

<b>Committee:</b> Police Authority Board	<b>Date:</b> 11 July 2019
<b>Subject:</b> The City of London Police Pensions Board – Review of Activities for the period 1 April 2018 to 31 March 2019	<b>Public</b>
<b>Report of:</b> The Chamberlain	<b>For Information</b>
<b>Report author:</b> Graham Newman – Chamberlain’s Department	

### **Summary**

This report summarises the activities of the Police Pensions Board for the period 1 April 2018 to 31 March 2019. The Police Pension Scheme Regulations 2015 provided for the establishment of a Board with the responsibility of assisting the Scheme Manager (the Commissioner of the City of London Police) in ensuring the efficient and effective governance and administration of the Police Pension Scheme (PPS).

Over the last twelve months the Board:

- continues to review the working practices of the City of London Police Pensions Office including reviews of all letters and documents issued to members, prospective members, leavers and retirees;
- monitored and where appropriate updated the Risk Register for the Board;
- received training on relevant pension matters at each Board meeting; and
- continues to undertake online training modules with the Pensions Regulator’s Toolkit.

The training needs of all Board Members continues to be monitored and training provided as required.

### **Recommendation**

Members are asked to note this report.

## **Main Report**

### **Background**

1. The Public Services Pensions Act 2013 (the 2013 Act) included several provisions regarding better governance and improved accountability for all public-sector pension schemes. As a result, the Police Pension Scheme Regulations 2015 provided for the establishment of a Board with the responsibility of assisting the Scheme Manager in ensuring the efficient and effective governance and administration of the Police Pension Scheme (PPS).
2. The Scheme Manager for the City of London Police Pension Scheme is the City of London Police Commissioner, with responsibility for the administration of the Scheme delegated to the Chamberlain of the City of London Corporation.

### **The Role of the Police Pension Board**

3. The Pension Board sits in an oversight role, to assist the Scheme Manager with ensuring the administration of the Scheme complies with
  - the Regulations;
  - other legislation relating to the governance and administration of the Scheme; and
  - the requirements imposed by The Pensions Regulator in relation to the Scheme.
4. In accordance with the Regulations, the structure of the Board must include an equal number of scheme member and scheme employer representatives. The City of London Police Pension Board consists of 3 scheme Member representatives and 3 scheme employer representatives.
5. The 2013 Act makes it a legal requirement that members of the Board do not have a conflict of interest and therefore all members are expected to identify, monitor and manage any potential, actual or perceived conflicts of interest. The Members of the Board are as follows:

#### *Scheme Employer Representatives:*

Alderman Ian Luder (Chairman) – Elected Member

Mr Alexander Barr – Elected Member

Superintendent Helen Isaac – Serving CoL Police Officer

#### *Scheme Member Representatives:*

Mr John Todd (Deputy Chairman) – Retired CoL Police Officer

Mr Philip Hodgson – Retired CoL Police Officer (since October 2018)

Mr Timothy Parsons – Retired CoL Police Officer (since October 2018)

Constable Davina Plummer – Serving CoL Police Officer (resigned September 2018)

Mr Kieron Sharp – Retired CoL Police Officer (Resigned September 2018)

Appendix A sets out the attendance record of each Board Member.

## Activities of the Board

6. Since 1 April 2018 three meetings have been held – 30 May 2018, 3 October 2018 and 25 January 2019. It is expected that there will continue to be 3 meetings held in every year.

### Training

7. Board Members have certain legal responsibilities and must be conversant with the PPS Regulations and the governance and administration of the Scheme to enable them to exercise their role as a Board Member.
8. Board Members were required to carry-out a training needs analysis which they all completed in 2017. The Board enlisted Barnet Waddingham, the Scheme Actuary, to analyse the training needs and this analysis has then been used by the Pensions Office to produce a training plan for the Board. All necessary training will be delivered by the Pensions Office and external providers as required.
9. Members are expected to keep their knowledge and understanding requirements under review. This will allow the training plan to be reviewed and updated as required to meet the training needs.
10. The Pensions Regulator has created an online learning programme, the Trustee Toolkit, which is aimed at the board members of occupational pension schemes. Members have been provided with the details of the Toolkit and are expected to undertake all 7 training modules.
11. The Pensions Office arranged and provided training presentations to aid the Board in their knowledge and understanding.

<b>Training Topic</b>	<b>Training Content</b>	<b>Delivered by</b>	<b>Board Meeting</b>
<b>Police Pension Schemes: An Overview</b>	Scheme benefits & Overview	The Pensions Office	June 2018
<b>Local Pension Boards: an overview of legislation and expectation</b>	Expectations of Local Pension Boards & the Scheme Advisory Board	The Pensions Regulator	October 2018
<b>Procurement Training</b>	Overview of the procurement process & procurement of pension software	COL Procurement Team & Pensions Office	January 2019

### Annual Schedule of Events

12. In order that the Board is able to monitor and oversee the administration of the Police Pension Scheme an Annual Schedule of Events to illustrate the tasks carried out by the Pensions Office, their deadlines and the actual completion dates of each task is maintained. The Schedule is updated as required and is a standing agenda item for each Board meeting.

### Risk Register

13. A risk register has been created to cover the risks in respect of the City of London Police Pension Scheme. The Register is a standing agenda item for each Board meeting and means that potential risks are continually assessed, reviewed and amended or added to or removed from the Register as deemed appropriate. Since April 2018 two additional risks have been added to the register. The additional risks are: Cyber-security and the Data Protection Act 2018 (DPA18) / General Data Protection Regulations (GDPR).

### Documentation and Communication

14. The Board continues to review the working practices of the City of London Police Pensions Office, including all letters and documents issued to members, prospective members, leavers and retirees to ensure optimum clarity as well as accuracy. This work is ongoing and several recommendations have been made in the past twelve months.

### Data Protection Act 2018 (GDPR)

15. On 25 May 2018 General Data Protection Regulations were introduced. Part of the requirement of pension schemes is to clearly communicate data use and retention. To meet this requirement, the Scheme Manager of City of London Police Pension Scheme must issue a privacy statement to scheme members.
16. The Pensions Office has been provided with a copy of the Police Force's generic privacy statement which the Scheme Manager has now confirmed covers the Force's obligation adequately. A copy of the privacy statement will be included with the annual benefit statement that is issued to all serving Police Officers by the Pensions Office. A copy of the privacy statement will also be sent separately to all retired and deferred officers.

### Breaches of Data Security (Information Commissioner's Office (ICO) GDPR)

17. There were no known breaches during the year

### Breaches of Pension Law (The Pensions Regulator (TPR) code of practice)

18. There were no known breaches during the year

## Insurance and Indemnities

19. The Information Commissioner has the power to impose civil penalties under various provisions of the Data Protection Act 2018 (DPA). The penalties lie against the relevant Data Controller responsible for the breach, but Members of the Board were concerned they could have a personal liability because of the nature of the Board.
20. Utilising powers in the Local Authorities (Indemnities for Members and Officers) Order 2004 and in the Localism Act 2011, and utilising City's Cash where necessary, the City Corporation resolved to indemnify Members and officers, including former officers, and serving and former police officers, who sit as members of the Board against any personal liability that may arise to pay a civil penalty under the Data Protection Act 2018, to the extent that the City Corporation's insurance policies do not fully cover such liability, and subject to the exclusions and restrictions contained in the 2004 Order.

## Governance

21. The Board is currently assessing its own Terms of Reference to ensure that it continues to comply with the statutory requirements.

## **Conclusions**

22. The Police Pension Board was created with reference to the Public Services Pensions Act 2013 and the Police Pension Scheme Regulations 2015. Since April 2018, the Board has met three times and Members continue to receive training to ensure they are compliant with the legal requirements.
23. The Board continues to review the working practices of the City of London Police Pensions Office and regularly monitors all letters and documents issued to members, prospective members, leavers and retirees. The Board maintains a Risk Register and an approved Breaches Policy.

## **Appendices:**

Appendix A – Board Member attendance record

## **Contact:**

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## Appendix A

### Police Pension Board - Board Member Record of Attendance

	<b>30/05/2018</b>	<b>3/10/2018</b>	<b>25/01/2019</b>
Alderman Ian Luder	X	X	
Alexander Barr	X	X	X
Helen Isaac		X	
Davina Plummer <sup>(i)</sup>		N/A	N/A
Kieron Sharp <sup>(i)</sup>		N/A	N/A
John Todd	X	X	X
Philip Hodgson <sup>(ii)</sup>	N/A	X	
Timothy Parsons <sup>(ii)</sup>	N/A	X	X

Notes:

- (i) Served on the Board until September 2018
- (ii) Joined the Board in October 2018