

Date: 27 July 2022

To: MEMBERS OF THE SOUTH YORKSHIRE
LOCAL PENSION BOARD

Oakwell House
2 Beevor Court
Pontefract Road
Barnsley
S71 1HG

www.sypensions.org.uk

This matter is being dealt with by: Gill Richards

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Dear Member

SOUTH YORKSHIRE LOCAL PENSION BOARD
Thursday, 4 August 2022

A meeting of the South Yorkshire Local Pension Board will be held at **Oakwell House, 2 Beevor Court, Pontefract Road, Barnsley, S71 1HG on Thursday, 4th August, 2022 at 10.00 am.**

The agenda is attached.

Yours sincerely



Sarah Norman
Clerk

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Distribution: Garry Warwick (Chair), Cllr Mike Chaplin, Nicola Doolan-Hamer, Rob Fennessy, Danny Gawthorpe, Andrew Gregory, Nicola Gregory, and David Webster

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, 4 AUGUST 2022 AT 10.00 AM, OAKWELL HOUSE, 2 BEEVOR COURT,
PONTEFRACT ROAD, BARNSELEY, S71 1HG

AGENDA

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3	Urgent Items	
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SOUTH YORKSHIRE PENSIONS AUTHORITY

LOCAL PENSION BOARD

28 APRIL 2022

PRESENT: G Warwick (GMB) (Chair)

Councillor M Chaplin (Sheffield CC), N Doolan-Hamer (Unison), R Fennessy (South Yorkshire Police), A Gregory (Scheme Member Representative), N Gregory (Academy Representative) and D Webster (Scheme Member Representative)

Officers: J Bailey (Head of Pensions Administration), G Graham (Director) and G Richards (Governance Officer)

C Scott (Independent Advisor to the Board)

Apologies for absence were received from D Gawthorpe

1 WELCOME AND APOLOGIES

The Chair welcomed everyone to the meeting.

There were no apologies.

2 ANNOUNCEMENTS

None.

3 URGENT ITEMS

None.

4 ITEMS TO BE CONSIDERED IN THE ABSENCE OF THE PUBLIC AND PRESS

None.

5 DECLARATIONS OF INTEREST

None.

6 MINUTES OF THE MEETING HELD ON 27 JANUARY 2022 AND ACTIONS AND MATTERS ARISING

G Graham informed the Board that Steve Loach, the local authority senior manager member of the Board, had ceased to be a member due to a lack of attendance, therefore there was a need to seek a replacement.

Members discussed the structure of the Board and the importance of members having a variety of specialities which was difficult to achieve in practice, especially when taking into account the general pressures facing senior LA managers.

The Chair asked whether there was any flexibility in who to appoint also bearing in mind the councillor vacancy on the Board. The Director suggested a preference for a HR manager.

The Director replied that this would need approval from the Authority to change the Constitution, but this would be possible if Board members so wished. He commented that one significant employer group – higher and further education institutions – was not represented on the Board and suggested this as an alternative.

The Board agreed that the Authority should be asked to amend the constitution to allow more flexibility for Board member appointments.

C Scott also reminded the Board that it had been agreed to request a change to the Constitution extend the term of local authority councillor appointments.

It was noted that Barnsley MBC had been requested to appoint a councillor to fill the current vacancy on the Board, but it was acknowledged that this would not be until the council's annual meeting at the end of May.

In answer to a question from C Scott, G Graham announced that Jo Garrison, formerly the Director of Governance at DN Colleges Group had been appointed as Corporate Manager – Governance and would be joining the Authority on Tuesday 3rd May. Her first priority would be member learning and development and communications for members of the Board and Authority.

RESOLVED – That:

- i) That the Authority be asked to amend the Board's Constitution to allow more flexibility for Board member appointments.
- ii) The minutes of the meeting held on 27th January 2022 be agreed as a true record.

7 RISK REGISTER UPDATE

A report was submitted which provided the Board with the opportunity to review the updated Risk Register which supported the new Corporate Strategy.

Members were reminded that as part of the process of creating the new Corporate Strategy, a fundamental rebasing of the Corporate Risk Register had been undertaken. This was attached at Appendix A to the report.

It was noted that many of the risks in the "new" register were either identical or similar to those included previously. However, the scores attached to the risks had changed – there had broadly been an upward drift reflecting changes in the

external environment (e.g. instability caused by the war in Ukraine and the higher base level of inflation) rather than any weakening in mitigation or the broader control environment within the organisation.

The Director pointed out that there were now four red risks as opposed to one on the previous version of the Risk Register, including one around project management delivery, it had been found that the current review did not highlight issues early enough and it was intended to recruit resources to assist with this.

J Bailey commented on the cyber security risk informing the Board that a recent cyber security audit had provided a 'substantial' opinion with just two low risk recommendations. The Authority had re-applied for the Cyber Essentials + accreditation and penetration testing was planned in the near future.

The Chair commented that he found the Risk Register difficult to follow and asked if there could be a simplified format with larger text. Other members of the Board agreed.

The Director took the point commenting that the Corporate Strategy and Annual Report contained a heat map but this contained less detail. It was difficult to find another format which would give enough detail but would be looked at to see if improvements could be made; the new Risk and Performance Management system may allow presentation in a different way when implemented, although this was some way into the future.

The Chair queried how the risk of underperformance from investments managed by Border to Coast was being managed. The Director agreed to add specific wording to risk I1 to address this aspect of the risk.

C Scott queried whether it was still the policy to remove risks from the register once they had reached their target score.

G Graham replied that risks were removed once they were viewed as having been sufficiently mitigated as they then ceased to be an area of focus. There could be a case for a separate list for these risks but in his view they should not remain on the Risk Register.

RESOLVED – That the Risk Register be noted.

8 ADMINISTRATION QUARTERLY REPORT

J Bailey presented the Quarterly Administration update for the period 1st January 2022 to 31st March 2022.

Staffing

The report contained a summary of joiners and leavers for the administration service during the period. It was noted that the Benefits Team (the largest administration team) now had a full complement of Pensions Officers, but in Quarter four two long standing and experienced officers had left for better paid and

more senior positions externally. The role profiles for these vacancies had been refreshed after consultation and were being advertised in April 2022.

It was noted that overall sickness absence had increased during the quarter, though the incidence of short-term absence had decreased slightly as had the number of staff contracting Covid.

Case Work Performance

It was noted that overall case volumes completed during the Quarter had dropped slightly compared with the previous quarter, this was likely due to a loss of processing time in March whilst the running of the 2022 pensions increase was undertaken.

Staff had returned to the office for part of the working week during Quarter 4, but it was too early to see whether this would have a positive impact on case processing productivity.

Statutory Disclosure Reporting

Appendix A showed the Quarter 4 report for the areas covered under the various disclosure regulations and provided some assurance that statutory targets were generally being met in the main areas.

Employer Performance

A table within the report showed the current position of employer monthly data returns and indicated that the vast majority of employers were continuing to provide the monthly returns, with no reported concerns.

Following a question from the Board, J Bailey confirmed that future reporting on performance of payroll providers would also be provided to the employers which was important for employers who had outsourced payroll services.

Individual Query Employer Reporting

The Board was reminded that the performance of employers in respect of responding to individual queries raised by SYPA had been monitored since last year.

Appendix B showed the performance in recent quarters for the employers with the highest volume of queries. This now also included two payroll providers (Capita and EPM) who had both recently undergone a number of personnel changes which had caused operational difficulties. The Head of Pensions Administration and members of the Engagement team were liaising with the new contacts to ensure they understood their statutory responsibilities and to provide any support/training required.

The Board noted that the trend analysis clearly indicated some good progress had been made with the volumes of outstanding queries for Doncaster MBC

(administered by Rotherham payroll service) although outstanding numbers remained high for Rotherham MBC. Monitoring meetings had been held regularly with Rotherham payroll and additional resources had been allocated to reduce the outstanding volumes. Sheffield CC had also devoted significant resources to resolve the volumes of outstanding queries and the Board noted their continued positive progress in this area.

The Board felt that although RMBC had made some progress, the outstanding figures were still high and not reducing sufficiently quickly. The Board requested that RMBC be asked to prepare (and potentially deliver) a report outlining the steps they were taking to improve performance and the intended timescales to resolve the issues.

N Doolan-Hamer queried the figures for Sheffield College which had gone from zero in the first two quarters followed by a sudden jump. J Bailey would look into this and report back.

The report contained details of scheme member engagement in the areas of customer satisfaction, the Customer Centre and email responses all which remained positive.

The Board was reminded that a satisfaction survey had been issued to employers before Christmas. A total of 42 responses were received with an overall satisfaction level of 94%. The feedback from the survey was presented at the virtual Employers Forum in March, a copy of which was at Appendix D.

The Board noted that preparations continued to ensure all scheme members received their Annual Benefit Statement (ABS) ahead of the statutory deadline of 31st August 2022. The ABS project team remained on target with the current plan to produce the ABS's over a two-month period between 1st May 2022 and 20th June 2022.

With regard to the Pensions Administration system, it was confirmed that the new software contract with Civica had been completed. Civica had committed to resolving all significant outstanding issues by September 2022 as per the Improvement Plan which was summarised at Appendix E.

In answer to a question from D Webster, J Bailey commented that there were no financial sanctions if Civica did not resolve the issues within the stated time as the contract was signed under a national framework. There were other options including the option to terminate the contract early.

The report also gave details of the Life Certificate Exercise, Appendix F summarised the outcomes of the exercise.

The Chair thanked J Bailey for the report.

RESOLVED – That the Board:

- i) Note the report.

- ii) Request a report from Rotherham Borough Council outlining the steps that they intended to take to improve their performance with regard to individual query employer reporting including the timescale to resolve the issue.

9 BREACHES, COMPLAINTS AND APPEALS

A report was considered which provided an update on the latest available record of reported breaches and provided details of complaints and appeals for the period 1st January 2022 to 31st March 2022.

Members noted that, in regard to a separate matter, one of the AVC providers, Prudential, had reported at the end of March that they had been unable to meet the statutory deadline for issuing member AVC statements for the 2020-21 year. It was noted that the administration problems with Prudential had been well documented and Prudential had already reported themselves to The Pensions Regulator (TPR).

Prudential had not shared details of their correspondence with TPR so, as a precautionary measure, SYPA had prepared a report to TPR to ensure they were aware of the breach specifically in relation to the SYPA Fund.

It was agreed that the report to TPR would be shared with the Board.

The breach report also included reference to the late issue of the Pensions Savings Statements for 2020/21.

It was noted that there had been one data breach during the period, one cyber security incident and five complaints, details of which were contained within the appendices. No formal appeals had been determined during the quarter.

RESOLVED – That members note the breaches summary and the outcomes of t complaints.

10 BENCHMARKING INVESTMENT COSTS & PERFORMANCE

A report was submitted which provided an update on the results of benchmarking work undertaken on the Authority's investment performance and costs.

The Board was informed that, as part of efforts to establish the success of the pooling process in improving both the cost efficiency and performance of the Local Government Pension Scheme (LGPS), the government encouraged LGPS funds to participate in investment benchmarking exercises. SYPA, along with most other LGPS funds and pools had, for the last seven years, participated in a benchmarking exercise undertaken by CEM, a global provider of such services.

The report gave details of:

- Cost Comparison
 - Impact of investment choices on costs
 - Price impact on costs

- Change in costs over time
- Performance Comparison
 - Comparative return over time
 - Development of risk over time
 - Comparative risk appetite

CEM's overall conclusion was that the Fund was delivering positive value add at low (tending towards median) cost. This was what was wanted but an eye would have to be kept on whether the continuing changes to the asset mix were delivering both the required performance and risk at reasonable cost.

RESOLVED – That the Board note the results of the investment benchmarking exercise.

11 ANNUAL ALLOWANCE 2021 - LESSONS LEARNED EXERCISE

A report was considered which provided an update on the results of the 2020/21 Pensions Savings Statements exercise and also set out the actions being taken to ensure the success of the 2021/22 exercise.

J Bailey explained the Annual Allowance, which was introduced by HMRC in April 2006, and the subsequent need to provide scheme members who had exceeded the AA limit for a specific tax year with a Pension Savings statement.

The Board was informed that for the year 2020/21 a total of 105 Pension Savings statements were issued where members had exceeded the £40,000 limit, but only five of these were issued within six months of the end of the tax year.

Appendix A to the report provided a high-level summary of the issues that led to the late production of the Pension Savings statements and also summarised the Action (Improvement) Plan which had been put together to rectify the issues experienced in 2020/21 and to ensure successful and timely completion of the 2021/22 and future exercises. It was noted that the status column on the Action Plan highlighted that the exercise was currently on target; a further update would be provided to the Board at its next meeting to provide assurance that the statements would be issued on time for 2021/22.

As this appeared to be a one-off issue affecting a relatively small number of members and there was a comprehensive list of actions and mitigations in place, the Board agreed with the Authority's position that the breach should not be reported to The Pensions Regulator.

RESOLVED – That members:

- i) Note the actions taken to address the late delivery of the 2020/21 Pension Savings Statement exercise and ensure successful completion for 2021/22.

- ii) Agree that the breach was not material enough to report to The Pensions Regulator.

12 ANNUAL REPORT OF THE LOCAL PENSION BOARD

The Board considered its Annual Report for 2021/22 which was submitted for approval subject to the inclusion of attendance at today's meeting. It was noted that, when approved, the Annual Report would be published on the Authority's website and included in SYPA's Annual Report.

Members felt that, in general, the content of the report was good. It was suggested that individual terms of office be included in the membership table.

C Scott commented that, as it was an individual's obligation to undertake training, the training events should be listed to show which individual had attended each event.

RESOLVED – That, subject to the amendments above and the inclusion of attendance at today's meeting, the Board approve its Annual Report for 2021/22.

13 BOARD EFFECTIVENESS REVIEW

The Board considered its Review of Effectiveness for 2022 which had been determined by a survey completed in March 2022 followed by a workshop to discuss the results of the survey and agree potential changes in the way the Board worked to improve its effectiveness. The report summarised improvements discussed at the workshop.

Discussions at the workshop and the survey included questions on the way Board meetings were conducted and knowledge, skills and capacity. The survey was completed by four of the nine members of the Board.

The results from the survey were broadly positive, and the report contained proposed actions for improvement.

With regard to further training, the Director commented that the results of the Knowledge Assessment would influence the Training Programme over the next 12 months which would also be driven by events such as the Actuarial Valuation and the investment strategy review. It was intended to run more Local Pension Board specific sessions and use more external resources. Because issues covered by the Authority were wide-ranging it would be impossible to cover everything and therefore self-learning would be important. He encouraged members to make use of the Hymans Robertson Online Learning Academy and attend the webinars offered when possible.

The Director agreed with all the suggestions and actions to improve effectiveness with the exception of the request to receive up-to-date documents irrespective of whether they had been considered by the Authority beforehand. This would be constitutionally inappropriate for the Board to consider a report before the Authority as the decision-making body.

With regard to the request for a glossary of terms, it was noted that the Online Learning Academy had a 'Jargon Buster' and a glossary from Border to Coast used by their Joint Committee could be shared with the Board.

RESOLVED – That the Board agree to all the actions and suggestions arising from the Review of Effectiveness and survey results as detailed in the report.

14 UPDATE ON AUTHORITY DECISIONS

A report was considered which updated the Board on decisions taken by the Authority at its February and March meetings.

RESOVLED – That members note the various decisions taken by the Authority.

CHAIR

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Subject	Quarterly Administration Update	Status	For Publication
Report to	Local Pension Board	Date	4 August 2022
Report of	Head of Pensions Administration		
Equality Impact Assessment	Not Required	Attached	No
Contact Officer	Jason Bailey	Phone	01226 772954
E Mail	JBailey@sypa.org.uk		

1 Purpose of the Report

- 1.1 To update Members on administration performance and issues for the period from 1 April 2022 to 30 June 2022
-

2 Recommendations

- 2.1 Members are recommended to:
- a. **Comment on the content of the revised administration update and indicate any areas where they would like to receive further detail**
 - b. **Highlight any areas of administration where further assurance may be required**
-

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 as well as those who have been in contact with our Customer Centre.

Listening to our stakeholders

To ensure that stakeholders' views are heard within our decision-making processes. The report includes information about the engagement with the employers in the scheme and how SYPA can support them to complete their responsibilities.

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 do not have 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 ensure that Members have access to the latest available data, this report includes data for the quarter just completed.
- 5.2 Members will note that the content of this administration update is continually reviewed to ensure it is appropriate to support scrutiny of the administration service and includes information not provided previously. This is intended to provide Members with a wider view of the issues the administration service is handling and we continue to welcome feedback on any subject areas where Members feel additional reporting would be beneficial.

Staffing

- 5.3 The following table is a summary of joiners and leavers for the administration service (i.e. excluding the smaller Investment and Finance/Corporate Services teams) during the last three months. The Authority has been successful in recruiting to existing vacancies, although internal offers made to Pensions Officers at the time of producing this report will likely result in a couple of vacancies in the Customer Services team. Although not referenced in the table below (as they are not part of the administration service), it should also be noted that two governance posts which support the work of the Board commenced work with the Authority in this quarter. These are the Governance and Risk Officer Gill Richards (transferred from Barnsley MBC) and the new Corporate Manager - Governance, Jo Garrison.

Starters	Comments
2 x Customer Services Officers	Entry Level – one vacancy is temporary covering maternity leave.
1 x Apprentice	
1 x Senior Systems Officer	Former experienced employee re-joining.
Leavers	
None – internal promotions only.	
Vacancies in Administration	
5 x Pensions Officers	(Entry level) vacancies following internal promotions – offers made in July 2022.
Communications Officer	Appointment made – starts August 2022.

- 5.4 In terms of sickness absence, the table below shows the annualised absence levels for the administration service for the last quarter and the two previous full years for reference. Overall, sickness absence has reduced for both short-term and long-term absence this quarter. Absence for Covid related illness is no longer reported separately, though our records suggest around 30% of the short-term absences were Covid related.

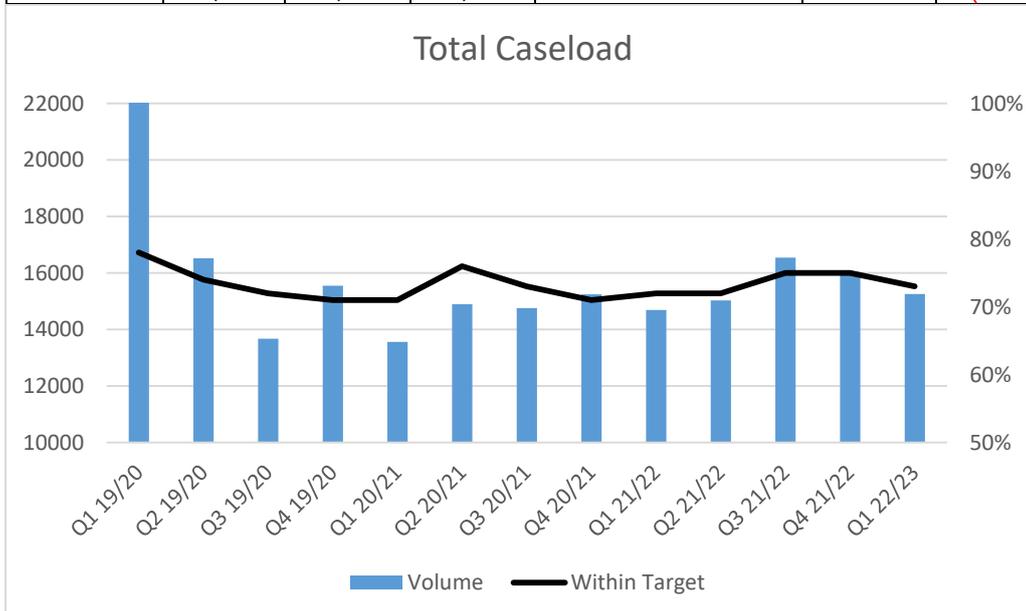
5.5 The incidence of long-term absence represents two staff on long-term absence. Both staff are being managed and supported in line with our Attendance Management arrangements.

Average Days per FTE (Admin Service only)	2020-21	2021-22		Q4 2021-22 Annualised	Q1 2022-23 Annualised
Short-Term	1.5	3.27		3.6	2.92
Long-Term	3	5.48		4.88	2.8
Total	4.15	8.74		8.48	5.76

Case Work Performance

5.6 The reporting of performance has been updated in order that members can more easily compare like-for-like periods. The table below shows the casework volumes for the last two quarters, compared with the previous quarter but also compared with the corresponding quarter for the previous year for comparison.

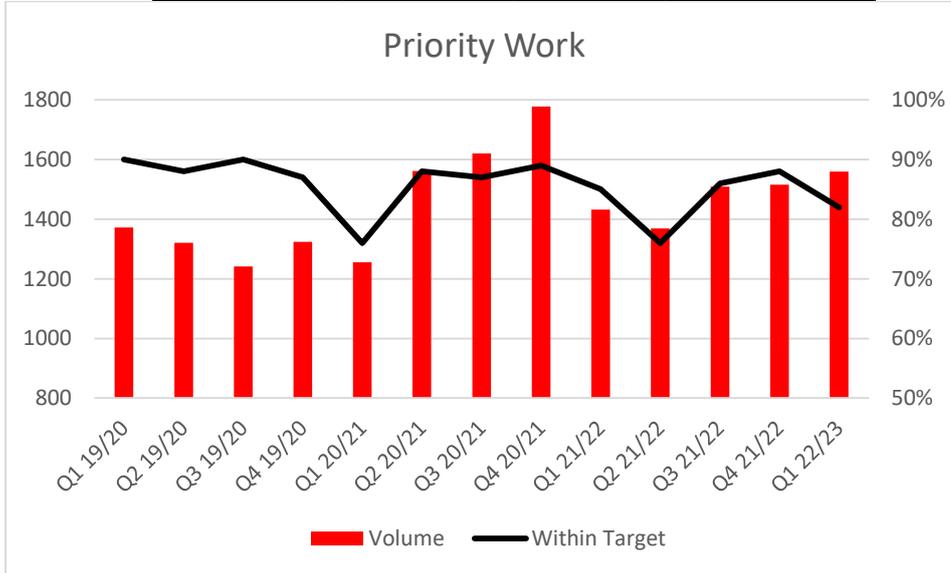
Category	Volumes			Variance to Comparators	
	Q1 Previous Year	Q4 2021-22	Q1 2022-23	To Q1 Previous Year	To Q4 2021-22
Priority	1,432	1,516	1,559	127	43
Non-Priority	13,258	14,446	13,693	435	(753)
Overall	14,690	15,962	15,252	562	(710)



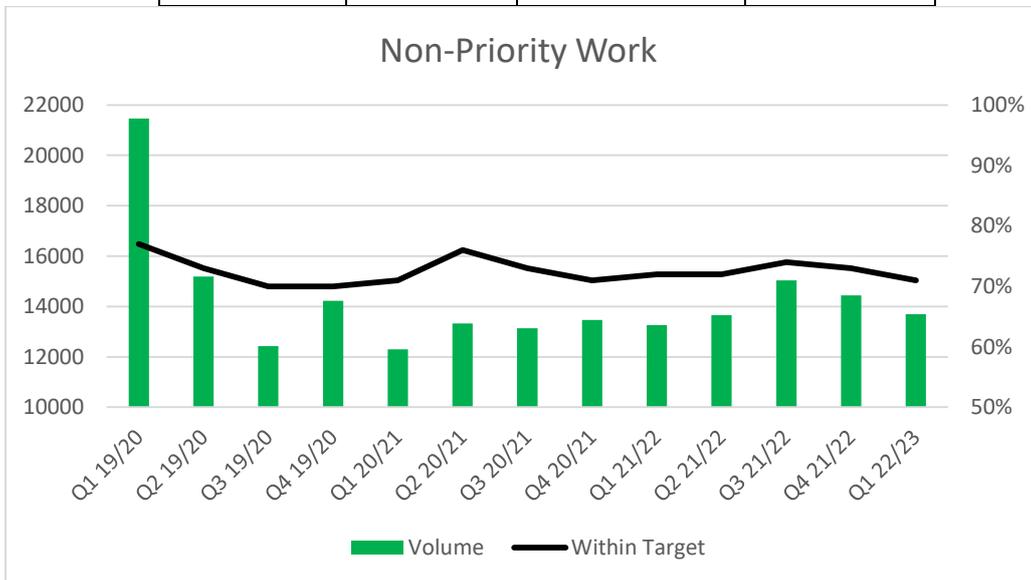
Overall case volumes completed in the Quarter dropped slightly compared with the previous quarter, but this is likely because the Projects Team (created earlier in 2022) were focused on completing data quality work ahead of the submission of the 2022 valuation data. It is anticipated the Projects Team will move on to the backlog of aggregation cases once the valuation data queries have been resolved. The overall volumes still comparable favourably with the volumes from the same quarter a year ago.

The following tables highlight the levels of performance for both priority and non-priority casework in terms of our service standards.

Priority Performance			
Q2 2021-22	Q3 2021-22	Q4 2021-22	Q1 2022-23
76%	86%	88%	82%



Non-Priority Case Performance			
Q2 2021-22	Q3 2021-22	Q4 2021-22	Q1 2022-23
72%	74%	73%	71%



5.7 The overall number of non-priority cases completed and the target rate dropped slightly this quarter. As well as the reasons set out in 5.6, additional resources were applied to complete processing of the monthly data files to the end of March ahead of the production of the 2022 Annual Benefit Statements. 1

5.8 The table below provides a summary of performance against the main subject areas. Performance levels have remained static for the individual subject areas when compared with Quarter Four in the main.

Case Type	Target Days	Q1 Previous Year Volume	Q1 Prev Yr % on time	Q4 21-22 Volume	Q4 21-22 % on time	Q1 22-23 Volume	Q1 22-23 % on time	Comment
Priority								
Retirements	5	821	76%	742	79%	850	71%	
Deaths - Acknowledge	5	257	96%	311	94%	286	90%	
Deaths - Payment	5	343	98%	463	99%	423	99%	
Non Priority								
New Joiners	5	2370	86%	2244	89%	2132	99%	
Deferreds	20	843	68%	1037	70%	1014	72%	
Refunds	9	105	82%	153	95%	195	95%	
Transfers In	7	301	48%	384	47%	398	48%	
Transfers Out	5	316	68%	338	74%	299	66%	
Divorce	5	84	64%	127	82%	90	80%	
General enquiries	5	848	90%	1008	91%	1113	56%	
Estimates	5	1780	74%	2048	82%	1469	78%	
Aggregations	20	904	59%	1350	51%	1025	62%	See 5.12

5.9 Quarter 1 is the first full quarter where the functionality for deferred members to retire online was available via the member portal. The introduction of this new functionality allows us to provide a further breakdown of the performance in relation to different retirement types and this is shown in the table below.

Retirement Case Type	Target Days	Number of cases Completed	Percentage Completed Within Target
Quotations			
Active Members (inc. Flex)	5	744	75%
Deferred Members (Online)	5	52	100%
Deferred Members (Offline)	5	220	85%
Deferred Members (with Special Conditions*)	5	21	62%
Total		1,037	78%
Settlements			
Active Members (inc. Flex)	5	533	65%
Deferred Members (Online)	5	101	93%
Deferred Members (Offline and inc. Special Conditions*)	5	216	77%
Total		850	71%

* Special conditions in this context are members with a separate AVC fund (where retiring online is not possible) or those expressing an interest in trivial commutation.

5.10 The table above illustrates the service improvements available for deferred members if they use the online functionality and we will be continuing to promote this route for active members. The table also demonstrates that performance in processing active member retirements needs to be an area of focus. The table below is a further breakdown of the total time taken to complete these cases. These are pure extracts from the administration system and a more detailed investigation into the cases recorded as taking greater than 16 plus days is currently being undertaken. A verbal update will be provided to the Board

on the progress with these investigations in anticipation that further reporting might be helpful in future.

Retirement Case Type	Total Cases	Completed 0-5 Days	Completed 6-10 Days	Completed 11-15 Days	Completed 16+ Days
Quotations					
Active Members (inc. Flex)	744	558	155	19	26
Deferred Members (Online)	52	52	-	-	-
Deferred Members (Offline)	220	187	17	9	7
Deferred Members (w/ Special Conditions)	21	13	7	1	-
Total	1,037	810	179	29	33
Settlements					
Active Members (inc. Flex)	533	346	119	45	23
Deferred Members (Online)	101	93	5	1	2
Deferred Members (Offline and inc. Special Conditions)	216	166	39	6	5
Total	850	605	163	52	31

5.11 At the last meeting, members of the Board were provided with a summary of cases outstanding at the end of Quarter Four of 2021/22. The tables below update these to 30 June 2022. The first table shows cases in pending whilst we await information from third parties and the second table shows cases ready to be processed.

Case Type	Volumes of cases pending (awaiting external parties) End Q1 Prev Year	Volumes of cases pending (awaiting external parties) End Q4 2021-22r	Volumes of cases pending (awaiting external parties) End Q1 current year	Variance to prior reporting period
Priority				
Retirements	186	210	131	(79)
Deaths	196	283	328	39
Non Priority				
New Joiners	110	62	80	18
Deferreds	3,558	4,768	5,124	356
Refunds	14	15	20	5
Transfers In	439	600	872	272
Transfers Out	250	237	245	8
Divorce	43	35	35	-
General enquiries	86	53	59	6
Estimates	1,254	1,204	913	(291)
Aggregations	525	826	1,014	188
Leavers to process	2,116	2,780	2,550	(230)

Case Type	Volumes of cases to be processed/in processing End Q1 prev year	Volumes of cases to be processed/in processing End Q4 2021-22	Volumes of cases to be processed/in processing End Q1 2022-23	Variance to prior reporting period	Number of active cases currently outside KPI measures
Priority					
Retirements	48	186	42	(144)	27
Deaths	50	130	91	(39)	35
Non Priority					
New Joiners	99	53	78	25	17
Deferreds	520	550	809	259	562
Refunds	11	12	13	1	6
Transfers In	115	142	161	19	73
Transfers Out	67	78	78	-	12

Divorce	25	7	12	5	0
General enquiries	61	87	120	33	22
Estimates	246	390	408	18	139
Aggregations	3,397	3,847	3,856	9	3,759
Unprocessed Leavers	2,592	1,089	1,159	70	998

- 5.12 At a previous meeting, Members requested some insight into the expected volumes of case work to be processed as part of 'business as usual'. We have attempted to demonstrate this by adding an additional column into the table above to show the numbers of cases that are outside of our KPI target measures. The two areas of particular concern remain as highlighted in the table above. We have explained to members previously that we are undertaking a project to introduce a means of processing the leavers either using automated tools or via bulk processing (or more likely a combination of both). The first stage of this project is to process these leavers on a bulk basis in a 'cloned' system environment ready to be submitted as part of the valuation extract. This stage is expected to be completed by 31 July. We will then be carrying out additional checks to ensure the bulk process can be utilised in the live systems environment. We expect to see a significant impact on the number of outstanding leavers by the end of Quarter Two.
- 5.13 In relation to aggregations, the numbers of outstanding cases remain high and insufficient progress has been made with eroding this backlog of cases. Members were advised previously that a dedicated project team was recently set up within the wider Benefits Team to focus on dealing with specific work areas as opposed to routine case processing and it was intended a significant part of their resource time would be dedicated to processing aggregations. Unfortunately the high level of data discrepancy queries that needed resolving ahead of the 2022 valuation means that this work has been delayed but it is anticipated the project team will be able to return to processing aggregations after the end of July and some impact will be seen in Quarter Two of 2022/23.

Statutory Disclosure Reporting

- 5.14 The Board previously requested some additional information about reporting performance against statutory disclosure requirements. The time limits for statutory disclosures are less rigid but they often measure different time scales to those historically measured by SYPA. As mentioned previously, we have developed our reporting in this area and **Appendix A** shows the Quarter 1 report for the areas covered under the various disclosure regulations. The Appendix provides some level of assurance that statutory targets are generally being met in the main areas. In general terms this data shows high levels of compliance in areas that SYPA can control. This does give us some pointers as to areas where further engagement with, and training for, employers could be beneficial. Members should note the addition of the Pension Savings Statements to the table for 2022/23.

Employer Performance

- 5.15 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 good. There was concern that Covid-19 would have impacted the ability of some employers to deliver the monthly submissions. However, this does not seem to be the case and submissions have continued to be provided. The tables below show the **current** position of monthly returns received in respect of the last three months.

	Number of returns expected	Returns received	Currently Outstanding	% Completion Rate	Total Scheme Members not submitted
Mar 2022 (due Apr)	542	541	1	> 99%	<10
Apr 2022 (due May)	541	540	1	>99%	<10
May 2022 (due June)	541	537	4	>99%	<10

- 5.16 Fortunately, the vast majority of employers have continued to provide the monthly returns even in these difficult circumstances and this is beneficial because it is now directly linked to the collection of contributions via Direct Debit (see below). An additional (highlighted) column has been added to the table above to provide some context to the missing returns. This shows the total number of scheme members that should have appeared on the monthly returns that are yet to be received.
- 5.17 There are two employers (four service contracts) with outstanding returns. One is in respect of a recent admission agreement where a multi academy trust has entered a service contract with a new provider and the provider have now committed to completing the returns by the end of July following a training session. The second is an existing provider with multiple service contracts where a small amount of data appears to have been omitted. There are not expected to be any issues with the submissions of the returns once resolved.

Individual query employer reporting

- 5.18 Last year we started monitoring performance of employers in respect of responding to individual queries raised by SYPA. Examples of the sorts of queries raised with employers are the provision of 2008 Scheme Final Pay for leavers (where additional information is required beyond the CARE pay included on the monthly returns); confirmation of hours changes; confirmation of role changes, confirmation of pay for Annual Allowance purposes, etc.
- 5.19 The Board previously requested that the reporting be updated to reflect the actual performance of key employers and payroll providers for each quarter so that the trends could be more effectively monitored. **Appendix B** therefore shows the performance in recent quarters for the employers or payroll providers with the highest volumes of queries.
- 5.20 Members will be aware of ongoing dialogue between SYPA and Rotherham MBC payroll services in relation to the volumes of outstanding queries for employers for whom they provide a payroll support service and at the last meeting it was requested that Rotherham MBC attend the next meeting to report on their improvement plans. Representatives of Rotherham MBC have prepared the report attached at **Appendix C** and will be attending the meeting to present the report and address any queries that members may wish to raise.
- 5.21 Following the refining of the reporting, two payroll providers (Capita and EPM) now appear on the list of employers/providers with high volumes of queries outstanding. Both organisations have recently undergone a number of personnel changes which have caused operational difficulties at their end and the Support and Engagement Manager and

his team are continuing to liaise with the new contacts provided to ensure they understand their statutory responsibilities and to provide any training/support required.

- 5.22 Note that the case completion rates showing the percentage ‘in time’ are based on our own internal targets for expected response levels which are 5 working days for urgent queries and 20 working days for standard queries. It is also the fact that there is a direct relationship between the number of members an employer has and the number of queries. It would normally be expected that Sheffield CC as by some margin the largest employer would have more queries. However, following our earlier engagement Sheffield CC have now devoted significant resources to resolve the volumes of outstanding queries and their continued positive progress in reducing the numbers of queries outstanding should be noted.

Contribution Payments

- 5.23 Members may recall that SYPA moved to the collection of contributions via Direct Debit from April 2020. The tables below show the status of payments in respect of contributions due for the latest available three months, as well as the details of any outstanding payments. Of the remaining employers not yet signed up to Direct Debit, these are predominantly service contract providers with multiple ‘employer’ contracts where they have unusual pay cycles which do not fit neatly with the monthly collection process and we have temporarily agreed they can continue to pay by BACS.

	Mar 22 (due Apr)	Apr 22 (due May)	May 22 (due Jun)
Employers Paid by Direct Debit	508	507	508
Employers Paid on time by BACS	33	32	29
Payment received late by BACS	0	1	0
Payment outstanding (see 5.17 and 5.24)	1	1	4

- 5.24 Of the two bodies with payments outstanding, both relate to the situations outlined in paragraph 5.17 which should be resolved by the end of July. Interest will be applied to any late payments where applicable but the amounts are likely to be modest as the total payments outstanding relate to less than ten scheme members in total.

Scheme Member Engagement – Customer Satisfaction

- 5.25 The Authority is always keen to improve engagement with our scheme members to measure the levels of satisfaction with our service and each month surveys all 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 February 2022, March 2022 and April 2022 who provided an email address.

Q. Overall, how satisfied are you with the service you receive from us?	
Very Satisfied	53%
Satisfied	44%
Dissatisfied	3%

Very Dissatisfied	0%
Total Number of Respondents	153 out of 707 issued

5.26 The percentage of members in the green category remains over 90% which is encouraging. The number of members who were dissatisfied was five. Of the comments received, three members felt that the online portal could be improved, and we are investigating whether we can make the initial registration process in particular easier for members.

Scheme Member Engagement – Customer Centre

5.27 Members of the Board will be aware that the Customer Centre exists to provide a single point of contact for scheme members and employers. Feedback for the Customer Centre continues to be reasonably positive overall, though satisfaction levels have dropped below 90% this quarter. An electronic survey was issued to 3,569 members with an email address who had contacted us by phone over the months of February, March and April 2022 to ask about their experience of our service delivery and for ideas on service improvements.

Q. Overall, how satisfied are you with the service you receive from us?	
Very Satisfied	56%
Satisfied	33%
Dissatisfied	7%
Very Dissatisfied	4%
Total Number of Respondents	468 out of 3,569

The 11% who were dissatisfied represented 51 individuals. As many do not leave specific comments it is often difficult to identify any recurring concerns but there are some clear themes that continue to emerge in relation to the accessibility of the online portal and also in terms of improving communications when we are awaiting information from third parties. We will be looking at some technological changes in the longer term that will help improve both of these aspects of the service but in the meantime we will aim to ensure that the Customer Centre staff can provide as much assistance to scheme members as is reasonably possible. A full list of the comments received in response to the survey has not been provided as an appendix for this Quarter but can be made readily available if members wish to receive a copy.

5.28 Email is an important channel for many of our members and, since October 2020, we have been monitoring customer satisfaction levels with our email responses by embedding “click face” surveys into our email signatures (see example below).



The table below shows the overall satisfaction levels for February, March and April 2022.

Q. Overall, how satisfied are you with the service you receive from us?	
Excellent	60%
Good	27%
OK	3%
Poor	10%
Total Number of Respondents	181 out of 5,263 emails sent

As with the telephony survey, the ratings have dropped slightly below 90% for this quarter. The response rates are relatively low and not all members provide information but we do follow up separately with those who leave contact details. The following was identified from comments made by members who rated the service as poor:-

- One member was very dissatisfied with our service because we were chasing the completion of a Life Certificate which the member had insisted, he had returned. Unfortunately, we hadn't received it.
- One member was unfortunately given the wrong information and was told there was a delay in paying benefits because they had not yet reached their retirement date when in fact, we were waiting for outstanding pay information from their employer. The Customer Centre is staffed with a couple of new members of the team who are still receiving training and this has been addressed with them.
- Another member was provided with a standard email containing transfer information and a link to forms on our website. Unfortunately, we had recently launched our new website and the links weren't in sync at that time. The member then received a letter and had the same issue. This issue has since been resolved and all relevant links now work.
- Another member was dissatisfied with the length of time it was taking to provide transfer information. Unfortunately, the delay was caused by the former employer. We were waiting for information in relation to an annual allowance check and we couldn't proceed until this check was complete.

Scheme Member Engagement – online portal

5.29 We continue to encourage all scheme members (regardless of status) to sign up to use the online portal which was enhanced and expanded in 2019. **Appendix D** shows the numbers of scheme members who have registered for the portal in the last two years and these numbers are continuing to increase.

5.30 Although the numbers registered to engage with us online are not as high as we would wish as a proportion of the scheme membership overall, evidence from other funds does suggest that our levels of registration are at least comparable with the percentage of members signed up to use online services within the LGPS more widely.

Scheme Member Engagement – New Joiner survey

- 5.31 As part of our wider engagement with scheme members, we wanted to gain some insight into how members who had recently joined the scheme rated our service. A survey was issued to 1,084 members who had joined the scheme in February, March and April 2022. The new joiner survey specifically asks about the welcome email/letter, including registration for the online portal. The results of the survey are shown below.

Q. Overall, how satisfied are you with the service you receive from us?	
Very Satisfied	17%
Satisfied	64%
Dissatisfied	11%
Very Dissatisfied	8%
Total Number of Respondents	47 out of 1,084 emails issued

- 5.32 The 19% of new joiners who responded to the survey represents 9 individuals. Of those, the majority of the queries related to members who did not find the process of signing up to the portal easy to follow. As mentioned above, we are hoping to make some changes to the registration process this year which will improve this position.

Annual Benefit Statements (ABS) and the triennial valuation

- 5.33 Members will be aware of the 2022 exercise to ensure all members receive their ABS ahead of the statutory deadline of 31 August 2022. As 2022 is a triennial valuation and the new fund actuary will require details of all liabilities as at 31 March 2022, the ABS project team had initially intended to issue the ABS's over a two month period between 1 May 2022 and 30 June 2022, two months ahead of the deadline. This was intended to assist with ensuring we met the timescales for both the submission of the valuation data to the actuary (end of July 2022) and the provision of Pension Savings Statements (October 2022).
- 5.34 Statements were successfully prepared for all deferred members but unfortunately Civica somewhat unexpectedly issued a significant systems upgrade which needed to be tested and installed before the ABS production process for active members could commence. This upgrade contained a significant number of long standing fixes and required extensive testing which delayed the original plan to have completed all statements by the end of June. The testing of the upgrade has now been completed and production of the ABS's for active members has now commenced. A verbal update on progress will be provided at the meeting but all of the year-end returns and processes have been completed and there is no reason to suggest there will be any concerns with meeting the 31 August deadline.
- 5.35 Separate to this, the data quality checks and corrections to enable the valuation data to be submitted to the actuary have been ongoing with the Projects Team for some time and the team are expected to be able to provide the data to the actuary in accordance with the

agreed timelines. A verbal update on progress against the valuation timetable will also be provided at the meeting.

Child Review Exercise

5.36 Members will recall we reported the outcomes of the Life Certificate exercise at the last meeting. Following a similar principle, one of the tasks performed by the administration service is the completion of an exercise which is designed to provide assurance that SYPA continues to pay monthly pensions only to those children who are entitled to receive benefits. In general terms this is up to age 18 or up to age 23 at the latest if the child remains in full-time education beyond age 18. There are specific provisions for children over the age of 23 who are incapable by reason of permanent disability of supporting themselves. The first table below provides a summary of the volumes of child pensions in payment.

Description	Number
Number of Child Pensions at 31 March 2021	335
Plus: New Child Pensions in Year	40
Less: Child Pensions ceased during Year	39
Number of Child Pensions at 31 March 2022	336

5.37 The table below shows the numbers of reviews that were undertaken in the last financial year. Predominantly these will be reviews of children reaching age 18 or over age 18 but in full-time education. We would be happy to provide any further information on the child review process as required.

Description	Number
No. Reviews Instigated	122
Completed Reviews	119
Ongoing (pension suspended awaiting info)	3

Implications

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

Financial	None
Human Resources	None
ICT	None
Legal	None
Procurement	None

Jason Bailey

Head of Pensions Administration

Background Papers	
Document	Place of Inspection

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Ref	Process	The Regulations that apply	The time limits	SYPA Compliance			SYPA Compliance			SYPA Compliance			SYPA Compliance		
				Number of Cases Q2	SYPA compliance within disclosure Q2	when exclude time waiting on third party Q2	Number of Cases Q3	SYPA compliance within disclosure Q3	when exclude time waiting on third party Q3	Number of Cases Q4	SYPA compliance within disclosure Q4	when exclude time waiting on third party Q4	Number of Cases Q1	SYPA compliance within disclosure Q1	when exclude time waiting on third party Q1
JOINING & CONTRIBUTING MEMBERS															
1	Joiner (Applies to all new joiners)	The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 - SI 2734 Regulation 6 - Basic scheme information	Basic information about the LGPS must be provided to a member within one month of receiving jobholder information telling us that the member has enrolled or re-enrolled under the Automatic Enrolment Regulations, or if not, within two months of the date that they became an active member.					NA. This is an employer responsibility, though we may wish to measure our own documentation.	NA. This is an employer responsibility, though we may wish to measure our own documentation.		NA. This is an employer responsibility, though we may wish to measure our own documentation.	NA. This is an employer responsibility, though we may wish to measure our own documentation.		NA. This is an employer responsibility, though we may wish to measure our own documentation.	NA. This is an employer responsibility, though we may wish to measure our own documentation.
2	Transfer Value In - Quotation (Applies to all contributors or prospective contributors who are enquiring about transferring benefits in)	The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 - SI 2734 Regulation 14 - Transfer credits	A statement, containing details of the cash equivalent transfer value provided by another scheme and what transfer credits this would buy in the LGPS, must be provided to a member or prospective member within two months of the date of their request. The two month time limit includes the time taken to obtain transfer value information from the ceding scheme.	106	83.96%	95.28%	110	99.09%	100%	196	77.04%	100%	218	91.74%	100%
3	Transfer Value In - Payment (Applies to all contributors who have elected to transfer benefits in)	Pension Schemes Act 1993 Regulation 99 - Trustees duties after exercise of option	If the member makes an election to transfer, a Club or non Club transfer in payment must be sent by the previous scheme (possibly via the scheme member) within six months of the date the quotation was issued.	81	100%	100%	53	100%	100%	161	100%	100%	185	100%	100%
		The Local Government Pension Scheme Regulations 2013 - SI 2013 No. 2356 Regulation 73 - Notification of first instance decisions	The six month time limit should include the requirement to issue a 'first instance decision' of the effect of the transfer credit on the members LGPS benefits under Reg 73 of the LGPS regs ("notified of it in writing by the body which made it as soon as is reasonably practicable after the decision is made".)												
4	Pension Savings Statements	The Registered Pension Schemes (Provision of Information) Regulations 2006	Pension Savings Statements as at 5 April must be provided to active members who have exceeded the annual allowance no later than 6 October each year								Due by 6/10/2022			Due by 6/10/2022	
5	Active Member Benefit Statements (Applies to all contributors who were contributors on 31 March)	Scheme Regulations 2013 - SI 2013 No. 2356 Regulation 89 - Annual benefit statements	If a member makes a request in writing to receive it earlier, it should be supplied to the member unless provided to active members no later than 31 August. If a member makes a request in writing to receive it earlier, it should be supplied to the member unless there is a reason why the Administering Authority is unable to do so.	44,220	> 99.5%	NA		Due by 31/8/2022			Due by 31/8/2022			Due by 31/8/2022	
MEMBERS WHO ARE LEAVING OR HAVE LEFT THE LGPS BEFORE RETIREMENT															
6	Deferred Benefit - Notification of Entitlement (Applies to any member who leaves before they have reached their normal pension age)	The Occupational Pension Schemes (Preservation of Benefit) Regulations 1991 Regulation 27A - Information to be furnished to early leavers	Details of all the rights and options that a member has when leaving before their normal pension age must be provided to the member within two months of the date that the Administering Authority has been informed that they have left.	888	59.23%	94%	877	87.57%	94.87%	946	75.90%	100%	1014	77.51%	100%

Ref	Process	The Regulations that apply	The time limits	SYPA Compliance											
				Number of Cases Q2	SYPA compliance within disclosure Q2	when exclude time waiting on third party Q2	Number of Cases Q3	SYPA compliance within disclosure Q3	when exclude time waiting on third party Q3	Number of Cases Q4	SYPA compliance within disclosure Q4	when exclude time waiting on third party Q4	Number of Cases Q1	SYPA compliance within disclosure Q1	when exclude time waiting on third party Q1
7	Transfer Value Out -Quotation (Applies to leavers who are entitled to transfer out of the Scheme or contributors who want a quotation because they are due to leave shortly or for another reason)	Occupational Pension Schemes (transfer values) Regulations 1996 Part III - Statements of entitlement and calculation of transfer values - (11) Disclosure	Unless a CETV quote has already been provided within the last twelve months, a quote must be provided to the member within three months of the date that they make the request.	144	85.42%	100%	127	88.19%	100%	234	93.60%	100%	123	80.49%	100%
8	Transfer Value Out -Payment (Applies to any leaver who is entitled to a transfer out)	Pension Schemes Act 1993 Regulation 99 - Trustees duties after exercise of option	If the member makes an election to transfer, a Club or non Club transfer out payment must be issued within six months of the date the quotation was issued.	28	100%	100%	21	100%	100%	70	100%	100%	77	100%	100%
9	Deferred Member and Pension Credit Member Benefit Statements (Applies to all deferred members, deferred pensioners and pension credit members who were deferred on 31 March)	The Local Government Pension Scheme Regulations 2013 - SI 2013 No. 2356 Regulation 89 - Annual benefit statements (Also Section 14 Chapter 25 Public Service Pensions Act 2013)	Annual benefit statements as at 31 March must be provided to deferred members no later than 31 August. If a member makes a request in writing to receive it earlier, it should be supplied to the member unless there is a reason why the Administering Authority is unable to do so.	45,826	>99.5%	NA		Due by 31/8/2022			Due by 31/8/2022			Due by 31/8/2022	
RETIRING & RETIRED MEMBERS															
10	Immediate Payment of Pension - Offer (Applies to all contributors who are entitled to the immediate payment of benefits)	The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 - SI 2734 Regulation 16 - Statement of benefits: non money purchase benefits	A statement containing retirement benefit information must be provided to the member within two months of the member's request.	1167	93.74%	100%	1368	92.25%	100%	1316	90.02%	100%	1037	92.39%	100%
11	Immediate Payment of Pension - Payment (Applies to all contributors who are entitled to the immediate payment of benefits)	The Local Government Pension Scheme Regulations 2013 - SI 2013 No. 2356 Regulation 73 - Notification of first instance decisions	A statement confirming the final amounts payable must be provided to the member as soon as is reasonably practicable.	659	91.54%	100%	755	81.72%	100%	742	99.06%	100%	850	100%	100%
ALL MEMBERS															
12	Divorce information - quotation (Applies to all members who need pension information required for divorce proceedings)	The Pensions on Divorce etc. (Provision of Information) Regulations 2000 Regulation 2 - Basic information about pensions and divorce	Information for divorce purposes must be provided within six weeks or a shorter period as specified by the court if court proceedings have commenced, or within three months if not.	57	96.49%	100%	67	83.58%	100%	93	82.65%	100%	65	93.85%	100%

Ref	Process	The Regulations that apply	The time limits	SYPA Compliance			SYPA Compliance			SYPA Compliance			SYPA Compliance		
				Number of Cases Q2	SYPA compliance within disclosure Q2	when exclude time waiting on third party Q2	Number of Cases Q3	SYPA compliance within disclosure Q3	when exclude time waiting on third party Q3	Number of Cases Q4	SYPA compliance within disclosure Q4	when exclude time waiting on third party Q4	Number of Cases Q1	SYPA compliance within disclosure Q1	when exclude time waiting on third party Q1
13	Divorce information - pension sharing order received - pre implementation (Applies to all members who have had a pension sharing order made as part of their divorce proceedings)	The Pensions on Divorce etc. (Provision of Information) Regulations 2000 Regulation 7 - Provision of information after receiving a pension sharing order	Statements containing the listed information must be provided to the relevant parties within 21 days of the order being received	3	60%	100%	4	25%	100%	4	100%	100%	2	100%	100%
BEREAVEMENTS															
14	Death (all types) (Applies to all beneficiaries)	The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 - SI 2734 Regulation 21 - Accessing benefits on the death of the member or beneficiary The Local Government Pension Scheme Regulations 2013 - SI 2013 No. 2356	Information must be provided to beneficiaries within two months of the Administering Authority becoming aware of the death.	224	99.55%	100%	306	99.81%	100%	311	99.68%	100%	286	100%	100%
		Regulation 73 - Notification of first instance decisions	Information must be provided to beneficiaries as soon as is reasonably practicable.	302	100%	100%	404	100%	100%	463	100%	100%	423	100%	100%

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Summary of Employer Queries Raised, Completed and Outstanding
Shown by Quarter for 10 Employers with highest total query volumes to up to 30 June 2022



Employer	Q2 2021/22			Q3 2021/22			Q4 2021/22			Q1 2022/23		
	Raised In Quarter	Completed In Quarter	Outstanding Quarter End	Raised In Quarter	Completed In Quarter	Outstanding Quarter End	Raised In Quarter	Completed In Quarter	Outstanding Quarter End	Raised In Quarter	Completed In Quarter	Outstanding Quarter End
[00500] Rotherham MBC	280	121	725	199	137	787	271	242	816	211	343	684
High	49	40	18	48	62	4	75	68	11	46	52	7
Standard	231	81	707	151	75	783	196	174	805	165	291	677
[00400] Doncaster MBC	338	119	713	124	131	706	286	597	395	219	329	285
High	47	43	14	28	41	1	65	61	5	50	50	5
Standard	291	76	699	96	90	705	221	536	390	169	279	280
[00600] Capita	48	31	314	48	34	328	98	73	353	57	58	352
High	6	3	25	8	9	24	16	9	31	11	11	31
Standard	42	28	289	40	0	304	82	64	322	46	47	321
[00600] Sheffield CC	234	295	179	154	183	150	219	228	141	147	196	92
High	59	58	3	46	43	6	74	69	11	78	89	0
Standard	175	237	176	108	140	144	145	159	130	69	107	92
[00600] EPM	26	24	173	24	13	184	75	19	240	17	16	241
High	10	6	13	4	3	14	1	6	9	4	5	8
Standard	16	18	160	20	10	170	74	13	231	13	11	233
[00473] Doncaster Childrens Services	50	31	134	24	30	128	71	98	101	26	39	88
High	10	12	4	6	10	0	15	14	1	12	11	2
Standard	40	19	130	18	20	128	56	84	100	14	28	86
[00300] Barnsley MDC	94	86	90	66	91	65	105	90	80	102	126	56
High	26	28	7	34	38	3	28	29	2	40	36	6
Standard	68	58	83	32	53	62	77	61	78	62	90	50
[00372] Greenacre Academy	32	8	65	8	2	71	14	12	73	9	10	72
High	1	1	0	0	0	0	3	2	1	5	3	3
Standard	31	7	65	8	2	71	11	10	72	4	7	69
[00222] The Sheffield College	13	7	50	4	4	50	16	7	59	24	8	75
High	1	2	1	1	1	1	4	0	5	7	3	9
Standard	12	5	49	3	3	49	12	7	54	17	5	66
[00295] The Chief Constable	42	35	57	28	37	48	56	50	54	34	53	35
High	15	13	5	9	0	3	16	17	2	6	8	0
Standard	27	22	52	19	0	45	40	33	52	28	45	35

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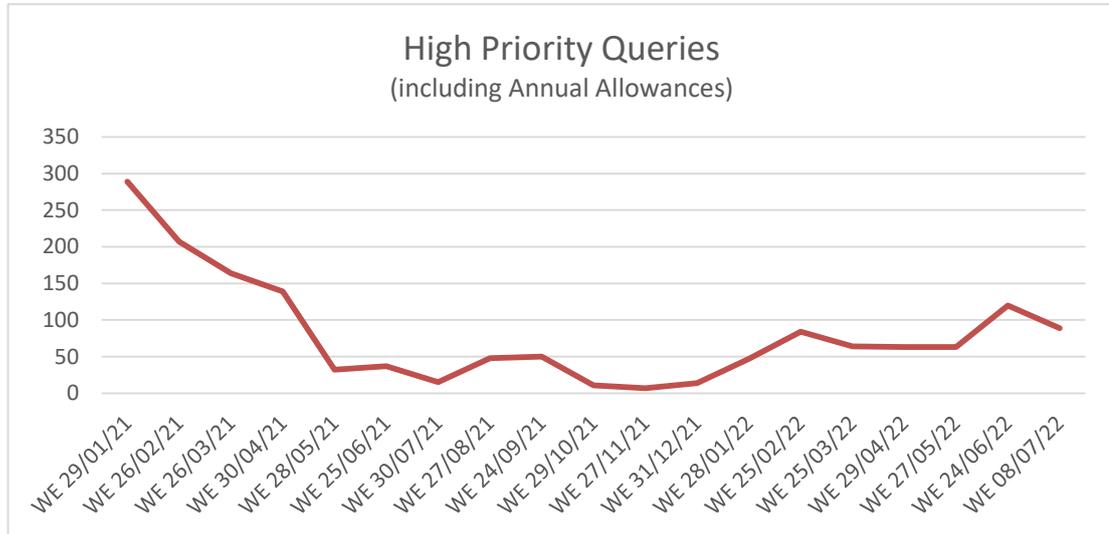
BRIEFING	TO:	South Yorkshire Pensions Authority Board
	DATE:	4 th August 2022
	LEAD OFFICER:	Lee Mann <i>Assistant Director, HR & OD</i> Alan Rodgers <i>HR Service Centre Manager</i>
	TITLE:	RMBC Pension Query Recovery Plan
1. Background		
1.1	<p>This briefing note has been prepared to provide an update in relation to Rotherham Metropolitan Borough Council's (RMBC's) administrative performance levels (with particular focus on work tray query volumes) and is to be presented to the SYPA Board on the 4th of August 2022.</p> <p>In addition to their own employees, RMBC also provide transactional HR & Payroll services (including Pension administration) for Doncaster Metropolitan Borough Council (DMBC), Doncaster Children's Services Trust (DCST), St Leger Homes Doncaster (SLHD) and a range of Rotherham and Doncaster Academies, who are admitted bodies in the SYPA scheme.</p> <p>A good working relationship has existed between RMBC and SYPA for many years, with RMBC historically topping SYPA's performance reporting year on year.</p> <p>This performance however was affected by several factors between late 2018 and early 2020, culminating in SYPA formally raising their concerns in April of 2020.</p> <p>The concerns raised at this point were split into three discreet areas:</p> <ol style="list-style-type: none"> I. Individual Member Queries II. Monthly Data Collection (MDC) File Submission III. Payment Discrepancies <p>As a result of this contact, an investigation to better understand the root causes of any issues and to identify and document the required solutions was instigated, along with an increase in the frequency and level of interaction between the two organisations.</p> <p>The findings of the investigation (completed August 2020) pointed to two main causes for the reduction in reported administrative performance levels:</p> <ul style="list-style-type: none"> • Lost MDC interface functionality, and general disruption, caused by the implementation of a new HR & Payroll system at RMBC. • The transfer of five key activity strands from SYPA to RMBC. 	

<p>1.2</p>	<p>A programme of work to address the identified issues was agreed, with both SYPA and RMBC investing significant time and resource to tackle them; coupled with a regular review process to monitor and feedback on progress. Substantial progress has been achieved during the last two years, with two of the three areas of concern fully addressed, and key aspects of the third progressed. However, there remains a backlog of individual member queries to be cleared for RMBC.</p> <p>Monthly Data Collection (MDC) File Submission</p> <p>The failure by the supplier of the new HR & Payroll system to adequately build and deliver the specified MDC interface, resulted in the transmission of late and poor-quality submissions, between June 2019 and March 2020.</p> <p>A complete re-write of the MDC solution by internal RMBC staff was required to deliver a 'fit for purpose' solution, however, because of the elapsed time, a backlog of load files and a significant number of individual member queries was generated.</p> <p>The MDC file load backlog, which impacted on the delivery of the 19/20 Annual Benefit Statements, was subsequently cleared and a monthly review process implemented to ensure any potential file load delays are flagged in a timely manner.</p> <p>Monthly submissions are now of a very high quality, submitted well in advance of the tightened deadlines introduced with the move to direct debit payments, and are subject to the ongoing process improvement review activity between SYPA and RMBC to continually seek further enhancements.</p>
<p>1.3</p>	<p>Payment Discrepancies</p> <p>The underlying cause of the payment discrepancies was initially hard to pinpoint due to the MDC file issues, however, once the file quality improved, the root cause was traced back to the transition to direct debit payments.</p> <p>Previously the calculation for payment was driven by the employer, based on the employee and employer contributions processed through the payroll, however the revised process calculates the employers' contributions directly from the reported pensionable pay, rather than employer contributions as an output of payroll.</p> <p>An additional quality assurance step has now been added to the monthly payroll cycle, to ensure that the relationship between pensionable pay and employer contributions is always maintained.</p> <p>There remains the potential for small variances between the direct debit value and the value processed through payroll, due to the differing calculation levels (total employer pay vs individual, position and period pay), however these differences are not material.</p>

<p>1.4</p>	<p>Individual Member Queries</p> <p>The most complex and difficult issue to resolve has been the backlog of individual member queries, this is a 'live' rather than static backlog, with incoming queries impacting on the numbers as the older queries are cleared.</p> <p>The volume of queries has been affected by the problems with the MDC files, the configuration and familiarisation issues with the new HR & payroll system, problems with the transition to work trays, SYPA system issues, academisation of schools, and the transfer of tasks from SYPA to RMBC.</p> <p>Activity to tackle the underlying causes of the queries, to remove duplicate queries, and to focus resource on the most important queries, to date, has been successful:</p> <ul style="list-style-type: none"> • The volume of queries generated following the monthly submission of MDC files has reduced significantly. • System improvements and staff/manager training in relation to the RMBC HR & Payroll system has cut the number of resulting queries. • Following initial teething issues, most of the work tray issues have been resolved. • Several of the SYPA system issues have been addressed, with ongoing work between SYPA and their system supplier to address the remaining issues. • Training and joint working between RMBC and SYPA has helped to reduce the impact of the transferred work, however there will always be a resulting workload impact from the change. • High priority queries have been prioritised, with this subset of queries now managed in an acceptable manner.
<p>2. Key Actions</p>	
<p>2.1</p>	<p>Based on the resolution of most of the underlying query causes, and the addition of resource to the Pensions Team, the original expectation was that the query backlog would be worked down over a period of 6 to 12 months.</p>
<p>2.2</p>	<p>Individual Member Queries Backlog</p> <p>The planned clearance of the query backlog has not yet been delivered due to a number of factors. The progress made and the factors that have impacted on the clearance are detailed below.</p>

2.3 High Priority Queries (HPs)

Queries identified by SYPA as high priority were given resource priority by RMBC, with the chart below highlighting the good progress made particularly during the period January to July 2021.

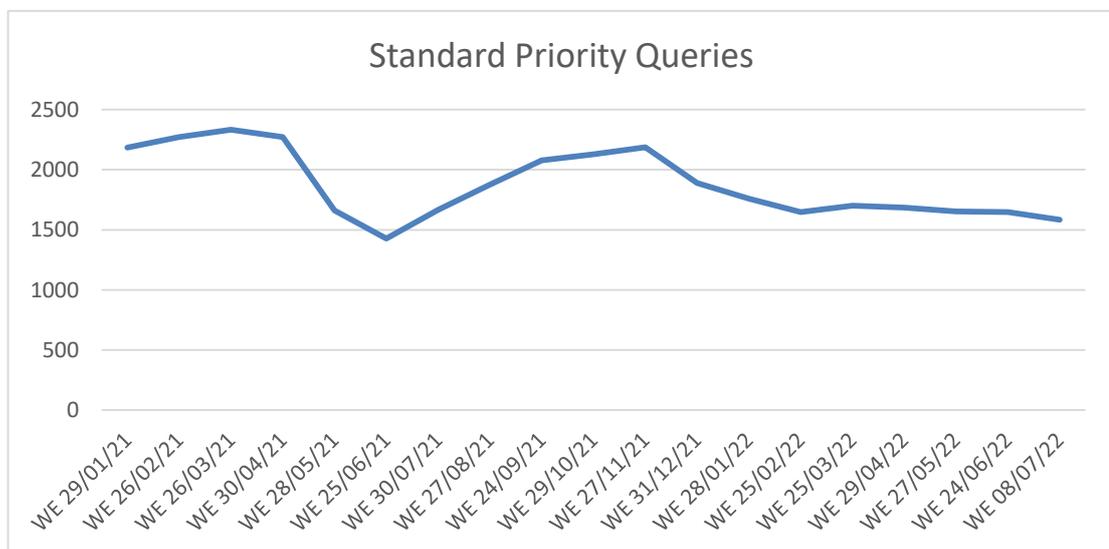


The number of active HPs are now being managed month on month at an acceptable level, with the Annual Allowance (AA) queries (that sit in this category, but with greater flexibility for completion) accounting for the vast majority of the HP queries.

The true number of active HPs, once the AA's are stripped out, is now in single digits, with an agreed plan to work through the incoming AA queries.

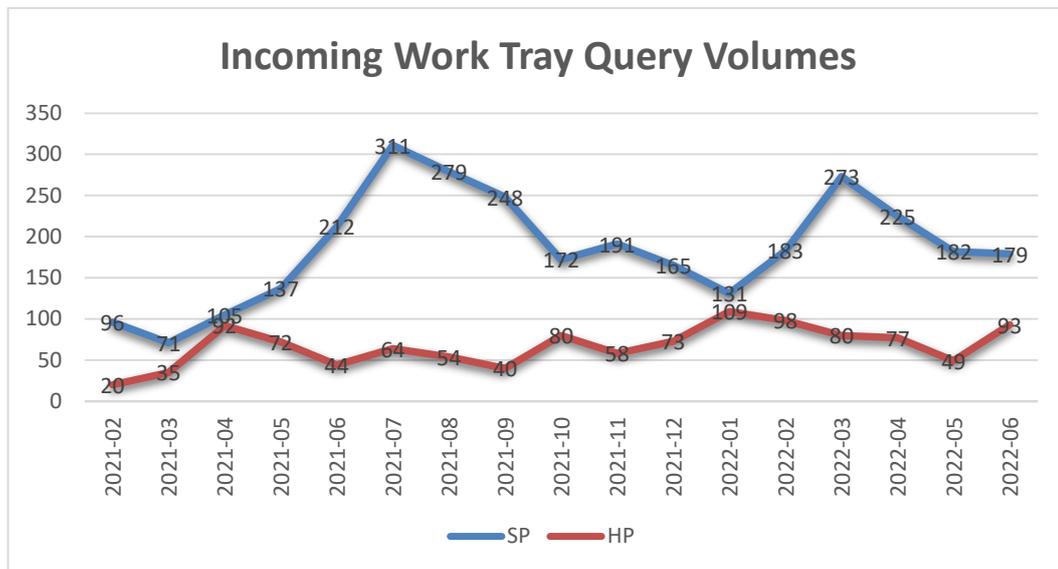
2.4 Standard Priority Queries (SPs)

The SP queries account for the bulk of the backlog, with a range of query types that may take between 10 minutes and several days per query to resolve.



	<p>Following the root cause analysis and resolution work, good progress was made between March and June 2021, however this momentum was lost, and the overall number crept back up between July and November 2021. There have been several factors that have impacted on the clearance rates, these have been detailed below for context.</p> <p>Since November 2021 there has been gradual progress in clearing the backlog, however the current rate of clearance is not acceptable, and it is acknowledged that further intervention is now required.</p> <p>2.5 Teachers MCR Project (June 2021 - July 2022)</p> <p>The introduction of Monthly Data Reconciliation by Teachers' Pensions has been a complicated and time consuming process which has adversely impacted capacity across the Pensions Team.</p> <p>The complexity of the requirement has caught many employers and software suppliers off guard, with failure to deliver across the sector.</p> <p>RMBC were able to take the learning from building the SYPA solution in-house and utilise this to deliver an appropriate solution for Teachers' Pensions.</p> <p>This obviously impacted on capacity, and despite the engagement of additional resource (via Agency), the project pulled on operational and management resource that would have otherwise been focused on the SYPA backlog.</p> <p>The TP MCR solution is now fully live, subject to any teething issues, with a contracted individual added to the Pensions Team to manage the ongoing activity, so there is no impact on the SYPA dedicated capacity within the team.</p> <p>2.6 Team Capacity</p> <p>The Pensions Team, which is relatively small, has faced some unique challenges which have affected capacity over recent months.</p> <p>Like other Local Authorities and the wider public sector, budgets remain a challenge and therefore deploying experienced resource from elsewhere into this priority work has been the first option. However, it is clear that additional capacity and investment will be required to address the current issue.</p> <p>2.7 Plan for Clearance of the Individual Member Queries</p> <p>To realistically forecast clearance rates, we need to consider the likely volume of new incoming queries, the time taken to clear each query, and the available resources to work on them.</p> <p>2.8 Incoming Queries</p>
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The chart below details the historical monthly volume of HP and SP queries submitted to RMBC via the SYPA work trays.



This historical data may help to forecast pinch points, where monthly volumes will be higher, however it is most likely skewed by queries resulting from the delayed MDC file loads and other activities.

Based on this and local knowledge, it is anticipated that there will be peaks between July to September (school leavers) and March to April (year-end).

The average number of queries over this period was 67 HPs per month and 186 SPs per month.

2.9 Time to Process Each Query

This aspect of the calculation is very challenging, as until each work tray item is opened and reviewed, it is not possible to accurately classify it or forecast the effort required to resolve it.

Linked into the resource review, RMBC (potentially with input/support from SYPA) plan to perform a process of triaging the work tray items, to better understand the task and allocate it to the most appropriate resource.

Following this triage activity, it is anticipated that more scientific monitoring and forecasting of progress will be possible.

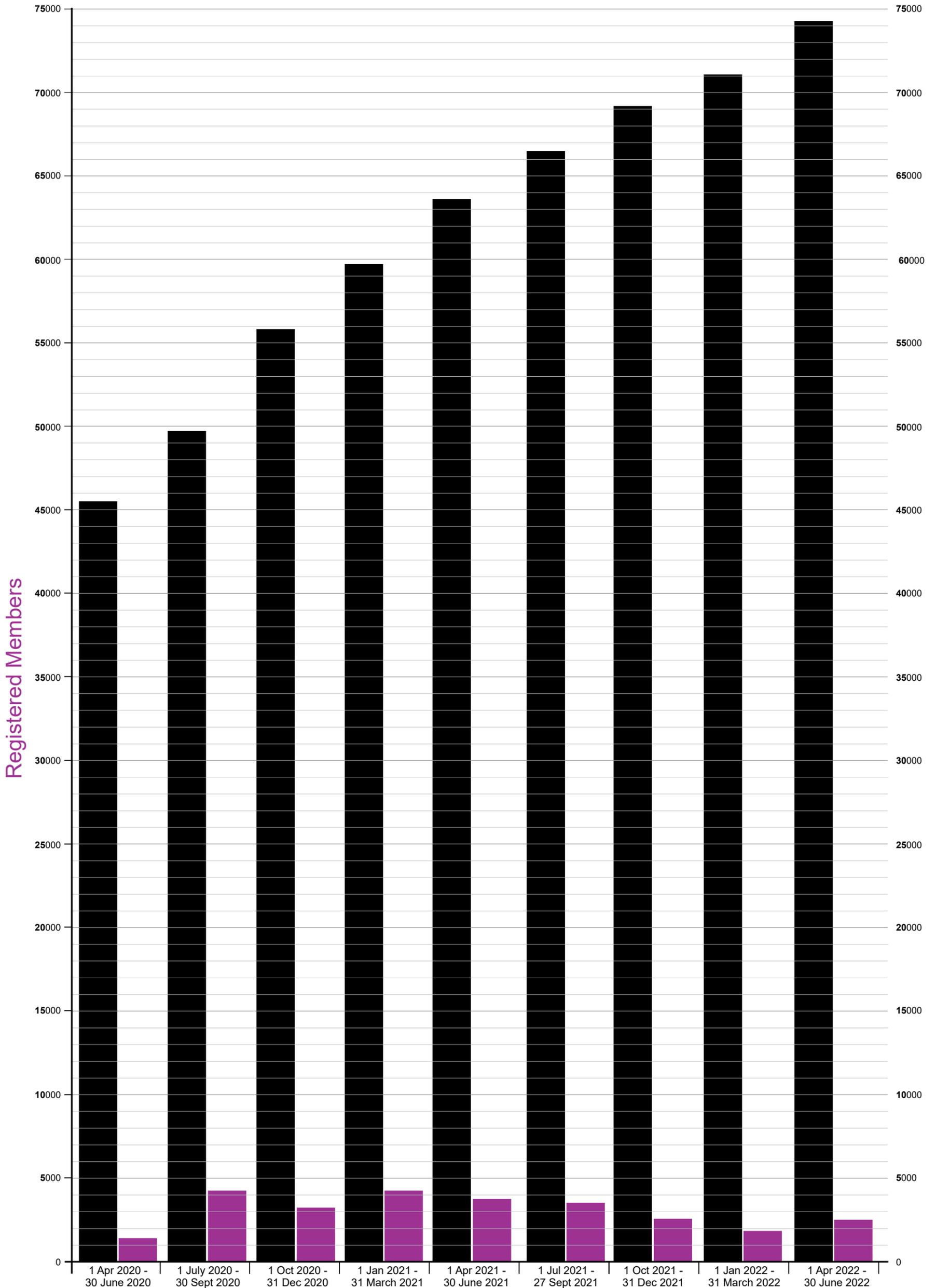
Based on our understanding of the queries, it is also anticipated that as the backlog is cleared and more recent queries are worked on, that the time to process each will decrease.

3. Key issues and relevant timelines

<p>3.1</p>	<p>Increases to existing resourcing levels, through the working of additional hours and overtime, and the appointment of additional staff, have to some degree been successful; with good progress made in many areas.</p> <p>Based on current backlog clearance rates however, it would appear that additional resource is required to expedite this process.</p> <p>Budgetary approval has now been given to recruit to two additional temporary posts (12 months) within the Pensions Team, with a sole focus on the SYPA backlog.</p> <p>Subject to being able to appoint to these roles and providing the appropriate training (which may need SYPA input), a marked increase in the clearance rate will be possible.</p>
<p>3.2</p>	<p>Clearance Plan</p> <p>Based on a desire to reduce the current SP query volume (1,584) to a manageable level (150 – or 10% of current volume) before the end of the current financial year (8 months), we would need to be clearing circa 180 more queries than received each month.</p> <p>The proposed additional resource, current resource freed up following the completion of the TP MCR work, ongoing improvements to SYPA systems and processes, and process-review work to streamline activities, should combine to support this.</p> <p>This is a challenging target that will require monitoring as activity is progressed, however with continued joint working between SYPA and RMBC and dedicated additional resource, RMBC is confident the target will be met within the proposed timeframe.</p>

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Registrations - April - June 2022



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Subject	Review of Breaches, Complaints and Appeals	Status	For Publication
Report to	Local Pensions Board	Date	4 August 2022
Report of	Head of Pensions Administration		
Equality Impact Assessment	Not Required	Attached	No
Contact Officer	Jason Bailey	Phone	01226 772954
E Mail	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 April 2022 to 30 June 2022.
-

2 Recommendations

- 2.1 Members are recommended to:
- a. **Note the breaches summary and comment on any further reporting requirements or actions**
 - b. **Note the outcome of complaints and appeals handled 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 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**. Quarter 1 has seen just one data breach where a unique set of circumstances involving a staff member using an incorrect process and a system fault on the address update from an employer allowed the same address to be updated for two different members (who had previously shared the same address). The system has been updated to prevent an error of this type recurring and checks are being undertaken to ensure the same error could not have occurred on the administration system.

Cyber Security Incidents

- 5.2 To improve visibility for the Board, the breach report now includes details of cyber security incidents. There were two incidents in the quarter, one of which was a result of the common issue of phishing emails. Fortunately, the phishing email purporting to be from the bank was recognised as such by Finance staff and the instructions on the email were ignored.
- 5.3 The second incident was a result of a member of staff using an online sort code checker which contained an advert with a redirect to a dubious website. The staff member recognised the issue immediately and ICT undertook all necessary safety checks. All staff have been reminded to use “official” sort code checkers when required in future.

Complaints

- 5.4 **Appendix B** provides a summary of complaints received in the reporting period(s). As previously requested by members of the Board, the summary report includes commentary as to whether the complaints received were indicative of a wider process issue which may need review/improvement. We have also included a trend analysis to provide visibility for the Board on the level of complaints.
- 5.5 The total number of complaints received in the Quarter was seven, which is slightly higher than the volumes received in recent quarters. Of these though, five were outside of SYPA control as they were a result of either delays from third-party providers, regulatory requirements or actions not taken by the member.
- 5.6 Of the two complaints that were directly attributable to SYPA, one was from a member who was unhappy with the delay in processing his aggregation. This is a known issue currently and referenced in the administration report. The second was a member who had a legacy AVC fund and unfortunately had not been given full details of his options in an initial call to the Customer Centre. This is a training issue which has been addressed with the relevant member of staff.
- 5.7 A third complaint was from a member who would not accept the (correct) explanation provided by the team for the difference between his Annual Benefit Statement (ABS) and a flexible retirement quotation. To avoid any further difficulties, a face-to-face meeting was arranged with the Head of Pensions Administration and the explanation has now been accepted. We have agreed to review the wording on future ABS's to make the position clearer.

Formal Appeals

- 5.8 During the reporting period there were three formal appeals determined. Two were ill-health appeals which were not upheld. The third related to a member who had elected to transfer his modest AVC fund from his former LGPS fund to SYPA and had experienced a delay which he felt had resulted in a loss of investment income. The member is being placed in the position he would have been if there had not been a delay between SYPA and the former LGPS fund. More widely, although this is an individual error a more comprehensive review of the LGPS interfund-in process is currently being undertaken which should help ensure this sort of delay with AVC funds does not recur.

Ref	Reason for Appeal	Stage	Upheld?	Response within IDRP timescales?
PS	Member not eligible for ill-health retirement	Stage 2	No	Yes
JM	Member not eligible for ill-health retirement	Stage 2	No	Yes
OC	Loss of income due to delay in transferring AVC fund	Stage 1	Partial	No – information needed from AVC provider

6 Implications

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

Financial	None
Human Resources	None
ICT	None
Legal	None
Procurement	None

Jason Bailey

Head of Pensions Administration

Background Papers	
Document	Place of Inspection

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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
2022/23	60	28/06/22	Personal Data	Life Certificate containing an NI Number was sent to the wrong address because an address had been updated incorrectly on the member record.	Apologised to member and confirmed no other comms had been issued to wrong address.	Green	04/08/2022 (LPB)	NO	NO	NI Number removed from Life Certificate process. Unique system issue indirectly linked to both members having previously shared the same address - now resolved	Open pending any Board comments

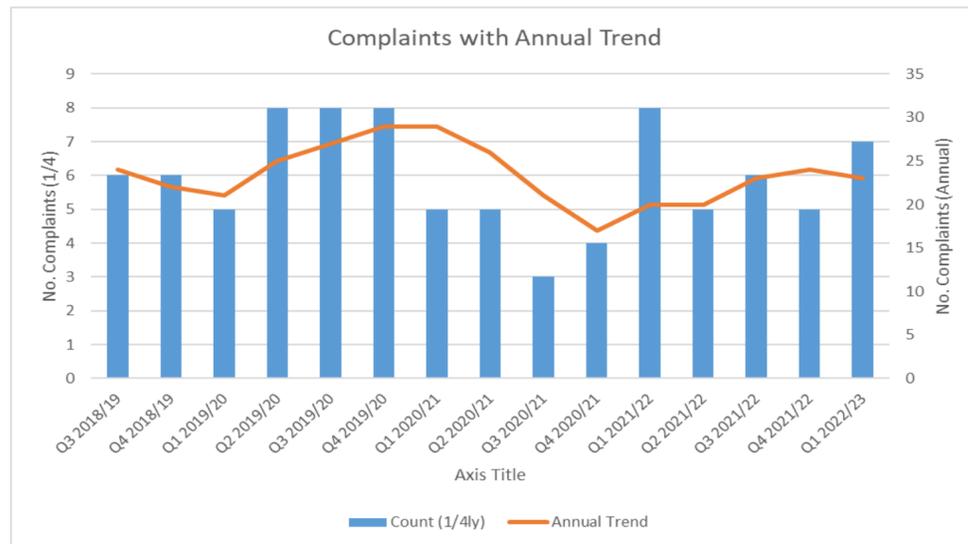
Year	Ref	Date Identified	Description of Cybersecurity Incident	Action Taken in Response to Incident	Date Reported to Local Pension Board or Authority	Reported to Pensions Regulator or other statutory body (e.g. ICO)?	Reported to Data Protection Officer?	Details of any follow up actions taken/required or wider implications	Incident Open/Closed
2022/23	CS16	30/06/22	Staff member was using an online sort code checker when they were redirected to a dubious site suggesting the PC had been locked and they should call a number that appeared on screen. Immediately reported to ICT.	Issue found by ICT to be a redirect likely via an advert. All MSEdge processes killed off, settings reset and browsing data cleared. Ran Sophos Scan	04/08/2022 (LPB)	NO	NO	All staff directed to use a specific sort code checker in future.	Closed
2022/23	CS17	21/07/22	Phishing email sent to two members of SYPA staff in Finance team suggesting bank account had been locked. Checked and it hadn't.	Emails were deleted. The sender was blocked and URLs also blocked.	04/08/2022 (LPB)	NO	NO	NA	Closed

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COMPLAINT SUMMARY

1 April 2022 to 30 June 2022

Reference	Complainant	Nature of Complaint	Response issued within target response time?	Responsible party	Follow up actions required/taken?
C87	Retiring Member	Member was unhappy at explanation of reduced benefits provided in flexible retirement quotation compared with Annual Statement.	Yes	SYPA/member	Meeting arranged between member and Head of Pensions Administration. Agreed to review future ABS content.
C88	Retiring Member	Member unhappy regarding incorrect uprating applied to salary by employer for term time only contract. This reduced the benefits quoted to member on retirement statement	Yes	Third Party	Apology and explanation of correct uprating supplied to member. Engagement with employer regarding correct uprating moving forwards.
C89	Retiring Member	Member unhappy regarding incorrect uprating applied to salary by employer for term time only contract. This reduced the benefits quoted to member on retirement statement	Yes	Third Party	Apology and explanation of correct uprating supplied to member. Engagement with employer regarding correct uprating moving forwards. Due to two identical complaints, request made to Support and Engagement Team to include information in next Employer Bulletin
C90	Active Member	Member unhappy at AVC performance and options for transferring out.	No	SYPA (for providing incomplete information)	Explanation of the origin of the AVC fund provided (had previously opted out of the LGPS, personal pension transfer in was greater than cost to reinstate pension). Explanation of AVC regulations provided to member. Clarified options, including ability to transfer out AVC fund to another provider. Apology issued for incomplete information being provided in initial phone call (training issue picked up).
C91	Active Member	Member unhappy at delay to settling Aggregation request.	Yes	SYPA	Aggregation settlement prioritised and completed. Apology for delay provided to member.
C92	Deferred Member (Transferring out)	Member unhappy at delay in transferring benefits to another local authority	Yes	Third Party	Explanation of delay provided to member. Their former employer had been chased numerous times to provide the required information to complete the deferment process on their record. This needed to be completed prior to any transfer taking place. Employer chased again, deferment completed and transfer initiated.
C93	Active Member	Member unhappy at length of time taken to transfer in benefits from another public service pension scheme	Yes	Third Party	Former Pension provider chased for payment. Explanation and apology issued to member. Transfer in completed as priority case.
Total for Three Months	7				



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Subject	Decisions Taken By the Authority	Status	For Publication
Report to	Local Pension Board	Date	04 th August 2022
Report of	Corporate Manager - Governance		
Equality Impact Assessment	Not Required	Attached	No
Contact Officer	Jo Garrison Corporate Manager - Governance	Phone	01226 666418
E Mail	jgarrison@sypa.org.uk		

1 **Purpose of the Report**

- 1.1 To update the Board on decisions taken by the Authority at its June meeting.
-

2 **Recommendations**

- 2.1 Members are recommended to:
- a. Note the various decisions taken by the Authority.**
-

3 **Link to Corporate Objectives**

- 3.1 This report links to the delivery of the following corporate objectives:
Effective and Transparent Governance

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

4 **Implications for the Corporate Risk Register**

- 4.1 The provision of this report addresses the identified corporate risks relating to effective governance and the control environment.

5 **Background and Options**

- 5.1 This report presents an update for the Board on the decisions taken by the Authority at its meetings held during June 2022. The full agendas and papers are available through the Authority's website.

- 5.2 The June meeting focussed on corporate and organisational matters and made the following decisions

- The June meeting of the Authority incorporated the Annual Meeting which included appointment of the Chair and Vice-Chair and appointments to Committees.

- Terms of Reference and nominations for the proposed Impact Investment Group were approved.
- The 2021/22 Q4 Corporate Performance Report was considered and transfers to and from earmarked reserves were approved.
- Early consultation with employers on key changes proposed to the principles and policies with the Funding Strategy Statement was approved. A report on this for the Local Pension Board is provided elsewhere on this agenda.
- Suggested amendments to the Local Pension Board Constitution were approved.
- The Annual Governance Statement was approved.
- The Authority approved changes to the list of officers authorised to execute sealed documents on behalf of the Authority.
- The proposed Member Learning and Development Plan was approved.
- The results of a review of the Director’s remuneration package were approved.

5.3 The Board are asked to note the various decisions taken.

6 **Implications**

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

Financial	As detailed in the various individual reports
Human Resources	As detailed in the various individual reports
ICT	As detailed in the various individual reports
Legal	As detailed in the various individual reports
Procurement	As detailed in the various individual reports

Jo Garrison

Corporate Manager - Governance

Background Papers	
Document	Place of Inspection



Subject	Consultation on Changes to the Funding Strategy Statement	Status	For Publication
Report to	Local Pension Board	Date	4 th August 2022
Report of	Director and Head of Pensions Administration		
Equality Impact Assessment	Not Required	Attached	No
Contact Officer	George Graham Director	Phone	01226 666439
E Mail	ggraham@sypa.org.uk		

1 **Purpose of the Report**

- 1.1 To seek the Board's views on proposed changes to the Funding Strategy Statement as part of a wider consultation with stakeholders.

2 **Recommendations**

- 2.1 Members are recommended to:
- a. **Note and comment on the proposed changes to the Funding Strategy Statement set out in the report at Appendix A.**

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.

Effective and Transparent Governance

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

4 **Implications for the Corporate Risk Register**

- 4.1 The actions outlined in this report address the various funding risks identified in the Corporate Risk Register.

5 **Background and Options**

- 5.1 At its meeting in June the Authority approved the beginning of consultation on changes to the Funding Strategy Statement set out in the report at Appendix A. While most of the changes are relatively technical in some cases reflecting changes in the way in which things are expressed by the new actuary with little change in underlying substance there is one major matter related to the way in which contribution rates for contractor bodies are set. These are set out in detail in the attached report.
- 5.2 While consultation with all employers on changes to the Funding Strategy Statement is required the composition of the Board means it is also able to act as a valuable sounding board on issues such as this and the Board are invited to make any comments they feel appropriate on these proposed changes for consideration in the determination of the final policy.

6 **Implications**

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

Financial	None directly, though the principles set out in the FSS do contribute to the assessment of employer contribution levels
Human Resources	None
ICT	None
Legal	Funds have a statutory obligation to consult on changes to the Funding Strategy Statement
Procurement	None

George Graham

Director

Background Papers	
Document	Place of Inspection
Briefing paper on considerations for pass through arrangements produced by one of the LGPS actuarial firms	Pass-through arrangements - Briefings Barnett Waddingham (barnett-waddingham.co.uk)



Subject	Consultation on Funding Strategy Statement (FSS)	Status	For Publication
Report to	Authority	Date	9 June 2022
Report of	Head of Pensions Administration		
Equality Impact Assessment	Not Required	Attached	No
Contact Officer	Jason Bailey	Phone	01226 666431
E Mail	JBailey@sypa.org.uk		

1 Purpose of the Report

- 1.1 To gain approval to consult informally with employers in the fund on the proposed changes to the Funding Strategy Statement (FSS).
-

2 Recommendations

- 2.1 Members are recommended to:
- a. **Approve the early consultation with employers on the key changes proposed to the principles and policies contained within the Funding Strategy Statement (FSS)**
-

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. The changes proposed in relation to funding of admission agreements are designed to assist employers in handling the pensions implications of outsourcing services.

Listening to our stakeholders

To ensure that stakeholders' views are heard within our decision making processes. Early consultation on proposed changes provides employers with increased opportunity to engage in understanding the principles behind the funding arrangements.

Effective and Transparent Governance

To uphold effective governance showing prudence and propriety at all times. The FSS is a key representation of the fund's approach to achieving long term sustainability and stability of contributions.

4 Implications for the Corporate Risk Register

- 4.1 The actions outlined in this report impact the risks around affordability of employer contributions and the level of investment risk set out in the Corporate Risk Register.

5 Background and Options

- 5.1 The purpose of the Funding Strategy Statement (FSS), as set out by the (then) Department for Communities and Local Government (DCLG) back in 2003 is “to establish a clear and transparent fund specific funding strategy which would identify how employers’ pension liabilities are best met going forward”.
- 5.2 The FSS is a statutory requirement under the LGPS Regulations and must be kept under review and subject to consultation where changes are being made. In producing the FSS, funds must have regard to guidance published by CIPFA as well as to the Investment Strategy Statement. For this reason, and because of the nature of the content, the FSS is subject to review as part of the triennial valuation process.
- 5.3 Historically, the draft FSS would be produced and issued for consultation towards the end of the calendar year once the provisional valuation results were available. However, the recent change of fund actuary affords an opportunity to revise the approach and to reflect recent experience of working with employers which suggests that some revisions to the FSS would be beneficial and that employers would appreciate early engagement on any changes being proposed.
- 5.4 Officers, in consultation with the actuary, have been reviewing the existing FSS and the actuary has produced a summary of the key principles contained within the FSS and the current expectation of how this may change as part of the 2022 review, subject to consultation. The summary document is attached at **Appendix A**.
- 5.5 As stated in the supporting document, there are no fundamental changes planned to the FSS but there a number of developments in line with the evolution of the funding strategy which it is intended to draw out as part of a consultation with employers:-
- i) **Funding Assumptions.** These are broadly in line with the valuation assumptions approved by the Authority in March 2022 but are represented in the FSS for transparency.
 - ii) **Setting Contributions.** These principles are broadly in line with the existing FSS in terms of the desire to achieve stability of contributions whilst reducing deficits and allowing some flexibility to reflect individual employer circumstances.
 - iii) **Other Funding Principles.** At the last valuation, the majority of employers chose to contribute towards the costs of meeting the expected costs of the McCloud remedy. Now that the legislation giving effect to the remedy is moving forward the costs will form a part of the overall liability assessment of employers.
- 5.6 The summary document draws attention to two new elements that are intended to be reflected in the updated FSS. The first is simply reflecting wider developments in the approach to climate change risk and these will continue to be covered extensively in other papers presented in relation to investment approach. The second is the proposed

introduction of “pass through” arrangements for new employer admissions created from outsourcings.

Pass Through

- 5.7 Traditionally, any new employer (contractor) joining the fund via an admission agreement following the outsourcing of a service from a local authority or academy trust would have its own assets and liabilities determined independently based on the membership profile of the transferring staff. Employer contribution rates are re-assessed as part of the triennial valuation (usually resulting in a change in contribution) and a further assessment is then carried out when the outsourcing comes to an end (e.g. if the service is re-tendered or brought back in-house) which can lead to a deficit or surplus payment being required.
- 5.8 Feedback from outsourcing employers and from contractors suggests that the potential cost impacts under the existing admission agreement arrangements are often difficult to predict and this can lead to complexities with service contracts; these can be particularly disproportionate where the outsourcings may involve just a small number of staff transferring employment. A “pass through” arrangement is one where a contractor applying for admitted body status simply pays the same primary contribution rate as the outsourcing (guarantor) employer who is letting the contract. The Fund is not required to separate out the assets and liabilities of the transferring staff as the outsourcing employer assumes responsibility for these.
- 5.9 The table below outlines the main potential advantages and drawbacks of a “pass through” arrangement compared with the more traditional agreement. As highlighted, there is a greater level of risk borne by the outsourcing employer though it is likely that this would be modest in the context of the overall funding risk for their entire scheme membership and would likely be offset by the advantages gained elsewhere.

“Pass Through” Advantages	“Pass Through” Drawbacks
Contractor pension cost certainty when bidding for new contracts creates an even playing field for procurement	Higher funding risk for outsourced staff is borne by outsourcing employer
Reductions in actuarial fees	
Avoids deficit or surplus payments at contract end	
Flexibility retained for contractors to meet certain extra costs e.g. early retirements	
No bond requirement – can be expensive to acquire	

- 5.10 Although the proposal would be to make “pass through” arrangements the default position for any new admission agreements, outsourcing employers would still have the option to elect not to apply “pass through” and retain the existing arrangements provided that both the contractor and the outsourcing employer had confirmed they understood the implications. This approach is consistent with that increasingly being adopted by other LGPS funds.
- 5.11 The intention is to consult on a separate “pass through” policy, albeit as part of the wider FSS consultation, so that employers have the opportunity to consider the

principles involved since this does mark a step change from the arrangements which have been in place for many years. Informal discussions with employers to date suggest the greater certainty provided by “pass through” would be welcomed.

6 **Implications**

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

Financial	None directly, though the principles set out in the FSS do contribute to the assessment of employer contribution levels.
Human Resources	None.
ICT	None.
Legal	Funds have a statutory obligation to consult on changes to the Funding Strategy Statement.
Procurement	None.

Jason Bailey

Head of Pensions Administration

Background Papers	
Document	Place of Inspection
Briefing paper on considerations for pass through arrangements produced by one of the LGPS actuarial firms	Pass-through arrangements - Briefings Barnett Waddingham (barnett-waddingham.co.uk)

South Yorkshire Pension Fund – 2022 FSS review

Purpose and scope

This paper has been commissioned by and is addressed to the South Yorkshire Pensions Authority (“the Authority”), the Administering Authority to the South Yorkshire Pension Fund (“the Fund”). Its purpose is to set out how the key principles of the Funding Strategy Statement (“FSS”) may change following the formal triennial review of this alongside the 2022 valuation of the Fund.

Process and consultation

The current FSS requires a formal review of this document every three years and the Authority is currently carrying out this review with support from the Fund Actuary.

The revised FSS will be available in October/November 2022 and a formal consultation period will follow, during which employers will be able to comment on the funding strategy set out (which will apply at the 2022 valuation) and associated policies.

Fundamental changes to the FSS are not expected following the current review. Changes made will be in line with the recent evolution of funding strategy i.e. those required to better manage risk in the Fund and improve the employer experience.

This document sets out the key principles and policies contained in the current FSS and how these are expected to change as a result of this review. I understand that this paper will be shared with employers as part of an initial consultation on the changes in FSS principles.

Key funding principles and suggested changes

The tables below set out the key principles contained in the FSS, and the current expectation with regards to how these may change as part of the 2022 review.

Assumptions

<u>Principle</u>	<u>Current position</u>	<u>Change</u>
Solvency objective	Achieve a 100% solvency level over a reasonable time period.	No change.
Prudence	A prudent approach to meeting solvency target is set.	Prudence will be explicitly measured at the 2022 valuation by measuring the likelihood of the certified contribution rates being sufficient to ensure that benefits can be paid in the future. A minimum likelihood of success (based on Hymans Robertson’s market assumptions) of 70% will apply. A higher threshold may apply for certain employers, specifically where there is a weak employer covenant.
Discount rate	Based on the expected return on the Fund assets using the long-term investment strategy. Discount rates are set relative to CPI, separately for pre-retirement (CPI plus 1.5%) and post retirement (CPI plus 2.35%)	A single discount rate will be set based on the level of returns expected to be achieved on the Fund assets (based on the long-term strategy) with a 70% likelihood of success. This leads to a discount rate assumption equal to the risk-free rate plus 2.3% per annum, which is broadly equivalent to that set under the previous funding strategy.

Consumer Price Inflation (CPI) – pension increase rate	Equal to long-term RPI less 1.0% per annum	A revised approach to recognise the distortions caused in the market price of RPI by the planned harmonisation of RPI with CPIH from 2030. The CPI assumption is expected to be higher than that set at the 2019 valuation due to a general increase in inflation expectations
Salary growth	CPI plus 1.25% per annum (which includes allowance for promotional increases)	CPI plus 0.6% per annum, plus a separate age and salary related allowance for promotional increases.
Baseline longevity	Standard mortality tables published by the actuarial profession's Continuous Mortality Investigation (CMI) group adjusted to reflect the characteristics of Fund members	Based on Club Vita tables allowing for the specific characteristics of each individual member. In effect, a separate mortality assumption is set for each member of the Fund based on relevant factors (e.g. lifestyle, affluence etc).
Longevity improvements	Based on the latest future improvements tables provided by the CMI.	No change in approach, leading to the use of the CMI 2022 tables adjusted to reflect expectations of future experience.

Setting contributions

The focus at the 2022 valuation will be in setting total contribution rates that are sufficient to lead to the employer being fully funded at the end of their appropriate time horizon.

<u>Principle</u>	<u>Current position</u>	<u>Change</u>
Stability for long term secure employers	Desire for as nearly a constant rate as possible	An explicit contribution stability mechanism will be set for each of the long-term secure employers in the Fund (typically the Scheduled Bodies). The mechanism will specify how contributions rates can vary in future by defining a maximum increase/decrease that can apply from one year to the next.
Deficit recovery periods	Maximum periods defined in current FSS with an expectation that these would generally reduce by three years each future valuation	The starting point will be for time horizons at the 2022 valuation to be set in a consistent manner to that defined in the current FSS. Shorter time horizons may apply in certain circumstances depending on the assessed employer covenant strength and in situations where employers are heading to a cessation event.
Phasing of contribution rates	If material increases in contribution rates are required, these increases may be phased in over the three-year period of the R&A.	No change

Reductions in contribution rates	Reduction in contribution rates will not be permitted if the employer is in deficit at the 2022 valuation.	No change.
Delaying introduction of new contribution rates	Where the employer's year-end is not 31 March, the new contributions will be permitted to commence from the beginning of the new financial year (following a formal request from the employer).	New contributions to apply from 1 April 2023

Other funding principles and policies

<u>Principle</u>	<u>Current position</u>	<u>Change</u>
McCloud	Employers have the choice of paying higher contributions to meet the expected cost of rectifying benefits for the McCloud remedy	Allowance for the McCloud remedy will be included in the measurement of the past service liabilities and (where appropriate) future service contribution rates, for all employers as a matter of course. Therefore, no choice element beyond 2023, and employers who chose to pay the higher rate for the past three years will (all other things being equal) be in a better place than those who didn't.
Contingent assets	The Authority will recognise contingent assets in place when agreeing funding plans with employers	No change
Prepayments	All employers may pre-pay secondary contributions Certain large employers may be permitted to pre-pay Primary contributions (subject to a check at the end of the year to make sure that there has been no underpayment – following which a 'top-up' payment may be required).	No change
Cessations	Policy for calculating cessation debts and exit credits, and for allowing Deferred Debt Arrangements is included in the existing FSS.	This is being reviewed by the Authority and any changes will be set out once the revised draft FSS is available in quarter 4 2022.
Covenant assessment	The Fund will make an objective assessment of covenant strength for each employer	No change

New academies	The approach taken to determine starting asset shares and contribution rates is set out in the existing FSS	No change to the asset allocation approach is expected.
Ill health retirement strains	A captive insurance arrangement is in place for certain (small) employers in the Fund where ill health strains are effectively pooled. All other (larger) employers meet the cost of their own ill health experience.	No changes are expected, but the Authority will carry out a review of the captive insurance arrangement and experience since the 2019 valuation prior to considering if changes are necessary.

New policies

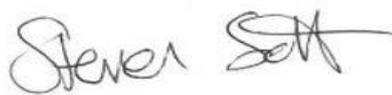
<u>Principle</u>	<u>Details</u>
Climate change risk	The Authority will develop a policy for measuring and monitoring the risks associated with climate change, including the effect on funding and investment outcomes.
Pass though	The Authority is reviewing the admissions policy with a view to facilitating pass though for all new admissions created from local authority and academy outsourcings.

Reliances and limitations

This paper has been prepared for the South Yorkshire Pensions Authority for the purpose described above. It has not been prepared for use for any other purpose and should not be so used.

This paper may be shared with participating employers for consultation purposes but should not be considered as advice to the employers.

This paper should not be disclosed to any other third party except as required by law or regulatory obligation or with our prior written consent. We accept no liability where the paper is used by or disclosed to a third party unless we have expressly accepted such liability in writing. Where this is permitted, the paper may only be released or otherwise disclosed in a complete form which fully discloses our advice and the basis on which it is given.

Douglas Green FFA – Fund Actuary

Steven Scott FFA – Fund Actuary

May 2022

For and on behalf of Hymans Robertson LLP



Subject	Local Pension Board Constitution	Status	For Publication
Report to	Local Pension Board	Date	8 th August 2022
Report of	Director and Clerk		
Equality Impact Assessment	Not Required	Attached	No
Contact Officer	George Graham Director	Phone	01226 772887
E Mail	ggraham@sypa.org.uk		

1 Purpose of the Report

- 1.1 To present the revised Constitution which had been approved by the Authority at its June meeting.
-

2 Recommendations

- 2.1 Members are recommended to:
- a. Approve the revised constitution set out at Appendix A.**
-

3 Link to Corporate Objectives

- 3.1 This report links to the delivery of the following corporate objectives:
Effective and Transparent Governance

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

Keeping the constitution under review and ensuring it evolves to meet the changing circumstances faced by the Board represents good practice.

4 Implications for the Corporate Risk Register

- 4.1 The actions outlined in this report address the risks around the effectiveness of the Board which are included in the Corporate Risk Register.

5 Background and Options

- 5.1 At its last meeting in April the Local Pension Board considered, as is good practice, its annual effectiveness review. This raised some specific issues around membership which fall to the Authority to determine.
- 5.2
- 5.3 The Board determined two key principles in relation to its membership which underpin the thinking for its requests to the Authority

- a. That the Constitution should be written flexibly enough in relation to membership that it does not require frequent changes.
- b. That the terms of office of all members of the Board should not be less than 3 years to allow members to develop the knowledge and skills necessary to fulfil the relevant regulatory requirements.

5.2 At its annual meeting on 9th June the Authority approved both of the proposed amendments.

5.3 Attached at Appendix A is a revised constitution giving effect to the agreed changes.

6 Implications

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

Financial	None
Human Resources	None
ICT	None
Legal	The Board is required to have a constitution which is subject to approval by the Authority as Scheme Manager.
Procurement	None

George Graham

Sarah Norman

Director

Clerk

Background Papers	
Document	Place of Inspection



Constitution of the South Yorkshire Local Pension Board

July 2022

Date Approved:	2015
Date Revised:	July 2022
Date of Next Review	July 2023
Responsible Officer:	Monitoring Officer

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1. Name

1.1 The name of the Board is “the South Yorkshire Pensions Authority Local Pension Board” and is established by South Yorkshire Pensions Authority (“the Authority”) as the administering authority for the South Yorkshire Pension Fund under the provisions of Section 5 of the Public Sector Pensions Act 2013 (“the Act”) and the Local Government Pension Scheme (Amendment)(Governance) Regulations 2015.

2. Purpose and Role

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

2.1.1 Secure the effective and efficient governance and administration of the LGPS for the South Yorkshire Pension Fund

2.1.2 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.

2.1.3 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.

2.2 The Board will carry out its role in line with the specific terms of reference set out in Appendix A to this Constitution.

3. Powers of the Local Pension Board

3.1 Where any breach of legislation or duties is committed or is alleged to have been committed by the Pensions Authority or its Boards the Local Pension Board shall:

3.1.1 Within one month of the possible breach, meet with the Authority Chair (supported by the Head of Paid Service and Section 73 officer) to discuss the breach.

3.1.2 Ask the Authority Chair to explain the actions taken and provide evidence of the legitimacy of the actions taken.

3.1.3 Consider the matter on the facts available and evidence provided by the Chair and shall:

3.1.3.1 Refer it back to the Authority to consider afresh and correct any areas of concern/breaches of duty; or

3.1.3.2 Determine that no breach of duty has taken place.

3.2 If under clause 3.1 above it is decided that a breach has occurred, the Local Pension Board shall (as required by the Code of Practice and the Pensions Act 2004):

3.2.1 Report the breach to the Scheme Manager who should take prompt and effective action to investigate and correct the breach and its causes and, where appropriate, notify any affected members: or

3.2.2 Where prompt and effective action to remedy the breach has not been taken and/or where scheme members have not been informed when they should have been, report the breach as a breach of material significance to the Pensions Regulator.

3.3 As per Regulation 106(6) of the Local Government Pension Scheme (Governance) Regulations 2014 and subject to the terms in this Constitution, the Local Pension Board shall have the power to do anything which is calculated to facilitate, or is conducive or incidental to, the discharge of any of its functions.

4. Scheme Manager Consents

4.1 The Local Pension Board shall not:

- 4.1.1 Consider or become involved in any internal dispute resolution appeals or the process itself.
- 4.1.2 Enter into contracts on behalf of the Administering Authority.
- 4.1.3 Use the Local Pension Board to act on behalf of a particular constituency or Pension Fund member in general or in relation to a specific complaint at any time.
- 4.1.4 Compromise the Pensions Authority's ability to comply with its fiduciary duty to the Pension Fund and its members.

4.2 The Local Pension Board must seek written consent from the Scheme Manager before it:

- 4.2.1 instructs the Pension Fund actuary to provide a report of any kind.
- 4.2.2 Requests any external advisor to attend a meeting of the Local Pension Board which shall require any remuneration of any level.
- 4.2.3 incurs a cost to the Pension Fund.
- 4.2.4 Can amend this constitution.

5. Membership

5.1 In accordance with Regulation 107 of the Local Government Pension Scheme (Amendment) (Governance) Regulations 2015 the South Yorkshire Local Pension Board will be made up of an equal number of employer and member representatives which is no less than four in total. The South Yorkshire LPB will comprise of 10 members in total.

5.1.1 Employer representatives will consist of:

- 2 Local Authority Councillors (rotated every 3 years) in line with a pattern agreed with the Constituent Authorities
- 3 other employers (appointed for 3 years) chosen with regard to the balance of different employer groups.

5.1.2 Employee representatives will consist of:

- 3 Trades Unions who must be LGPS Scheme members (appointed for 3 years)
- 2 members selected from active, pensioner and deferred members (appointed for 3 years)

5.1.3 Appointment of employer and Trades Union representatives will be by nomination, Scheme member representatives will be appointed by an application process.

5.1.4 A non-Councillor member (employer or scheme member) may serve a maximum of three terms of office.

5.2 No officer of South Yorkshire Pensions Authority or any elected Member appointed by a constituent Authority to serve on the South Yorkshire Pensions Authority may be a Member of the Local Pension Board.

5.3 Members of the Local Pension Board will be voting members; each member shall have one vote. It is expected that the Board will, as far as possible, reach a consensus; the Chair of the Board will have the final deciding vote which will be reported to the Administering Authority.

5.4 Regulation 107 requires that the administering authority, South Yorkshire Pensions Authority, ensures that all employer or member representatives sitting on the Board have relevant experience and capacity to represent the employers or members of the Fund.

5.5 Substitute members will not be permitted.

5.6 Each Local Pension Board member shall endeavour to attend all LPB meetings during the year. Failure to attend any meetings within a 6-month period will result in removal from the Board unless a meeting of the Board specifically agrees to a waiver of this rule because of specific circumstances.

6. Chair

6.1 The Board shall elect a Chair from amongst its members.

6.2 The Board shall elect a Vice-Chair from amongst its members.

6.3 When the Chair of the Board is from the employer representatives, then the Vice-Chair will be elected from the member representatives, and vice versa.

7. Leaving the Board

7.1 A member of the Board shall cease to hold office if:

7.1.1 He or she notifies the Board of a wish to resign.

7.1.2 He or she is an elected councillor and is appointed to the Pensions Authority.

7.1.3 He or she ceases to be employed by the body on behalf of whom he/she acts as a representative, including but not limited to Trade Unions or Scheme employers.

7.1.4 A member fails to attend meetings or otherwise comply with the requirements of being a Board member, for example fails to attend the necessary knowledge and understanding training.

7.1.5 A member dies or becomes incapable of acting.

7.1.6 There exists a conflict of interests in relation to a Board member which cannot be managed within the internal procedures of South Yorkshire Pensions Authority.

8. Standards and Interests

8.1 All members of the Board will adhere to the Seven Principles of Public Life. These are:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

8.2 In addition, Local Authority Councillors serving on the Board are subject to their Council's Code of Conduct for Members. Members of the Board who are not Councillors but are members of a professional body or represent a Trade Union are subject to any Code of Conduct applicable to that body or Trade Union.

8.3 All members of the Board shall complete a declaration of their interest and deposit it with South Yorkshire Pensions Authority's Monitoring Officer as required by Regulation 108 (4) of the Local Government Pension Scheme (Amendment) (Governance) Regulations 2015.

8.4 The Monitoring Officer will make arrangements for the publication of the register of interests of members of the Local Pension Board on the website of the South Yorkshire Pensions Authority.

9. Conflicts of Interests

9.1 Further to the Regulations, a member shall not be appointed who has an existing conflict of interest.

9.2 For the avoidance of doubt, being a member of the Pension Scheme is not a conflict of interest.

- 9.3 Where a member becomes conflicted during their appointment, they shall inform the Scheme Manager without delay and their tenure shall end with immediate effect.
- 9.4 Where a member has been removed from the Board under this clause 9, they will be entitled to be reappointed once the conflict has been resolved.
- 9.5 Such reappointment shall be made to the Board only where written approval from the Scheme Manager (advised by the Monitoring Officer) has been provided.
- 9.6 The Board shall maintain a policy in relation to conflicts of interest which will form part of this Constitution and to which members of the Board must have regard.

10. Meetings and Procedures of the Board

- 10.1 The Board shall hold a minimum of four meetings in any municipal year. Additional meetings may be called at any time by the Chair.
- 10.2 For the avoidance of doubt “meeting” in this context includes meetings held entirely virtually or allowing the participation of individual members virtually.
- 10.3 In the absence of the Chair at a meeting of the Board, the Vice-Chair will preside over that meeting. If both the Chair and Vice-Chair are absent, then the Board will appoint one of its members to preside at that meeting.
- 10.5 The quorum for a meeting of the Board shall be at least 2 employer and 2 employee representatives.
- 10.6 Board meetings shall be held in public. The public may be excluded from the meeting when matters are considered that, in the opinion of the Scheme Manager, contain information covered by exempt/confidential information procedures under Schedule 12A of the Local Government Act 1972 (as amended) or represent data covered by the Data Protection Act 1998.
- 10.7 All agendas and papers for Board meetings will be made publicly available on South Yorkshire Pensions Authority’s website unless, in the opinion of the Scheme Manager, they are covered by exempt/confidential information procedures under Schedule 12A of the Local Government Act 1972 (as amended) or represent data covered by the Data Protection Act 1998.
- 10.8 Minutes of proceedings at meetings of the Board shall be kept in accordance with statutory requirements. Following the approval of the minutes by the Chair of the Board, they shall be forwarded to all Pension Board members.
- 10.9 Minutes of meetings of the Board shall be published on South Yorkshire Pensions Authority’s website.

11. Knowledge, Skills and Training

- 11.1 To be appointed as a member of the Board a person must have knowledge and understanding of and be fully familiar with:
- 11.1.1 The rules of the scheme.
 - 11.1.2 Any document recording policy about the administration of the Scheme which is for the first time being adopted in relation to the Scheme.
 - 11.1.3 The law relating to pensions; and
 - 11.1.4 Any other matters which are prescribed in regulations.
- 11.2 Pension Board members will undertake a personal training needs analysis and regularly review their skills, competencies, and knowledge to identify gaps or weaknesses.
- 11.3 Pension Board members will comply with the Scheme Manager’s training policies as set out in the Learning and Development Strategy and attend all training provided by the Scheme Manager.

- 11.4 A written record of relevant training and development will be maintained for each member of the Board and details of training undertaken by each member of the Board will be published in the Board's Annual Report.
- 11.5 Training where needed, that is provided by the Scheme Manager, will be charged to the Pension Fund.
- 11.6 Subject to the Regulations or any advice or requirement issued by the Pensions Regulator, the Board must agree and implement a programme of training in respect of all members of the Board to ensure that they are adequately trained to perform their respective duties.

12. Accountability

- 12.1 The Local Pension Board will be collectively and individually accountable to the Scheme Manager and the Pensions Regulator.

13. Expenses and Funding

- 13.1 Members of the Board will be reimbursed for reasonable subsistence and travel expenses in accordance with relevant policies of the Administering Authority.
- 13.2 For the avoidance of any doubt, Pension Board members shall not receive an annual allowance of any kind.
- 13.3 The Board will be provided with adequate resources to undertake its role; these will include as a minimum:
- Accommodation and administrative support to conduct its meetings.
 - Training; and
 - Legal, technical, and other professional advice.
- 13.4 The expenses of the Local Pension Board shall be regarded as part of the costs of the administration of the Fund.

14. Annual Report

- 14.1 At the end of each Municipal Year the Chair of the Board shall compile an annual report on the activities of the Board, including records of attendance and training, for submission to the Authority and for inclusion in the Authority's Annual Report and Accounts.

15. Variations

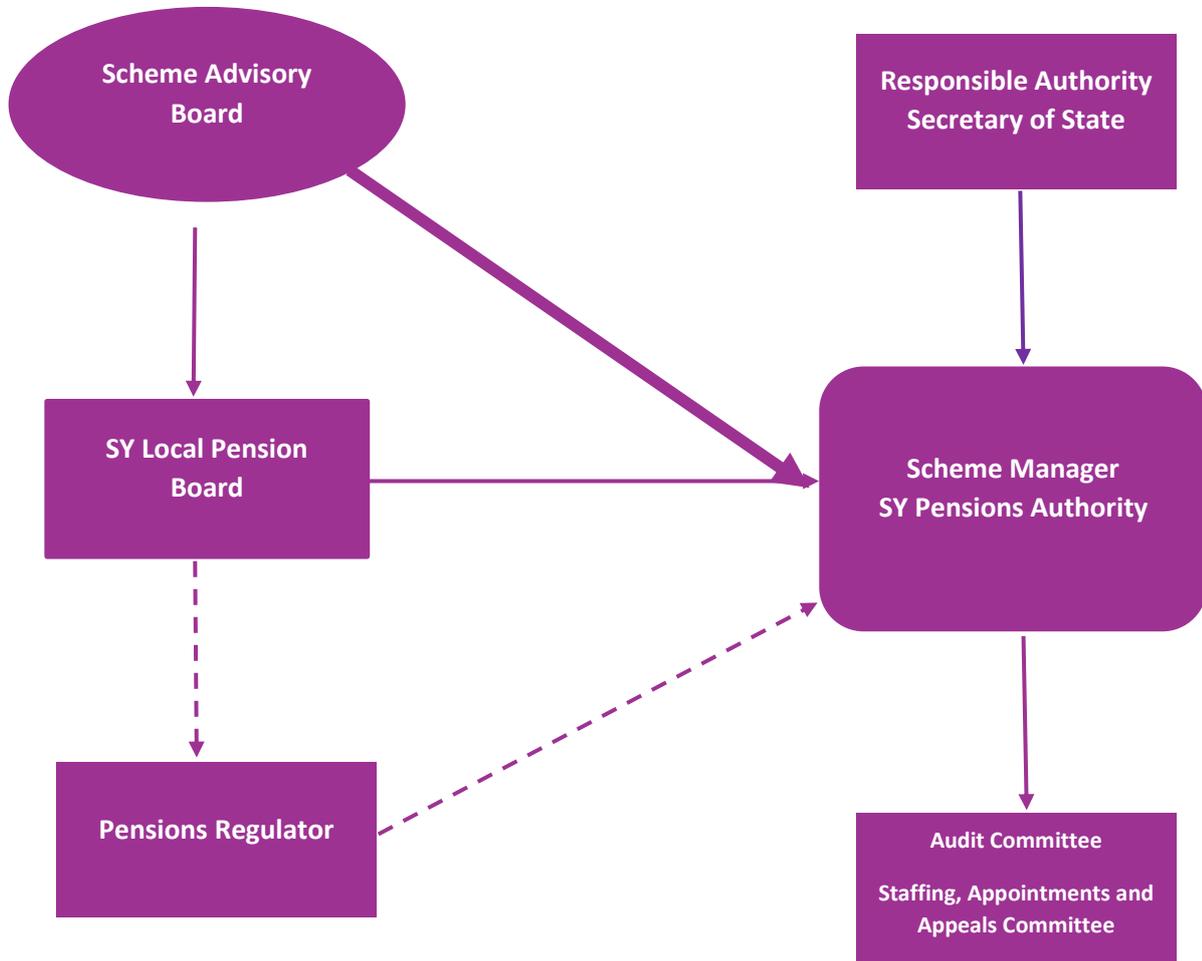
- 15.1 Any variation to this Constitution, considered necessary by the Board, shall be reported to the Scheme Manager for consideration and written consent.
- 15.2 No variation made by the Board will be valid without the express consent of the Scheme Manager.

16. Data Protection

- 16.1 The Local Pensions Board will adhere to the Data Protection Policies of the Administering Authority.

17. Governance Structure

17.1 The diagram below shows how the South Yorkshire Local Pension Board fits into the overall governance structure flowing from the Public Sector Pensions Act 2013 and the Local Government Pension Scheme Regulations 2013 (as amended).



Constitution of the
South Yorkshire
Local Pension
Board
Appendix A –
Terms of Reference
July 2021

Appendix A Terms of Reference

1. Compliance and Control

- 1.1 To review administrative governance and risk management processes and procedures to ensure they remain compliant with the Regulations and the Regulator's 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 Scheme administration from the scheme members' and employers' perspective including making any recommendations for changes to the Pensions Administration Strategy.
- 2.2 To assess the quality of service provided by the pension 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. Budgets

- 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.

Constitution of the
South Yorkshire
Local Pension
Board
Appendix B –
Conflicts of Interest
July 2021

Appendix B – Local Pension Board Conflicts of Interest Policy

1. Introduction

There is a requirement for Local Pension Board (LPB) members not to have a conflict of interest. However, it is important to note that the issue of conflicts of interest must be considered in the light of the LPB's role in assisting the Scheme Manager (South Yorkshire Pensions Authority) in securing compliance with the Local Government Pension Scheme (LGPS) regulations.

The LPB does not make decisions in relation to the Scheme and, therefore, it is not anticipated that significant conflicts will arise. Nevertheless, this Policy has been drafted to assist in the effective identification, monitoring, and management of conflicts of interest.

This Policy sets out to meet the requirements that specifically apply by virtue of the Public Service Pensions Act 2013 and the standards of conduct and practice as set out in the Pensions Regulator's Code of Practice.

2. Identifying Conflicts

LPB Members

For the purposes of a member of the LPB, a conflict of interest is defined in section 5(5) of the 2013 Act as a "financial or other interest likely to prejudice the way in which someone carries out their role as a member of a pension board". It further specifies that a conflict does not include a financial or other interest arising merely by virtue of that person being a member of a relevant pension scheme. Therefore, a conflict of interest may arise when a member the LPB must fulfil their legal duty to assist the Scheme Manager and, at the same time, they have.

- a separate personal interest (financial or otherwise); or
- another responsibility in relation to that matter, giving rise to a possible conflict with their first responsibility as a member of the LPB.

The Scheme Manager must also satisfy itself that those appointed to the LPB do not have an actual conflict of interest prior to appointment and "from time to time". This will be achieved by regular monitoring and review of the declarations of interest register.

There is a corresponding duty on any person who is proposed to be appointed, or an appointed member of the LPB, to provide the Scheme Manager with such information as it may require to be satisfied that there are no conflicts of interest. LPB members will also have the responsibility to anticipate potential conflicts of interest in relation to plans for future LPB activity.

Some examples of how a conflict of interest may arise specifically in relation to an LPB member include.

- a) a finance officer appointed as a member of the LPB may, from time to time, be required to take or scrutinise a decision which may be, or appear to be, in opposition to another interest or responsibility. For example, they may be required as an LPB member to take or scrutinise a decision which involves the use of departmental resources to improve scheme administration, whilst at the same time being tasked, by virtue of their employment, with reducing departmental spending.

- b) an LPB member who works closely with the Scheme Manager's internal audit function may be required, as part of their work to audit the administration of the Pension Scheme. For example, the employee may become aware of confidential breaches of law which have not yet been brought to the attention of the LPB.
- c) an employer representative (elected Member) who also works in the private sector, may also have a conflict of interest as a decision-maker in their own workplace. For example, they may work for a company to which the Scheme Manager has outsourced its pension administration services and the Board are reviewing the standards provided by it.

LPB Advisors

Conflicts of interest may also arise in respect of Advisors to the LPB.

For example: an Advisor may have a conflict of interest if he or she (or the same company) is also advising the Scheme Manager. The risk to the LPB is that the Advisor does not provide, or is not seen to provide, independent advice.

Where there is likely to be a conflict of interest in giving advice, the LPB should consider carefully whether it is appropriate to appoint the Advisor in the first place. It may also be necessary to consider carefully whether they should take steps to remove the Advisor who has already been appointed.

3. Monitoring and Managing Potential Conflicts

For the Scheme Manager to fulfil its obligations to ensure the LPB members do not have a conflict of interest, the LPB must include an item on conflicts of interest at each meeting and also in its Annual Report.

The LPB is required to maintain a written register of dual interests and responsibilities which have the potential to become conflicts of interest, which may adversely affect members' or advisors' suitability for the role. Each member (as well as any attendees participating in the meeting) will be expected to declare, on appointment and at each meeting, any matter which may lead to conflicts of interest, such a conflict could be in relation to a general subject area or to a specific agenda item of an LPB meeting.

The Chair of the LPB must be satisfied that the LPB is acting within.

- the conflicts of interest requirements of the Public Service Pensions Act 2013 and the pension scheme regulations, and
- in the spirit of any national guidance or code of practice in relation to conflicts of interest for LPB members.

Each LPB member, or a person proposed to be appointed to the LPB (as well as any attendees participating in the meeting) must provide the Chair of the LPB with such information as he or she reasonably requires for the purposes of demonstrating that there is no conflict of interest.

LPB members are required to have a clear understanding of their role and the circumstances in which they may find themselves in a position of conflict of interest and should know how potential conflicts should be managed.

The LPB is required to evaluate the nature of any dual interests and responsibilities, assess the impact on operations and governance were a conflict of interest to materialise and seek to prevent a potential conflict of interest becoming detrimental to the conduct or decisions of the LPB. The LPB may consider seeking independent legal advice from the Monitoring Officer, or external advisors where necessary, on how to deal with these issues, if appropriate.

Individual members of the LPB must know how to identify when they have a conflict of interest which needs to be declared and which may also restrict their ability to participate in meetings or decision-making. They also need to appreciate that they have a legal duty under the Regulations to provide information to the Scheme Manager in respect of conflicts of interest.

The Member will need to consider how any conflict can best be managed to comply with the statutory requirements. Options may include.

- a) the member withdraws from the discussion and any decision-making process on the relevant item(s); or
- b) the member resigns from the LPB if the conflict is so fundamental that it cannot be managed in any other way.



Subject	Updated Risk Register	Status	For Publication
Report to	Local Pension Board	Date	4 th August 2022
Report of	Director		
Equality Impact Assessment	Not Required	Attached	No
Contact Officer	Annie Palmer Risk and Governance Officer	Phone	01226 666404
E Mail	apalmer@sypa.org.uk		

1 **Purpose of the Report**

- 1.1 To provide members of the Board with the opportunity to review the updated risk register which supports the new corporate strategy.
-

2 **Recommendations**

- 2.1 Members are recommended to:
- a. Note and comment upon the revised risk register.**
-

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).

Listening to our stakeholders

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

Investment Returns

To maintain an investment strategy which delivers the best financial return, commensurate with appropriate levels of risk, to ensure that the Fund can meet both its immediate and long term liabilities.

Responsible Investment

To develop our investment options within the context of a sustainable and responsible investment strategy.

Scheme Funding

to maintain a position of full funding (for the fund as a whole) combined with stable and affordable employer contributions on an ongoing basis.

Effective and Transparent Governance

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

Valuing and engaging our Employees

To ensure that all our employees are able to develop a career with SYPA and are actively engaged in improving our services.

4 Implications for the Corporate Risk Register

- 4.1 The actions outlined in this report address the entirety of the risk landscape facing the Authority.

5 Background and Options

- 5.1 The Board's workplan requires it to regularly review the Authority's Corporate Risk Register. The latest version of the Register which was considered by the Authority at its meeting on 9th June 2022 is at Appendix A. The latest management review of the Register has resulted in several changes as set out below.
- 5.2 *G2 Governance – Local Pension Board Knowledge and Understanding.* The score for this risk has reduced given that the Board has a stable membership and, based on the outcome of the learning needs assessment, a sound level of knowledge and understanding. In addition to this it has been agreed to extend the contract of the current Independent Adviser which strengthens the effectiveness of the Board.
- 5.3 *G3 Governance – Breakdown of the Control Environment.* The score for this risk has reduced as the current status and experience over the last year warrants a change to the assessed probability of this risk from medium to low resulting in a reduced current score.
- 5.4 *I3 Investment and Funding – Key Risks Identified in the Boarder to Coast Strategic Plan.* The score for this risk has reduced given that the Company's Strategic Plan, including spend to address key risks, was agreed in March and the new plan focuses in part on people risks and succession planning. Recent recruitment indicates some success in mitigating this risk and as a result the impact score has been reduced to medium.
- 5.5 Commentary is provided with Appendix A on the reasoning for not changing the scores for other risks including, where relevant, the likely timescales for a change in score.
- 5.6 The Board are asked to review the Risk Register and in particular to consider whether any significant areas of risk are not captured.

6 **Implications**

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

Financial	None directly from this report but mitigation of individual risks will have implications.
Human Resources	None directly from this report but mitigation of individual risks will have implications.
ICT	None directly from this report but mitigation of individual risks will have implications.
Legal	None directly from this report but mitigation of individual risks will have implications.
Procurement	None directly from this report but mitigation of individual risks will have implications.

George Graham

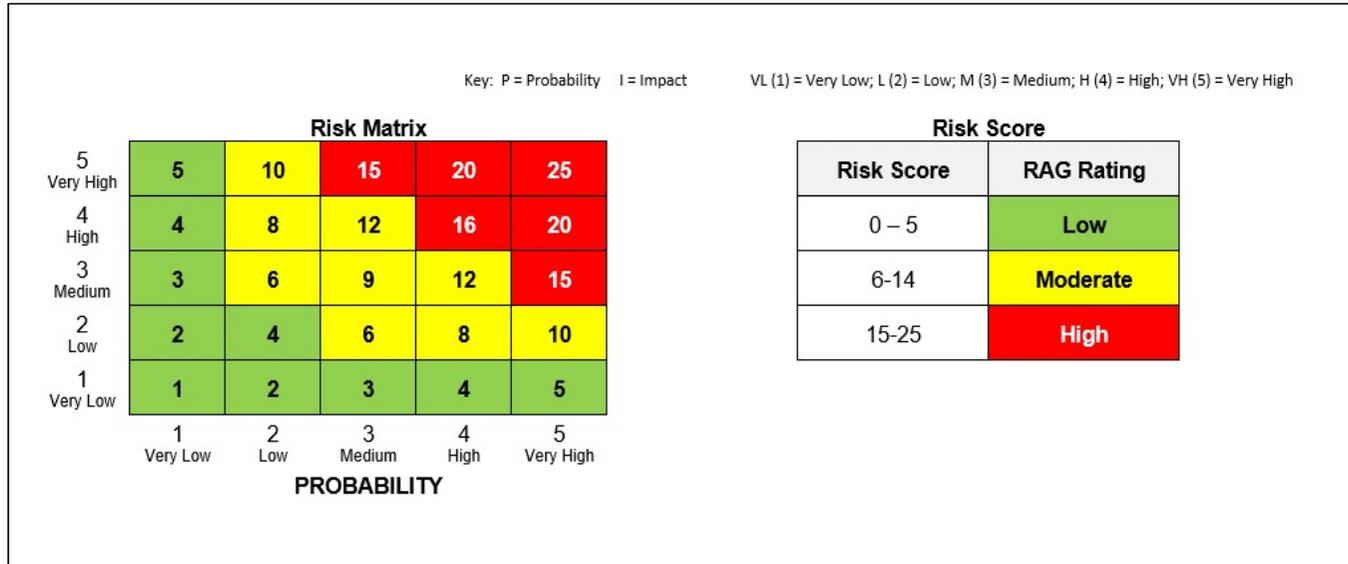
Director

Background Papers	
Document	Place of Inspection
None	N/A

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**South Yorkshire Pensions Authority Risk Register As At
20 May 2022**

Key:



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Risks currently under particular focus are:

Risk No	Risk Type	Risk Title	Current Score	Risk Change at Review
G2	Governance	Failure of members of the Local Pension Board to maintain adequate levels of knowledge and understanding	9	↓
I3	Investment and Funding	Failure to manage the key risks identified in the Border to Coast Strategic Plan	9	↓

SOUTH YORKSHIRE PENSIONS AUTHORITY RISK REGISTER AS AT 20/05/2022

Risk No	Risk Type	Risk Title	Risk Consequences	Risk Owner	Existing Control Measures	Current Score	Probability & Impact	Target Score	Probability & Impact	Risk Mitigation Action	Owner	Risk Change at Review	Last Review Date
G1	Governance	Failure of members of the Authority to maintain adequate levels of knowledge and understanding	Poor decision making not supported by appropriate advice. Regulatory criticism/action. Insufficient challenge being provided to officers	Corporate Manager - Governance	Member Learning and Development Strategy and associated mandatory requirements. Provision of on-line learning resources and knowledge assessment tools. Provision of internal seminars programme. Support for attendance at appropriate external events.	12	P=M I=H	6	P=L I=M	Additional support to complete knowledge assessments for all members. Examination of additional bite size learning options. Provide further internal seminars and examine options for more individualised "tuition". <i>Comment 17/05/2022 :</i> No change to risk score at this stage. This will be re-assessed in the light of finalised membership and comprehensive assessment of learning and development needs, to be completed during June 22.	Corporate Manager - Governance		17/05/2022
G2	Governance	Failure of members of the Local Pension Board to maintain adequate levels of knowledge and understanding	Poor decision making not supported by appropriate advice. Regulatory criticism/action. Insufficient challenge being provided to officers.	Corporate Manager - Governance	Member Learning and Development Strategy and associated mandatory requirements. Provision of on line learning resources and knowledge assessment tools. Provision of internal seminars programme. Support for attendance at appropriate external events. Additional support from the Board's Independent Adviser	9	P=M I=M	6	P=L I=M	Additional support to complete knowledge assessments for all members Examination of additional bite size learning options Provide further internal seminars and examine options for more individualised "tuition". <i>Comment 17/05/2022:</i> The Board has a stable membership and a sound level of knowledge and understanding based on the learning needs assessment that has been undertaken. In addition, it has been agreed to extend the contract of the current Independent Adviser which strengthens effectiveness of the Board, to the point where a further review may result in the target being reached. As a result the impact in relation to this risk has reduced from high to medium.	Corporate Manager - Governance		17/05/2022
G3	Governance	Breakdown of the control environment	Exposure to the risk of loss due to fraud or error. Critical external audit reports leading to regulatory action.	Senior Management Team	Documented internal controls. Senior Management review of controls to provide assurance as part of the process for developing the Annual Governance Statement. Effective Internal Audit service to provide assurance to management in relation to the control framework. Ongoing replacement of aging systems which require manual controls with more modern systems which allow controls to be automated	8	P=L I=H	4	P=L I=L	Completion of system replacement and upgrade programmes. Extension of management assurance process to Team Managers. Adoption of Governance Assurance Framework suggested by Internal Audit <i>Comment 17/05/2022:</i> The current status and experience over the last year warrants a change to the assessed probability of this risk from Medium to Low, resulting in a reduced current score.	Senior Management Team		17/05/2022

Risk No	Risk Type	Risk Title	Risk Consequences	Risk Owner	Existing Control Measures	Current Score	Probability & Impact	Target Score	Probability & Impact	Risk Mitigation Action	Owner	Risk Change at Review	Last Review Date
G4	Governance	Weak or ineffective project management arrangements	Failure to deliver key projects included within the Corporate Strategy	Director	Some project management training delivered for key staff. Limited project management support.	16	P=H I=H	6	P=L I=M	<p>Appoint to redefined role of Project / Programme Manager.</p> <p>Provide all managers responsible for leading and delivering projects with a standard toolkit to follow to ensure consistent planning and delivery. Institute a more formal and documented process of reporting on the progress of projects.</p> <p><i>Comment 17/05/2022:</i> At this stage no change to the current score is justified. The recruitment process is in hand and it is anticipated that an appointment will be made shortly.</p>	Director		17/05/2022
I1	Investment and Funding	Material changes to the value of investment assets and/or liabilities due to major market movements	Sharp and sudden movements in the overall funding level	Head of Investment Strategy	Investment Strategy focussed on relatively lower risk and less volatile investments. Element of inflation protection built into the asset allocation both through specific assets (such as index linked gilts) and proxies such as property and infrastructure.	15	P=M I=VH	9	P=M I=M	<p>Ability to implement protection strategies if market circumstances indicate they are appropriate.</p> <p><i>Comment 17/05/2022:</i> Given the current uncertainty in the market there is no justification for reducing the score.</p>	Head of Investment Strategy		17/05/2022
I2	Investment and Funding	Failure to mitigate the impact of climate change on the value of the Fund's investment assets and liabilities	Significant deterioration in the funding level	Director	Climate Change Policies and Net Zero Goals adopted by both the Authority and Border to Coast. Asset allocation tilted to favour more climate positive investments. Reporting in line with the requirements of TCFD and regular monitoring of the level of emissions from portfolios, with outline targets for reductions. Work commenced to provide more comprehensive data on private market investments.	20	P=H I=VH	12	P=H I=M	<p>Review of Investment Strategy following the 2022 Valuation to integrate the achievement of Net Zero within the Strategic Asset Allocation.</p> <p>Clear targets for emission reduction to be set for all portfolios.</p> <p>Additional engagement with Border to Coast to identify potentially climate positive investments.</p> <p><i>Comment 17/05/2022:</i> At this stage there is no evidence to support a change in the score for this risk. However work on the review of the investment strategy will actively consider the delivery of our net zero goal as part of its work over the coming year. Work is also in hand to analyse end of year climate data to gain a more detailed understanding of the current emissions trajectory.</p>	Director		17/05/2022
I3	Investment and Funding	Failure to manage the key risks identified in the Border to Coast Strategic Plan	Decline in investment performance. Increased costs as a result of the need to move to more expensive products. Potential changes in the risk and volatility levels within the portfolio	Director	Process of engagement between the Company and stakeholders to agree the Company's Strategic Plan and Budget containing appropriate mitigations. Succession and contingency planning arrangements in place within the Company	9	P=M I=M	6	P=L I=M	<p>Agreement of a programme of specific risk mitigations as part of the 2022 - 2025 Strategic Plan and Budget</p> <p><i>Comment 17/05/2022:</i> The Company's Strategic Plan, including spend to address key risks, was agreed in March and the new plan focuses in part on people risks and succession planning. Recent recruitment indicates some success in mitigating this risk, and in view of this the impact score has been reduced to medium.</p>	Director		17/05/2022

Risk No	Risk Type	Risk Title	Risk Consequences	Risk Owner	Existing Control Measures	Current Score	Probability & Impact	Target Score	Probability & Impact	Risk Mitigation Action	Owner	Risk Change at Review	Last Review Date
I4	Investment and Funding	Imbalance in cashflows	Inability to pay pensions without resorting to borrowing or "fire sale" liquidation of investments. Potential negative impacts on individual pensioners.	Head of Investment Strategy	Maintenance of "cash buffer" of liquidity sufficient to cover more than one monthly payroll. Process for monitoring and forecasting cashflows	10	P=L I=VH	5	P=VL I=VH	Further improvements in cashflow forecasting., Implementation of strategies to more regularly harvest income from investments. <i>Comment 17/05/2022:</i> At this stage there is no justification to reduce the score.	Head of Investment Strategy		17/05/2022
I5	Investment and Funding	Affordability of contributions	Negative impact on employer financial viability. Default on the making of contributions by employers.	Director	Investment strategy focussed on less volatile investments. Focus in the valuation process on delivering longer term stability in contribution rates. Retention of elements of any surplus to manage the risks to contribution stability.	9	P=M I=M	6	P=M I=L	Adjustments to balance of the investment strategy between growth and protection according to market circumstances <i>Comment 17/05/2022:</i> The valuation process is likely to produce broadly the same outcome with overall affordability remain the same. At this stage there is no justification to reduce the score.	Director		17/05/2022
O1	Operational	Failure to maintain effective cyber defences	Significant disruption to the provision of services. Loss / unauthorised release of key data.	Corporate Manager - ICT & Digital	Regularly updated firewalls and other protections. Regular refresher training on cyber security for all staff with a requirement to achieve a minimum level of pass. Regular penetration testing.	16	P=H I=H	12	P=M I=H	Additional testing of disaster recovery arrangements <i>Comment 17/05/2022:</i> Working towards annual recertification of Cyber Security Essentials Plus accreditation, this will maintain the current accreditation rather than add to our current mitigations. In view of this there is no justification to reduce the score of this risk.	Corporate Manager - ICT & Digital		17/05/2022
O2	Operational	Impact of poor data quality on operational project delivery	Failure to deliver key projects such as McCloud rectification on time. Provision of inaccurate information to members such as Annual Benefit Statements. Inaccurate data impacting the valuation of liabilities during the triennial valuation.	Head of Pensions Administration	Ongoing data improvement plan. Projects Team put in place to resource specific exercises to address data improvement. Implementation of front end validation of employer data submissions.	12	P=M I=H	6	P=M I=L	Additional actuarial validation checks undertaken on an ongoing basis <i>Comment 17/05/2022:</i> The new projects team s in it's early days, initial indications are that it is having a positive effect but it is too early to measure this meaningfully. At this stage there is no justification for a reduction in the score.	Head of Pensions Administration		17/05/2022
O3	Operational	Data Protection and GDPR	Unauthorised release of personal data. Action by the Information Commissioner.	Head of Pensions Administration	Review process built into processes involving the release of information. Secure e-mail facility used where personal information involved. Mandatory staff training in relation to data protection issues repeated on a regular basis. Regular internal audit work to review and test controls.	12	P=M I=H	6	P=M I=L	Increase in the volume of member correspondence managed through the member portal <i>Comment 17/05/2022:</i> Following a recent Advisory audit, work is ongoing with Internal Audit and BMBC to review and develop further our suite of policies and procedures. In particular focusing on Information Sharing Agreements and Document Retention. A Gateway approval document has been drafted, which captures the need for Data Impact Assessments etc. as part of the procurement process. At this stage the is no justification for a reduction in the score, however a further review will take place when the above has been progressed.	Head of Pensions Administration		17/05/2022

Risk No	Risk Type	Risk Title	Risk Consequences	Risk Owner	Existing Control Measures	Current Score	Probability & Impact	Target Score	Probability & Impact	Risk Mitigation Action	Owner	Risk Change at Review	Last Review Date
O4	Operational	Regulatory Compliance	Enforcement action by relevant regulatory authorities	Senior Management Team	Reporting of compliance with relevant standards. Ongoing process of awareness raising and training for staff in relation to operational matters such as TPR Scams requirements. Basic assessment of compliance with TPR CoP 14 in place.	12	P=M I=H	8	P=L I=H	More detailed assessment of compliance with emerging TPR Single Code and other regulatory requirements with associated action plan and enhanced regular reporting. Additional training for Authority and Pension Board Members to enable improved oversight. <i>Comment 17/05/2022:</i> There is no justification at this stage to reduce the score. However the potential of implementing an enhanced management system will be reviewed, further supporting the internal management reporting and early risk identification.	Corporate Manager - Governance		17/05/2022
P1	People	Ability to recruit and retain an appropriately skilled and qualified workforce	High level of vacancies	Director	Pay and benefits package with emphasis on employee wellbeing. Career grade scheme in place for Pensions Officers.	12	P=H I=M	6	P=M I=L	Review of pay and benefits package. Introduction of additional personal development opportunities. Introduction of a structured approach to succession planning. <i>Comment 17/05/2022:</i> It is intended to report the pay and benefit review to members in the Autumn. Steps have been taken to utilise different routes to recruit with some initial success in terms of widening the application pool. This pilot will reviewed later in the year to consider if it will be continued. At this stage there is no justification to reduce the score.	Director		17/05/2022

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