

SELF-ASSESSMENT – JANUARY 2017

This self-assessment is not designed to assess compliance with the law, and does not replace a comprehensive review of the Scheme against relevant Legislation and TPR’s code of practice which all Schemes should undertake. It is primarily concerned with the governance and administration of the Scheme.

GOVERNING YOUR SCHEME			
Have you clearly defined and recorded the roles and responsibilities of the Pension Board?			
YES (GREEN) <ul style="list-style-type: none"> FRA Local Pension Board has an agreed Constitution and Terms of Reference that all Members were provided with on appointment. It would be good practice to have a ‘Role Profile’. Both documents are available on the LPB page of the FRA website at xxxxxx Annual report submitted to FRA. Minutes of the LPB are submitted to FRA as Scheme Manager. 	IN PROGRESS / DON’T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS <ul style="list-style-type: none"> Consider strengthening links between the LPB and the Scheme Manager
Have you published information about the Pension Board and kept it up-to-date			
YES (GREEN) <ul style="list-style-type: none"> The LPB has a page on the FRA website and this is regularly reviewed / updated. The page contains a list of Members, Constitution, Declarations of Interest, Member Code of Conduct, TPR website link, other useful documents. The published information complies with the list provided by The Pensions Regulator. The agenda papers for the LPB meetings are also published. The Scheme Manager receives an annual report from the LPB. 	IN PROGRESS / DON’T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS
Do you have policies and arrangements in place to help Pension Board Members acquire and retain the requisite knowledge and understanding?			
YES (GREEN) <ul style="list-style-type: none"> All LPB members were offered an initial Development Discussion to ascertain their learning and development requirements. From 1st April 2015 the LPB has taken advantage of several training opportunities delivered by the LGA, TPR and other organisations. A bespoke session for the FRA LPB was delivered by the LGA on xx xx xx. A number of learning outcomes were identified which are being discussed / actioned at meetings of the LPB. 	IN PROGRESS / DON’T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS <ul style="list-style-type: none"> To lobby the National Scheme Advisory Board on generic Learning and Development events across the country for LPBs.

<ul style="list-style-type: none"> • Documentation, web links and an online Knowledge Hub have been shared for Members to undertake their own research. • Several members of the LPB (including the Chair) attending the Annual Firefighters' Pension Conference. 			<ul style="list-style-type: none"> • It would be helpful for all LPBs to have the same level of understanding / common events.
Do you use the following for your Pension Board? – Individual Training needs analysis			
YES (GREEN) <ul style="list-style-type: none"> • Following the establishment of the LPB in April 2015, Development Discussions (TNAs) were undertaken and documented. • This informed an initial learning and development programme / provision of documentation etc. 	IN PROGRESS / DON'T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS
Do you use the following for your Pension Board? – Training Plans			
YES (GREEN)	IN PROGRESS / DON'T KNOW (AMBER) <ul style="list-style-type: none"> • Members of the LPB have been provided with all the support available in the first year. • There is an acceptance that the LPB will take some personal responsibility for maintaining their own level of knowledge as member of the LPB. 	NO (RED)	SUGGESTED ACTIONS <ul style="list-style-type: none"> • To re-visit TPR Code 12 and the quick guide to personal development.
Do you use the following for your Pension Board? – Training Log			
YES (GREEN) <ul style="list-style-type: none"> • All members of the LPB have their own training log. • This is retained by xxxxx who provide secretariat and support for the LPB. 	IN PROGRESS / DON'T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS

Do you have a Conflicts Policy and Procedure for Pension Board Members?			
YES (GREEN) <ul style="list-style-type: none"> An agreed Conflicts Policy exists for the LPB. 	IN PROGRESS / DON'T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS
Do you have a register of interests (or equivalent)?			
YES (GREEN) <ul style="list-style-type: none"> Declarations of Interest forms have been completed by each member of the Local Pension Board and appear on the website under each Member's name. 	IN PROGRESS / DON'T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS
MANAGNG RISKS AND RESOLVING ISSUES			
Do you have procedures in place for assessing and managing risk?			
YES (GREEN) <ul style="list-style-type: none"> The FRA has a dedicated Risk Register that is reported to the Audit and Governance Committee on a quarterly basis (alongside the Fire & Rescue Service Risk Register). As part of the risk covering the Medium-Term Financial Strategy (MTFS), there is a mitigation addressing the pension strain costs. 	IN PROGRESS / DON'T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS <ul style="list-style-type: none"> To seek clarification and guidance from the National Scheme Advisory Board on the need for a Fire LPB to have its own dedicated risk register. To consider inclusion of an appropriate risk on the FRS Risk Register.
Do you have a risk register?			
YES (GREEN) <ul style="list-style-type: none"> The FRA has a dedicated Risk Register, but the LPB does not have a separate Risk Register (see above). A risk is included on the FRA Risk Register around managing pension strain cost. 	IN PROGRESS / DON'T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS <ul style="list-style-type: none"> See above.
Where you have outsourced services, do you ensure that providers demonstrate that they have internal controls in place?			
YES (GREEN) <ul style="list-style-type: none"> SLA agreement with Pensions Admin providers Quality audits under ISO:9001 are regularly undertaken Internal Audits are regularly carried out 	IN PROGRESS / DON'T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS <ul style="list-style-type: none"> Would be prudent to request documented internal control procedures?

Do you have a service level agreement, or equivalent, in place with your scheme administrators, whether in-house or outsourced?			
YES (GREEN) <ul style="list-style-type: none"> • A Service Level Agreement (SLA) exists between FRA and xxxx who administer the Scheme. • The LPB has received a copy of the SLA for scrutiny / discussion. • A representative from the scheme administrator attends the LPB. 	IN PROGRESS / DON'T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS
Are your internal dispute resolution arrangements clearly communicated to members and others?			
YES (GREEN) <ul style="list-style-type: none"> • The Internal Dispute Resolution Procedure is available on the Intranet • Right of appeal is communicated in correspondence when a decision is made in relation to the scheme 	IN PROGRESS / DON'T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS
Do you have procedures in place to identify, assess and report breaches of the law?			
YES (GREEN) <ul style="list-style-type: none"> • Financial regulations and Financial Procedures and documentation within Our Constitution • A breaches register is kept by the scheme administrator and issues may be reported to TPR. 	IN PROGRESS / DON'T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS

ADMINISTRATION

Do you have a process in place to ensure that information is provided to TPR as required (eg through the scheme return)?			
<p>YES (GREEN)</p>	<p>IN PROGRESS / DON'T KNOW (AMBER)</p>	<p>NO (RED)</p>	<p>SUGGESTED ACTIONS</p> <ul style="list-style-type: none"> Improve communications between Service and Joint Authorities Governance Unit in respect of TPR requirements. Ensure the TPR fully understand the difference between the governance of the LPB and the administration via FRA. Liaise with scheme administrators to provide information they may hold.
Do you have processes in place to monitor scheme records for all membership types on an ongoing basis and ensure they are accurate and complete?			
<p>YES (GREEN)</p> <ul style="list-style-type: none"> Procedures in place to deal with all aspects of data recording, transactional processing and exception reporting. Data cleansing is carried out annually 	<p>IN PROGRESS / DON'T KNOW (AMBER)</p>	<p>NO (RED)</p>	<p>SUGGESTED ACTIONS</p>
Do you have controls in place to ensure that your employer(s) provide timely, accurate and complete data?			
<p>YES (GREEN)</p>	<p>IN PROGRESS / DON'T KNOW (AMBER)</p>	<p>NO (RED)</p>	<p>SUGGESTED ACTIONS</p>
When did you last carry out a data review exercise?			
<p>YES (GREEN)</p> <ul style="list-style-type: none"> A data review exercise has been carried out within the last 12 months 	<p>IN PROGRESS / DON'T KNOW (AMBER)</p>	<p>NO (RED)</p>	<p>SUGGESTED ACTIONS</p>

Where you have identified poor quality or missing data, do you have an improvement plan to addresses?			
YES (GREEN) <ul style="list-style-type: none"> Poor quality data has not been identified to date. We would set up an improvement plan specific to the nature of the issue. 	IN PROGRESS / DON'T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS
Do you have processes in place for monitoring scheme contributions, resolving issues and assessing whether to report payment failures to TPR?			
YES (GREEN) <ul style="list-style-type: none"> Exception reporting, management accounting, government returns 	IN PROGRESS / DON'T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS <ul style="list-style-type: none"> Record any issues on the breaches register.
Have you reviewed your processes for issuing annual benefit statements to ensure they are fit for purpose?			
YES (GREEN) <ul style="list-style-type: none"> Process reviewed by scheme administrators each year before start of exercise to review feedback from last year and take into account any regulatory changes. 	IN PROGRESS / DON'T KNOW (AMBER)	NO (RED)	SUGGESTED ACTIONS
Have you taken steps to ensure member communications are clear, accurate and easily accessible?			
YES (GREEN) <ul style="list-style-type: none"> Pension newsletters, intranet, and other forms of media are regularly used to provide information to members in plain English The LPB meeting has communication as an standing agenda item 	IN PROGRESS / DON'T KNOW (AMBER) <ul style="list-style-type: none"> The LPB has recognised that it would be useful to get feedback from members regarding the pension information communication strategy and will be looking at how best this can be achieved. 	NO (RED)	SUGGESTED ACTIONS