excellent communication skills with a confident approach to scrutinising and challenging constructively;
- Ability to establish effective working relationships with Pension Board members and supporting officers;
- Willing to express opinions in a reasoned way, while also listening to the views of others;
- Be assertive in pursuing the appropriate course of action.

### **Other**

- A personal commitment to high standards of probity, propriety and governance.



**South Yorkshire Pensions Authority**



SOUTH YORKSHIRE  
**LOCAL PENSION BOARD**

**ANNUAL REPORT 2018/19**

## Foreword

Welcome to the 4th annual report of the South Yorkshire Joint Local Pension Board (LPB).

The Board seeks to assist the South Yorkshire Pensions Authority to maintain effective and efficient administration and governance. The LPB comprises in equal numbers, scheme members, which includes the three recognised trade unions, and employer representatives.

We have seen a number of changes this year with some long standing members retiring from our Board, Sue Ross, our Vice-Chair and Geoff Berrett one of our Employer representatives and also Nicola Simpson one of our Academy representatives. I would like to thank them all for their commitment and service on our Board which has contributed to its evolution within the governance structure of the Authority as it stands today. I took over as Chair last year following the retirement from office of Glyn Boyington and would like to take this opportunity to thank him also for his diligence and leadership over the previous three years. I would also like to welcome our new employer representative Rob Fennessy to our Board.

The establishment of the Border to Coast Pensions Partnership has brought with it the opportunity this year for all the Chairpersons from the 12 authorities to come together to share best practice and collectively assist each other in achieving the purpose of why the Boards were set up, which is 'to contribute to the governance of the pension scheme and make recommendations where appropriate'.

In November last year I was invited to attend the Employers Forum and was given the opportunity to raise awareness of the LPB amongst our Employers. This was well received by all enabling a platform for our Board to showcase some of the good work that it has done and plans to do.

A key focus from the Pensions Regulator is on good record keeping and data quality and to this end one of the main focuses this year has been a full scale review of both the data held on our Scheme members and also the quality of that data. A data improvement plan has also been produced and is being reviewed on a regular basis by our Board.

This year has also seen a change in the leadership of the officers of the Authority. The efforts of all officers, both past and present, on behalf of the Board are greatly appreciated.

Finally, without the commitment of all the members of our Board we would not be where we are today so a huge thank you to you all for your continued diligence and support.

Jill Thompson, Chair



## Membership

### **Employee Representatives**

Jill Thompson - LGPS Member (Acting Chair)

Garry Warwick (GMB) - Trades Union

Kevin Morgan (Unite) - Trades Union

Nicola Doolan (Unison) - Trades Union

Vacancy - LGPS Member

### **Employer Representatives**

Vacancy - Admitted Body

Rob Fennessy (South Yorkshire Police) - 'Other Large Employer'

Nicola Gregory– Academy

Councillor Philip Lofts - Local Authority Member (Barnsley)

Vacancy - Local Authority Member (Rotherham)

## Member Attendance

Attendance at the LPB meetings has been positive with members and employer representatives freely giving their time and commitment. Indeed 4 members have achieved 100% attendance over the year.

	7 June 2018	4 Oct 2018	17 Jan 2019	18 Apr 2019
Nicola Doolan-Hamer	✓	x	✓	x
Geoff Berrett	x	✓		
Rob Fennessy				✓
Nicola Gregory	✓	✓	✓	✓
Cllr Phillip Lofts	x	x	✓	✓
Kevin Morgan	✓	x	✓	✓
Sue Ross	✓	✓	✓	
Nicola Simpson	x			
Jill Thompson	✓	✓	✓	✓
Garry Warwick	✓	✓	✓	✓
HR Officer				✓

## Role of the LPB

The role of the Local Pension Board as defined by Sections 5(1) and (2) of the Public Service Pensions Act 2013 is to:

- Secure the effective and efficient governance and administration of the LGPS for the South Yorkshire Pension Fund;
- Provide the Scheme Manager with such information as it requires to ensure that any member of the Local Pension Board or person to be appointed to the Local Pension Board does not have a conflict of interest;
- Ensure the South Yorkshire Pension Fund effectively complies with the Code of Practice on the Governance and Administration of Public Service Pensions Schemes issued by the Pensions Regulator and is effectively managed and administered in compliance with the Code.

## Work of the Board 2018/19

The Board held four meetings during the year.

The Board continued to develop their **Work Programme**. This is a fluid document and one which evolves as Members knowledge and understanding of their roles evolve and also as situations arise within the Authority that require the Boards attention/consideration. Agreement has been reached to ensure specific issues set out in Government Guidance were cross referenced and gaps included in the Work Programme, for the avoidance of doubt. Members of the Board receive all **agenda papers** issued to Members of the Pensions Authority.

During the year the Board has considered:

- **Annual Fund Member Event** – Members of the Board were invited to the Annual Fund Member Event in Rotherham.
- **Guaranteed Minimum Pension Reconciliation** – The Board have been kept informed on the progress of this exercise.
- **Internal Audit** – The Board received Internal Audit progress reports.
- **Investment Pooling** – The Board were regularly updated on the progress of the Border to Coast Pensions Partnership.
- **Budget** – the Board regularly reviewed their budget.
- **External Audit Arrangements** – The Board, through the receipt of all Authority papers, was kept fully briefed on the work of the Authority's External Auditors Deloitte.
- **Review of Breaches and Complaints** - The Board received regular reports on breaches and Scheme Member complaints.
- **The Pensions Regulator** – The Board received a presentation from the Pensions Regulator.
- **Employer Survey** – The Board reviewed the outcome of the Employer survey.
- **Administration and Employer Performance** – The Board regularly considered Administration and Employer performance.
- **Data Quality Improvement** – The Board monitored the Data Quality Improvement Plan.

## Training and Development

The Board has in place a Training and Development Strategy similar to that of the Authority and both bodies have acknowledged the requirement to undertake training and development in tandem for mutual benefit and to provide value for money in training delivery.

During the year, Board Members have received the following training/development support:

- LGA Fundamentals Training

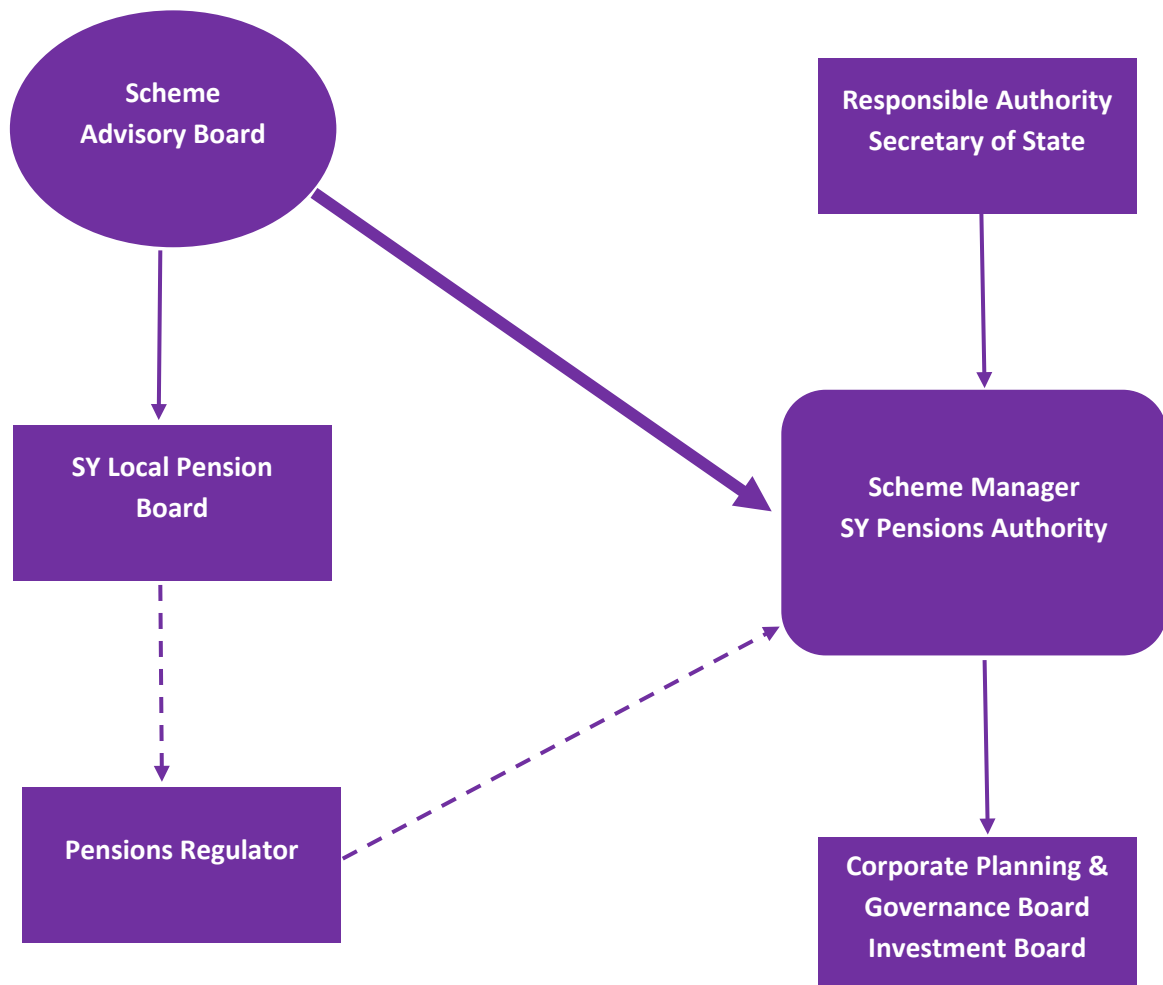
- BCPP Conference
- Authority Seminar - Corporate Strategy and Beliefs
- CIPFA LPB Members Annual Event

### **Future Plans**

We aim to:

- Communications – increased focus on the quality and frequency of the Authority's communications with scheme members and employers
- Monitor governance arrangements both within the Authority and the Border to Coast Pensions Partnership.
- Receive and make recommendations on data improvements through the newly designed data scoring model.
- Introduce mandatory training for all members of the LPB.
- Work closely with the other Local Pension Boards within our Pensions Partnership to share best practice.

## Governance Structure



SOUTH YORKSHIRE PENSIONS AUTHORITY						
LOCAL PENSION BOARD EXPENDITURE TO 31/03/19						
		ORIGINAL	REVISED	ACTUAL	2018-19	
		OUTTURN	OUTTURN	OUTTURN	VARIANCE	Note
<b>LOCAL PENSION BOARD</b>						
Travel, Accommodation and Subsistence		3,500	1,000	189	811	<b>1</b>
Training/Conferences		8,000	6,000	2,653	3,347	<b>1</b>
Professional Advice/Other		3,500	3,000	1,222	1,778	<b>2</b>
		<b>15,000</b>	<b>10,000</b>	<b>4,064</b>	<b>5,936</b>	
<b>1. Expenditure has been minimal against this budget as the Local Pension Board has only incurred travel</b>						
<b>expense claims, subsistence and training expenses at 31 March 2019</b>						
<b>2. Professional Indemnity Insurance expenditure plus LPB meeting costs.</b>						



# Agenda Item 7



SOUTH YORKSHIRE  
PENSIONS AUTHORITY

<b>Subject</b>	<b>Quarterly Administration Update</b>	<b>Status</b>	For Publication
<b>Report to</b>	Local Pensions Board	<b>Date</b>	25 July 2019
<b>Report of</b>	Head of Pensions Administration		
<b>Equality Impact Assessment</b>	Not Required	Attached	No
<b>Contact Officer</b>	Jason Bailey	<b>Phone</b>	01226 772954
<b>E Mail</b>	JBailey@sypa.org.uk		

## **1 Purpose of the Report**

- 1.1 To update Members on administration performance and issues for the period from 1 January 2019 to 30 June 2019

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## **2 Recommendations**

- 2.1 Members are recommended to:
- a. Comment on the content of the revised administration update and advise on any areas where they would like to receive further detail.**

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## **3 Link to Corporate Objectives**

- 3.1 This report links to the delivery of the following corporate objectives:

### **Customer Focus**

To design our services around the needs of our customers (whether scheme members or employers). The report includes reference to feedback from our customers as to their experience of the retirement process.

### **Effective and Transparent Governance**

To uphold effective governance showing prudence and propriety at all times. The report includes detail on the overall administration performance to ensure Members are able to scrutinise the service being provided to our customers.

## **4 Implications for the Corporate Risk Register**

- 4.1 The actions outlined in this report have no implications for the Corporate Risk Register.

## 5 **Background and Options**

- 5.1 This report seeks to make Board Members aware of the main areas of administration performance and any topical issues relevant to the reporting period(s) in question. To align reporting periods and ensure that Members have access to the latest available data, this report includes data for the last two quarters, ending 31 March 2019 and 30 June 2019. Single quarterly data will be provided in future updates.
- 5.2 Existing Members will note that the content of this administration update differs from information provided previously. This is intentional in order to provide Members with a wider view of the issues the administration service is handling and we would welcome feedback on any subject areas where Members feel additional reporting would be beneficial.

### *Staffing Issues*

- 5.3 The following table is a summary of joiners and departures for the administration service during the last six months. The redundancy departures shown were voluntary and were agreed by the Chair of the Authority in the context of the relocation of the District teams work base to Gateway Plaza. Approval was given on the basis that the overall work load of the District team service was reduced following the successful hand back of employer administration functions. From a customer perspective, the provision of face to face appointments for scheme members at the District offices remains in place and all other members of the District teams have successfully transferred to Gateway Plaza.

<b>Starters</b>	<b>Comments</b>
Casual Systems Officer (PT)	Former UPM Manager assisting with production of ABS and other duties.
Casual Data Processing Assistant (PT)	Assisting with routine administration functions ahead of automation.
Apprentice	12 month fixed term appointment.
<b>Leavers</b>	
Pensions Manager	Retirement. Post partially filled internally on acting up basis pending July restructure.
District Team Manager	Voluntary redundancy
District Team Officer (PT)	Voluntary redundancy
Pensions Assistant (PT)	Resignation
Data Team Assistant	Resignation

- 5.4 Members may wish to note that the administration service is currently in the middle of a six week consultation on a restructuring of the service launched on 2 July 2019 following approval by the Staffing, Appointments and Appeals Committee on 27 June 2019. The consultation proposes a number of changes to the structure of the service designed to facilitate improved resource allocation to the key areas of customer focus (both employers and scheme members) and the increased application of available technology to improve efficiency.
- 5.5 The Committee approved the consultation on the understanding that no compulsory redundancies would apply and there will be an overall increase in staffing of 1.5 FTE which will be achieved within existing budgets. The future structure of the service will

be reported to Members of the Board in the next quarterly update once the consultation has closed and any changes to the proposals agreed.

- 5.6 In terms of sickness absence, the table below shows the absence levels for the last two quarters and the two previous full years for reference. The Board requested that sickness absence information be provided in a revised format showing average days lost per year and this is reflected below.

Average Days per FTE	Q1 2019-20 Annualised	Q4 2018-19 Annualised	2018/19	2017/18
Short-Term	2.24	5.44	2.53	3.7
Long-Term	7.44	5.56	11.23	3.22
Total	9.68	11.00	13.76	6.92

- 5.7 As noted, the overall sickness absence levels have been inflated as a result of three individual complex long term absences during the periods in question. We expect these numbers to reduce going forward, however, as there is currently only one member of staff on long-term absence and this is being actively managed in line with our long-term absence policy.
- 5.8 The high incidence of short-term absence for Quarter 4 is a concern and this will continue to be monitored to gauge whether there are any underlying factors which may be causing the increase.

#### *Case Work Performance*

- 5.9 Under the standard reporting protocol, the case work performance of the administration teams for the last two quarters was as shown below. Previous year figures are shown for comparison.

Category	Volumes		Performance			
	Q1 2019-20	Q4 2018-19	Q1 2019-20	Q4 2018-19	Total 2018-19	Total 2017-18
Priority	1,372	1,335	90%	94%	91%	83%
Non-Priority	21,468	22,008	77%	84%	83%	83%
Overall	22,840	23,343	78%	84%	83%	83%

- 5.10 The overall performance dipped slightly for Quarter 1 which was expected because a couple of days processing time were lost in April following some system issues associated with the April pensions increase exercise. These were issues outside of the team's control and we will be conducting a 'lessons learnt' exercise with our software provider to ensure the issues identified will not recur in 2020. A small number of pensioners did not receive their annual increase in April but this was rectified in May and backdated.
- 5.11 Leaving aside the issues in Quarter 1, the general direction of travel compared with past years is an upward trend and the performance on non-priority work should be viewed in the context that much of this work is completing the backlog of "aggregation" project work that commenced on 1 October 2018. By means of illustration, the average number of total cases completed for each quarter in 2017/18 was **17,726** and in

2019/20 this had risen to **19,091**. In the performance table below the aggregations will show as having been completed late as this is a backlog exercise.

- 5.12 The table below provides a summary of performance against the main subject areas. Performance on transfers and divorce quotations is particularly low but this reflects the fact that new transfer value factors were issued by the Government Actuary and there were anticipated delays in programming these into our administration system.

Case Type	Target Days	Q1 19-20 Volume	Q1 19-20 % on time	Q4 18-19 Volume	Q4 18-19 % on time	2017-18	Comment
Priority							
Retirements	5	922	95%	883	96%	87%	
Deaths	4	441	80%	406	92%	78%	See 5.13
Non Priority							
New Joiners	5	1966	91%	2460	93%	89%	
Deferreds	20	1238	49%	980	60%	64%	
Refunds	9	131	75%	183	91%	91%	
Transfers In	7	92	15%	66	26%	40%	See 5.12
Transfers Out	5	55	29%	106	57%	44%	See 5.12
Divorce	5	74	66%	104	89%	71%	See 5.12
General enquiries	5	626	94%	719	96%	91%	
Estimates	5	408	91%	231	98%	75%	
Aggregations	20	2072	34%	3008	55%	NA	See 5.11*

- 5.13 The table above shows **Priority** work which is defined as case work involving the processing of retirements and deaths. We have previously reported that the target time for a death case was four days for handling the complete process. At its meeting in March 2019, the Authority agreed a more realistic timescale going forward for handling death cases which involved splitting the process into two constituent parts – the initial notification to the next of kin and the processing of benefits once all claim documentation was received. Although not reflected in the table above as this would distort comparisons between quarters, early indications of this more realistic target suggest that performance levels rise near to 100% when this has been taken into account. Future performance reporting will reflect the revised target days agreed by the Authority in March.

#### *Employer Performance*

- 5.14 Members will be aware that employers now submit individual data on a monthly basis and we previously reported that commitment from employers to the monthly data collection process has been strong. We are pleased to report that the submission of monthly returns remains high as demonstrated in the tables overleaf.

March 2019 (due April)	Number of returns expected	Returns received	Outstanding	% Success Rate
Total Active Employers in SYPA Fund	478	477	1	99.8%

April 2019 (due May)	Number of returns expected	Returns received	Outstanding	% Success Rate
Total Active Employers in SYPA Fund	478	478	0	100%

May 2019 (due June)	Number of returns expected	Returns received	Outstanding	% Success Rate
Total Active Employers in SYPA Fund	485	484	1	99.8%

- 5.15 One area that we have not previously reported on is the resolution of queries from employers once the monthly data file has been submitted. This is important because each monthly data file cannot be processed by SYPA until the individual data queries resulting from the previous month's data file have been fully resolved. Now that the monthly data file submission process is embedded with employers, we are developing a mechanism to report on employer responsiveness to monthly data queries and we hope to be in a position to report to the Board on this from Quarter 3 onwards.

*Scheme Member Engagement – Customer Satisfaction*

- 5.16 The Authority is keen to improve engagement with our scheme members to measure the levels of satisfaction with our service and had agreed to start with surveying members who have recently retired to understand their experiences. The table below shows the overall satisfaction levels from respondents to the survey issued to members who retired in March, April and May 2019.

Q. Overall, how satisfied are you with the service you receive from us?	
Very Satisfied	69.57%
Satisfied	22.61%
Dissatisfied	7.83%
Very Dissatisfied	0%
Total Number of Respondents	115

- 5.17 Although overall positive satisfaction levels of 92% are pleasing, that clearly leaves 8% of retiring members who were not satisfied with the process. Looking in more detail at the reasons for this, it is evident this is mainly due to delays experienced in SYPA receiving the necessary leaver information from the employer to enable benefits to be paid.
- 5.18 In some instances, it was clear that we had not communicated the reason for the delay with the member so we will be looking to improve our processes in this area. As importantly, we need to understand more about the issues employers are facing in providing us with the information we need to pay retirement benefits. The restructure of the administration service proposes the creation of two new engagement officer posts working more pro-actively with employers and acting upon the feedback from the survey to understand how we resolve the issues raised will be a key focus of their work.
- 5.19 In addition to overall satisfaction rating, the survey does also provide some useful feedback around how scheme members feel about the nature and content of the documentation they received from us as part of the retirement process. One common theme in the responses to the first survey was that our correspondence was not clear in explaining when the first pension payment would be made and we are therefore making changes to our documentation to ensure this information is clear and upfront.

#### *Scheme Member Engagement – online portal*

- 5.20 Members may recall that the annual benefit statements for 2019 will be issued online rather than paper based and, ahead of the completion of the 2019 exercise, we have been carrying out an exercise to encourage all scheme members (regardless of status) to sign up to use the online portal which was enhanced and expanded earlier this year. **Appendix A** shows the numbers of scheme members who have registered for the portal since April 2018.
- 5.21 Whilst the increase in online registrations continues, it is evident that we still need to improve the numbers of scheme members who are registered for the portal. We will continue to issue communications to members and, where appropriate, employers, to encourage everyone who has access to the internet to register for the portal. The registration process itself has been simplified over the last couple of months which should help improve registrations and both telephone and online support are available if required.
- 5.22 Following a successful period of testing, we are starting to make the annual benefit statements online in July for small groups of scheme members and we will aim to ensure that statements are available for all members ahead of the 31 August statutory deadline. Scheme members can of course request a hard copy of their statement if required, though there are considerable advantages to members in registering for the portal. They can, for example, view their complete pension record, update personal details and (for active and deferred members) generate personalised retirement illustrations. The functionality of the online portal will continue to be developed over time.

#### *Administration timeline*

- 5.23 There is a calendar of activity for the administration service which may not always be visible to members of the Board and **Appendix B** is therefore an attempt to provide a summary of the main headline activities for the current financial year. We are very

happy to consider providing further information on any aspect of the scheduled activity list in future reporting to the Board.

- 5.24 In the last quarter, the administration service has successfully carried out the activities set out in the timeline and, as indicated above, the exercise to issue annual benefit statements is well underway. We have successfully provided the full member data extract to the fund actuary for the scheme liabilities to be assessed as part of the triennial valuation process which will result in the setting of employer contribution rates for the three year period from 1 April 2020. We await the actuary's feedback on the quality of the data submitted but extensive data preparation was completed prior to submission and we anticipate the feedback will be positive.

#### *Employer Movements*

- 5.25 The overall number of employers in the Fund continue to grow, partly as a result of academisation in the education sector but also due to employers contracting out services to bodies who join the LGPS through admission agreements. **Appendix C** shows the movements of employers joining the Fund in the last two quarters. There were no employer exits from the Fund completed in the period.

#### *CIPFA Administration guidance*

- 5.26 At the last Board meeting in March 2019, members were advised that CIPFA had recently published a guide to 'Administration in the LGPS'. The Guide is attached at **Appendix D** and has been written to "...assist committee and board members to better understand how they can oversee the delivery and quality of administration and communications within their administering authorities, with a view to identifying where improvements may be needed."
- 5.27 In the light of the information set out in the Guide, members of the Board are invited to consider any areas where they would like additional information to be included in this quarterly administration update.

## **6 Implications**

- 6.1 The proposals outlined in this report have the following implications:

Financial	None apparent.
Human Resources	None
ICT	None
Legal	None
Procurement	None

**Jason Bailey**

**Head of Pensions Administration**

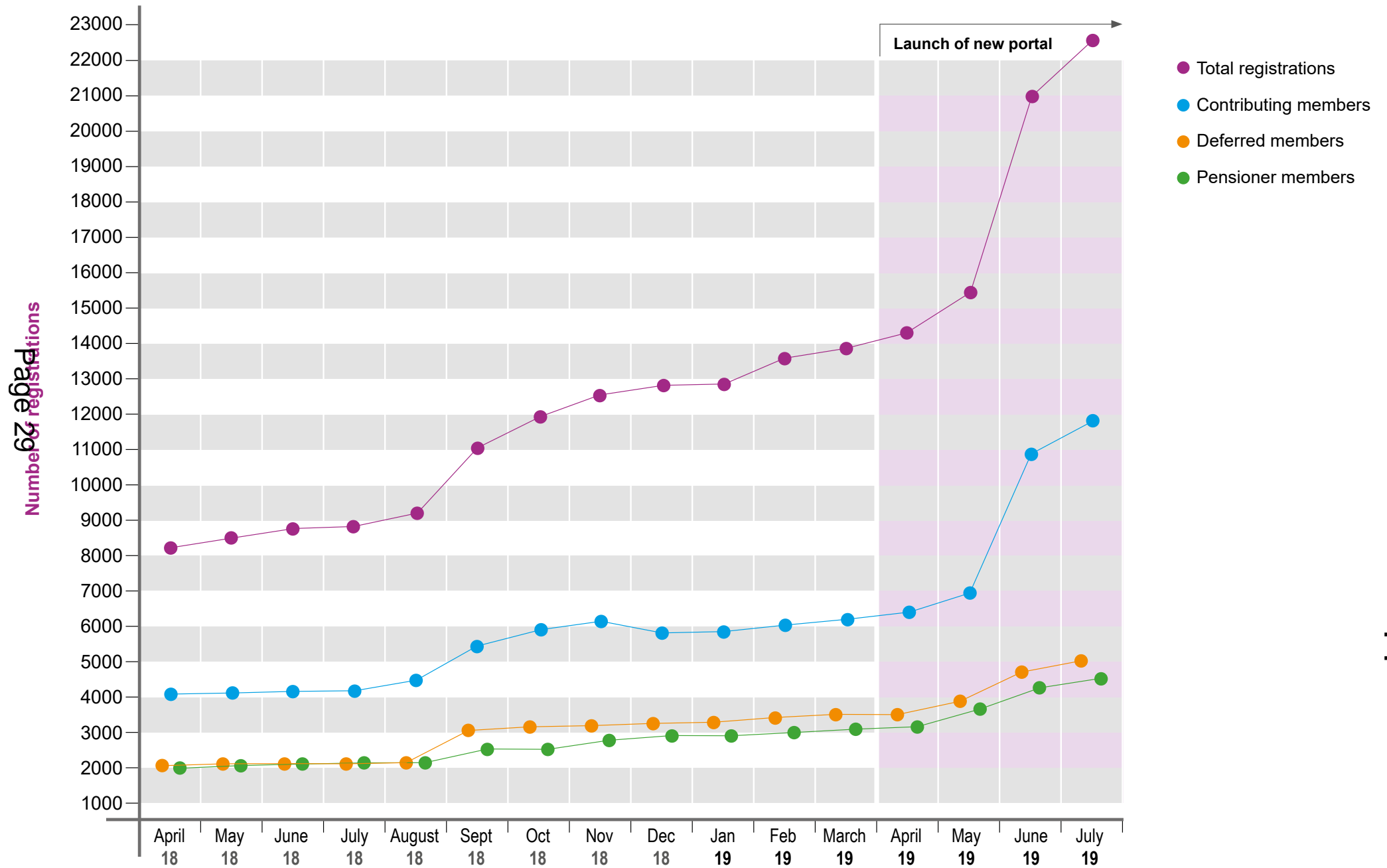
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# my pension registrations

April 2018 - July 2019



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# Administration Service Timeline



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# Appendix C

## EMPLOYER ENTRIES AND EXITS: JANUARY TO JUNE 2019

Employer Name	Employer Type	Admission Date	Bond /Guarantor
Dalton Parish Council	Resolution Body	20-Jun-19	NA
Askern Spa Primary	Scheduled Body	01-Jun-19	DfE
Horizon Community College	Scheduled Body	01-Jun-19	DfE
MAM (Doncaster) Ltd - Doncaster Markets	Contractor (TAB)	15-May-19	No Bond (outsourcing scheme employer is the de facto guarantor)
Oughitbridge Primary School	Scheduled Body	01-May-19	
Chorus Education Trust - MAT HQ	Scheduled Body	01-May-19	DfE
Bradfield Dungworth Primary	Scheduled Body	01-May-19	DfE
Nook Lane Junior School	Scheduled Body	01-May-19	DfE
Peak Edge Academy	Scheduled Body	01-May-19	DfE
Stannington Infant School	Scheduled Body	01-May-19	DfE
Wharnccliffe Side Primary	Scheduled Body	01-May-19	DfE
Maltby Learning Trust MAT HQ	Scheduled Body	01-Apr-19	DfE
Wath Comprehensive School	Scheduled Body	01-Apr-19	DfE
Sheffield City Region - Combined Authority	Scheduled Body	01-Apr-19	NA
Marshland Primary	Scheduled Body	01-Apr-19	DfE
Thorne Brooke Primary	Scheduled Body	01-Apr-19	DfE
Minerva Learning Trust - MAT HQ	Scheduled Body	01-Apr-19	DfE
Mercia Learning Trust MAT HQ	Scheduled Body	01-Apr-19	DfE
Askern Moss Road Infant Academy	Scheduled Body	01-Feb-19	DfE
Astrea Academy Dearne	Scheduled Body	01-Feb-19	DfE
Askern Littlemoor Infant Academy	Scheduled Body	01-Feb-19	DfE

**NO TERMINATIONS COMPLETED IN REPORTING PERIOD**

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# administration in the LGPS

A guide for pensions authorities



## **About CIPFA**

CIPFA, the Chartered Institute of Public Finance and Accountancy, is the professional body for people in public finance. Our members and trainees work throughout the public services, in national audit agencies, in major accountancy firms, and in other bodies where public money needs to be effectively and efficiently managed.

## **About Aon**

Aon plc is a leading global professional services firm providing a broad range of risk, retirement and health solutions. Its 50,000 colleagues in 120 countries empower results for clients by using proprietary data and analytics to deliver insights that reduce volatility and improve performance.

Aon's public sector retirement team specialise in providing advice in relation to the Local Government Pension Scheme (LGPS), police and fire schemes and the public services schemes of offshore Governments. They also advise employers in relation to public service pension schemes including the Police and Fire schemes, LGPS, the NHS Pension Scheme, the Teachers' Pension Scheme and the Principal Civil Service Pension Scheme (PCSPS).



# \ foreword

For many years the Local Government Pension Scheme (LGPS) was relatively simple with benefits based on a final salary and the number of years an individual was a member. Changes in accrual rates, changes in taxation and the move to a scheme based on career average earnings have led to a significant increase in the complexity of the scheme. Recruiting experienced pension people has proved an added difficulty resulting in our pension administrators being placed under increasing pressure. While the management of pension fund assets and the introduction of investment pools are critically important, it often means that pensions administration does not get the attention or resources it deserves. However the LGPS only exists to administer and pay benefits to its scheme members. The member experience is paramount. The purpose of this insight is to raise the profile and awareness of the pensions administration function.

Within the public sector environment there is also continuous pressure to drive down costs and the administering authorities of local government pension funds have not been able to avoid this pressure. While there is much good practice within the LGPS, the CIPFA Pension Panel has become increasingly concerned that in some instances the pensions administration function may not be operating as effectively as it should be. The guide is timely given the increasing focus by the Pensions Regulator on the need to deliver effective and efficient administration.

This insight has been written to assist senior officers, committee and board members to better understand how they can oversee the delivery and quality of administration and communications within their administering authorities, with a view to identifying where improvements may be needed.

I welcome this insight as a key piece of the LGPS jigsaw. It has been developed by Aon and supported by Neil Sellstrom (CIPFA Pensions Technical Manager) on behalf of the CIPFA Pensions Panel.

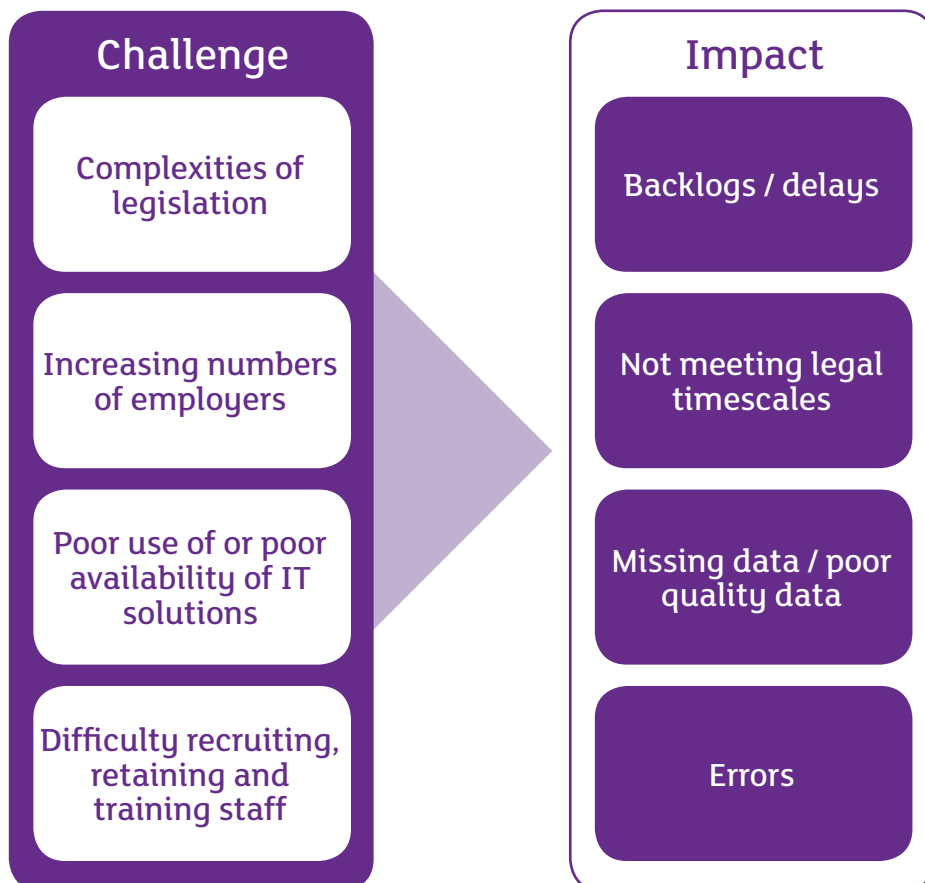
The Panel would like to thank Karen McWilliam, Catherine Pearce, Craig Payne and other colleagues at Aon for their contributions to the guidance.

**Mike Ellsmore**  
Chair, CIPFA Pensions Panel

# what are the challenges?

## What are the administration and communication challenges?

Administration teams have been faced with some major challenges in recent years. We have seen evidence from some LGPS administering authorities that the amount of 'tasks' having to be dealt with has doubled in the last two or three years. Given these challenges, it should not be a surprise that most administering authorities are experiencing some of the areas of impact highlighted below (and this is by no means an exhaustive list).



Source: Aon

## What is your role?

Each administering authority has a legal responsibility to maintain and manage their LGPS fund. This role is referred to as the scheme manager in the Public Service Pensions Act 2013. Although these legal responsibilities lie with the organisation as a whole, they are usually delegated to committees, sub-committees and/or senior officers. The local pension board has a legal responsibility to “assist the scheme manager” in securing compliance with its obligations and so is expected to work closely with those who are managing the LGPS fund ensuring that those responsibilities are met. A key part of this role is also ensuring that the Pension Regulator’s requirements are met, many of which are focused on efficient and effective administration.

Consequently, senior officers and committee and board members have a collective responsibility for the proper governance of the fund, including administration and communications matters. Key steps in dealing with these administration challenges should include:

- ensuring you have **administration and communications strategies** in place and that they are regularly reviewed, providing clarity on the fund’s aims and objectives including how these will be monitored
- **engaging** with your administration team. Encourage **transparency** and be supportive
- **identifying the current challenges** your administration teams are faced with – for example backlogs, data gaps, poor satisfaction scores or lack of time/resources to develop efficiencies and improvements
- **developing a plan** with clear actions and timescales to overcome the current challenges. This should be part of the fund’s business plan and is likely to involve some or all of the following: reviewing priorities, increasing resource, implementing new systems or procedures and outsourcing some or all of the rectification
- getting regular updates showing **progress against the action plan** to ensure your remedial work is delivering as expected
- ensuring you are provided with information on a regular basis, and you are **monitoring** against your fund’s aims and objectives as well as the legal requirements. This will mean you can more quickly identify issues as they arise, as well as seeing where performance is strong. Suggestions of what you should monitor are included in this document.

You should accept that there is no silver bullet. Existing backlogs and data problems could take many months or even years to resolve, particularly where recruitment and training are required.

But it is critical that a clear plan of action is in place with targets, timescales and resources clearly identified.

# foundations and monitoring

## Strong foundations – strategies and business planning

The fund's administration and communication strategies are critical to setting the aims and objectives that the administration teams need to focus on. The administration strategy should clarify how administration will be delivered as well as confirming the responsibilities of the various stakeholders, and particularly the employers of the fund. The communications strategy should confirm how you will communicate with the key stakeholders, as well as clarifying how much focus will be put on areas such as electronic communications. The strategies should explain how the aims and objectives will be measured on an ongoing basis. You should ensure both strategies are regularly reviewed and that achievement of the aims and objectives are regularly monitored.

The next part of the jigsaw is the fund's business plan. This should be agreed at least annually and it will set out the key steps to delivering the administration and communications strategies (as well as the other strategies of the fund) together with the associated budget. This should confirm the key projects and tasks for the administration teams in the forthcoming year or longer, including any system or process changes that may be required to meet the fund's strategies and any changes or projects required as a result of national initiatives or regulatory changes. The business plan provides direction for the administration team, so they know the areas of focus for the forthcoming period.

## Regular monitoring – what should you be looking for?

The world of administration is complicated and therefore you should be receiving regular monitoring updates to help you identify if things aren't going as planned. Here are some key areas we recommend that you ensure you receive as a minimum. The level of detail provided might vary depending on whether the information is being considered by a pension committee, a local pension board or senior officers. For example, the pension committee may wish to receive something with less detail, albeit they should still be made aware of areas of concern.

## 1. Are legal deadlines being met?

There are many legal timescales that the administration team should be meeting. There is no flexibility in these timescales and the administering authority should be doing everything it can to meet them. It may be impractical to expect reporting against all the legal timescales, but some of the key ones are illustrated below with sample data which shows the specific process, the legal timescale and the performance in the month. The data should be supplied with some context eg reasons why the legal timescale has not been met and what is being done to improve the position. This information may highlight breach situations (see 4.).

Process	Legal requirement	Total number completed	% achieved in legal deadline
		April 2018	
Send a notification of joining the LGPS to a scheme member.	Two months from date of joining the scheme), or if earlier within one month of receiving jobholder information where the individual is being automatically enrolled/re-enrolled.	256	99%
Inform a member who left the scheme of their leaver rights and options.	As soon as practicable and no more than two months from date of initial notification (from employer or from scheme member).	49	99%
Obtain transfer details for transfer in, and calculate and provide quotation to member.	Two months from the date of request.	18	95%
Provide details of transfer value for transfer out, on request.	Three months from date of request (CETV estimate).	25	100%
Notify the amount of retirement benefits.	One month from date of retirement if on or after normal pension age or two months from date of retirement if before normal pension age.	40	97%
Provide a retirement quotation on request.	As soon as is practicable, but no more than two months from date of request unless there has already been a request in the last 12 months.	33	97%
Calculate and notify dependant(s) of amount of death benefits	As soon as possible but in any event no more than two months from date of becoming aware of death, or from date of request by a third party (eg personal representative).	9	100%
Provide all active and deferred members with an Annual Benefit Statement	By 31 August each year.	12358	96%

## 2. Is the administration team meeting the fund's agreed internal target timescales?

The majority of existing timescale monitoring that we see falls within this category. This relates to the internal timescales for work carried out by the administration team, usually focusing on the period from when all data is received (for example, from the employer or scheme member) to when the administration team complete that task. It is good practice to have specific timescales and targets for specific processes carried out by the administration team.

A range of target timescales should be determined by each administering authority and it is good practice for them to be included, or at least referred to, in a fund administration strategy. The following data illustrates some key processes, sample fund targets and performance within a month. Again, the data should be accompanied by some explanation where targets are not met.

Process	Administration team target	Target %	Total number completed	% achieved in admin team deadline
April 2018				
Send a notification of joining the LGPS to a scheme member.	15 working days from receipt of all information	90%	256	97%
Inform a member who left the scheme of their calculated benefits (refund or deferred).	15 working days from receipt of all information	90%	49	99%
Obtain transfer details for transfer in, and calculate and provide quotation to member.	20 working days from receipt of all information	90%	18	92%
Provide details of transfer value for transfer out, on request.	20 working days from receipt of all information	90%	25	100%
Notify a member of final amount of retirement benefits (post commutation).	Five working days from receipt of all information	95%	40	95%
Providing a retirement quotation on request.	10 working days from receipt of all information	90%	33	96%
Calculate and notify dependant(s) of amount of death benefits.	Five working days from receipt of all information	95%	9	98%

### 3. Are total turnaround times being met?

Looking at the data in 1 and 2 above alone does not necessarily provide you with a true indication of what your scheme members' experiences are. For example, how long are scheme members waiting to receive the calculation of their deferred benefits if they resign? Even where the legal timescales cover the member experience, you may wish to set shorter timescales or other targets for specific processes carried out for your fund. Again, these should be included or referred to within the fund's Administration Strategy. The following data illustrates some key processes, sample fund targets and performance within a month:

Process	Overall process target	Target %	Total number completed	% achieved in overall process target
		April 2018		
Send a notification of joining the LGPS to a scheme member.	30 working days from date of joining	90%	256	96%
Inform a member who left the scheme of their calculated benefits (refund or deferred).	40 working days from date of leaving	90%	49	97%
Obtain transfer details for transfer in, and calculate and provide quotation to member.	40 working days from date of member's initial request	90%	18	94%
Provide details of transfer value for transfer out, on request.	40 working days from date of request	90%	25	100%
Notify a member of final amount of retirement benefits	20 working days from date of retirement	95%	40	91%
Providing a retirement quotation on request.	15 working days from date of request	90%	33	93%
Calculate and notify dependant(s) of amount of death benefits.	20 working days from date of death	95%	9	96%

## 4. Breaches and errors

Whenever an administering authority fails to do something it is required to do by law, it is good practice that it should be included in the fund's 'breaches of the law' register, regardless of whether the breach should be reported to the Pensions Regulator. This register should include the more commonly recorded breaches such as employers failing to pay contributions to the fund (either on time or incorrect amounts) and not issuing all annual benefit statements.

It should also include cases where a legal timescale is not met (some of which will be included in 1. above, but others could apply including HMRC deadlines such as pension savings statements) and other situations such as a result of incorrect benefit calculations. It is worth extending the reporting to include other errors and omissions, for example as identified through internal dispute resolution procedures (IDRPs), as these can highlight quality issues or a specific area of concern that needs to be resolved.

### **The Pension Regulator's requirements in relation to breaches of the law**

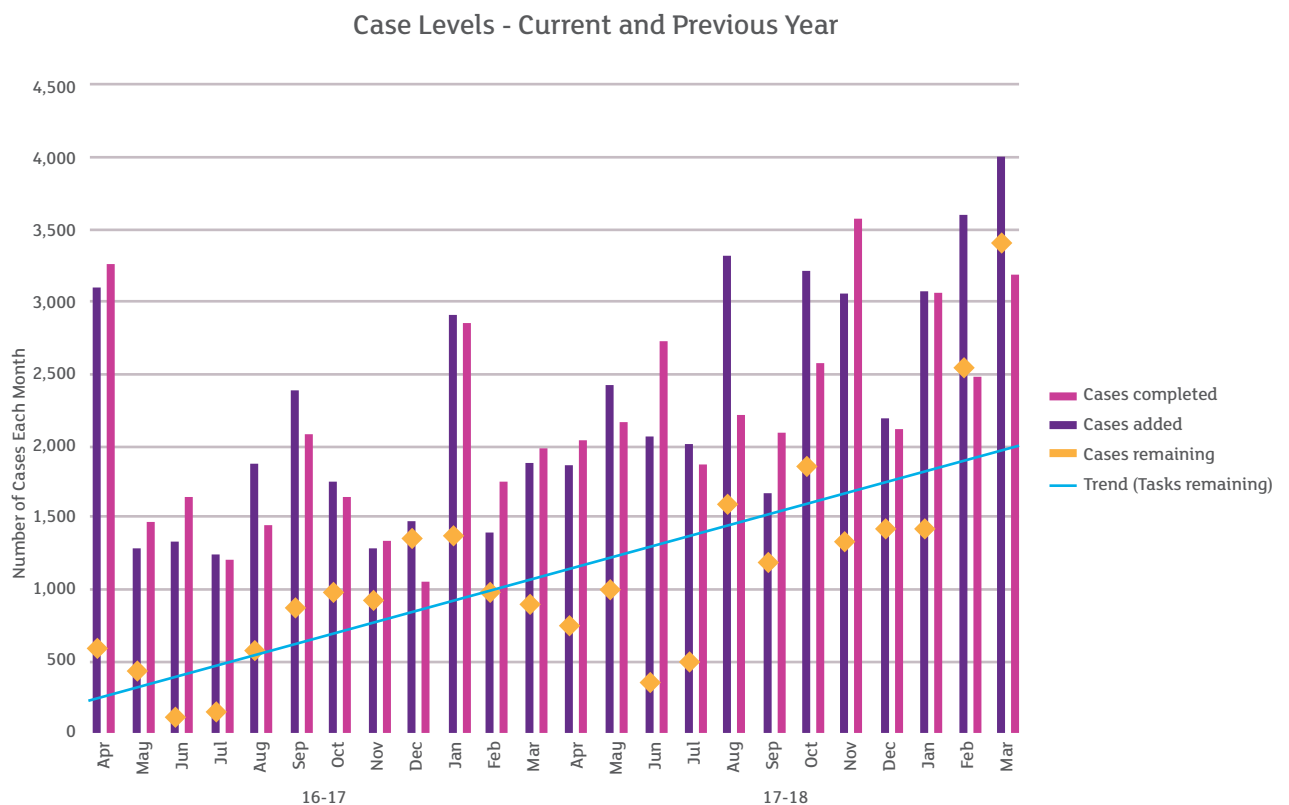
The Pension Regulator's Code of Practice 14 relating to the governance and administration of public service pension schemes places a lot of focus on the requirements to manage breaches of the law. In this regard a breach of the law relates to a legal duty relevant to the administration of the scheme under the Pensions Act 2004 which is not being complied with. This Regulator's Code of Practice reminds us that we should:

- have appropriate processes in place to consider whether a breach of the law is materially significant to the Pensions Regulator and therefore should be reported to it (which is a statutory requirement)
- have a system to record breaches even if they are not reported to the Pension Regulator.



## 5. What new tasks are coming in, how many are being completed and how many are outstanding?

The information you will receive in relation to measures 1. 2. and 3. above focus on the tasks and processes the administration team are completing. What they don't show are the cases that are still waiting to be processed; nor do they highlight the amount of work being received by the team. It is therefore important to monitor these two further areas by comparing them with the number of cases being completed each month. It is particularly important to understand any trends over time and whether there are any explanations so you can assess the likelihood of the situation continuing. One example of how this information can be reported is shown below.



Source: Aon

## 6. What do scheme members and employers think?

Most administering authorities will have administration and communications strategies with specific objectives that can best be measured by customer feedback – relating to both scheme members and employers. It is important for administering authorities to gather and consider feedback on a regular basis (at least annually, if not ongoing).

One sample of scheme member feedback against fund objectives is shown below. In this example, the fund has an objective of 80% of responses being ‘agree’ or ‘strongly agree’.

Scheme member survey		Strongly disagree	Disagree	Agree	Strongly agree	>Agree
Admin	...offers documentation, guidance and information in a professional manner?	8.7%	4.3%	52.2%	34.8%	87.0%
	...is proactive in their approach to provide a service to members?	8.7%	8.7%	52.2%	30.4%	82.6%
	...gives an appropriately timed service with regular updates?	13.0%	8.7%	60.9%	17.4%	78.3%
	...is customer focused and meets the needs of its members	8.7%	4.3%	60.9%	26.1%	87.0%
	...has provided a high quality service throughout your membership?	8.7%	8.7%	43.5%	39.1%	82.6%
Comms	...promotes the scheme as a valuable benefit and provides sufficient information so you can make informed decisions about your benefits?	15.4%	7.7%	46.2%	30.8%	76.9%
	...communicate in a clear and concise manner?	15.4%	7.7%	46.2%	30.8%	76.9%
	...use the most appropriate means of communication?	7.7%	15.4%	38.5%	38.5%	76.9%
954 surveys issues / 132 returned (13.8%)						

Source: Aon

## 7. What other data issues are there?

The Pensions Regulator is putting a lot of focus on data issues in 2018 and expects all public service pension scheme administrators to have improvement plans in place including [facilities to measure common data and scheme specific data](#).

The Scheme Advisory Board will be developing a template for LGPS scheme specific data that all administering authorities will be expected to report on from 2019, in addition to common data. In the interim, all administering authorities should have developed their own approach to scoring of the quality of their scheme specific data. Senior officers, committee and board members should ensure they regularly see the fund’s data improvement plan which should highlight all data issues and the plan of action to rectify them where appropriate, together with progress against that plan.

## 8. What other objectives and aims are in your strategies? Are you receiving reporting to identify if they are being achieved?

All administering authorities must, by law, have a communications policy in place and it is also best practice to have an administration strategy in place. Within both of these, you should have a number of aims and objectives. It is important that any aims or objectives you have are being appropriately measured and monitored. You should review those aims and objectives against the monitoring information that you receive from the administration team to ensure that is the case, and ensure that a plan is put in place where objectives are not being met.

## 9. Are employers meeting their requirements?

Many of the requirements imposed on administering authorities are only achievable if the scheme employers do their part of the process correctly and on time. Administering authorities should set out to their employers what they are required to do and when, and this is commonly included in the administration strategy. The strategy will usually also set out the fund's policy on recharging costs to those employers who cause additional work for the administering authority by sending incorrect or late data.

It is therefore important to monitor the performance of employers against the requirements set out in the strategy and you should ensure that you receive information about this monitoring and include in your action plan where an employer is not meeting requirements. This can be presented in various ways and some of it may be implicit in the reporting elements outlined previously.

## 10. Is the administration team delivering on the priorities on the business plan?

Finally, every year the pension committee should be asked to approve a business plan outlining the key priorities for the forthcoming period – best practice would be a rolling plan covering at least three years, updated on an annual basis. This should include administration and communications elements, such as:

- review of processes due to changes in legislation
- implementing new systems
- procurement of suppliers
- any other known projects (a recent example is GMP reconciliation)
- any projects to clear backlogs or other issues identified.

As a matter of course, you should receive regular information showing whether these priorities are being delivered to the planned timetable and to budget.

## What if administration is outsourced or delivered through a shared-service arrangement?

Whether your administration service is delivered internally (within the administering authority), outsourced to a private sector contractor or provided through a shared-service arrangement, the responsibility for the proper governance of the fund, including administration and communications matters, still lies with the administering authority. Accordingly, you would expect all of the points highlighted above to equally be included in reporting from any external provider or shared service partner of your administration services. A close working relationship is fundamental to ensuring that your administration provider is able to continually meet legal and other requirements, particularly given you will have no or little direct control over the resources available to deliver your administration services.

It will be extremely important to ensure that the information to be included in reporting, and the level of detail expected, is clearly set out when carrying out any tender or appointment process. This should ensure full details of all fund specific service standards or other targets (albeit noting that these may move during the period of the contract). This should also set out expectations in relation to rectification where an administration provider is failing to meet requirements.

# \ conclusion

Administering authorities should ensure they understand the administration challenges they face and meet their fiduciary responsibilities to their scheme members, as well as working with their employers to ensure they also understand and meet their responsibilities. The level of scrutiny on LGPS funds has never been higher, both from internal sources such as local pension boards but particularly from external sources such as the Pensions Regulator, the Pensions Ombudsman and the national press.

It is therefore essential that administering authorities and their fund employers have the necessary capacity to meet these challenges, otherwise there is a significant risk of censure and the subsequent reputational damage at local and national level and, more concerning, of scheme members not receiving accurate benefits paid on time. The period of time required to recruit and train staff should not be underestimated. It is hoped that this guidance informs authorities with a view to ensuring robust governance arrangements are in place in relation to administration and communications on an ongoing basis.



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## Agenda Item 8



SOUTH YORKSHIRE  
PENSIONS AUTHORITY

<b>Subject</b>	<b>Review of breaches, complaints and appeals</b>	<b>Status</b>	For Publication
<b>Report to</b>	Local Pensions Board	<b>Date</b>	25 July 2019
<b>Report of</b>	Head of Pension Administration		
<b>Equality Impact Assessment</b>	Not Required	Attached	No
<b>Contact Officer</b>	Jason Bailey	<b>Phone</b>	01226 772954
<b>E Mail</b>	JBailey@sypa.org.uk		

### **1 Purpose of the Report**

- 1.1 To update members on the latest available record of reported breaches and provide details of complaints and appeals for the period from 1 January 2019 to 30 June 2019.
- 

### **2 Recommendations**

- 2.1 Members are recommended to:
- a. **Note the breaches summary and audit outcome and comment on any further reporting requirements or actions**
  - b. **Note the outcome of complaints received and comment on any further requirements**
- 

### **3 Link to Corporate Objectives**

- 3.1 This report links to the delivery of the following corporate objectives:

#### **Customer Focus**

To design our services around the needs of our customers (whether scheme members or employers). Complaints and appeals provide valuable feedback on potential areas for improvement in administration.

#### **Effective and Transparent Governance**

To uphold effective governance showing prudence and propriety at all times. The Pensions Regulator's Code of Practice 14 places focus on the requirements to manage breaches of the law and the importance of maintaining a system of recording breaches.

---

#### **4     Implications for the Corporate Risk Register**

- 4.1     The actions outlined in this report are one method of working to mitigate risk O1 in the Corporate Risk Register which centres on the ability of the Authority to protect the data it owns and the data it handles.

#### **5     Background and Options**

##### *Breach Reporting*

- 5.1     The reporting of breaches was expanded previously at the request of members of the Board to include all the items listed in the latest breaches report which is now attached at **Appendix A**. It should be noted that four of the five breaches recorded in the period were breaches by employers in the Fund rather than by SYPA but these are recorded on the breaches log and are therefore included for transparency.
- 5.2     At the time of producing this report, the internal audit function had just completed an audit of the Breach Management policy and procedures. All internal and external audit outcomes are reported to the Authority's Audit Committee for scrutiny and to avoid duplication are not therefore routinely submitted to the Board. In the case of breaches management, however, this has direct relevance to the responsibilities of the Board and a copy of the assurance report is therefore enclosed at **Appendix B**.
- 5.3     Members will note that an assurance rating of **Substantial** has been provided and the contribution of the Board in the effectiveness of this process is acknowledged. There is one agreed management action relating to an update of the existing breaches policy to ensure it explicitly references requirements under the General Data Protection Regulation. An updated policy document will be presented to the next Board meeting for approval.

##### *Complaints*

- 5.4     **Appendix C** provides a summary of complaints received in the reporting period(s). As previously requested by members of the Board, the summary report now includes commentary as to whether the complaints received were indicative of a wider process issue which may need review/improvement.
- 5.5     As will be evident from the summary, a number of complaints relate to delays with the handling of aggregations. Members will be aware that this backlog project is working towards completion so it is anticipated that this should reduce the number of complaints received going forward but, in the interim, any cases flagged up by scheme members are added to a priority queue for resolution.

##### *Formal Appeals*

- 5.6     During the reporting period, three formal appeals were completed under the Internal Disputes Resolution Process (IDRP). Of the two appeals at Stage 1 of the IDRP, one was upheld and one was rejected. The upheld appeal concerned a member asserting that their transfer in from an external scheme had understated the benefits due upon transfer. There was a manual error by SYPA following a re-calculation of the transfer but this is not thought to have any wider implications as it was a one-off recalculation.
- 5.7     The second appeal at Stage 1 related to a member who argued that SYPA had not correctly determined the beneficiaries of a lump sum death grant following the death of a member. This appeal was rejected at Stage 1.



- 5.8 One appeal was completed at Stage 2 of the IDRP which related to a member who argued that SYPA had not fulfilled its duty of care in allowing a transfer to an alternative arrangement that had subsequently lost value. This appeal was rejected and the member advised that she would need to address any further appeal direct to the Pensions Ombudsman.

## **6 Implications**

- 6.1 The proposals outlined in this report have the following implications:

Financial	None apparent.
Human Resources	None
ICT	None
Legal	None
Procurement	None

**Jason Bailey**

**Head of Pensions Administration**

<b>Background Papers</b>	
<b>Document</b>	<b>Place of Inspection</b>

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## 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
2019/20	21	01/06/2019	Personal Data	Member had been online and noticed 2017 annual statement had incorrect address. Records show employer had provided SYPA with incorrect address for member.	Notified employer of their error and asked them to exercise care.	Green	25/07/2019 (LPB)	NO	NO	None - statement had been returned to SYPA.	Open pending any Board comments
2019/20	22	23/04/2019	Personal Data	Employer (1) submitted bulk file which included personal data for employees not in the LGPS.	Notified employer of their error and asked them to exercise care.	Green	25/07/2019 (LPB)	NO	NO	All data sent in error deleted from SYPA records.	Open pending any Board comments
2019/20	23	23/04/2019	Personal Data	Employer (2) submitted bulk file which included personal data for employees not in the LGPS.	Notified employer of their error and asked them to exercise care.	Green	25/07/2019 (LPB)	NO	NO	All data sent in error deleted from SYPA records.	Open pending any Board comments
2019/20	24	02/05/2019	Personal Data	Employer (3) submitted bulk file which included personal data for employees not in the LGPS.	Notified employer of their error and asked them to exercise care.	Green	25/07/2019 (LPB)	NO	NO	All data sent in error deleted from SYPA records.	Open pending any Board comments
2019/20	25	05/06/2019	Personal Data	Letter including member options (transfer) sent to Derbyshire pension fund instead of direct to member.	Derbyshire instructed to destroy letter.	Green	25/07/2019 (LPB)	NO	NO	Member of staff alerted to human error. No personal data shared that Derbyshire did not have access to.	Open pending any Board comments

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# DATA PROTECTION ASSURANCE REPORT

## SYPA DPO Assurance Plan: 2019/2020 Breach Management Report



**BARNSLEY**

Metropolitan Borough Council

**Date of Issue:** 10<sup>th</sup> July 2019

## Table of Contents

Contents	Page
Executive Summary	Pages 1 - 3
Findings, Implications and Agreed Management Actions	Pages 4
Glossary of Terms	Page 5

## Key Dates

Assurance Review Stage	Date
Pre- assurance review meeting Date:	30 <sup>th</sup> April 2019
Draft Report Issued:	5 <sup>th</sup> July 2019
Draft Report Discussed:	9 <sup>th</sup> July 2019
Final Report Issued:	10 <sup>th</sup> July 2019

## Report Distribution

Name
<b>Client Lead:</b> Jason Bailey - Head of Pensions Admin
George Graham – Fund Director
Neil Copley – Section 151 Officer (Final Only)
Andrew Frosdick – Monitoring Officer to South Yorkshire Pensions Authority (Final Only)

## DPO Assurance Team Contact Information

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**Acknowledgement**

The DPO would like to take this opportunity to express thanks to management and staff for their help and co-operation during this review.

**Confidentiality**

This report is strictly private and confidential and as such is for the exclusive use of the intended recipients. The content and results of the review should not be copied in part or in whole without the prior permission of the receiving sponsor of the report.

**Assurance Review Methodology**

The review was conducted in conformance with the Public Sector Internal Audit Standards using a combination of enquiry, observation and sample testing techniques.

## Introduction and Background

General Data Protection Regulations (GDPR) and Data Protection Act (DPA) principals are at the heart of data collection, processing and sharing.

The Information Commissioner's Office (the ICO) enforces and promotes compliance with the DPA, which contains eight principles of good information handling and GDPR.

Recital 87 of the GDPR - Promptness of reporting / notification makes clear that when a security incident takes place, the authority should quickly establish whether a personal data breach has occurred and, if so, promptly take steps to address it, including telling the ICO if required.

### Personal Data Breach

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. The Authority has to consider the likelihood and severity of the risk to people's rights and freedoms, following a breach. When this assessment is made, if it's likely there will be a significant risk then the ICO must be informed.

This review was part of **planned** DPO assurance work for 2019/20.

## Assurance Review Objectives and Scope

### Scope

The scope of this review was to consider the breach management arrangements for the Authority and consider whether there are sufficient procedures, controls and processes in place.

The review covered the following areas:-

- breach management policy: existence of a policy providing a framework for reporting and managing information security breaches,
- ownership and understanding of breach management responsibilities: management responsibilities and procedures should be established to ensure a quick, effective and orderly response to information security breaches,
- breach reporting and feedback procedures, including reporting to the ICO: staff should be aware of the nature of an information security event, its potential detriment to the organisation and how to report it,
- appropriate escalation of breaches: information security breaches should be responded to in accordance with the documented procedures, and
- breach logs and review of breach management systems: evidence of lessons learned and consideration by senior management.

### Objectives

The Authority has a duty to establish whether a personal data breach has occurred and, if so, promptly take steps to address it, including telling the ICO if required as per Recital 87 of the GDPR - Promptness of reporting / notification. The objective of the review was to provide assurances that there are



## Executive Summary

### DPO Assurance Review – SYPA Breaches Management

adequate breach reporting procedures, controls and processes in place to fulfil the Authority's responsibility in recognising, receiving, processing, recording, reporting and responding to data breaches.

### DPO's Final Assurance Opinion

Based on the above the DPO can provide the SIRO with a **Substantial** assurance opinion in relation to the internal control framework.

An explanation of the ratings is included within the Glossary of Terms.

### Summary of Implications

Impact	Number	Adequacy of Controls	Application of Controls	Systems Efficiency
High	0	0	0	0
Medium	0	0	0	0
Low	1	1	0	0
<b>Total</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>

### Positive Findings

The following good practices were identified during this review:-

- ✓ A process for personal data incident reporting, investigation, recording and responding is in place in practice and robust;
- ✓ Line Manager responsibility is in place and there is an intranet link for staff to log breaches in the shared document store (SharePoint);
- ✓ The Head of Pensions Administration is automatically informed when the log is updated;
- ✓ The breach log is shared on a quarterly basis with the Local Pensions Board and this is a regular agenda item;
- ✓ Comments about individual incidents are invited from the Board;
- ✓ The report to the Local Pensions Board includes the dates that incidents were identified, dates (when applicable) that incidents were reported to the DPO and/or the ICO.

### Overall Conclusion

From the review, the DPO has made 1 implications, these have been classified as:

- High 0
- Medium 0

## Executive Summary

### DPO Assurance Review – SYPA Breaches Management

- Low 1
- Verbal 0

Based on the above the DPO can provide a **Substantial** assurance opinion in relation to the internal control framework. An explanation of the ratings is included within the Glossary of Terms.

The reason that a substantial rating has been given is because SYPA have a process in place with regard to personal breach management. The process is robust with line manager responsibility, a reporting log, recording of incident details and relevant dates, details of reporting to the DPO and the ICO and the sharing of this information with the Local Government Board. The current policy however does not fully align with actual practice and does not reference GDPR, the ICO, timeframes and the DPO. It may be advisable to consider a separate personal data procedure or adapt the current procedure to include these specific areas.

The following sections of the report summarise the findings of the review. Where relevant, any control weaknesses identified are outlined, including actions that have been agreed in order to address the associated risks.

**Risk: The Security Incident Reporting arrangements of the Authority are inadequate and not consistent with the requirements of Recital 87 of the GDPR. Recital 87 of the GDPR - Promptness of reporting / notification makes clear that when a security incident takes place, the authority should quickly establish whether a personal data breach has occurred and, if so, promptly take steps to address it, including telling the ICO if required.**

### Breaches Management Procedures

#### Finding

1.1 Although there is a 'blanket' procedure for breach management which covers reportable law breaches to the Pensions Regulator, there is insufficient procedural advice in this document regarding personal information data breaches. This would include mention of the GDPR requirements, statutory timeframes, investigation responsibilities, cyber incidents and when to notify the DPO and ICO.

It may be advisable to have a separate procedure in place to document personal data breaches or adapt the existing policy.

#### Implication

- Although the process of incident reporting is place in practice the procedures are not tailored to cover GDPR specific requirements such as timeframes, reporting to ICO and liaison with the DPO so there is a risk that the security reporting arrangements of the authority is inadequate and not consistent with the requirements of Recital 87 of the GDPR.
- Incidents/Breaches are not promptly reported and investigated.

Control/Risk Impact **Low**

Adequacy of Controls

Governance Theme: Information Governance

Risk Ref:

#### Agreed Management Action (AMA)

AMA1

The existing breach management policy will be updated to explicitly reference the procedures for handling breaches in the context of GDPR, including statutory timeframes, investigation responsibilities, cyber incidents and when to notify the DPO and ICO.

It is felt, in the context of the pension's environment, it would be more beneficial to retain a single integrated policy that covers ICO and TPR requirements as the process will follow a similar decision tree and the updated procedural advice attached to the policy will reflect this. The updated policy will be presented to the Local Pension Board at their next meeting in October.

#### Responsible Officer:

Head of Pensions Administration

#### Target Implementation Date

30 September 2019

1. Classification of Implications (Impact on control/risk)

- High

Significant impact on ensuring the objectives of the system under review are met.
- Medium

Requiring action to avoid exposure to a significant risk to the achievement of the objectives of the system under review.
- Low

Action is advised to enhance control or improve operational efficiency.

2. Assurance Opinions

Page 64

	Level	Control Adequacy	Control Application
POSITIVE OPINIONS	Substantial	Robust framework of controls exist that are likely to ensure that objectives will be achieved.	Controls are applied continuously or with only minor lapses.
	Reasonable	Sufficient framework of key controls exist that are likely to result in objectives being achieved, but the control framework could be stronger.	Controls are applied but with some lapses.
ADVERSE OPINIONS	Limited	Risk exists of objectives not being achieved due to the absence of key controls in the system.	Significant breakdown in the application of key controls.
	No	Significant risk exists of objectives not being achieved due to the absence of controls in the system.	Fundamental breakdown in the application of all or most controls.

## COMPLAINT SUMMARY

1 January 2019 to 30 June 2019

Reference	Complainant	Nature of Complaint	Response issued within target response time?	Responsible party	Follow up actions required/taken?
C11	Retiring Member	Incorrect use of a 'Protection of Pay' certificate	YES	SYPA	Administrative error but this relates to a legacy provision so no wider implications to consider.
C12	Active Member	Member unhappy with delays in processing of aggregation.	YES	SYPA	Case now processed. Was part of aggregation backlog which is being actively addressed since 1 October 2018.
C13	Active Member	Member unhappy with delays in processing of aggregation.	YES	SYPA	Case now processed. Was part of aggregation backlog which is being actively addressed since 1 October 2018.
C14	Deferred Member	Member felt that implications of delaying claiming retirement benefits were not clear.	YES	SYPA	Standard documentation has now been updated to make the position clearer.
C15	Active Member	Member unhappy about issues experienced with registering for MyPension.	YES	SYPA/Member	Member had incorrectly tried to register before joining. New registration process from 1 April 2019 prevents this in any event.
C16	Deferred Member	Member unhappy with delays in processing of aggregation.	YES	SYPA	Case now processed. Was part of aggregation backlog which is being actively addressed since 1 October 2018.
<b>Total for Quarter</b>	<b>6</b>				
C17	Retiring Member	Delays in the AVC provider paying out value of AVC fund	YES	AVC provider	A full review of the existing AVC providers is scheduled for later this year.
C18	Deferred Member	Member unhappy with delays in processing of aggregation.	YES	SYPA	Case now processed. Was part of aggregation backlog which is being actively addressed since 1 October 2018.
C19	Deferred Member	Delay in processing deferred benefit.	YES	Payroll Provider/SYPA	Information required received from payroll provider following intervention and case processed.
C20	Retiring Member	Member unhappy with delays in processing of aggregation.	YES	SYPA	Case now processed. Was part of aggregation backlog which is being actively addressed since 1 October 2018.
C21	Deferred Member	Delay in processing deferred benefit and transfer value.	YES	Payroll Provider/SYPA	Information required received from payroll provider following intervention and case processed.
<b>Total for Quarter</b>	<b>5</b>				

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