

PENSION BOARD			
REPORT TITLE	Compliance Review Action Plans		
KEY DECISION	No	Item No:	
WARD	N/A		
CONTRIBUTORS	Acting Chief Finance Officer		
CLASS	Part 1	Date:	October 2019

1. PURPOSE

- 1.1. The purpose of this report is to present draft action plans to the Board for addressing areas of partial and non-compliance to the Pension Regulator's Code of Practice and Scheme Advisory Board (SAB) guidance.

2. RECOMMENDATIONS

- 2.1. Members are recommended to note the action plans as presented, specifically to:
- 2.1.1. Agree with the plan set out for the Pension Board; and
- 2.1.2. Comment and feedback on the plan set out for the Administering Authority.

3. BACKGROUND

- 3.1. At the meeting of the Board held in May 2019, officers presented Board members with the results of the compliance review undertaken by Aon. The report identified areas of partial and non-compliance to the Pension Regulator's Code of Practice, as well as the Scheme Advisory Board's Guidance on the Creation and Operation of Local Pension Boards in England and Wales.
- 3.2. In order to address those areas of non-compliance, the Board requested that two action plans be drawn up detailing the steps to be taken to achieve compliance with the regulations, and a suggested timeframe for completing them.

4. ACTION PLANS

- 4.1. The action plan for the Administering Authority is attached at Appendix 1, and is mostly concerned with meeting the requirements of the Pension Regulator's Code of Practice. The plan for the Pension Board is attached at Appendix 2, and comprises actions in response to the recommendations of the SAB Guidance.
- 4.2. Each plan outlines the requirements of the relevant regulation and the recommendations put forward by Aon to address non-compliance. Actions are mostly in direct response to those recommendations, with suggested due-by dates in line with likely quarterly Board meetings, to be completed by Q2 2020, or April-June 2020, being a year after the initial compliance review was undertaken.

4.3. At the next Board meeting further information will be provided by officers on the options for additional support with the compliance model provided by Aon, with a view to undertaking an updated review following the implementation of the action plans.

5. FINANCIAL IMPLICATIONS

5.1. There are no financial implications arising directly from this report.

6. LEGAL IMPLICATIONS

6.1. Section 5 of the Public Service Pensions Act 2013 and Regulation 106 of the Local Government Pension Scheme Regulations 2013 (as amended) makes provision for the establishment of a Pension Board, with responsibility for assisting the scheme manager in relation to:

- Securing compliance with the scheme regulations and other legislation relating to the governance and administration of the scheme and any statutory pension scheme that is connected with it;
- Securing compliance with requirements imposed in relation to the scheme and any connected scheme by the Pensions Regulator; and
- Such other matters as the scheme regulations may specify.

7. CRIME AND DISORDER IMPLICATIONS

7.1. There are no crime and disorder implications directly arising from this report.

8. EQUALITIES IMPLICATIONS

8.1. There are no equalities implications directly arising from this report.

9. ENVIRONMENTAL IMPLICATIONS

9.1. There are no environmental implications directly arising from this report.

APPENDICES

Appendix 1 – Administering Authority Action Plan (October 2019)

Appendix 2 – Local Pension Board Action Plan (October 2019)

FURTHER INFORMATION

If there are any queries on this report or you require further information, please contact:

David Austin, Acting Chief Finance Officer on 020 8314 9114 or at david.austin@lewisham.gov.uk

Robert Browning, Principal Accountant – Treasury & Pensions on 020 8314 6274 or at robert.browning@lewisham.gov.uk