

Ref	Legal requirement	TPR's guidance	How Surrey Pension Fund complies with TPR guidance	Compliant	Update
<p>Governing the scheme</p> <p>Knowledge and understanding required by Pension board members</p> <p>[34 – 60]</p>	<p>A member of the pension board of a public service pension scheme must be conversant with:</p> <ul style="list-style-type: none"> • the rules of the scheme and • any document recording policy about the administration of the scheme which is for the time being adopted in relation to the scheme. <p>A member of a pension board must have knowledge and understanding of:</p> <ul style="list-style-type: none"> • the law relating to pensions, and • any other matters which are prescribed in regulations. <p>The degree of knowledge and understanding required is that appropriate for the purposes of enabling the individual to properly exercise the functions of a member of the pension board.</p>	<p>1. Schemes should assist pension board members to determine the degree of knowledge and understanding needed. [48].</p>	<p>Pension fund committee and Local Pensions Board members will be required to carry out Self-Assessment Questionnaire on an annual basis to assess their overall level of 'Knowledge and Understanding'.</p> <p>Training on the identified areas will be provided as necessary, including induction and on an ongoing refresher basis.</p> <p>Also all new members are provided with key documents as per Training Policy.</p> <p>Ongoing Board members will be required to attend further training with Pensions Committee in addition to carrying out additional ad - hoc training as other needs arise.</p>	<p>Partially</p>	<p>The Self-Assessment Questionnaire will be provided in December to the Pension Fund Committee and Local Pension Board members to complete, which will form part of 2020 training plan based on the specific needs of the members.</p>

		2. Pension board members completed the Pensions Regulator toolkit.	Local Pension Board members must complete induction training within the first three months of their appointment.	Partially	Encourage members to complete Pensions Regulator toolkit.
Conflicts of interest and representation [61 – 91]	<p>In relation to the pension board, scheme regulations must include provision requiring the scheme manager to be satisfied:</p> <ul style="list-style-type: none"> • that a person to be appointed as a member of the pension board does not have a conflict of interest: and • from time to time, that none of the members of the pension board has a conflict of interest. <p>Scheme regulations must require each member or proposed member of a pension board to provide the scheme manager with such information as the scheme manager reasonably requires for the purposes of meeting the requirements referred to above.</p> <p>Scheme regulations must include provision requiring the pension board to include employer representatives and member representatives in equal numbers.</p>	3. Membership of boards should be designed with regard to proportionality, fairness and transparency and with the aim of ensuring that the board has the right balance of skills, experience and representation [91].	The board membership includes suitable representation on from employers and scheme members and includes an elected councillor to provide for fairness and proportionality.	Yes	

<p>Publishing information about schemes</p> <p>[92 – 99]</p>	<p>The scheme manager for a public service scheme must publish information about the pension board for the scheme(s) and keep that information up to-date.</p> <p>The information must include:</p> <ul style="list-style-type: none"> • who the members of the pension board are • representation on the board of members of the scheme(s), and • the matters falling within the pension board’s responsibility. 	<p>4. Have policies and processes to monitor all published data on an ongoing basis to ensure it is accurate and complete [98].</p>	<p>Changes to the membership are reflected on the fund website.</p> <p>Information relating to the Pension fund committee and Local Pension Board is published on the council’s website.</p>	<p>Yes</p>	<p>The Pension Fund website is updated on monthly basis.</p>
<p>Managing Risks</p> <p>Internal Controls</p> <p>[101 – 120]</p>	<p>The scheme manager of a public service pension scheme must establish and operate internal controls. These must be adequate for the purpose of securing that the scheme is administered and managed in accordance with the scheme rules and in accordance with the requirements of the law.</p>	<p>5. Schemes should periodically review the adequacy of internal controls [115].</p>	<p>The risk register is presented to the Local Pension Board on quarterly basis and a report is presented to the Pension Fund Committee to approve changes or additions in the risk register.</p>	<p>Yes</p>	<p>The internal audit carried out their review and the report was presented to Board on 18 July 2019. Recommendations are agreed and are in process of being implemented.</p>
<p>Suggested internal controls</p>		<p>6. Internal controls that ensure that new employers understand what member data is required and how it should be supplied.</p> <p>Internal controls that</p>	<p>Internal controls are subject to regular to internal and external audit.</p> <p>New employers are provided with an admission agreement which sets out their obligation to the scheme.</p>	<p>Partially</p>	<p>The fund is currently in process of reviewing the strength of employer's covenant.</p>

		<p>require internal or external auditors to audit any automated systems.</p> <p>Internal controls to ensure that systems support the maintenance and retention of good member records.</p> <p>Internal controls that ensure that data are complete (e.g. undertake a data-cleansing or member tracing exercise and review this on a regular basis (at least annually or at regular intervals that they consider appropriate).</p> <p>Ensure that all staff completes information management training before they are given access to sensitive data.</p> <p>Ensure that member communications are reviewed Regularly.</p> <p>Schemes should put in place systems and processes for making an</p>	<p>Information is shared with employers through secure network.</p>		
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		objective assessment of the strength of an employer's covenant [112].			
Administration Scheme recordkeeping [122 – 146]	<p>Scheme managers must keep records of information relating to:</p> <ul style="list-style-type: none"> • member information • transactions, and; • pension board meetings and decisions <p>Legal requirements for this are set out in the Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014.</p> <p>Schemes must ensure that processes that are created to manage scheme member data meet the requirements of the Data Protection Act 1998 and the data protection principles.</p>	7. Schemes should be able to demonstrate to the regulator, where required, that they keep accurate, up-to-date and enduring records [124].	Officers are currently working on the Administration strategy and communication plan to ensure data is accurate and up-to-date.	Yes	The Administration strategy and the Communication to be presented to the Local Pension Board in October and Pension Fund Committee in December for approval.
		8. Schemes should require employers to provide them with timely and accurate data and ensure that appropriate procedures and timescales are in place to do this. [128 and 130].	The fund is currently working on Administration Strategy & Communications Policy outlines the procedure and deadlines for employers' submission of data to the fund.	Yes	Officers liaise with employers on regular basis for outstanding data.

		<p>9. Schemes should seek to ensure that employers understand the main events which require information to be passed to the scheme [129].</p>	<p>At the beginning of the financial year all employers are provided with an updated contribution form, providing guidance and required timescales. The form allows employers to validate if they are paying the right contributions.</p>		
		<p>10. Records should be retained for as long as they are needed [135].</p>	<p>Most records are stored electronically. The fund is currently in process of scanning paper copies onto an electronic system.</p>	Yes	<p>The fund officers upload scan paper copies onto the system.</p>
		<p>11. Schemes should monitor data (based on a proportionate and risk based approach) on an ongoing basis to ensure it is accurate and complete [136,137].</p> <p>12. Schemes should carry out a data review exercise at least annually. Schemes should continually review their data [138].</p>	<p>Pension fund is working with the Admin team to enhance the quality of data to ensure it is accurate and complete. However, checks are carried out to validate the data which include:</p> <ul style="list-style-type: none"> • Triennial valuation exercise • Records amended on 3 yearly basis if any issues are identified by actuaries doing their data cleaning. 	Yes	<p>The Pension Administration Team routinely check the integrity of member records as part of BAU processing and raise queries for any potential errors.</p> <p>Annually the PAT load, validate and resolve queries relating to completeness and accuracy as part of</p>

					<p>Employer year end returns.</p> <p>Significant data cleanse work was carried out as part of the 31st March 2019 Valuation.</p> <p>tPR Common and Scheme Specific data quality reports are produced annually to monitor data quality and inform priority areas for improvement.</p> <p>October 2019 sees the start of an address tracing exercise for deferred members who have "gone away".</p>
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		13. Schemes should put in place a data improvement plan where poor quality or missing data is identified [141].	Pension service is currently in process of arranging a meeting with members to discuss improvement plan.	Yes	Pension service Improvement meetings have been held with the chairman and vice chairman of the Local Board.
		14. Schemes should reconcile member records with information held by the employer [142].	End of year return forms are sent to employers to complete to reconcile records.	Yes	Significant effort is put into employer engagement and follow up in order to receive end of year information in a timely and accurate way. It is the employer responsibility for prompt notification of membership changes to the Fund.
Maintaining contributions [147 – 186]	Employer contributions must be paid to the scheme in accordance with any requirements in the scheme regulations. Where employer contributions are not paid on or before the date they are due under the scheme and the scheme manager has reasonable cause to believe that the failure is	15. Such procedures are likely to involve: a) Developing a record to monitor the payment of contributions. b) Monitoring the payment of contributions. c) Managing overdue contributions.	The contribution spreadsheet automatically flags if employer paying the right contribution.	Partially	The fund officers carry out reconciliation on quarterly basis, with the aim of monthly reconciliation.

	<p>likely to be of material significance to the regulator in the exercise of any of its functions, the scheme manager must give a written report of the matter to the regulator as soon as reasonably practicable.</p> <p>Where employee contributions are not paid within the prescribed period, if the scheme manager has reasonable cause to believe that the failure is likely to be of material significance to the regulator in the exercise of any of its functions, they must give notice of the failure to the regulator and the member within a reasonable period after the end of the prescribed period. Where there is a failure to pay employee contributions on an earlier date in accordance with scheme regulations, schemes should also consider their statutory duty under section 70 of the Pensions Act 2004 to assess and if necessary report breaches of the law.</p>	d) Reporting payment failures which are likely to be of material significance to the regulator [152].			
<p>Administration</p> <p>Providing information to members</p>	<p>The law requires schemes to disclose information about benefits and scheme administration to scheme members and others. The Code summarises the legal requirements</p>	16. Managers of a scheme must ensure that scheme managers and others are given information in accordance with the Disclosure Regulations	The Fund aims to provide an annual benefit statement to active and deferred members by 31 August each year.	Yes	<p>Ensure all Annual Benefit Statements are provided on time.</p> <p>ABS to active and</p>

<p>[187 – 211]</p>	<p>around:</p> <p>(1) Benefit statements, provided annually for active members [188 – 195] (2) Other information about scheme administration [196 – 197]. (3) Who is entitled to information [198 – 199] (4) When basic scheme information must be provided [200 – 201] (5) What information must be disclosed on request [202] (6) How benefit statements and other information must be provided [203 – 206]</p> <p>Scheme should also comply as appropriate with other legal disclosure requirements [211].</p>	<p>2013, unless they are an ‘excluded person’. [198]</p>			<p>deferred members generated and distributed on the basis agreed with Fund Officers.</p>
		<p>17. Schemes should attempt to make contact with their scheme members and, where contact is not possible, schemes should carry out a tracing exercise to locate the member and ensure that their member data are up-to-date [208].</p>	<p>The Fund is scheduled to commission its next tracing exercise to locate missing deferred scheme members.</p>	<p>Partially</p>	<p>Pension Service to commission tracing agency.</p> <p>Tracing agency ITM appointed to perform an initial system search of addresses for deferred members who have “gone</p>

					away". Ongoing, it is standard practice to perform tracing on deferred members with out of date addresses who are approaching retirement age.
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