

# **CAMBRIDGESHIRE PENSION FUND BOARD**

Date: Friday, 23 February 2018

Democratic and Members' Services Quentin Baker LGSS Director: Lawand Governance Shire Hall Castle Hill Cambridge CB3 0AP

# <u>10:00hr</u>

# Shire Hall, Castle Hill, Cambridge, CB3 0AP

# AGENDA

# Open to Public and Press

1	Apologies for absence and declarations of interest	
	Guidance on declaring interests is available at <a href="http://tinyurl.com/ccc-conduct-code">http://tinyurl.com/ccc-conduct-code</a>	
2	Minutes and Action Log – 19 October 2017	5 - 16
3	LGSS Pensions Service Administration Performance Report	17 - 34
	Note:	
	The Administration Performance Report contains a confidential appendix. If Board Members wish to discuss the appendix the press and public will need to be excluded from the meeting using the exclusion at agenda item 8.	

4 Governance and Legislation Report

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Statutory and non-statutory policies and strategies relating to the	43 - 50
operation, management and governance of the Cambridgeshire	
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	operation, management and governance of the Cambridgeshire Pension Fund

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#### 7 Forward Agenda Plan

#### 8 Exclusion of Press and Public

To resolve that the press and public be excluded from the meeting on the grounds that the agenda contains exempt information under Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972, as amended, and that it would not be in the public interest for this information to be disclosed (information relating to the financial or business affairs of any particular person (including the authority holding that information)).

#### 9 Overseas Pensioners Proof of Existence Exercise

 Information relating to the financial or business affairs of any particular person (including the authority holding that information);

# 10 Procurement of Actuarial, Benefits and Governance Consultancy Services

 Information relating to the financial or business affairs of any particular person (including the authority holding that information);

#### 11 Asset Pooling Update

 Information relating to the financial or business affairs of any particular person (including the authority holding that information);

The Cambridgeshire Pension Fund Board comprises the following members:

Councillor Simon King (Chairman) Mr David Brooks (Vice-Chairman)

Mr Barry O'Sullivan Mr Denis Payne and Mr John Stokes and Councillor Ian Manning

For more information about this meeting, including access arrangements and facilities for people with disabilities, please contact

Clerk Name: Ruth Yule

Clerk Telephone: 01223 699184

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Public speaking on the agenda items above is encouraged. Speakers must register their intention to speak by contacting the Democratic Services Officer no later than 12.00 noon three working days before the meeting. Full details of arrangements for public speaking are set out in Part 4, Part 4.4 of the Council's Constitution https://tinyurl.com/CCCprocedure.

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# LOCAL PENSION BOARD

# MINUTES OF THE CAMBRIDGESHIRE PENSION FUND BOARD

# Agenda Item No: 2

# Friday 27th October 2017

Members of the Board in attendance: Employer Representatives – Councillor S King; D Payne Scheme Member Representatives - B O'Sullivan, D Brooks, and J Stokes

Officers in attendance: M Oakensen – Governance Officer M Rowe – Democratic Services Manger J Walton – Governance and Regulations Manager M Whitby – Head of Pensions R Yule – Democratic Services Officer

*Time: 10.00am to 12.10pm Place: Shire Hall, Cambridge* 

## 1. ELECTION OF CHAIRMAN

It was resolved unanimously to elect Councillor Simon King as Chairman of the Board for the municipal year 2017-18.

# 2. ELECTION OF VICE-CHAIRMAN

It was resolved unanimously to elect David Brooks as Vice-Chairman of the Board for the municipal year 2017-18.

# 3. APOLOGIES FOR ABSENCE AND DECLARATIONS OF INTEREST

Councillor King declared a Disclosable Pecuniary Interest under the Code of Conduct as a deferred member of the Local Government Pension Scheme.

#### 4. MINUTES – 12th APRIL 2017

The minutes of the meeting of 12th April 2017 were approved as a correct record and signed by the Chairman.

It was noted that the Pension Fund Board (PFB) Annual Report for 2016-17, circulated to Board members by email in July following the cancellation of the Board's July meeting, had now been published on the Pension Fund website.



Members requested that the draft Pensioner Matters newsletter be on the agenda for its next meeting, to give members the opportunity to suggest changes before it was sent to pensioners, but on learning that the meeting dates did not fit with the production schedule for the newsletter, agreed to receive and comment on the draft by email. They also asked that the contact telephone number on the pension pay slip be checked for accuracy.

The Board agreed that the forward agenda plan should in future be a standing item on its agenda. Action required

### 5. REVIEW OF TERMS OF REFERENCE AND STANDING ORDERS

The Board received a report inviting it to consider its Terms of Reference and Standing Orders as requested at the Board's meeting in April 2017. Members noted that, while any recommendation for substantial constitutional change needed to be addressed to the Constitution and Ethics Committee in the first instance and then approved by Full Council, the Monitoring Officer had delegated authority to make minor changes to the Constitution.

In discussion, Board members

 queried the rationale for a four-year term of appointment for PFB members, given the length of time required for a member to become fully conversant with the range of knowledge and understanding required, and pointed out that the terms of reference were silent on the question of whether a member could serve for more than one term.

Officers advised that there was nothing to prevent a Board member from standing again when their term of office expired, and expressed gratitude to any members willing to do so. It was noted that members of the Board were free to stand for an additional term of office

- asked that the Chairman and Vice-Chairman continue to be involved in the recruitment process for Board members. The Democratic Services Manager said that the Monitoring Officer had already agreed to their presence at recruitment interviews, and could be asked to make the necessary adjustment to Standing Orders
- drew attention to the provision in Standing Orders that the Chairman/woman would agree the agenda for each meeting, commenting that some PFBs did this through an agenda planning meeting with chair, vice-chair and officers. The Chairman asked that the draft agenda be emailed to him for agreement ahead of each meeting
- in relation to Standing Order 11 on expenses, requested the removal of the current requirement that an allowance for carrying a passenger could only be paid where the passenger was 'another councillor.'

It was resolved unanimously to request the Monitoring Officer to exercise his delegated powers to make the following changes to the Pension Fund Board's standing orders, as set out in the Council's Constitution and in Appendix B of the report before the Board:

- a) in section 2, Chairmanship, to add that either or both the Chairman/woman and Vice-Chairman/woman, or a substitute Board member from the same side (i.e. employer or scheme member representative), would be present at interviews to recruit members of the Board
- b) in section 11, Expenses, to delete the bracket and words '(another councillor)'.

### 6. GOVERNANCE & LEGISLATION REPORT

The Board received a report providing information on changes in legislation affecting the Local Government Pension Scheme (LGPS), other pensions legislation, activities of the LGPS Advisory Board and Pensions Regulator, national and local issues concerning the governance of the LGPS, and skills and knowledge opportunities.

Commenting on the report, points raised and noted by members included

• Cohabiting partner's pensions – when payment of partner benefits for cohabiting partners had been introduced in 2008, there was a requirement for a nomination form to be completed by the scheme member. This requirement had been removed in 2014, leaving a question mark over the rights of a cohabitee whose partner died between 2008 and 2014 without having completed the nomination form. Following a successful appeal in the Northern Ireland LGPS, anybody who thought they were in this position was free to approach the Fund; they would be required to meet various criteria to demonstrate their status, but current advice was that it was not possible to do anything to pay partner benefits to them under present legislation. In theory it was open to the partner to appeal through the dispute resolution process, the Pensions Ombudsman, or judicial review.

Officers had obtained Counsel's opinion on the matter, and that opinion was that it was not possible to go against legislation that was still clearly in place; this situation would not change until statutory guidance was issued by the Department of Communities and Local Government (DCLG) or the law was altered.

The Chairman expressed the Board's disquiet at the unsatisfactory nature of this situation for both pension funds and their members. The Board agreed that it would be appropriate to write to the Government about this. The Head of Pensions undertook to draft a letter for the Chairman to approve and sign; the Chairman agreed and asked that the draft be emailed to all Board members. **Action required** 

• Exit payment reform – the purpose of recovering exit payments when a retired employee was re-employed in public service was to stop individuals receiving a large sum and coming back to benefit again. Legislation was not yet in place, and it was not yet clear how the original employing authority would receive its money back.

Members expressed concern that the exit cap would affect a large number of employees and could prevent them from receiving their full entitlement. Officers said that the consultation on how the cap would work in practice was expected to start soon, and they undertook to report these concerns as part of the consultation response. Action required

- LGPS Scheme Advisory Board England and Wales (SABEW) Activities funds in the ACCESS pool would be expected to sign up to the Investment Transparency Code, and if possible, the smaller funds retained locally would also be covered by the Code. A member asked that the Board be kept informed on who had and who had not signed up to the Transparency Code.
- Local Pension Board Liability Insurance members of the Board, including the County Councillors, were not covered by the County Council's insurance when acting as members of the PFB, a topic which had been recently discussed by the Pensions Committee. Officers considered this lack of insurance to be unsatisfactory, because there could be a liability on Board members if they were to breach the law in their PFB role, and were pursuing the matter with the Council's insurance department.

The Chairman said that all PFB members wanted to have some insurance in place, and asked how this could be progressed. Officers undertook to obtain three quotations and seek the approval of the Section 151 Officer for the expenditure, noting that members wished to have the process completed before the next meeting of the Board. Action required

Training Events – it could be difficult for recently-appointed Board members to judge which training events they could most usefully, and cost-effectively, attend. Attention was drawn to the four in-house information days, which concentrated on investments and investment governance, and to the training needs analysis already completed by some members. The responses to this analysis then formed the basis of recommendations to members on what events they should attend. The Governance and Regulations Manager undertook to re-circulate the training needs analysis, which would be available online shortly.

It was resolved to note the contents of the report.

# 7. LGSS PENSIONS SERVICE ADMINISTRATION PERFORMANCE REPORT

The Board received the administration service report for consideration. Members noted that the Key Performance Indicators (KPIs) were in general good, though it was proving difficult to secure timely payments from several academies in one multi-academy trust. The matter had been considered by the Pensions Committee, and had been reported to the Pensions Regulator.

Discussing the problem of securing payment from academies, members noted that it was not possible to expel them from the scheme, and that the contact at the trust was the Chief Operating Officer. The trust's employees were still covered under the scheme, but there was some risk to employees if Additional Voluntary Contribution (AVC) payments were not being made.

The Board expressed unanimous support for imposing a higher contribution rate on the trust because of the level of risk involved in their membership of the scheme, should other attempts to secure payment fail. Members suggested that the Scheme Advisory Board be asked what actions were available to pension funds when dealing with late-paying employers who could not be ejected from the scheme because of their status.

In the course of discussing further aspects of the administration performance report, members pointed out that an employee who was intending to retire beyond the scheme pension age was unable to receive an estimate of benefits from the online system, and asked whether enabling this feature would help improve performance on the KPI of providing a maximum of one estimate of benefits to employees per year on request. Officers advised that a new, improved online system was due to be in place in January 2018. This system was used by most local government pension administrators, and if a facility to provide an automated forecast of post-retirement age benefits was thought by that community to be beneficial, it would be put forward to the software providers as an item for development.

It was resolved to note the Administration Performance Report.

# 8. DATA QUALITY

The Board received a report setting out information on how data quality would be assessed and rectified, and on the progress of data improvement projects already underway.

Discussing the report, Board members

• asked whether scheme members saw the information held on them, and pointed out that the introduction of General Data Protection Regulation (GDPR) would confer greater rights on people to check the data held on them.

Officers advised that active scheme members, whose data tended to change more than that of other members, were encouraged to use member self-service to view their annual statements online and to check the details. It was planned to introduce this facility for pensioner members once online payslips had been introduced; members urged that ways be investigated of drawing members' attention to the option for self-service

- expressed surprise that 'risks associated with ensuring that records held on members are accurate' had a residual risk rating of green; officers advised that this was a work in progress
- noted that the policy on overpayments of pension was to seek to recover, but officers were sensitive to individual circumstances, and did not apply a rigidly uniform approach.

It was resolved to note the content of the report.

# 9. GOVERNANCE POLICY & GOVERNANCE COMPLIANCE STATEMENT

The Board received a report presenting the revised Governance Policy and Governance Compliance Statement, which had been revised to reflect the establishment of the Joint Committee for the ACCESS pool. Members noted that there was a requirement to update the Compliance Statement every time a change was made to the constitution of the Pension Fund, and to send a copy of the statement to DCLG to demonstrate that this had been done.

It was resolved to note the Governance Policy and Governance Compliance Statement provided in the appendix of the report before the Board.

## 10. CAMBRIDGESHIRE PENSION FUND ANTI-FRAUD AND CORRUPTION POLICY

The Board received a report presenting the Anti-Fraud and Corruption Policy, noting that the earlier comments of both the Cambridgeshire and Northamptonshire PFBs and Internal Audit had been incorporated into the final version of the Policy.

It was resolved to note the contents of the report.

#### 11. PROCUREMENT OF ACTUARIAL, BENEFITS AND GOVERNANCE CONSULTANCY SERVICES

The Board received a report updating it on the procurement of Actuarial, Benefits and Governance Consultancy Services. Members noted that Actuarial Service, Benefits Consultancy and Governance Consultancy were being re-procured under three separate tenders, with the Cambridgeshire and Northamptonshire pension funds working together. Members of both authorities' pension committees were involved in evaluating the bids, and the contract was expected to be in place on 1 April 2018.

It was resolved to note the update for the procurement of Actuarial, Benefits and Governance Consultancy Services.

# 12. GENERAL DATA PROTECTION REGULATION

The Board received a report setting out an overview of the GDPR and a plan of action to ensure compliance with the regulation. Members noted that

- the data controller was the Local Authority, as the administering authority
- LGSS Pensions officers were awaiting guidance from the administering authority on what needed to be done to comply with the regulation
- the Board report set out the current position based on officers' research and training events attended to date
- data should not be held when it was no longer required, but pension funds often had to deal with queries about for example employment several decades ago, which made it difficult to know when particular data would no longer be required
- together with officers from other funds, LGSS Pensions officers had drafted a privacy statement; the privacy statement had been sent to the Local Government Association (LGA) for review, to ensure it was compliant
- once the LGA review was complete, the privacy statement would be personalised for the Cambridgeshire fund and publicised on the website, and suppliers' contracts would be reviewed
- the deadline for full compliance was 25 May 2018.

Discussing the report, Board members

- noted that reassurance was being sought from the administering authority that the level of detail in the information asset register would be compliant with the GDPR; the question had been raised recently at the LGSS Management Board
- encouraged officers in their efforts to seek guidance from the administering authority; the Chairman offered his assistance as a member of the largest political group on the Council

- noted that much of the work already done by officers applied also to Northamptonshire, so their efforts would not be wasted
- commented that it would be best if the same protocols could apply to both the Northamptonshire and the Cambridgeshire pension funds; every effort should be made to adopt as simple an approach to the GDPR as possible, while ensuring that this was compliant with the legislation
- noted that the right to be informed was already included in the provisions of the Data Protection Act 1998 (DPA); what was unclear was the issue of consent for data to be processed
- suggested that it would be helpful for Board members to receive training on the GDPR in the longer term, once the outstanding questions had been resolved, to help them judge how the requirements were being implemented
- asked that the GDPR be a standing item on the Board's agenda. Action required

It was resolved to note the contents of the report.

### 13. EXCLUSION OF PRESS AND PUBLIC

It was resolved to:

Exclude the press and public from the meeting for the following item of business on the grounds that it contained exempt information under Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972, as amended, and that it would not be in the public interest for this information to be disclosed: information relating to the financial or business affairs of any particular person (including the authority holding that information).

#### 14. ASSET POOLING UPDATE

The Board received an oral update on progress with asset pooling arrangements from the Head of Pensions. He advised that the passive management contract had now been awarded, and that several expressions of interest in the remaining operator contract had been received and were being followed up.

The Head of Pensions undertook to provide a written update on asset pooling for future meetings of the Board.

It was resolved to note the oral update.

Chairman

# Agenda Item No: 2a



# Cambridgeshire Local Pension Board

# **Minutes - Action Log**

## Introduction:

This log captures the actions arising from the Cambridgeshire Local Pension Board and will form an outstanding action update from meetings of the Committee to update Members on the progress on compliance in delivering the necessary actions.

This is the updated action log as at 9<sup>th</sup> February 2018.

Minute No.	Report Title	Action to be taken by	Action	Comments	Status	Date for completion
			Minutes of 27 Octob	er 2017		
4.	Minutes	Joanne Walton	Circulate draft of next edition of 'Pensioner Matters' to Board members by email for comment. Check the accuracy of contact phone number on pension pay slip	The Employers Team have been made aware that the communication needs to be circulated to the Local Pension Board for review prior to being sent for publication.	In progress	Spring 2018
4.	Minutes	Joanne Walton	The forward agenda plan to be a standing item on each Board agenda	Included for February 2018 and will be on the agenda going forward	Completed	

Minute No.	Report Title	Action to be taken by	Action	Comments	Status	Date for completion
5.	Review of Terms of Reference and Standing Orders	Michelle Rowe/ Quentin Baker	Revise Standing Order 2 to require that either or both the Chairman/ woman and Vice-Chairman/woman, or a substitute Board member from the same side (i.e. employer or scheme member representative), would be present at interviews to recruit members of the Board	The revisions of Standing Orders 2 and 11 have been incorporated into the Constitution under the Monitoring Officer's delegated powers.	Completed	
5.	Review of Terms of Reference and Standing Orders	Michelle Rowe/ Quentin Baker	Revise Standing Order 11 to delete '(another councillor)'	See above	Completed	
5.	Review of Terms of Reference and Standing Orders	Michelle Oakensen	Email draft agenda to Chairman for agreement prior to each meeting	Agenda items sent to the Chairman of the Local Pension Board for February's meeting and will continue for future meetings	Completed	
6.	Governance and Legislation Report	Cllr King/ Mark Whitby	Send letter to DCLG expressing Board's disquiet at the lack of guidance on paying pensions to cohabiting partners where the pensioner died between 2008 and 2014 without having completed a nomination form naming the cohabiting partner	No longer required pending the outcome of the Elmes v Essex case. The case was heard on 18 January. The outcome is in the Governance and Legislation Report.	Not required	
6.	Governance and Legislation Report	Mark Whitby	Include PFB's concerns at effect of exit cap on employees in response to forthcoming consultation on the issue	Officers would respond to the consultation at the appropriate time.	In progress	Upon release of the consultation

Minute No.	Report Title	Action to be taken by	Action	Comments	Status	Date for completion
6.	Governance and Legislation Report	Mark Whitby	Arrange Local Pension Board Liability Insurance for Board members, to be in place by 16 February 2018	Agreed in principal, awaiting confirmation of the proportionate costs which are to be split between the County Council and the Pension Fund.	In progress	
6.	Governance and Legislation Report	Michelle Oakensen	Re-send link to training needs analysis to Board members and give guidance on which training events to attend	Training needs analysis link was sent to all members who hadn't already completed the exercise on 30 October 2017 with a deadline for completion of the 20 November 2017.	Completed	
12.	General Data Protection Regulations		The GDPR to be a standing item on the Board's agenda	All future meetings to have a GDPR item on the agenda until further notice.	Completed	

# CAMBRIDGESHIRE PENSION FUND



## **Pension Fund Board**

Date: 23 February 2018

#### Report by: Head of Pensions

Subject:	LGSS Pensions Service Administration Performance Report
Purpose of the	To present the Administration Performance Report to the Pension
Report	Fund Board
Recommendations	The Pension Fund Board are asked to note the
Recommendations	Administration Performance Report
	Name – Michelle Oakensen – LGSS Pensions Governance
Enquiries to:	Officer
	E-mail – moakensen@northamptonshire.gov.uk

#### 1. Background

1.1 One of the core functions of the Pension Fund Board (the Local Pension Board) is to ensure the effective and efficient governance and administration of the Scheme. This report demonstrates a number of key areas of administration performance for consideration by the Pension Fund Board.

#### 2. Administration Reporting

#### 2.1 Receipt of Employee and Employer Contributions

2.1.1 The following table shows the percentage of employers in the Cambridgeshire Pension Fund who paid their employee and employer contributions and/or submitted their schedules on time or late (after the 19<sup>th</sup> of the month following deduction) for the period 1 January 2017 to 31 December 2017.

	%	%	%	%
Month/Year	of Employers	of Employers	of Employers	of Employers
	Paid on Time	Paid Late	that Submitted	that Submitted
			Schedule on	Schedule Late
			Time	
January 2017	98.0	2.0	95.0	5.0
February 2017	97.7	2.3	94.7	5.3
March 2017	98.0	2.0	94.4	5.6
April 2017	96.4	3.6	97.8	2.2
May 2017	97.7	2.3	91.7	8.3
June 2017	98.0	2.0	96.0	4.0
July 2017	95.3	4.7	94.3	5.7
August 2017	97.6	2.4	97.3	2.7
September 2017	98.0 Pa	ge 17 of 72	97.7	2.3

	%	%	%	%
Month/Year	of Employers	of Employers	of Employers	of Employers
	Paid on Time	Paid Late	that Submitted	that Submitted
			Schedule on	Schedule Late
			Time	
October 2017	97.2	2.8	95.8	4.2
November 2017	98.8	1.2	98.4	1.6
December 2017	99.1	0.9	99.1	0.9
Average for period	97.6	2.4	96.0	4.0

- 2.1.2 An analysis of late payments for the previous quarter can be found in **Appendix 1** of the report (Private).
- 2.1.3 Persistent late payments and submission of accompanying payment schedules are monitored closely and officers work in close liaison with scheme employers and third party payroll providers to resolve issues.

### 2.2 Overpayments of Pension

2.2.1 The table below shows all the overpayments of pension that have occurred in the Cambridgeshire Pension Fund, split by categories of explanation, during the period 1 September 2017 to 31 January 2018.

Overpayment Type	Action	Amount	Total
Death of a Pensioner/Dependant	Written off	£5,054.67	£21,886.52
	Recovery	£16,831.85	
Retirement	Written off	£0	£0
	Recovery	£0	

\*Total Pensioner Payroll for the 16/17 financial year was £63,156,723.11

- 2.2.2 During the period 1 September 2017 to 31 January 2018, 73 scheme members passed away and the date of notification to the Fund resulted in an overpayment of the late member's pension. Of the overpayments, 58 were automatically written off as the value of the overpayment was less than £250. The remaining 15 cases are currently being pursued for recovery of the overpayments.
- 2.2.3 In this period £26,550.68 has been recovered to date for the current financial year and £323.43 for the previous financial year across all overpayment types.

# 2.3 Key Performance Indicators – LGSS Pensions Service

2.3.1 The Pension Committee has previously agreed a set of key performance indicators (KPIs) to assess the performance of LGSS Pensions Service.

2.3.2 The performance against the key performance indicators for the period 1 September 2017 to 31 January 2018 are detailed in the table below.

KPI	Target	Sept	Oct	Nov	Dec	Jan
Notify leavers of deferred benefit entitlement. (Notify leavers of deferred benefit entitlements or concurrent amalgamation within 15 working days of receiving all relevant information)	90%	100	99	99	96	100
Payment of retirement benefits from active employment. (Payment of lump sum within 5 working days of payable date or date of receiving all necessary information if later. First pension paid in the month of leaving or in month of receiving all necessary information if later).	95%	99	99	96	100	97
Award dependant benefits. (Issue award within 5 working days of receiving all necessary information).	95%	100	100	100	100	95
Provide a maximum of one estimate of benefits to employees per year on request. (Estimate in agreed format provided within 10 working days from receipt of all information).	90%	99	97	91	94	94
Provide transfer-in quote to scheme member. (Letter issued within 10 working days of receipt of all appropriate information).	95%	80	93	97	100	100
Process transfer out payment – letter issued within 10 working days of receipt of all information needed to calculate transfer out payment.	95%	96	95	100	100	100
Notify the employer and scheme members of changes to the scheme rules. (Within one month of the LGSS Pensions Service being informed of the change).	95%	100	100	100	100	100
Issue annual benefit statements to active members as at 31 March each year. (By the following 31 August - pending timely receipt of satisfactory year end data from the scheme employer).	100%	N/A	N/A	N/A	N/A	N/A

2.3.3 The full analysis of data for the September, October, November, December and January statistics along with explanations on the lower than expected performance can be found in **Appendix 2** of this report.

# 2.4 Key Performance Indicators – Scheme Employer Performance

2.4.1 The following key performance indicators, as agreed by the Pension Committee, are based on the performance of the scheme's employers for the period 1 August 2017 to 31 December 2017 are detailed in the table below.

KPI	Target	Aug	Sept	Oct	Nov	Dec
Arrange for the correct deduction of employee and employer contributions to Pension Fund in a timely manner, providing an associated monthly statement/schedule in a format acceptable to the Administering Authority.	100%	97.6	98.0	97.2	98.8	99.1
Provide LGSS Pensions Service with accurate year end information in the prescribed format.	100%	N/A	N/A	N/A	N/A	N/A

2.4.2 Employer performance continues to be managed by officers and progress continues to be made. Close liaison with employers in regards to the timely submission of both payments and schedules in order for them to meet statutory compliance.

# 3. Employer Admissions and Cessations

### 3.1 Admissions

- 3.1.1 Regulation 3 (1) of the Regulations provides for a person employed by a body listed in Schedule 2 to be an active member of the Local Government Pension Scheme. Part 1 of Schedule 2 includes "a proprietor of an Academy" as being a class of Schedule 2 employer and therefore a Scheduled Body. There is no discretion on the administering authority or the employer as to whether or not employers in Schedule 2 are provided with access to the Fund; it is a requirement.
- 3.1.2 The LGPS Regulations recognise the proprietor of an Academy Trust as a scheme employer. Where academies are part of a Multi Academy Trust (MAT), the Trust is the scheme employer and not each individual Academy. Academies joining an existing MAT are not reported as they are therefore not recognised as new scheme employers.

Date of admission	New Academy/Trust	Name of Academies transferring
01/01/2018	Soke Education Trust	John Clare Primary Gunthorpe Primary Werrington Primary Wittering Primary
01/01/2018	Aces Multi Academy Trust	Hinchingbrooke School Cromwell Academy

3.1.3 The Local Government Pension Scheme Regulations 2013 (as amended) [the Regulations] provide for the admission of a number of different types of body to the Local Government Pension Scheme; scheduled bodies, designating bodies, and admission bodies.

3.1.4 Paragraph 1 of Part 3 of Schedule 2 to the Regulations provides for an Administering Authority making an admission agreement with an admission body, enabling employees of the admission body to be active members of the Local Government Pension Scheme.

Date	New Admission Body	Background information
01/09/2016	Pabulum Catering (City of Ely College)	Cambridgeshire Meridian Academy Trust outsourced their catering service for the City of Ely College and transferred 8 members of catering staff to Pabulum Catering, under TUPE regulations on 1 September 2016.City of Ely College will act as guarantor for this full closed admission following an actuarial assessment.
01/09/2016	VHS Cleaning Services	Netherhall School outsourced their cleaning service and transferred their cleaning staff to VHS Cleaning Services, under TUPE regulations. Netherhall School, a scheme employer in their own right, agreed to a Pass Through admission and will retain responsibility for the pension liabilities.
01/06/2017	Pabulum Catering (Sawtry College)	Cambridgeshire Meridian Academy Trust outsourced the catering services for Sawtry College to Pabulum Catering and transferred 7 members of catering staff to Pabulum Catering, under TUPE regulations. This body has been admitted under a pass through agreement with Cambridgeshire Meridian Academy Trust remaining responsible for the pension liabilities.
01/07/2017	Easy Clean Contractors Ltd	Hemingford Grey Primary School outsourced their cleaning service and transferred their cleaning staff to Easy Clean Contractors Ltd, under TUPE regulations. As the recognised scheme employer, Cambridgeshire County Council agreed to a Pass Through admission and will retain responsibility for the pension liabilities.
01/01/2018	ABM Catering	Abbots Ripton Church of England Primary School outsourced their catering service and transferred their catering staff to ABM Catering Ltd, under TUPE regulations. As the recognised scheme employer, Cambridgeshire County Council agreed to a Pass Through admission and will retain responsibility for the pension liabilities.

# 4. Relevant Pension Fund Objective

Have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance. *Objective 1* 

Manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers. *Objective 2* 

Ensure the relevant stakeholders responsible for managing, governing and administering the Fund, understand their roles and responsibilities and have the appropriate skills and knowledge to ensure those attributes are maintained in a changing environment. *Objective 3* 

Continually monitor and measure clearly articulated objectives through business planning *Objective 4* 

Continually monitor and manage risk, ensuring the relevant stakeholders are able to mitigate risk where appropriate. *Objective 5* 

Put in place performance standards for the Fund and its employers and ensure these are monitored and developed as necessary. *Objective 8* 

Administer the Fund in a professional and efficient manner, utilising technological solutions and collaboration. *Objective 10* 

# 5. Finance & Resources Implications

5.1 The financial and resource implications are set out in the Business Plan.

#### 6. **Risk Implications**

a) Risk(s) associated with the proposal

Risk	Mitigation	Residual Risk
There are no risks associated with managing the administration	Key areas of control to be reported to the Pension	Green
performance of the scheme.	Committee and Pension Fund	
	Board are highlighted in the	
	Fund's Business Plan.	

#### b) Risk(s) associated with not undertaking the proposal

Risk	Risk Rating
If the Fund does not monitor and report administration standards the Fund will not demonstrate that it has appropriate control over the management of its core functions.	Green

#### 7. Communication Implications

Direct	The Fund publishes its performance against the key performance
Communications	indicators in the regular reports to the Pension Committee and
	Pension Fund Board and in the Fund's Annual Report.

## 8. Legal Implications

- 8.1 Not applicable
- 9. Consultation with Key Advisers
- 9.1 Consultation with the Fund's advisers was not required for this report.

#### **10.** Alternative Options Considered

10.1 Not applicable

#### 11. Background Papers

11.1 Not applicable

#### 12. Appendices

- 12.1 Appendix 1 Late payments of employee and employer contributions (Private)
- 12.2 Appendix 2 Key performance indicators LGSS Pensions Service

Checklist of Key Approvals									
Is this decision included in the Business Plan?	Not applicable								
Will further decisions be required? If so, please outline the timetable here	Not applicable								
Is this report proposing an amendment to the budget and/or policy framework?	No								
Has this report been cleared by Chief Finance Officer/Section 151 Officer?	N/A								
Has this report been cleared by Head of Pensions?	Mark Whitby – 6 February 2018								

•	ey Performance Indicato – LGSS Pensions Serv		s for Septemb	per, Octob	er, Noven	nber, Dec	ember	and January
Function/Task	Indicator	Target	Completed	Within Target	Over Target	% Within Target	RAG	Comments
Notify leavers of deferred benefit entitlement.	Notify leavers of deferred benefit entitlements or concurrent amalgamation within 15 working days of receiving all relevant information.	90%	469	469	0	100	G	SLA target met.
Payment of retirement benefits from active employment.	Payment of lump sum within 5 working days of payable date or date of receiving all necessary information if later. First pension paid in the month of leaving or in month of receiving all necessary information if later.	95%	84	83	1	99	G	SLA target met.
Award dependant benefits.	Issue award within 5 working days of receiving all necessary information.	95%	46	46	0	100	G	SLA target met.

Function/Task	Indicator	Target	Completed	Within Target	Over Target	% Within Target	RAG	Comments
Provide a maximum of one estimate of benefits to employees per year on request.	Estimate in agreed format provided within 10 working days from receipt of all information.	90%	76	73	3	96	G	SLA target met.
Provide transfer-in quote to scheme member.	Letter issued within 10 working days of receipt of all appropriate information.	95%	71	57	14	80	А	Cases outside of SLA target are within the statutory target of 2 months This area has experienced an increase in volume of 42% from 16/17 to the year to date.
Payment of transfer out	Process transfer out payment – letter issued within 10 working days of receipt of all information needed to calculate transfer out payment.	90%	23	22	1	99	G	SLA target met.

Function/Task	Indicator	Target	Completed	Within Target	Over Target	% Within Target	RAG	Comments
Notify leavers of deferred benefit entitlement.	Notify leavers of deferred benefit entitlements or concurrent amalgamation within 15 working days of receiving all relevant information.	90%	584	583	1	99	G	SLA target met.
Payment of retirement benefits from active employment.	Payment of lump sum within 5 working days of payable date or date of receiving all necessary information if later. First pension paid in the month of leaving or in month of receiving all necessary information if later.	95%	114	113	1	99	G	SLA target met.
Award dependant benefits.	Issue award within 5 working days of receiving all necessary information.	95%	44	44	0	100	G	SLA target met.

Function/Task	Indicator	Target	Completed	Within Target	Over Target	% Within Target		Comments
Provide a maximum of one estimate of benefits to employees per year on request.	Estimate in agreed format provided within 10 working days from receipt of all information.	90%	79	76	3	96	A	Cases outside of SLA target are within the statutory target of 2 months. Cases outside of SLA target due to reduction in staffing levels, the development of new team members and the high volume of requests.
Provide transfer-in quote to scheme member.	Letter issued within 10 working days of receipt of all appropriate information.	95%	54	50	4	93	G	SLA target met.
Payment of transfer out	Process transfer out payment – letter issued within 10 working days of receipt of all information needed to calculate transfer out payment.	90%	19	18	1	99	G	SLA target met.

	′ – Cambridgeshire Pens		Completed	\ <b>\/:</b> 4\- !	0	0/		Commente
Function/Task	Indicator	Target	Completed	Within Target	Over Target	% Within Target	RAG	Comments
Notify leavers of deferred benefit entitlement.	Notify leavers of deferred benefit entitlements or concurrent amalgamation within 15 working days of receiving all relevant information.	90%	271	216	1	99	G	SLA target met.
Payment of retirement benefits from active employment.	Payment of lump sum within 5 working days of payable date or date of receiving all necessary information if later. First pension paid in the month of leaving or in month of receiving all necessary information if later.	95%	55	53	2	96	G	SLA target met.
Award dependant benefits.	Issue award within 5 working days of receiving all necessary information.	95%	15	15	0	100	G	SLA target met.
Provide a maximum of one estimate of benefits to employees per year on request.	Estimate in agreed format provided within 10 working days from receipt of all information.	90%	44	40	4	91	G	SLA target met.

Function/Task	Indicator	Target	Completed	Within Target	Over Target	Within	RAG	Comments
Provide transfer-in quote to scheme member.	Letter issued within 10 working days of receipt of all appropriate information.	95%	29	28	1	97	G	SLA target met.
Payment of transfer out	Process transfer out payment – letter issued within 10 working days of receipt of all information needed to calculate transfer out payment.	90%	5	5	0	100	G	SLA target met.

Function/Task	Indicator	Target	Completed	Within Target	Over Target	% Within Target	RAG	Comments
Notify leavers of deferred benefit entitlement.	Notify leavers of deferred benefit entitlements or concurrent amalgamation within 15 working days of receiving all relevant information.	90%	235	226	9	96%	G	SLA target met.
Payment of retirement benefits from active employment.	Payment of lump sum within 5 working days of payable date or date of receiving all necessary information if later. First pension paid in the month of leaving or in month of receiving all necessary information if later.	95%	22	22	0	100%	G	SLA target met.
Award dependant benefits.	Issue award within 5 working days of receiving all necessary information.	95%	26	26	0	100%	G	SLA target met.
Provide a maximum of one estimate of benefits to employees per year on request.	Estimate in agreed format provided within 10 working days from receipt of all information.	90%	65	61	4	94%	G	SLA target met.

Function/Task	Indicator	Target	Completed	Within Target	Over Target	% Within Target	RAG	Comments
Provide transfer-in quote to scheme member.	Letter issued within 10 working days of receipt of all appropriate information.	95%	24	24	0	100%	G	SLA target met.
Payment of transfer out	Process transfer out payment – letter issued within 10 working days of receipt of all information needed to calculate transfer out payment.	90%	7	7	0	100%	G	SLA target met.

Function/Task	Indicator	Target	Completed	Within Target	Over Target	% Within Target	RAG	Comments
Notify leavers of deferred benefit entitlement.	Notify leavers of deferred benefit entitlements or concurrent amalgamation within 15 working days of receiving all relevant information.	90%	287	287	0	100%	G	SLA target met.
Payment of retirement benefits from active employment.	Payment of lump sum within 5 working days of payable date or date of receiving all necessary information if later. First pension paid in the month of leaving or in month of receiving all necessary information if later.	95%	30	29	1	97%	G	SLA target met.
Award dependant benefits.	Issue award within 5 working days of receiving all necessary information.	95%	21	20	1	95%	G	SLA target met.
Provide a maximum of one estimate of benefits to employees per year on request.	Estimate in agreed format provided within 10 working days from receipt of all information.	90%	68	64	4	94%	G	SLA target met.

Function/Task	Indicator	Target	Completed	Within Target	Over Target	% Within Target	RAG	Comments
Provide transfer-in quote to scheme member.	Letter issued within 10 working days of receipt of all appropriate information.	95%	10	10	0	100	G	SLA target met.
Payment of transfer out	Process transfer out payment – letter issued within 10 working days of receipt of all information needed to calculate transfer out payment.	90%	9	9	0	100	G	SLA target met.

#### Green:

## • Equal to or above SLA target.

#### Amber:

- If there is a statutory target below SLA target, but all within statutory target.
- If there is no statutory target below SLA target, but number completed within target is within 10% of the SLA target.

#### Red:

- If there is a statutory target below SLA target and not within statutory target.
- If there is no statutory target below SLA target and number completed within target is not within 10% of the SLA target.

#### CAMBRIDGESHIRE PENSION FUND



## **Pension Fund Board**

Date: 23 February 2018

#### **Report by:** Head of Pensions

Subject:	Governance and Legislation Report					
Purpose of the Report	<ul> <li>To provide the Pension Fund Board with:</li> <li>1) Information on potential, new or amending legislation affecting the LGPS;</li> <li>2) Information on other pensions legislation;</li> <li>3) Activities of the LGPS Scheme Advisory Board and the Pensions Regulator;</li> <li>4) Information on issues concerning the governance of the Local Government Pension Scheme (LGPS) on a national and local basis; and</li> <li>5) Skills and knowledge opportunities.</li> </ul>					
Recommendations That the Pension Board notes the content of the repo						
Enquiries to:	Jo Walton – Governance and Regulations Manager, LGSS Pensions Service E-mail: jwalton@northamptonshire.gov.uk					

#### 1. Background

1.1 This is a standing report that identifies issues concerning the governance of the Local Government Pension Scheme (LGPS) and also potential, new, amending and overriding legislation that will have an impact on how the Scheme is managed and on members' benefits.

#### 2. Activities of the Pensions Regulator

#### 2.1 Quick guides to improving and measuring data

- 2.1.1 The Pensions Regulator has recently published quick guides for trustees and scheme managers of pension schemes on improving and measuring their data. From 2018 it will be mandatory for schemes to include common and scheme specific (conditional) data scores on their annual scheme return.
- 2.1.2 LGSS Pensions were already aware of this requirement which has been incorporated into the Data Audit conducted by ITM Limited and the Data Improvement Plan, both of which will be discussed in greater depth in a further report being presented at this meeting.

2.1.3 In addition, the Scheme Advisory Board for the LGPS in England and Wales are looking to set up a working group including the Government Actuaries Department and the Pensions Regulator with a view to providing guidance on what data should be included in the key scheme-specific (conditional) data for the LGPS (E&W).

# 3. Activities of the Scheme Advisory Board

## 3.1. Tier 3 employer project – publication of surveys

- 3.1.1 The Scheme Advisory Board for the LGPS in England and Wales (SAB) has appointed Aon Hewitt to help them in their review of Tier 3 employers in the LGPS. Tier 3 employers are all those with no tax-payer backing (i.e. colleges, universities, housing associations, charities and any admission bodies with no guarantee from a Council, academy or other tax-payer backed employer).
- 3.1.2 The aims of the exercise are to identify:
  - the duties, benefits, issues and challenges for LGPS funds, Tier 3 employers and their scheme members with regard to their participation in the LGPS
  - options for change that would improve the funding, administration, participation and member experience with regard to Tier 3 employers.
- 3.1.3 A key element of this project is information gathering and, on 27th November, the SAB launched three surveys for completion by:
  a) LGPS administering authorities <u>http://lgpsregs.org/survey/administering-authorities.php</u>,
  b) Tigr 2 ampleyorg \_ http://lgparage.org/author/empleyor.php \_ and

b) Tier 3 employers - <u>http://lgpsregs.org/survey/employer.php</u> , and

c) LGPS members employed by tier 3 employers https://lgpsmember.org/survey/member.php

- 3.1.4 The surveys closed on 31 January 2018. LGSS Pensions responded to the survey on behalf of the Fund.
- 3.1.5 The results of the survey will be shared with the Local Pension Board once they become available.

# 3.2. Letter to the Minister regarding survivor benefits

- 3.2.1 As agreed by the Scheme Advisory Board on the 16th November, the Chair, Councillor Roger Phillips, wrote to the Local Government Minister on 27 November setting out the Board's intention to explore the scope for eliminating any existing inequalities in the scheme regarding survivor benefits.
- 3.2.2 The letter went on to confirm that the Government Actuary's Department should be commissioned to cost any such proposal ranging from full retrospection to equalising future survivor benefits only. At this stage, and in the absence of any such costing, the Scheme Advisory Board has no firm view on how any such proposal should be applied.
- 3.2.3 In the meantime, representations will continue to be made to DCLG for clarification on the extent to which the Brewster judgement applies to the LGPS in England and Wales. It was expected that the outcome of the Elmes v Essex County Council judicial review will provide further clarity (see section 4).

# 4. High Court judgement in the case of Elmes v Essex

- 4.1 This case concerns Nichola Elmes versus Essex County Council with an interested party of the Ministry of Housing, Communities and Local Government which is similar to that decided upon in the Supreme Court on 8 February 2017 (Brewster v NILGOSC, the Northern Ireland LGPS).
- 4.2 This case was heard before the High Court on 18 January 2018 and declared that:

"The requirement to nominate a person under regulations 24 and 25 of the LGPS (Benefits, Membership and Contributions) Regulations 2007 is incompatible with Article 1 of the first Protocol to, and Article 14 of, the European Convention on Human Rights and must therefore be disapplied".

- 4.3 It is understood that the outcome of this case effectively removes the requirement for a nomination form from regulations and enables an LGPS administering authority to pay a partner's pension, to the partner (who meets the definition of co-habiting partner set out in the LGPS Regulations 2013) of a deceased member who died without completing a nomination form, and who left active membership on or after 1 April 2008 and before 1 April 2014.
- 4.4 Whilst this judgement appears clear in respect of the payment of co-habiting partners, questions still remain around the children's pensions that were paid at a higher rate in the absence of a co-habiting partner's pension being paid and if these are now regarded as overpaid and whether administering authorities should seek recovery of these amounts.

#### 5. Consultations

# 5.1 Indexation and equalisation of guaranteed minimum pensions (GMP) in public service pension schemes: HM Treasury response to the consultation

- 5.1.1 On 22 January 2018 HM Treasury published its response to the consultation on indexation and equalisation of GMP in public service pension schemes that was originally issued on 28 November 2016.
- 5.1.2 The consultation set out options for how government should continue to meet its obligations to index and equalise pension entitlements for members in public sector pension schemes with GMP entitlements (from being contracted out of the State Earnings Related Pension Scheme between 6 April 1978 to 5 April 1997) following reform to state pensions and the end of contracting out which removed the mechanism for full indexation of GMPs being paid through the State Additional Pension.
- 5.1.3 An "interim solution" is already in place whereby indexation on GMP for those reaching state pension age between 6 April 2016 and 5 December 2018 is paid by the public service pension scheme.
- 5.1.4 The government's decision is to extend the interim solution for a further two years and four months so that indexation on GMPs in payment will now be paid by public sector pension schemes for those who reach state pension age on or before 5 April 2021.

5.1.5 During this extension period, the government proposes to investigate an alternative long-term methodology, known as "conversion" and give time for GMP reconciliation exercises to be completed and a methodology to be agreed. "Conversion" is an actuarial methodology whereby GMP is converted into a scheme benefit. This would apply to all active and deferred members of schemes reaching state pension age after the date the interim solution expires.

# 6. Skills and knowledge opportunities

# 6.1. Training Events

- 6.1.2 Section 248A of The Pensions Act 2004 as incorporated within The Pensions Regulator's Code of Practice (Governance and administration of public service pension schemes) requires all members of the Pensions Committee to maintain the necessary skills and knowledge to undertake their role effectively.
- 6.1.3 In order to facilitate the acquisition of skills and knowledge for members of the Pension Committee, appendix 1 lists all events that are deemed useful and appropriate.
- 6.1.4 Requests to attend events will be facilitated by the Governance Team. It may be necessary to restrict numbers of attendees on some courses through reasons of cost.

# 7. Relevant Pension Fund Objectives

Have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance. *Objective 1* 

Manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers. *Objective 2* 

Ensure the relevant stakeholders responsible for managing, governing and administering the Fund, understand their roles and responsibilities and have the appropriate skills and knowledge to ensure those attributes are maintained in a changing environment. *Objective 3* 

Continually monitor and manage risk, ensuring the relevant stakeholders are able to mitigate risk where appropriate. *Objective 5* 

#### 8. Risk Implications

#### a) Risk(s) associated with the proposal

Risk	Mitigation	Residual Risk
There is no risk associated with this report		Green
as it is a to note report.		

#### b) Risk(s) associated with not undertaking the proposal

Risk	Risk Rating
That the Committee are ill-informed about important consultations and changes affecting the Fund they are responsible for administering	Green

# 9. Finance & Resources Implications

9.1 Not applicable

## **10.** Communication Implications

Training	All staff involved in the administration of the LGPS are aware of the new legislation and the impact on the calculation and payment of benefits from
	the scheme.

#### 11. Legal Implications

11.1 There are no legal implications connected to the contents of this report.

## 12. Consultation with Key Advisers

12.1 There has been no requirement to consult with advisers over the content of this report.

#### 13. Alternative Options Considered

13.1 There are no alternative options to be considered.

#### 14. Background Papers

14.1 Not applicable

#### 15. Appendices

15.1 Appendix 1 - List of training events/conferences.

Checklist of Key Approvals			
Is this decision included in the Business Plan?	Not applicable		
Will further decisions be required? If so, please outline the timetable here	Not applicable		
Has this report been cleared by Head of Pensions?	Mark Whitby – 6 February 2018		

Appendix 1 - Internal/External training and events 2018 - 2019				g and events 2018 - 2019
Date	Event	Training Credits	Target Audience	Website Link
7 February 2018	LGSS Pensions Information Day	2	Officers, Committee/ Board Members	Internal ACCESS – appointment of operator
23 February 2018	Schroders Trustee Training (Part 1)	2	Officers, Committee/ Board Members	https://www.schrodersevents.co.uk/schroders/frontend/reg/thom e.csp?pageID=474304&eventID=1363&traceRedir=2&eventID= 1363 The programme is designed to cover a wide range of different asset classes and investment strategies, as well as how to manage some of the risks associated with them
26 February 2018	Local Pension Board – Spring Seminar	2	Board Members	https://www.barnett-waddingham.co.uk/events/2018/02/26/lgps- local-pension-board-members-spring-seminar The latest updates on governance and the LGPS, including a focus on key emerging issues. It will also provide opportunities for discussion on the issues you face and for networking with Board members from other funds
1–2 March 2018	LGC Investment Seminar	4	Officers, Committee/ Board Members	https://investmentseminar.lgcplus.com/ Keeping the LGPS affordable and accessible through austerity and uncertain times.
16 March 2018	Schroders Trustee Training (Part 2)	2	Officers, Committee/ Board Members	https://www.schrodersevents.co.uk/schroders/frontend/reg/thom e.csp?pageID=474304&eventID=1363&traceRedir=2&eventID= 1363 The programme is designed to cover a wide range of different asset classes and investment strategies, as well as how to manage some of the risks associated with them
21-23 May 2018	PLSA Local Authority Conference	4	Officers, Committee/ Board Members	https://www.plsa.co.uk/Events/Local-Authority-Conference
27 June 2018	LGPS Local Pension Boards Three Years on	2	Board Members	http://www.cipfa.org/training/l/lgps-local-pension-boardsthree- years-on-20180627
4 July 2018	LGSS Pension Information Day	2	Officers, Committee/ Board Members	Internal

Date	Event	Training Credits	Target Audience	Website Link
3-5 July 2018	LGA Annual Conference and Exhibition 2018	4	Officers, Committee/ Board Members	https://www.local.gov.uk/events The conference provides plenty of opportunities for delegates to engage in a range of sessions on how innovation and good practice can deliver the best local public services for our communities.
11–12 July 2018	Heywood Class Group AGM	4	Officers	https://www.aquilauk.co.uk/
12-13 July 2018	LGC Pension Fund Symposium	4	Officers	https://pensionfund.lgcplus.com/
5 October 2018	LGSS Pension Information Day	2	Officers, Committee/ Board Members	Internal
12 October 2018	Schroders Trustee Training (Part 1)	2	Officers, Committee/ Board Members	https://www.schrodersevents.co.uk/schroders/frontend/reg/thom e.csp?pageID=474304&eventID=1363&traceRedir=2&eventID= 1363 The programme is designed to cover a wide range of different asset classes and investment strategies, as well as how to manage some of the risks associated with them
2 November 2018	Schroders Trustee Training (Part 1)	2	Officers, Committee/ Board Members	https://www.schrodersevents.co.uk/schroders/frontend/reg/thom e.csp?pageID=474304&eventID=1363&traceRedir=2&eventID= 1363 The programme is designed to cover a wide range of different asset classes and investment strategies, as well as how to manage some of the risks associated with them
ТВС	UBS First Steps Seminar	2	Officers, Committee/ Board Members	
TBC	UBS Second Steps Seminar	2	Officers, Committee/ Board Members	
TBC	Pension Managers Annual Conference	4	Officers, Committee/ Board Members	
TBC	PLSA Annual Conference	4	Officers, Committee/ Board Members	
13 February 2019	LGSS Pension Information Day	2	Officers, Committee/ Board Members	Internal

# CAMBRIDGESHIRE PENSION FUND



# **Pension Fund Board**

Date: 23 February 2018

**Report by:** Head of Pensions

Subject:	Statutory and non-statutory policies and strategies relating to the operation, management and governance of the Cambridgeshire Pension Fund	
Purpose of the Report	To present to the Board with an overview of statutory and non- statutory policies and strategies relating to the operation, management and governance of the Cambridgeshire Pension Fund	
Recommendations	The Board are asked to note the contents of the report.	
Enquiries to:	Name – Michelle Oakensen, Governance Officer. moakensen@northamptonshire.gov.uk	

#### 1. Purpose of the report

1.1 This report is designed to provide an overview of the statutory and non-statutory policies and strategies required under the Local Government Pension Scheme. The main aim of the report is to ensure the Board are making appropriate recommendations within the parameters of the law.

#### 2. Statutory policies/strategies

- 2.1 Cambridgeshire County Council is the administering authority responsible for maintaining and managing the Cambridgeshire Pension Fund on behalf of its stakeholders; the scheme members and employers participating in the Fund. These responsibilities are primarily set out in Local Government Pension Scheme (LGPS) Regulations.
- 2.2 Cambridgeshire Pension Funds policies and strategies can be found on the LGSS Pensions Service website as public documents at the following address http://pensions.northamptonshire.gov.uk/index.php/governance2/key-documents

#### 3.1 Investment Strategy Statement

3.1.1 Under powers contained in The Public Service Pensions Act 2013 and The LGPS Regulations, the Secretary of State made the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016, which replace the 2009 Investment Regulations. These regulations came into force on 1 November 2016.

- 3.1.2 Regulation 7(1) of the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 requires administering authorities to formulate an Investment Strategy Statement (ISS) which must be in accordance with guidance issued by the Secretary of State, and replaces the existing requirement to produce and maintain a Statement of Investment Principles.
- 3.1.3 The ISS must include:

(a) A requirement to invest money in a wide variety of investments;

(b) The authority's assessment of the suitability of particular investments and types of investments;

(c) The authority's approach to risk, including the ways in which risks are to be measured and managed;

(d) The authority's approach to pooling investments, including the use of collective investment vehicles and shared services;

(e) The authority's approach on how social, environmental or corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments; and

f) The authority's policy on the exercise of rights (including voting rights) attaching to investments.

- 3.1.4 For full regulation details please see http://www.legislation.gov.uk/uksi/2016/946/pdfs/uksi\_20160946\_en.pdf
- 3.1.5 The Investment Strategy Statement was last reviewed in April 2017 and is due for review in April 2018.

#### 3.2 Governance Policy and Compliance Statement

- 3.2.1 The Governance Policy and Compliance Statement is enforceable by regulation 55 of the LGPS Regulations 2013.
- 3.2.2 The LGPS Regulations require each Administering Authority to prepare, publish and maintain a governance policy and compliance statement setting out whether the Administering Authority delegates its functions, or part of its functions to a committee, a sub-committee or an officer of the authority. The regulations require administering authorities to consult such persons as it considers appropriate when preparing the policy and compliance statement.
- 3.2.3 For the full regulation details please see http://www.legislation.gov.uk/uksi/2013/2356/regulation/55/made
- 3.2.4 The Governance and Compliance Statement was reviewed in October 2017 and included the changes to the constitution resulting from to asset pooling. The statement is due to be reviewed again in October 2018.

#### 3.3 Annual Report and Statement of Accounts

3.3.1 The Annual Report and Statement of Accounts is enforceable by regulation 57 of the LGPS Regulations 2013.

- 3.3.2 An Administering Authority must, in relation to each year beginning 1 April 2014 and every subsequent year, prepare a document which contains key information such as the management and financial performance during the year, policies in place and the actuarial position.
- 3.3.3 The report must be completed by 1 December following the scheme year end and must have regard for the guidance set by the Secretary of State.
- 3.3.3 For the full regulation please see <u>http://www.legislation.gov.uk/uksi/2013/2356/regulation/57/made.</u>
- 3.3.4 The Annual Report and Statement of Accounts was last produced for the 2016/17 financial year.

#### 3.4 Funding Strategy Statement

- 3.4.1 The Funding Strategy Statement is enforceable by regulation 58 of the LGPS Regulations 2013.
- 3.4.2 The LGPS and CIPFA guidance provide the statutory framework from which the administering authority is required to prepare the Funding Strategy Statement.
- 3.4.3 The Funding Strategy Statement must be revised and published whenever there is a material change in either policy set out in the Funding Strategy Statement or in the Investment Strategy Statement. A consultation with employers must take place before the administering authority can publish their Funding Strategy.
- 3.4.4 For the full regulation please see http://www.legislation.gov.uk/uksi/2013/2356/regulation/58/made
- 3.4.5 The Funding Strategy Statement was last reviewed in 2016 and is due to be reviewed in 2019 in line with the valuation cycle.

#### 3.5 Administration Strategy

- 3.5.1 Regulation 59 of the LGPS Regulations 2013 states that the administering authority may put in place an Administration Strategy.
- 3.5.2 The aim of the administration strategy is to ensure both the administering authority and the employers are fully aware of their responsibilities under the Scheme, and to outline the performance standards they are expected to meet to ensure the delivery of a high-quality, timely and professional administration service.
- 3.5.3 Delivery of a high standard of administration service is not the responsibility of one person or organisation, but rather of a number of different parties, who between them are responsible for delivering the pensions administration service to meet the diverse needs of the membership.
- 3.5.4 The strategy applies to all employers in the Fund. The strategy sets out the expected levels of administration performance of both the administering authority and the employers within the Fund, as well as details on how performance levels will be monitored and the action that might be taken where persistent failure occurs.

- 3.5.5 For the full regulation details please see http://www.legislation.gov.uk/uksi/2013/2356/regulation/59/made
- 3.6.6 The Pension Administration Strategy was last reviewed in August 2017 and is due to be reviewed in August 2018.

## 3.7 Statement of policy about exercise of discretionary functions

- 3.7.1 The Statement of policy about exercise of discretionary functions is enforceable by regulation 60 of the LGPS Regulations 2013.
- 3.7.2 Discretions is taken to include where the administering authority is required to do something but an element of choice exists as to how it is done. Some examples of discretions include payments of death grants, commutation of small pensions, admitting admission bodies and revision of employers' contribution rates.
- 3.7.3 For the full regulation details please see <u>http://www.legislation.gov.uk/uksi/2013/2356/regulation/60/made</u>.
- 3.7.4 The discretions were last updated and published in June 2014 following the changes to the regulations, a further review will be carried out when there is a change to the regulations.

#### 3.8 Communication Strategy

- 3.8.1 The Pension Communication Strategy is enforceable by regulation 61 of the LGPS Regulations 2013.
- 3.8.2 The aim of the Communication Strategy is to ensure that scheme members appreciate the benefits of the scheme and all stakeholders are kept informed of developments within the Pension Fund, and effective communications will also help to maintain the efficient running of the Scheme.
- 3.8.3 The strategy sets out who we will communicate with, how this will be done and how the effectiveness of that communication will be monitored. It also outlines the type of communications the administering authority will to provide to its stakeholders.
- 3.8.4 For the full regulation details please see <u>http://www.legislation.gov.uk/uksi/2013/2356/regulation/61/made</u>.
- 3.8.5 The Communication Strategy was last reviewed in March 2017 and is due to be reviewed in March 2018.

#### 3.9 Actuarial Valuation Report

- 3.9.1 The Actuarial Valuation Report is enforceable by regulation 62 of the LGPS Regulation 2013.
- 3.9.2 The purpose of the triennial actuarial valuation is for the administrating authority to determine:
  - The expected cost of providing the benefits built up by members at the valuation date ("the liabilities"), and compare this against the funds held by the Fund (the "assets").
  - An appropriate plan for making up the shortfall if there are less assets than liabilities

- The contributions needed to cover the cost of the benefits that active members will build up in the future and other costs incurred in the running the Fund.
- 3.9.3 For the full regulation details please see <u>http://www.legislation.gov.uk/uksi/2013/2356/regulation/62/made</u>
- 3.9.4 The Actuarial Valuation Report was last produced in respect of the 2016 triennial valuation and published prior to 31 March 2017 deadline. The next report will be produced for the 2019 triennial valuation to be published by 31 March 2020.

## 4. Non-statutory policies/strategies

4.1 Non-statutory policies demonstrate good governance by applying best practice principals. The below table shows the best practice policies currently in place -

Policy/Strategy	Purpose	Review date
Admitted Bodies, Scheme Employers and Bulk Transfer Policy	To ensure fair treatment of admission bodies and scheme employers and the bulk transfer of pension rights to and from the Scheme.	Due for review (last reviewed in 2015)
Annual Business Plan and Medium Term Strategy	To document the priorities and improvements to be implemented in the operation and management of the Scheme over the next three years outlining associated financial and resource requirements.	March 2018
Anti-Fraud and Corruption Policy	To detail the deterrents and controls in place to prevent fraud and corruption and the processes in place to deal with suspected fraud and corruption.	October 2018
Cash Management Strategy	The Pension Fund must operate a separate bank account to that of the administering authority for the activities of the Pension Fund and the strategy sets out how compliance will be met.	Due for review (last reviewed 2013/14)
Overpayments of Pension Policy	Overpayments of pension benefits can occur for a variety of reasons. The policy sets out how overpayments are managed once they are identified.	Currently being reviewed (last reviewed October 2015)

Policy/Strategy	Purpose	Review date
Payment of Employee and Employer Pension Contributions Policy	Sets out the expectations of the scheme employer with regards to the payment of employee and employer pension contributions and the associated reconciliation processes performed by the Fund.	October 2018
Reporting Breaches of the Law to the Pensions Regulator Policy	Sets out the procedures to be followed in relation to identifying, recording and potentially reporting breaches of the law to the Pensions Regulator.	Due for review (last reviewed December 2015)
Risk Strategy	Sets out the approach to managing the risks faced by the Fund and how such risks are measured.	Due for review (last reviewed March 2016)
Training Strategy	To aid Pension Fund Committee and Pension Board members and senior officers in performing and developing personally in their individual roles to ensure the Fund is managed by individuals who have the appropriate levels of knowledge and skills as required by the Pensions Regulator.	March 2018

# 5. Pending policies and next steps

- 5.1 During the 2018/2019 financial year the following policies will be developed –
- 5.1.1 **Conflicts of Interest Policy** The policy will detail how actual and potential conflicts of interests are identified and managed by those involved in the management and governance of the Fund.
- 5.1.2 **Record Keeping Policy** The policy will demonstrate how the Fund fulfils its legal obligations in terms of keeping records. The Pensions Regulator's guidance will be used when devising the policy to ensure best practice is applied.
- 5.1.3 **Data Quality Improvement Plan** The plan will detail how the Fund will continue to improve the quality of the data it holds to ensure integrity and to comply with various legislation on the accuracy and presence of data.
- 5.2 All the existing policies, plans and strategies will be reviewed in the 2018/2019 and a process put in place to ensure their regular and appropriate review.

# 6. Relevant Pension Fund Objectives –

Have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance. *Objective 1* 

#### 7. Finance and resource implications

7.1 None.

#### 8. Risk implications

8.1 If the fund does not have appropriate policies in place it risks financial and reputational damage.

# 9. Communication implications

Direct	All policies and relevant documents are public documents and held
Communications	on the LGSS Pensions Website.

# 10. Legal implications

10.1 Statutory policies must be in place to ensure compliance with the legislation.

# 11. Consultation with key advisers

11.1 Not applicable

# 12. Alternative options considered

12.1 Not applicable

# 13. Background papers

13.1 Not applicable

# 14. Appendices

14.1 Not applicable

Checklist of Key Approvals				
Is this decision included in the Business Plan? Not applicable				
Will further decisions be required? If so, please outline the timetable here	Not applicable			
Has this report been cleared by Head of Pensions?	Mark Whitby – 6 February 2018			

Policy/Strategy	Implementation/Review
Overpayments of Pension Policy	Currently being reviewed
Annual Business Plan and Medium Term Strategy	March 2018
Communication Strategy	March 2018
Training Strategy	March 2018
Investment Strategy Statement	April 2018
Admitted Bodies, Scheme Employers and Bulk Transfer Policy	April 2018
Annual Report and Statement of Accounts	April 2018
Cash Management Strategy	April 2018
Reporting Breaches of the Law to the Pensions Regulator Policy	April 2018
Risk Strategy	April 2018
Conflicts of Interest Policy	For April 2018 LPB and for June 2018 Committee
Data Improvement Plan	For June 2018 Committee
Administration Strategy	August 2018
Governance Policy and Compliance Statement	October 2018
Payment of Employee and Employer Pension Contributions Policy	October 2018
Anti-Fraud and Corruption Policy	October 2018
Record Keeping Policy	For October 2018 Committee
Funding Strategy Statement	March 2019

# CAMBRIDGESHIRE PENSION FUND



#### **Pension Fund Board**

Date: 23 February 2018

#### **Report by:** Head of Pensions

Subject:	General Data Protection Regulation
Purpose of the Report	To provide the Local Pension Board with an update on the work undertaken to achieve compliance with the General Data Protection Regulation
Recommendations	That the Local Pension Board notes the contents of this report
Enquiries to:	Jo Walton – Governance and Regulations Manager, LGSS Pensions Email: jwalton@northamptonshire.gov.uk

#### 1. Introduction

- 1.1. The General Data Protection Regulation is regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection for all individuals within the European Union.
- 1.2 The primary objectives of the General Data Protection Regulation (GDPR) are to give control back to citizens over their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU.
- 1.3 The regulation was adopted on 27 April 2016 and becomes enforceable from 25 May 2018 after a two year transition period.

#### 2. Accountability

- 2.1 Under the GDPR, the data protection principles set out the main responsibilities for organisations. The principles are similar to those in the Data Protection Act 1998 (DPA) but with a new accountability requirement which requires organisations to show how they comply with the principles.
- 2.2 To demonstrate compliance organisations must have in place the following documentation:
  - Record of processing activities (see section 3);
  - Information Asset Register (see section 4);
  - Privacy Notice (see section 5);
  - Retention schedule (see section 6); and
  - GDPR compliant contract clauses (see section 7).

- 2.3 In addition, organisations must:
  - Implement appropriate technical and organisational measures that ensure and demonstrate compliance such as staff training and internal audits of processing activities;
  - Appoint a data protection officer (see section 8);
  - Implement measures that meet the principles of data protection by design and data protection by default.
- 2.4 This report will provide an update as to the work undertaken to demonstrate that the Cambridgeshire Pension Fund, on behalf of the administering authority, Cambridgeshire County Council, is achieving compliance with the principles of the GDPR.

# 3. Record of processing activities

- 3.1 Article 30 of the GDPR states that both the data controller and the data processor should maintain electronic records of processing activities under its responsibility. In respect of the data controller that record should contain the following:
  - Name and contact details of the controller and where applicable the joint controller, the controller's representative and the data protection officer;
  - Purpose of the processing;
  - Description of the categories of data subjects and of the categories of personal data;
  - Categories of recipients to whom the personal data have been or will be disclosed;
  - Whether the data is transferred outside of the EEA;
- 3.2 The record of processing activities in respect of the Cambridgeshire Pension Fund has been drafted in accordance with the requirements detailed in section 3.1 and can be found in appendix 1 of this report.

# 4. Information Asset Register

- 4.1 In order to achieve compliance with the GDPR, the Information Commissioner's Office has advised that organisations should document what data is held, where it came from and who it is shared with through an Information Asset Register.
- 4.2 As such the existing Information Asset Register has been updated to take into account the additional requirements of the GDPR. The draft Information Asset Register in respect of data held by Cambridgeshire Pension Fund can be found in appendix 2 of the this report.

# 5. Privacy Notice

- 5.1 The GDPR include rules on giving privacy information to data subjects which are more detailed and specific than under the DPA and place an emphasis on making privacy notices understandable and accessible.
- 5.2 A GDPR compliant privacy notice must contain the following:
  - Identity and contact details of the controller and the Data Protection Officer;
  - Purpose of the processing and the lawful basis for the processing;
  - Categories of personal data;
  - Any recipient tor categories of recipients of the personal data;
  - Details of any transfers of data outsider of the EEA;

- Retention period or criteria used to determine the retention period;
- The existence of the data subject's rights;
- The right to lodge a complaint with a supervisory authority;
- Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data;
- The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences;
- 5.3 The privacy notice should be made available as follows:
  - Where data is received directly from the individual at the time the data are obtained.
  - Where data is not received directly from the individual in no less than one month or if the data are used to communicate with the individual, at the latest when the first communication takes place.
- 5.4 A draft privacy notice in respect of the personal data collected and processed by the Cambridgeshire Pension Fund has been constructed and can be found in appendix 3 of this report.
- 5.5 The Local Government Pensions Committee have enlisted Squire Patton Boggs to draft a template for use by Councils administering the Local Government Pension Scheme. This is expected to be issued at the end of February and will be cross referenced with the draft privacy notice and any revisions made.

# 6. Retention schedule

- 6.1 As part of demonstrating transparency in the way the data is stored and processed a retention schedule should be produced to inform data subjects how long their data will be held in order to comply with legal and regulatory requirements balanced with operational requirements of the Pension Fund.
- 6.2 The retention schedule will also include information about data minimisation in instances such as when individuals no longer have any liability in the Fund following a refund of contributions, transfer out or having fully commuted their benefits.
- 6.3 The retention schedule will be drafted and presented to the Local Pension Board at the next meeting.

# 7. GDPR compliant contract clauses

- 7.1 It is necessary to ensure that all the contracts in force with the Fund's suppliers of services contain the necessary clauses in relation to the sharing and processing of data and are compliant with the GDPR. As such all contracts will all suppliers will be reviewed and suppliers will be contacted to discuss how they would like to make any necessary changes through mechanisms such as variation agreements or new data sharing agreements. All such changes will be referred to LGSS Law to ensure the Fund's data is adequately protected.
- 7.2 The Fund also uses the County Council's corporate contracts for activities such as print, design and distribution of member communications and the production and postage of pensioner payslips. The Fund will need to ensure that these corporate contracts have been reviewed and updated for compliance with the GDPR.
- 7.3 An update on the progress of reviewing and amending contract terms will be presented to the Local Pension Base of at the hext meeting.

# 8. Appointment of a Data Protection Officer

8.1 It is the responsibility of the data controller, i.e. the administering authority (County Council) to appoint a Data Protection Officer. At the time of writing this report no appointment has been made.

# 9. Relevant Pension Fund Objectives

1. Have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.

2. Manage the Fund in a fair and equitable manner, having regard to what is in the best interest of the Fund's stakeholders, particularly the scheme members and employers.

3. Ensure the relevant stakeholders responsible for managing, governing and administering the Fund, understand their roles and responsibilities and have the appropriate skills and knowledge to ensure those attributes are maintained in a changing environment.

5. Continually monitor and manage risk, ensuring the relevant stakeholders are able to mitigate risk where appropriate.

11. Maintain accurate records and ensure data is protected and used for authorised purposes only.

## 10. Finance & Resources Implications

10.1 The cost of implementing the GDPR, such as LGSS Law's fees, will be met via normal operating activities of the administration budget.

#### 11. Risk Implications

a) Risk(s) associated with the proposal

Risk	Mitigation	Residual Risk
There is no risk associated with preparing for and complying with the requirements of the GDPR.	N/A	Green

b) Risk(s) associated with not undertaking the proposal

Risk	Risk Rating
Failure to understand the implications of the GDPR may result in a	Red
breach of up to £17m) or 4% of global turnover)	

# 12. Communication Implications

Website	Privacy notices will be published on the Fund's website
Communications	Scheme members will be contacted at appropriate times as to their
	rights under the GDPR.
Training	All officers of LGSS Pensions will receive training as to the
	requirements and provisions of the GDPR.

#### 13. Legal Implications

13.1 Legal advice will be sought where deemed necessary during the implementation of the GDPR.

# 14. Consultation with Key Advisers

14.1 Consultation will take place as the project progresses.

# 15. Alternative Options Considered

15.1 Not applicable

## 16. Background Papers

16.1 Not applicable

# 17. Appendices

- 17.1 Appendix one Draft record of processing activities
- 17.2 Appendix two Draft information asset register
- 17.3 Appendix three Draft privacy notice

Checklist of Key Approvals												
Is this decision included in the Business Plan?	Not applicable											
Will further decisions be required? If so, please outline the timetable here	Yes – Annual Business Plan 2018-19 (March 2018)											
Has this report been cleared by Head of Pensions?	Mark Whitby – 6 February 2018											

# Appendix 1

Who processes the data?	Processor or Controller?	What personal data do they hold?	Why are they using the data? (legal basis - Article 6c of the GDPR - processing is necessary for compliance with a legal obligation on the controller)	Who are the data subjects?	Where is data held?	Will the data be shared with any third parties by the Processor/ Controller?	Is data transferred outside EEA?	How long is the data kept?	How is the data secured?
Administeri ng authority /administra tor (NCC/ CCC)	ty potential beneficiaries' dat istra members' C/ representative data, optants ou data, previous scheme member with no remainin liability (see Information Asse Register)		To administer the scheme	Scheme members, potential beneficiaries, representatives of scheme members, optants out, previous scheme members with no remaining liability.	Pensions administratio n system, microfiche, scanned documents, secure archive storage, SharePoint, local network drives.	Yes - see Information Asset Register and as explained below.	No. Unless members reside in a country outside the EEA in which case the Fund will communicate personal data to them normally via letter, email, payslip and P60.	99+ years	TBC
Employing Authorities	Controller in common	Member data (see Information Asset Register)	To facilitate employment decisions (ill health, redundancy estimates) as requested by the employer, to make additional pension contribution deductions from the employee's pay.	The employing authority's employees (scheme members)	N/A - specific to each scheme employer.	N/A	N/A	As determined by the employer.	As determined by the employer.

Who processes the data?	Processor or Controller?	What personal data do they hold?	Why are they using the data? (legal basis - Article 6c of the GDPR - processing is necessary	Who are the data subjects?	Where is data held?	Will the data be shared with any third parties by the Processor/	Is data transferred outside EEA?	How long is the data kept?	How is the data secured?	
			for compliance with a legal obligation on the controller)			Controller?				
Auditor	Processor	Member data, potential beneficiaries' data, members' representative data, optants out data, previous scheme members with no remaining liability (see Information Asset Register)	To audit the Fund's Annual Report and Statement of Accounts and to ensure appropriate internal controls are in place	Scheme members, potential beneficiaries, representatives of scheme members, optants out, previous scheme members with no remaining liability.	SharePoint	No.	No.	To be confirmed but no longer than the end of the contract.	TBC	
Actuary	Joint Controller	Member data, potential beneficiaries' data, members' representative data, optants out data, previous scheme members with no remaining liability (see Information Asset Register)	To calculate the value of the Fund's assets and liabilities based on its membership profile and to set employer contribution rates.	Scheme members, potential beneficiaries, representatives of scheme members, optants out, previous scheme members with no remaining liability.	Secure portal.	No.	No.	To be confirmed but no longer than the end of the contract.	ТВС	

Who processes the data?	Processor or Controller?	What personal data do they hold?	Article 6c of the GDPR - processing is necessary for compliance with a legal obligation on the controller)	Who are the data subjects?	Where is data held?	Will the data be shared with any third parties by the Processor/ Controller?	Is data transferred outside EEA?	How long is the data kept?	How is the data secured?
Legal Processo Advisor		Member data, potential beneficiaries' data, members' representative data, optants out data, previous scheme members with no remaining liability (see Information Asset Register)	Provision of legal advice with regards to dispute resolution and TUPE transfers/employer admissions.	Scheme members, potential beneficiaries, representatives of scheme members, optants out, previous scheme members with no remaining liability.	N/A - specific to service provider.	No.	No.	To be confirmed but no longer than the end of the contract.	TBC
Pensioner Payroll Provider (LGSS Payroll) (NCC/CCC - same Data Controller)	Processor	Member data - pensioner and dependants' data only (see Information Asset Register)	To process pension payments, make statutory deductions, issuing P60s.	Pensioner and dependant scheme members.	Pensions administratio n system, local network drives.	No.	No.	6 + current tax year on local network drives, 99+ years on Pension Administrati on System	ТВС
AVC Provider	Processor	Member data (see Information Asset Register)	Creation and maintenance of an individual member's AVC account.	Scheme members.	N/A - specific to service provider.	No.	No.	To be confirmed but no longer than the end of the contract.	ТВС

Who processes the data?	Processor or Controller?	What personal data do they hold?	Why are they using the data? (legal basis - Article 6c of the GDPR - processing is necessary for compliance with a legal obligation on the controller)	Who are the data subjects?	Where is data held?	Will the data be shared with any third parties by the Processor/ Controller?	Is data transferred outside EEA?	How long is the data kept?	How is the data secured?
Printers	Processor	Member data (see Information Asset Register)	To print pensioner payslips, P60s and bulk member communications.	Scheme members, representatives of scheme members, optants out.	N/A - specific to service provider.	NCC/CCC corporate contract used for print services. Please refer to NCC/CCC's ROPA.	No.	To be confirmed but no longer than the end of the contract.	NCC/CCC corporate contract used for print services. Please refer to NCC/CCC's ROPA.
Software Provider Processor		Member data, potential beneficiaries' data, members' representative data, optants out data, previous scheme members with no remaining liability (see Information Asset Register)	To provide software management support in the delivery of the Fund's pensions administration, pensioner payroll, member and employer self-service functions.	Scheme members, potential beneficiaries, representatives of scheme members, optants out, previous scheme members with no remaining liability.	Secure servers.	No.	No.	To be confirmed but no longer than the end of the contract.	TBC
Overseas Payments Transmitter	Processor	Member data - pensioner and dependants' data only (see Information Asset Register)	To transmit net pension payments to overseas bank accounts.	Pensioner and dependant scheme members.	N/A - specific to service provider.	No.	Yes - where a member has an overseas bank account outside the EEA.	To be confirmed but no longer than the end of the contract.	TBC

Who processes the data?	Processor or Controller?	What personal data do they hold?	Why are they using the data? (legal basis - Article 6c of the GDPR - processing is necessary for compliance with a legal obligation on the controller)	Who are the data subjects?	Where is data held?	Will the data be shared with any third parties by the Processor/ Controller?	Is data transferred outside EEA?	How long is the data kept?	How is the data secured?
Benefits Consultant	Processor	Member data, potential beneficiaries' data, members' representative data, optants out data, previous scheme members with no remaining liability (see Information Asset Register)	To support the Fund in delivering ad hoc and specific pensions administration activities.	Scheme members, potential beneficiaries, representatives of scheme members, optants out, previous scheme members with no remaining liability.	N/A - specific to service provider.	No.	No.	To be confirmed but no longer than the end of the contract.	ТВС
Independe nt Data Auditor	Processor	Member data, potential beneficiaries' data, members' representative data, optants out data, previous scheme members with no remaining liability (see Information Asset Register)	To provide independent insurance on the quality and accuracy of the Fund's data.	Scheme members, potential beneficiaries, representatives of scheme members, optants out, previous scheme members with no remaining liability.	Secure portal.	No.	No.	To be confirmed but no longer than the end of the contract.	ТВС
Data Controller:	Cambridges hire County Council	Shire Hall, Cambridge, CB3 OAP	Data Protection Officer: TBC						
Joint Controller:	Hymans Robertson LLP (Fund Actuary)	Exchange Place One, Semple Street, Edinburgh, EH3 8BL	Data Protection Officer: TBC						

Category	Subject Area	Description of Information Held	SP Status	System or Physical location	Informat ion Asset owner	Updating frequency	Disposal date	Modified By	Modified	Legal basis under which data held and processed	What (if applicable) are the consent arrangements for collecting this information?	Can you remove records if consent to hold is withdrawn?	Shared with other NCC services?	Shared with other organisatio ns?	Where is the information sent to or received from?	If shared, how does information get to and from there?	Is there a data sharing agreement that relates to this data flow?	How does the recipient store the information?
Finance	Pensions	Scheme members' personal details (common data): full name, previous surname(s), DOB, NINO, pay references, address, previous addresses, partnership status	Protected	Altair - Pensions Administr ation system	Head of LGSS Pensions	Daily	31/12/9999	Jo Walton	26/01/ 2018	GDPR Article 6 (c)	None - as per GDPR Article 6(c)	If a member exercises their right to be forgotten/processed, then data will be minimised/not processed but complete deletion is not always possible - please refer to privacy notice	LGSS Payroll for processing of pensioner payroll, optants out and refunds. LGSS Law for dispute resolution.	Yes - please refer to privacy notice.	Received from: Employing authorities, scheme members, their representatives, HMRC, DWP. Sent to: See privacy notice	By secure email, uploading to secure portals, post marked private and confidential.	Yes / or in very limited circumstances data is to shared without (see privacy notice).	As detailed in the data sharing agreement / contract which would have been deemed satisfactory for DPA 1998 upon establishment.
		Scheme members' scheme data (common data): Status of membership, employing authority, dates of membership including transfers in, pensionable salary, contributions paid, national insurance earnings, pension debits and pension credits, ear marking orders, court orders, non-statutory deductions (pensioner payroll)	Protected	Altair - Pensions Administr ation system	Head of LGSS Pensions	Daily	31/12/9999	Jo Walton	26/01/2018	GDPR Article 6 (c)	None - as per GDPR Article 6(c)	If a member exercises their right to be forgotten/processed, then data will be minimised/not processed but complete deletion is not always possible - please refer to privacy notice	LGSS Payroll for processing of pensioner payroll, optants out and refunds. LGSS Law for dispute resolution.	Yes - please refer to privacy notice.	Received from : Employing authorities, scheme members, their representatives, HMRC, DWP. Sent to: See privacy notice	By secure email, uploading to secure portals, post marked private and confidential.	Yes / or in very limited circumstances data is to shared without (see privacy notice).	As detailed in the data sharing agreement / contract which would have been deemed satisfactory for DPA 1998 upon establishment.
		Scheme members' scheme specific data: value of CARE pension accrual, accrued final salary pension, acrrued automatic lump sum, frozen refund, refund, transfer out, transfer in, deferred benefit, pension in payment, accrued dependants' entitlement, Guaranteed Minimum Pension, tax code, tax deductions, age related adjustments, gross pay, net pay, amounts to be recovered, estimated benefits payable, details relating to annual allowance and lifetime allowance	Protected	Altair - Pensions Administr ation system	Head of LGSS Pensions	Daily	31/12/9999	Jo Walton	26/01/2018	GDPR Article 6 (c)	None - as per GDPR Article 6(c)	If a member exercises their right to be forgotten/processed, then data will be minimised/not processed but complete deletion is not always possible - please refer to privacy notice	LGSS Payroll for processing of pensioner payroll, optants out and refunds. LGSS Law for dispute resolution.	Yes - please refer to privacy notice.	Received from : Employing authorities, scheme members, their representatives, HMRC, DWP. Sent to: See privacy notice	By secure email, uploading to secure portals, post marked private and confidential.	Yes / or in very limited circumstances data is to shared without (see privacy notice).	As detailed in the data sharing agreement / contract which would have been deemed satisfactory for DPA 1998 upon establishment.

# <u>Appendix 2</u>

Category	Subject Area	Description of Information Held	SP Status	System or Physical location	Informat ion Asset owner	Updating frequency	Disposal date	Modified By	Modified	Legal basis under which data held and processed	What (if applicable) are the consent arrangements for collecting this information?	Can you remove records if consent to hold is withdrawn?	Shared with other NCC services?	Shared with other organisatio ns?	Where is the information sent to or received from?	If shared, how does information get to and from there?	Is there a data sharing agreement that relates to this data flow?	How does the recipient store the information?
		Potential beneficiaries that are not scheme members: cohabiting partners / nominees for death grant / spouses / civil partners / children: full name, DOB, address	Protected	Altair - Pensions Administr ation system	Head of LGSS Pensions	Daily	31/12/9999	Jo Walton	26/01/2018	GDPR Article 6 (c)	None - as per GDPR Article 6(c)	If a member exercises their right to be forgotten/processed, then data will be minimised/not processed but complete deletion is not always possible - please refer to privacy notice	LGSS Payroll for processing of pensioner payroll, optants out and refunds. LGSS Law for dispute resolution.	Yes - please refer to privacy notice.	Received from : Employing authorities, scheme members, their representatives, HMRC, DWP. Sent to: See privacy notice	By secure email, uploading to secure portals, post marked private and confidential.	Yes / or in very limited circumstances data is to shared without (see privacy notice).	As detailed in the data sharing agreement / contract which would have been deemed satisfactory for DPA 1998 upon establishment.
		Members' representatives: holders of power of attorney / executors of estates: full name, address	Protected	Altair - Pensions Administr ation system	Head of LGSS Pensions	Daily	31/12/9999	Jo Walton	26/01/2018	GDPR Article 6 (c)	None - as per GDPR Article 6(c)	If a member exercises their right to be forgotten/processed, then data will be minimised/not processed but complete deletion is not always possible - please refer to privacy notice	LGSS Payroll for processing of pensioner payroll, optants out and refunds. LGSS Law for dispute resolution.	Yes - please refer to privacy notice.	Received from : Employing authorities, scheme members, their representatives, HMRC, DWP. Sent to: See privacy notice	By secure email, uploading to secure portals, post marked private and confidential.	Yes / or in very limited circumstances data is to shared without (see privacy notice).	As detailed in the data sharing agreement / contract which would have been deemed satisfactory for DPA 1998 upon establishment.
		Optants Out (no liability): full name, previous surname(s), DOB, NINO, pay references, addresss, previous addresses, partnership status, employing authority	Protected	Altair - Pensions Administr ation system	Head of LGSS Pensions	Daily	31/12/9999	Jo Walton	26/01/2018	GDPR Article 6 (c)	None - as per GDPR Article 6(c)	If a member exercises their right to be forgotten/processed, then data will be minimised/not processed but complete deletion is not always possible - please refer to privacy notice	LGSS Payroll for processing of pensioner payroll, optants out and refunds. LGSS Law for dispute resolution.	Yes - please refer to privacy notice.	Received from : Employing authorities, scheme members, their representatives, HMRC, DWP. Sent to: See privacy notice	By secure email, uploading to secure portals, post marked private and confidential.	Yes / or in very limited circumstances data is to shared without (see privacy notice).	As detailed in the data sharing agreement / contract which would have been deemed satisfactory for DPA 1998 upon establishment.
		Scanned images of documents	Protected	Altair - Pensions Administr ation system	Head of LGSS Pensions	Daily	31/12/9999	Jo Walton	26/01/2018	GDPR Article 6 (c)	None - as per GDPR Article 6(c)	If a member exercises their right to be forgotten/processed, then data will be minimised/not processed but complete deletion is not always possible - please refer to privacy notice	LGSS Payroll for processing of pensioner payroll, optants out and refunds. LGSS Law for dispute resolution.	Yes - please refer to privacy notice.	Received from : Employing authorities, scheme members, their representatives, HMRC, DWP. Sent to: See privacy notice	By secure email, uploading to secure portals, post marked private and confidential.	Yes / or in very limited circumstances data is to shared without (see privacy notice).	As detailed in the data sharing agreement / contract which would have been deemed satisfactory for DPA 1998 upon establishment.

Category	Subject Area	Description of Information Held	SP Status	System or Physical location	Informat ion Asset owner	Updating frequency	Disposal date	Modified By	Modified	Legal basis under which data held and processed	What (if applicable) are the consent arrangements for collecting this information?	Can you remove records if consent to hold is withdrawn?	Shared with other NCC services?	Shared with other organisatio ns?	Where is the information sent to or received from?	If shared, how does information get to and from there?	Is there a data sharing agreement that relates to this data flow?	How does the recipient store the information?
		Microfiche	Protected	Archiving - BoxIt	Head of LGSS Pensions	Never	31/12/9999	Jo Walton	26/01/2018	GDPR Article 6 (c)	None - as per GDPR Article 6(c)	If a member exercises their right to be forgotten/processed, then data will be minimised/not processed but complete deletion is not always possible - please refer to privacy notice	LGSS Law for dispute resolution.	Yes - please refer to privacy notice.	Received from : Employing authorities, scheme members, their representatives, HMRC, DWP. Sent to: See privacy notice	By secure email, uploading to secure portals, post marked private and confidential.	Yes / or in very limited circumstances data is to shared without (see privacy notice).	As detailed in the data sharing agreement / contract which would have been deemed satisfactory for DPA 1998 upon establishment.
		Archived files - contribution history, year end history, transfers out, bulk transfers, admissions	Protected	Archiving - BoxIt /Cambrid geshire County Council basemen t	Head of LGSS Pensions	Annually	31/12/9999	Jo Walton	26/01/2018	GDPR Article 6 (c)	None - as per GDPR Article 6(c)	If a member exercises their right to be forgotten/processed, then data will be minimised/not processed but complete deletion is not always possible - please refer to privacy notice	LGSS Payroll for processing of pensioner payroll, optants out and refunds. LGSS Law for dispute resolution.	Yes - please refer to privacy notice.	Received from : Employing authorities, scheme members, their representatives, HMRC, DWP. Sent to: See privacy notice	N/A	N/A	N/A
		Electronic documents detailing membership data (for the purpose of being transferred to membership records)	Protected	SharePoi nt (CCC and NCC networks)	Head of LGSS Pensions	Daily	31/12/9999	Jo Walton	26/01/2018	GDPR Article 6 (c)	None - as per GDPR Article 6(c)	If a member exercises their right to be forgotten/processed, then data will be minimised/not processed but complete deletion is not always possible - please refer to privacy notice	LGSS Payroll for processing of pensioner payroll, optants out and refunds. LGSS Law for dispute resolution.	Yes - please refer to privacy notice.	Received from : Employing authorities, scheme members, their representatives, HMRC, DWP. Sent to: See privacy notice	N/A	N/A	N/A

#### **Cambridgeshire Pension Fund - Privacy Notice**

The General Data Protection Regulation (GDPR) requires organisations to be more transparent and accountable to individuals about how it manages and controls their data. This Privacy Notice, sets out how the Cambridgeshire Pension Fund manages members' and potential beneficiaries' data, including who it shares it with and for what purpose it might be used.

Cambridgeshire County Council (The Data Controller) administers the Local Government Pension Scheme (LGPS) on behalf of all participating employers throughout Cambridgeshire and operates as the Cambridgeshire Pension Fund administering the Local Government Pension benefits of over 77,000 scheme members.

Article 6(c) of the GDPR allows CCC to process personal data on the basis that processing is necessary for compliance with a legal obligation to which CCC (the data controller) is subject. As such consent is not required.

The Fund holds personal information about individuals so that it can provide pension services to its members and employers.

The Fund has a legal obligation and a statutory duty to provide individuals with certain information under a number of regulations, including:

- The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013
- The Pensions Act 2011 (Transitional, Consequential and Supplementary Provisions) Regulations 2014
- The Occupational and Personal Pension Schemes (Disclosure of Information) Amendment Regulations 2015
- The LGPS Regulations 2013
- The Public Service Pensions Act 2013
- The Pensions Act 2004

Under these regulations, the Fund has a legal requirement to provide individuals with the following:

- Basic information to members on the LGPS on joining or upon request by other parties
- Information to early leavers and those retiring from the LGPS
- Information on request relating to the transfer to and from the LGPS
- Issue Annual Benefit Statements to all active members of the LGPS no later than 31 August each year
- Information regarding changes to the Regulations that govern the LGPS that may affect the calculation of a member's benefits.

The Fund may, if it chooses, pass certain details to a third party, if that third party is carrying out an administrative function of the Fund, for example, the Fund's appointed firm of actuaries.

By law, the Fund is required to share in certain circumstances to share members' information with government organisations such as Her Majesty's Revenue and Customs and the Department for Work and Pensions so that they can monitor the Fund's performance and ensure that public are safeguarded. Information may also be shared in the prevention and detection of fraud.

#### Who we may share your information with

The Cambridgeshire Pension Fund/Northamptonshire Pension Fund may share of disclose personal information with any of the following bodies or organisations as may be necessary to administer the scheme in line with the statutory obligations and/or comply with contractual obligations relating to it. In certain circumstances, these bodies may also be data controllers in their own right.

Type of service/advisor	Name of body/organisation	Reasons for sharing the personal data				
Scheme Actuary	Hymans Robertson	To calculate the value of the Fund's assets and liabilities based on its membership profile and to set employer contribution rates. To facilitate the creation and maintenance of an individual member's AVC account.				
Scheme Additional Voluntary Contribution Provider*	Prudential* Equitable Life					
Scheme Auditor	BDO	To facilitate the statutory duty of auditing the Fund's Annual Report and Statement of Accounts and internal controls.				
LGPS National Insurance Database	South Yorkshire Pension Fund	To enable the Fund to identify if members have benefits in other LGPS Funds to ensure that that appropriate benefits are paid.				
Tell Us OnceDepartment of Work andServicePensions		To enable the Fund to be notified of the death of a scheme member.				
Pensions administration and pensioner payroll software provider	Aquila Heywood	To provide software management support in the delivery of the Fund's pensions administration, pensioner payroll, member and employer self-service functions.				
Independent Investment Advisor	Mercer	To support the Fund in determining its investment strategy based on its liabilities as determined by its membership profile.				
Transmission of overseas pension payments	Western Union Business Solutions	The transmission of monthly pensions in local currency to retired or dependant scheme members with a non-UK bank account.				
Independent Data Auditor	ITM Limited	To provide independent insurance on the quality and accuracy of the Fund's data.				

Benefits Consultant	AON Hewitt	To support the Fund in delivering ad hoc and specific pensions administration
		activities.
Regulators, the	National Fraud Initiative	To comply with the Fund's statutory duty in the management and administration of
government, law	Government Actuary	benefits. This includes participation in the Cabinet Office National Fraud Initiative for
enforcement bodies	Department	the purposes of the prevention and detection of fraud against the Fund and
including local and	The Pensions Regulator	organisations within the public sector. Personal data is also shared with the
foreign courts,	The LGPS Scheme Advisory	Government Actuary Department for the calculation of the triennial assessment of the
tribunals and	Board (England & Wales)	cost of the LGPS on a national basis as per Section 13 of the Public Service Pensions
arbitrators	Her Majesty's Revenue and	Act 2013.
	Customs	

\*The Fund is required by law to have an Additional Voluntary Contribution (AVC) provider. The Cambridgeshire Pension Fund partners with Prudential and Equitable Life to provide AVC options to its members. Through that arrangement, the AVC provider may have access to members' contact details in order to provide information and options in relation to AVCs. Members will always be notified and permission sought where their information is shared with the AVC provider.

#### Who may have access to your personal information

The Fund procures the services of a number of suppliers who support the various electronic systems and software used by the Fund. Those suppliers may have access to the personal data held by the Fund for the purposes of supporting the IT infrastructure only, they will not have access to the information for any other purpose.

# Your rights

The GDPR provide the right for you to control the information the Fund has about you and how it is used. Your statutory rights under GDPR and the processes adopted by the Fund in compliance of those rights are detailed here:

# The right to be informed

This is your right to know how your information is used and who it will be shared with. This privacy notice explains who the Fund will share information with any why. Should you feel that the information supplied in this privacy notice is inadequate or does not inform you about how your information is used by the Fund, please contact Cambridgeshire County Council's Data Protection Officer for more information.

# The right of access

This is your right to obtain:

- Confirmation that your data is being processed
- Access to your personal data
- Access to policies and information held by the Fund about how it uses data.

This right enables you to verify that the Fund is using your data appropriately as well as providing you access to obtain copies of information we hold about you.

You are entitled to see the information that the Fund holds about you and you can request a copy of this information by emailing pensions@northamptonshire.gov.uk.

Copies of the information held will be provided within one month of receiving your request, however should your request be more complex, we may write to you informing you that your request may take longer conforming the date when the information will be provided.

# The right to rectification

You have a right to have your information added or rectified if you believe it is inaccurate or incomplete.

If you believe any information held about you is incorrect, please email <u>pensions@northamptonshire.gov.uk</u> and we will amend the information accordingly.

# The right to erasure / right to be forgotten

This right allows individuals to request that a company or body delete all or some information held about them.

It is important to note that the right to erasure does not provide an absolute 'right to be forgotten'. Individuals have a right to have personal data erased and the prevent processing in specific circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
- When the individual withdraws consent.
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
- The personal data was unlawfully processed (i.e. otherwise in breach of the GDPR).
- The personal data has to be erased in order to comply with a legal obligation.

The Fund, in providing statutory duties under the regulations has determined that it cannot permanently delete a member's record. Should a member transfer out of the scheme the Fund will retain a basic record confirming the member's name, contact details, date of birth and national

insurance number. The Fund will endeavour to delete any other information including any documents relating to the member. The basic member details are required to be retained to enable the Fund to comply with statutory and legal obligations such as fraud prevention and the national contracting-out reconciliation.

## The right to restrict processing

You have a right to limit how the Fund uses your data, including who we share it with.

A request for your information to be used for limited purposes will not delete the information we hold about you.

Should you wish for the Fund to limit how we use your data please contact the Data Protection Officer with the reasons for your request.

#### The right to data portability

This right enables you to obtain copies of the information we hold about you in a format that is easily transferred to either yourself of another organisation.

Should you wish to obtain a copy of your data in this form please email pensions@northamptonshire.gov.uk.

#### The right to object

In addition to the right to limit the use of your data, you also have a right to object to the use of your data for certain actions. The Fund may share your information with third parties, for example where we our printing of payslips and P60s. Under GDPR you can object to the Fund sharing your data with these third parties.

Should you exercise your right to object, it will not limit the information you receive from the Fund as we may still be required by law to provide you with certain information. In cases such as this the Fund will take appropriate steps to ensure your request is complied with but that it also fulfils any legal obligation it has to provide with information or supply services.

Version 1 25/01/2018

CAMBRIDGESHIRE PENSION FUND BOARD AGENDA PLAN	Updated on 13 February 2018	Cambridgeshire County Council
		Agenda Item No: 7

#### <u>Notes</u>

Items shown in bold have been or will be considered by the Pension Fund Committee.

Draft reports are due with the Democratic Services Officer by 10.00 a.m. eight clear working days before the meeting. The agenda dispatch date is six clear working days before the meeting.

Meeting date	Agenda item	Lead officer	Deadline for draft reports	Agenda despatch date
20/04/18	Minutes 16/02/18	R Yule	09/04/18	11/04/18
	Administration Report (includes Employers, Admissions and Cessations Report, Business Plan Update and Governance and Legislation Report	J Walton		
	Implementation of the General Data Protection Regulation (GDPR) [standing item]	J Walton		
	Pension Committee Minutes.	J Walton		
	Asset Pooling update [standing item]	M Whitby		
	Forward agenda plan [standing item]	R Yule		
06/07/18	Election of Chairman/woman		25/06/18	27/06/18
	Election of Vice-Chairman/woman			
	Minutes 20/04/18	R Yule		

n	Lead officer	Deadline for draft reports	Agenda despatch date
on Report (includes Employers, Admissions and Report, Business Plan Update and Governance and Report	J Walton		
ion of the General Data Protection Regulation nding item]	J Walton		
nmittee Minutes.	J Walton		
g update [standing item]	M Whitby		
enda plan [standing item]	R Yule		
07/18	R Yule	08/10/18	10/10/18
on Report (includes Employers, Admissions and Report, Business Plan Update and Governance and Report	J Walton		
ion of the General Data Protection Regulation nding item]	J Walton		
nmittee Minutes.	J Walton		
g update [standing item]	M Whitby		
enda plan [standing item]	R Yule		
10/18	R Yule	04/02/19	06/02/19
on Report (includes Employers, Admissions and Report, Business Plan Update and Governance and Report	J Walton		
ion of the General Data Protection Regulation nding item]	J Walton		
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Meeting date	Agenda item	Lead officer	Deadline for draft reports	Agenda despatch date
	Pension Committee Minutes.	J Walton		
	Asset Pooling update [standing item]	M Whitby		
	Forward agenda plan [standing item]	R Yule		
03/05/19	Minutes 15/02/19	R Yule	18/04/19*	24/04/19
	Administration Report (includes Employers, Admissions and Cessations Report, Business Plan Update and Governance and Legislation Report	J Walton		
	Implementation of the General Data Protection Regulation (GDPR) [standing item]	J Walton		
	Pension Committee Minutes.	J Walton		
	Asset Pooling update [standing item]	M Whitby		
	Forward agenda plan [standing item]	R Yule		

\*unusually early because of Good Friday and Easter Monday (19 & 22 April)