

# APPENDIX A

Bill

I write to provide our response to the survey. In the main we have answered the questions in the attached, but where none of the available options felt appropriate we have provided details below. We have also provided further details in relation to some of our answers.

Please let me know if you have any questions.

Kind regards

Euan

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Q6

Attendance at LGPS specific and wider pensions and investment conferences and seminars. Facilitators include CIPFA, NAPF, LGA and professional services firms.

Q12

None of the available answers feel particularly appropriate. Our understanding is that we are compliant with the legal requirements of the Act.

Q15

Pension Board members have been asked to complete a training needs analysis which will be reviewed at the October meeting of the Pensions Board. Part of this training needs analysis is an assessment of Pension Board members' understanding of the roles, responsibilities and duties, which were set out in a report to the previous meeting of the Pensions Board and discussed in detail.

Q16

The training needs analysis developed for Pension Board members directs members to the tPR toolkit and provides links to where relevant information to satisfy knowledge and understanding requirements can be found.

Individual and Pension Board training plans will be developed based on responses to individual needs analysis.

Board members have access to GMPF officers to provide support.

Q20

As per Q15, Pension Board members have been asked to complete a training needs analysis which will be reviewed at the October meeting of the Pensions Board. There will be regular training items at Pensions Board meetings, the subject of the training will be determined by the outcome of the training needs analysis. In addition, Pensions Board members will be expected to undertake their own learning outside of meetings and attend ad-hoc training events, some of which will be organised in conjunction with the GMPF Management Panel.

Q28

The GMPF Fund Management Team, which comprises 5 senior officers of the Fund meet on a monthly basis and discuss developments and potential risks.

A formal review of the risks is undertaken annually as part of the Fund's annual reporting process.

The Fund also uses the Administering Authority's internal audit function to analyse specific areas of risk in detail and the internal auditors work closely with Fund officers and external auditors. Over the course of the year there are several internal audits undertaken on specific risks.

Q35

We have a battery of tests that vet our data. One of the most important of these is the monthly comparison of the benefits as calculated to the benefits that are in payment. As far as we know we were the first LGPS fund to run such a vet - in 1985 - which we now run monthly. Others then followed, such as checking the pensions increase (PI) in payment is supported by the right amount of basic pension. As an example, if the basic pension is £1,000 pa and the cumulative increase in PI after several years is 20%, then the PI in payment should be £200 pa (ignoring any effects of guaranteed minimum pensions). We also have some minor vets, such as before we do a mass mailing we will check that titles and genders agree, ie. if a member is a woman then her title shouldn't be "Mr".

Another important data vet is the monthly comparison of our live payroll to the four UK death registers. This reveals deaths every month that have not hitherto been reported to us.

There is evidence that our data management is of above average quality. Hymans Robertson, our actuary and the actuary to many other LGPS funds, said at the last valuation our data was "top of the class". We have also corrected various pensions that we have inherited due to us becoming the "one fund" for the Probation Service's LGPS liabilities, which included identifying a pension that was being paid at twice the correct rate (a short-term widow's pension had not been halved to the long-term rate).

Having said that, no fund of any size can have data that is totally accurate and complete, and nor is ours. In particular, we don't try and trace deferred beneficiaries that go missing until the months prior to their deferred benefits are due to come into payment. [Although if they die, at least in the UK, this is revealed by the National Fraud Initiative.] Nor do we compare addresses for active members with those held by employers, as we know from experience that our address records are better than employers, ie. we don't want to import wrong addresses. And increasingly it is not the home address that is important, but rather the email one.

We do however raise queries with employers when we believe our data is wrong. As an example, if we can see that contributions reduced during the year, we will seek leaving notifications/explanations from employers.

Q43

We have over 450 employers with active members, most of which are very small, eg. academies. We don't however track the timeliness of data notifications from all of them, only our ten local authorities.

Q46

As a matter of course we have provided annual benefit statements (ABSs) to the large majority of our active members and deferred members in the last 12 months. Regarding the latter, and as permitted by the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013, we have not sent ABSs where we do not know addresses. Regarding both the former and the latter, we have not sent ABSs where we believe data from employers is wrong or missing.

Q48

Frequency: Infrequently. An annual report is made to the GMPF Management Panel summarising IRDP cases at stage 1 and stage 2 and ombudsman decisions. We receive relatively few Stage 1 appeals. Most Stage 2 appeals relate to incapacity. Training is to be delivered to employers regarding the incapacity provisions in the Scheme's Regulations.

Circumstances: The Fund is a member of the LGPS and the national Scheme Advisory Board has tasked its Administration & Communications Sub-committee with reviewing the extant internal dispute resolution procedure. The outcome of this review is awaited.

Q50 and Q51

Answer: We are in the throes of establishing a procedure for reporting breaches. As draft procedure will be considered by the Fund's Pensions Administration Working Group at its meeting on 16 October, and then the Pension Fund Management Panel in December. Assuming it is approved, complementary training for schemes managers and pension board members on their duty to report breaches will be provided.

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