



Local Pension Board

Date Thursday 14 March 2019
Time 2.00 pm
Venue Committee Room 2 - County Hall, Durham

Business

Part A

1. Apologies for Absence
2. Declarations of Interest (if any)
3. Minutes of the Meeting held on 6 December 2018 (Pages 3 - 8)
4. Observations from Pension Fund Committee held on 14 March 2019
5. Local Pension Board Annual Report (Pages 9 - 14)
6. Local Pension Board Membership (Pages 15 - 30)
7. Communications Review (Pages 31 - 36)
8. Internal Dispute Review Procedure (IDRP) Cases (Pages 37 - 44)
9. Date of Next Meeting
10. Any Other Business

Helen Lynch

Head of Legal and Democratic Services

County Hall
Durham
6 March 2018

To: **The Members of the Local Pension Board**

Scheme Employer Representatives

Councillors A Hopgood and F Tinsley (1 vacancy)

Scheme Member Representatives

IR Densham, N Hancock and G Sykes

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DURHAM COUNTY COUNCIL

At a Meeting of **Local Pension Board** held in Committee Room 2 - County Hall, Durham on **Thursday 6 December 2018 at 2.00 pm**

Present:

Councillor A Hopgood (Chair)

Scheme Member Representatives:

I R Densham and N Hancock

Officers:

Beverley White – Finance Manager – Strategic Finance

Bryan Smith – Legal Manager - Litigation

Observer:

Paul Cooper – newly appointed Pensions Manager

1 Apologies for Absence

Apologies for absence were received from scheme employer representative Councillor F Tinsley and scheme member representative Mr G Sykes.

2 Declarations of Interest

There were no declarations of interest.

3 Minutes

The Minutes of the meeting held on 6 September 2018 were agreed as a correct record and were signed by the Chair.

Matters Arising from the Minutes

Local Government Pension Scheme Administering Authority and Employer Discretions

In respect of contribution rates Members were informed of non-pensionable elements which included pay in lieu of holidays, and compensation payments. The information was included on the Council's website.

Work Plan - Key Performance Indicators

Members were informed that due to budgetary constraints many Pension Funds were not taking part in benchmarking. This would be pursued by the new Pensions Manager Paul Cooper following his appointment early in 2019.

AGREED that the information given be noted.

4 Observations from Pension Fund Committee held on 6 December 2018

Ian Densham, Neville Hancock and Councillor Hopgood were in attendance at the Pension Fund Committee and provided observations from the meeting.

Councillor Hopgood advised that in the move towards pooling there would be a need to make decisions which may not fit with the Committee's cycle of meetings. It had been suggested that the Committee delegates decisions to the Corporate Director in consultation with the Chair and Vice-Chair of the Committee, but both the Chair and Vice-Chair did not feel that this would be appropriate. Councillor Hopgood suggested that a small Sub-Committee be set up by the Committee who would be authorised to make decisions between meetings of the full Committee.

Ian Densham concurred with Councillor Hopgood and stressed the importance of the Committee process keeping pace with the decisions required as pooling progressed, and to ensure that the Fund was not rushed into decisions regarding asset allocation. The establishment of a Sub-Committee was proposed by the Board. Beverley White stated that there may be a Special meeting of the Pension Fund Committee called in January 2019 to discuss the asset allocation to the BCPP which could also consider setting up a Sub-Committee.

Board members again raised the matter of the length of Pension Fund Committee meetings and the length of time available for Fund Manager presentations. It was noted that the meeting that day had been particularly long due in part to a lengthy presentation from BCPP representatives regarding asset allocation. The Board had written to the Chair of the Committee previously on the matter of the management of meetings, and therefore decided at this point to monitor the situation, as pooling progressed.

Board members also noted that there had been no challenge by the Committee of the Fund Managers, despite Members being provided with suggested questions by Mercer. The Board suggested that to ensure that the questions were asked, the Chair be asked to remind Members to do so before the Managers entered the meeting.

Neville Hancock reported that agreement had been reached for a scheme member to be represented on the BCPP Joint Committee, and information on the appointment process was now awaited.

AGREED that

- a) the information given be noted;
- b) Beverley White and Bryan Smith discuss with the Corporate Director of Resources the feasibility of a Sub-Committee of the Pension Fund Committee which would be authorised to make decisions relating to pooling between Committee meetings;

- c) the Chair of Pension Fund Committee be asked to remind Members at each meeting to put the questions suggested by Mercer to the Fund Managers in attendance.

5 Local Pension Board Work Plan

The Board considered the report of the Corporate Director of Resources which provided Members with a work plan which would help frame the work of the Board over the next two years (for copy see file of Minutes).

Members were advised that Paul Cooper would consider if there were any other matters that should be included in the Work Plan.

Board members considered that the Local Pension Board should publish an Annual Report for report to Pension Fund Committee which reviewed the work it had undertaken in the year, and discussed when it should be produced.

AGREED that

- a) the Work Plan be agreed, subject to the inclusion of any additional work proposed by the new Pensions Manager;
- b) Annual Reports be produced in future with the first to be considered by the Board in March 2019, for presentation to the June meeting of Pension Fund Committee.

6 Pensions Regulator – Code of Practice for Public Service Pension Schemes – Gap Analysis

The Committee considered a report of the Corporate Director of Resources which provided Board members with an assessment of the Council's level of compliance with the Pensions Regulator's Code of Practice on the governance and administration of public service pension schemes (for copy see file of Minutes).

The Board thanked the officers for what had been achieved to date, and noted that in the last year Members had concentrated on those areas that were non-compliant. The Board decided that their focus would be on those areas identified as partially compliant over the next year, with a target to achieve 50% full compliance of those areas by the end of 2019.

Councillor Hopgood noted that the Code of Practice required Board Members to be conversant with relevant scheme documents, and that easier access to documents was identified as an action. The Member asked if it would be possible to have a single link to all relevant documents which members could access on their devices.

AGREED that

- a) the report be noted;

- b) the Board focus on achieving 50% full compliance of those areas identified as partially compliant by the end of next year;
- c) the provision of easier access to relevant documents for Board members be explored.

7 Training

Beverley White reported that training had been held on 26 September 2018 for Members of the Pension Fund Committee and Local Pension Board following the self-assessment forms completed by Members. The forms would now be re-circulated to Members and a further gap analysis carried out.

Councillor Hopgood suggested that Paul Cooper be asked to review the forms and consider if there were other training requirements not already identified. Paul Cooper confirmed that self-assessment was a key tool for examining training needs.

AGREED that the information given be noted.

8 Date of Next Meeting

AGREED that the next meeting be held at 2.00pm on Thursday 14 March 2018, following the Pension Fund Committee.

9 Any Other Business

Cost Management Process

Neville Hancock reported that the Scheme Advisory Board had issued an update on the cost management process which set out that the SAB part had revealed that improvements equal to 0.5% of pay was required. The outcome was expected to lead to improvements in member benefits but could potentially impact on employer contributions. Benefit changes were being considered to return the scheme to its total target costs without affecting contribution rates.

Beverley White confirmed that the Actuary was aware of the situation and as a decision would be made before the end of March 2019, there may be an impact upon the actuarial valuation.

AGREED that the information given be noted.

BCPP Matters

The Chair advised that Geoff Sykes had made a request for the following questions to be asked in his absence. Beverley White responded to each of the queries but advised that a full response would be circulated to Board members following the meeting:

1. The section 151 Officer has a statutory duty to ensure that there is an effective internal audit of the council's operations. Has Internal Audit reviewed the governance arrangements of the proposed pool and particularly in relation to internal controls, monitoring and reporting? Reporting has been cited as a problematic area in the financial press.

Members were informed that Internal Audit had not carried out any specific reviews of the governance arrangements for reporting to the Committee. She expected monitoring and reporting for Fund Managers to be similar to existing arrangements.

2. Does Internal Audit have the right to visit and inspect the records of the new company?

Members were informed that Internal Audit would not have a right but external audit would have access to relevant information.

3. Is there a Remuneration Committee and what is the policy re bonuses?

Beverley White confirmed that there was a separate Sub-Group of staff not paid by the BCPP who reviewed salary and bonus payments. At present no bonuses were being paid.

4. What is the progress on the new Private Equity investment?

BCPP were expecting to launch their private equity fund early in 2019, and a Special meeting of the Committee was likely to be called in January 2019 to finalise the Fund's strategic asset allocation.

5. An article in the financial press had stated that authorities were having recruitment issues because staff are defecting to the new pools. Is this an issue? The Council had recently lost the Pensions Manager and who would replace him?

Members were informed that Durham would have a full complement of staff once the new Pensions Manager commenced his role on 2 January 2019.

Terms of Office – Board Members

Members were informed that the terms of office for Board members ended in 2019, and a recruitment exercise would be required for the appointment/re-appointment of members.

AGREED that Officers establish from the Terms of Reference what actions were required for appointments to the Board at the end of the terms of office for existing Members in 2019.

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Local Pension Board

14 March 2019

Local Pension Board Annual Report



Report of John Hewitt, Corporate Director of Resources

Purpose of the Report

- 1 To provide an overview of the work completed by Local Pension Board during 2018/19, and confirm the Work Plan which will help frame the work of the Board over the next two years.

Executive summary

- 2 During the last year the Board have considered a broad range of areas in assisting the Administering Authority to secure compliance with regulations, and ensuring the effective and efficient governance and administration of the Local Government Pension Scheme.

Recommendation(s)

- 3 The Board is asked note this report.

Background

- 4 The Public Service Pensions Act 2013 introduced the requirement to have a Local Pension Board to assist in the good governance of the scheme.
- 5 Durham County Council Pension Fund's Local Pension Board was established in 2015, first meeting on 9 July 2015. The Board meets four times a year and consists of three scheme member representatives, two employer representatives, with one current employer representative vacancy.
- 6 The Board's role is to assist the Administering Authority in its role as a scheme manager of the Pension Fund. Such assistance is to:
 - Secure compliance with the Regulations, any other legislation relating to the governance and administration of the Scheme, and requirements imposed by the Pensions Regulator in relation to the scheme and;
 - To ensure the effective and efficient governance and administration of the scheme

June 2018

- 7 The Board met for the first time during 2018/19 on 14 June 2018. The Board reviewed the Fund's communications, considering how different stakeholder groups received communication from the Pension Fund, and considered plans to develop the Fund's Communication Strategy, including the feasibility of electronic communication. The Board also sought assurance about the requirements of the GDPR.
- 8 The Board also considered a report of the Corporate Director of Resources, which provided Board Members with a summary of the outcomes of internal dispute cases or Pensions Ombudsman cases the Pension Fund had been involved in between April 2015 and March 2018.

September 2018

- 9 At the Board meeting of 6 September 2018 the Board considered the choices available to the Administering Authority and to employers under the regulations governing the Local Government Pension Scheme and how these were being exercised within the Pension Fund.
- 10 The Board also considered that the areas within the current Work Plan were still relevant, and should form the basis of the Board's Work Plan for the next two years, from December 2018 to September 2020. It was agreed that a new plan for this period be drafted.

December 2018

- 11 At the meeting of the Board held on 6 December 2018, Board Members considered the draft Work Plan that had been agreed previously. This plan will help frame the work of the Board over the next two years. Board Members agreed the report, and considered the publication of an Annual Report to the Pension Fund Committee.
- 12 The Board also considered the Fund's compliance with the Pensions Regulator's Code of Practice on the governance and administration of public service pension schemes. The Board had previously concentrated on areas where the Fund was non-compliant. As there are no areas now deemed non-compliant, the Board agreed to focus on those areas identified as partially-compliant over the next year.

March 2019

- 13 At the final meeting of the Board during 2018/19, held on 14 March 2019, the Board were updated on the Fund's Communication Strategy. Board Members considered how the Pension Fund communicates with different stakeholder groups, and were provided an update on the Fund's progress with regard to electronic communications.
- 14 The Board also considered internal dispute cases. Board Members were provided with an update on the outcomes of any internal dispute cases up to the end of 2018/19.

Work Plan

- 15 The work plan for the Local Pension Board covering the next two years is attached as Appendix 1. The plan is based on holding four Local Pension Board meetings a year, which reflects the frequency of meetings held since the Local Pension Board was established.
- 16 Officers will provide the necessary support to allow the Local Pension Board to carry out its core functions and to develop and implement its work plan. Appendix 2 provides further detail of how this proposed work plan should ensure the Local Pension Board is able to fulfil its core functions.

Contact: Paul Cooper

Tel: 03000 269798

Appendix 1: The Local Pension Board Work Plan

Meeting	Topics to be considered	Comments
December 2018	Pensions Regulator Code of Practice	Consider Gap analysis against Code of Practice
March 2019	Member and employer communications	Review standard communications and communication strategy
	Internal disputes cases, Pensions Ombudsman cases	Review and consider any lessons learned
June 2019	Review performance statistics – review Key Performance Indicators	Consider Board members, Committee members and officers involved in scheme administration
	Review training approach	
September 2019	Review Pension Fund Annual Report and Accounts	Consider compliance with UK Stewardship Code
	Assist in development and review of asset voting and engagement processes	
December 2019	Pensions Regulator Code of Practice	Review and update gap analysis
March 2020	Member and employer communications	Review standard communications and communication strategy
	Internal disputes cases, Pensions Ombudsman cases	Review and consider any lessons learned
June 2020	Review performance statistics – review Key Performance Indicators	
	Review final valuation report outcome	
September 2020	Employer and Administering Authority discretions	Review approach and application

Appendix 2: Functions of the Local Pensions Board

Function	When	How
Review regular compliance monitoring reports which shall include reports to and decisions made under the Regulations by the Committee.	Ongoing	Review of Committee papers and minutes, attendance at Committee
Review management, administrative and governance processes and procedures in order to ensure they remain compliant with the Regulations, relevant legislation and in particular the Code of Practice.	December 2018	Code of Practice gap analysis
Review the compliance of scheme employers with their duties under the Regulations and relevant legislation.	December 2018	Code of Practice gap analysis
Assist with the development of and continually review such documentation as is required by the Regulations including Governance Compliance Statement, Funding Strategy Statement and Statement of Investment Principles.	Ongoing	Consider and review, as and when statements are updated by the Committee
Assist with the development of and continually review scheme member and employer communications as required by the Regulations and relevant legislation.	March 2019 March 2020	Review standard employer and scheme member communications
Monitor complaints and performance on the administration and governance of the scheme.	June 2019 June 2020	Review performance statistics over previous year
Assist with the application of the Internal Dispute Resolution Process.	March 2019 March 2020	Review application of dispute procedure
Review the complete and proper exercise of Pensions Ombudsman cases.	March 2019 March 2020	Review handling of any cases referred to Pensions Ombudsman
Review the implementation of revised policies and procedures following changes to the Scheme.	As required	Following legislative changes to Scheme
Review the arrangements for the training of Board members and those elected members and officers with delegated responsibilities for the management and administration of the Scheme.	June 2019	

Review the complete and proper exercise of employer and administering authority discretions.	September 2020	
Review the outcome of internal and external audit reports.	Ongoing	Audit reports and outcomes are supplied to Committee

Local Pension Board

14 March 2019

Local Pension Board Membership



Report of John Hewitt, Corporate Director of Resources

Purpose of the Report

- 1 To provide Board Members with an overview of the Terms of Office for current Scheme Employer and Scheme Member Representatives.

Executive summary

- 2 There are currently five Board Members, with one vacancy for a Scheme Employer Representative. The Term of Office for all five current Board Members will expire between June and September 2019.

Recommendation(s)

- 3 Board Members are asked note this report, and confirm whether they wish to extend their Term of Office.

Background

- 4 The Local Pension Board was established in 2015 by Durham County Council, in its capacity as Administering Authority of the Pension Fund, and is governed by the Council's Constitution. Relevant information about the operation of the Board is contained in Appendix 1 'Local Pension Board of Durham County Council Terms of Reference'.
- 5 The Board consists of six members, comprising three Scheme Employer Representatives and three Scheme Member Representatives. There is currently a vacancy for one employer representative. The membership of the Board is shown in the table below.

Name	Date appointed	Expiry of Term of Office
Scheme Employer Representatives		
Cllr Fraser Tinsley	26 June 2015	26 June 2019
Cllr Amanda Hopgood	10 September 2015	10 September 2019
1 vacancy		
Scheme Member Representatives		
Geoff Sykes	26 June 2015	26 June 2019
Ian R Densham	26 June 2015	26 June 2019
Neville Hancock	26 June 2015	26 June 2019

- 6 Under the Terms of Office, set out in the 'Local Pension Board of Durham County Council Terms of Reference', the Term of Office for Board Members is four years and extensions may be made by the Administering Authority with the agreement of the Board.
- 7 So that the Administering Authority can commence advertising for replacement members (and the already vacant Representative), Board Members are asked to indicate whether they would wish to extend their Term of Office.

Contact: Paul Cooper

Tel: 03000 269798

**Appendix 1: Local Pension Board of Durham County Council
Terms of Reference**

Local Pension Board of Durham County Council

Terms of Reference

Introduction

1. The Local Pension Board is established by Durham County Council (the 'Administering Authority') and will be governed by Durham County Council's Constitution.
2. This document sets out the terms of reference of the Local Pension Board of Durham County Council (the 'Administering Authority') a scheme manager as defined under Section 4 of the Public Service Pensions Act 2013. The Local Pension Board (the 'Board') is established in accordance with Section 5 of that Act and under regulation 106 of the Local Government Pension Scheme Regulations 2013 (as amended).
3. The Board is established by the Administering Authority and operates independently of the Committee. Relevant information about its creation and operation are contained in these Terms of Reference.
4. The Board is not a committee constituted under Section 101 of the Local Government Act 1972 and therefore no general duties, responsibilities or powers assigned to such committees or to any sub-committees or officers under the constitution, standing orders or scheme of delegation of the Administering Authority apply to the Board unless expressly included in this document.
5. Except where approval has been granted under regulation 106(2) of the Regulations the Board shall be constituted separately from any committee or sub-committee constituted under Section 101 of the Local Government Act 1972 with delegated authority to execute the function of the Administering Authority.

Interpretation

6. The following terms have the meanings as outlined below:

'the Act'	The Public Service Pensions Act 2013.
'the Code'	means the Pension Regulator's Code of Practice No 14 governance and administration of public service pension schemes.
'the Committee'	means the Pension Fund Committee - the committee that has delegated decision making powers for the Fund in accordance with Section 101 of the Local Government Act 1972.

'the Fund'	means the Durham County Council Pension Fund – the Fund managed and administered by the Administering Authority.
'the Guidance'	means the guidance on the creation and operation of local pension boards issued by the Shadow Scheme Advisory Board.
'the Regulations'	means the Local Government Pension Scheme Regulations 2013 (as amended from time to time), the Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014 (as amended from time to time) including any earlier regulations as defined in these regulations to the extent they remain applicable and the Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 (as amended from time to time).
'Relevant legislation'	means relevant overriding legislation as well as the Pension Regulator's Codes of Practice as they apply to the Administering Authority and the Board notwithstanding that the Codes of Practice are not legislation.
'the Scheme'	means the Local Government Pension Scheme in England and Wales.

Statement of purpose

7. The purpose of the Board is to assist¹ the Administering Authority in its role as a scheme manager of the Scheme. Such assistance is to:
 - (a) secure compliance with the Regulations, any other legislation relating to the governance and administration of the Scheme, and requirements imposed by the Pensions Regulator in relation to the Scheme and;
 - (b) to ensure the effective and efficient governance and administration of the Scheme.

Duties of the Board

8. The Board should, at all times, act in a reasonable manner in the conduct of its purpose. The principles included in the 'Code of conduct for Members', set out in Durham County Council's Constitution, will apply to members of the Board.
9. All other relevant Council policies shall also apply to members of the Board.

¹ Please see paragraph 3.28 of the Guidance for more information on what assisting the Administering Authority means.

Establishment

10. The Board is established on 1 April 2015 following approval by the County Council at its meeting on 25 February 2015. Subsequent to its establishment, the Board may establish sub-committees.

Membership²

11. The Board shall consist of six voting members, as follows:

Three Member Representatives; and

Three Employer Representatives.

12. There shall be an equal number of Member and Employer Representatives.

Member representatives

13. Member representatives shall either be scheme members³ or have capacity to represent scheme members of the Fund.
14. Member representatives should be able to demonstrate their capacity⁴ to attend and complete the necessary preparation for meetings and participate in training as required.
15. Substitutes shall not be appointed.
16. Three member representatives shall be appointed following a transparent recruitment process which should be open to all Fund members and be approved by the Administering Authority.

Employer representatives

17. Employer representatives shall be office holders or senior employees of employers of the Fund or have experience of representing scheme employers in a similar capacity. No officer or elected member of the Administering Authority who is responsible for the discharge of any function of the Administering Authority under the Regulations may serve as a member of the Board.
18. Employer representatives should be able to demonstrate their capacity⁵ to attend and complete the necessary preparation for meetings and participate in training as required.

² When determining the size of the Board consideration should be given to items noted in paragraphs 5.7 to 5.12 of the Guidance.

³ Active, deferred or pensioner members

⁴ See paragraphs 5.16 to 5.20 of the Guidance which outlines what 'capacity' in this context means.

⁵ See paragraphs 5.16 to 5.20 of the Guidance which outlines what 'capacity' in this context means.

19. Substitutes shall not be appointed.
20. Three employer representatives shall be appointed by the Administering Authority following a transparent recruitment process which should be open to all employers in the Fund.

Appointment of chair⁶

21. Subject to the meeting arrangements in paragraphs 35 to 37 below a chair shall be appointed for the Board by the employer and member representatives of the Board from amongst their own number or on a rotating basis with the term of office shared between an employer and a member representative on an equal basis.

Duties of chair

22. The chair of the Board:
 - (a) Shall ensure the Board delivers its purpose as set out in these Terms of Reference,
 - (b) Shall ensure that meetings are productive and effective and that opportunity is provided for the views of all members to be expressed and considered, and
 - (c) Shall seek to reach consensus and ensure that decisions are properly put to a vote when it cannot be reached. Instances of a failure to reach a consensus position will be recorded and published.

Terms of Office⁷

23. The term of office for Board members is four years and consideration will be given to allowing members to retire on a rolling basis during their term of office.
24. Extensions to terms of office may be made by the Administering Authority with the agreement of the Board.
25. A Board member may be appointed for further terms of office using the methods set out in paragraphs 16 and 20.
26. Board membership may be terminated prior to the end of the term of office due to:

⁶ This is not a regulatory requirement under the LGPS Regulations 2013 as amended. The appointment of a Chair is a decision to be made locally, where a Chair is appointed this section should be amended as appropriately. For more information see paragraphs 5.37 to 5.40 in the Guidance.

⁷ See paragraphs 5.29 and 5.30 of the Guidance which outlines points to consider when setting out the term of office for Board members. In particular consideration should be given to allowing members to retire on a rolling basis to ensure experience is retained.

- (a) A member representative appointed on the basis of their membership of the scheme no longer being a scheme member in the Fund⁸.
- (b) A member representative no longer being a scheme member or a representative of the body on which their appointment relied.
- (c) An employer representative no longer holding the office or employment or being a member of the body on which their appointment relied.
- (d) A Board member no longer being able to demonstrate to the Administering Authority their capacity to attend and prepare for meetings or to participate in required training.
- (e) The representative being withdrawn by the nominating body and a replacement identified.
- (f) A Board member has a conflict of interest which cannot be managed in accordance with the Board's conflict policy.
- (g) A Board member who is an elected member becomes a member of the Committee.
- (h) A Board member who is an officer of the Administering Authority becomes responsible for the discharge of any function of the Administering Authority under the Regulations.

Conflicts of interest⁹

- 27. All members of the Board must declare to the Administering Authority on appointment and at any such time as their circumstances change, any potential conflict of interest arising as a result of their position on the Board.
- 28. A conflict of interest is defined as a financial or other interest which is likely to prejudice a person's exercise of functions as a member of the Board. It does not include a financial or other interest arising merely by virtue of that person being a member of the Scheme.
- 29. On appointment to the Board and following any subsequent declaration of potential conflict by a Board member, the Administering Authority shall ensure that any potential conflict is effectively managed in line with both the internal procedures and the requirements of the Code.

Knowledge and understanding (including Training)¹⁰

- 30. Knowledge and understanding must be considered in light of the role of the Board to assist the Administering Authority in line with the requirements outlined in paragraph 7 above.
- 31. The Board shall establish and maintain a record of training to address the knowledge and understanding requirements that apply to Board members under the Act. A list of examples of the knowledge and understanding required is attached at Annex 1 to this document and is summarised in paragraph 32. That record shall set out the degree of knowledge and

⁸ This includes active, deferred and pensioner members.

⁹ See section 7 of the Guidance for more information on Conflicts of Interest.

¹⁰ See section 6 of the Guidance for more information on Knowledge and Understanding.

understanding required as well as how knowledge and understanding is acquired, reviewed and updated.

32. Following appointment, Board Members should be conversant with:
 - (a) The legislation and associated guidance of the Local Government Pension Scheme (LGPS);
 - (b) General pensions legislations applicable to the LGPS;
 - (c) Role and Responsibilities of a LPB;
 - (d) Role and Responsibilities of the Administering Authority;
 - (e) Role and Responsibilities of Scheme Employers, Advisers and key persons; and
 - (f) Funding and Investment
33. The Administering Authority will provide training in these areas for Board members.
34. Board members shall attend and participate in training arranged by the Administering Authority. They shall undertake such personal training needs analysis or other processes that are put in place in order to ensure that they maintain the required level of knowledge and understanding to carry out their role on the Board.

Meetings

35. The Board shall as a minimum meet twice each year.
36. Meetings shall normally take place between the hours of 9:00am and 5:00pm at County Hall, Durham.
37. The chair of the Board with the consent of the Board membership may call additional meetings. Urgent business of the Board between meetings may, in exceptional circumstances, be conducted via communications between members of the Board including telephone conferencing and e-mails.

Quorum

38. A meeting is only quorate when at least one member and one employer representative is present.
39. A meeting that becomes inquorate may continue but any decisions will be non-binding.

Board administration

40. The Chair shall agree with the Monitoring Officer (the 'Board Secretary') an agenda prior to each Board meeting.
41. The agenda and supporting papers will be issued at least five working days (where practicable) in advance of the meeting except in the case of matters of urgency.

42. Draft minutes of each meeting including all actions and agreements will be recorded and circulated to all Board members within five working days after the meeting. These draft minutes will be subject to formal agreement by the Board at their next meeting. Any decisions made by the Board should be noted in the minutes and in addition where the Board was unable to reach a decision such occasions should also be noted in the minutes.
43. The minutes may with the agreement of the Board, be edited to exclude items on the grounds that they would either involve the likely disclosure of exempt information as specified in Part 1 of Schedule 12A of the Local Government Act 1972 or it being confidential for the purposes of Section 100A(2) of that Act and/or they represent data covered by the Data Protection Act 1998.
44. The Board Secretary shall ensure that Board members meet and maintain the knowledge and understanding as determined by guidance or legislation.
45. The Board Secretary shall arrange such advice as is required by the Board subject to such conditions as are listed in these Terms of Reference for the use of the budget set for the Board.
46. The Board Secretary shall ensure an attendance record is maintained along with advising the Administering Authority on expenses to be considered under these terms.
47. The Board Secretary shall liaise with the Administering Authority on the requirements of the Board, including advanced notice for officers to attend and arranging dates and times of Board meetings.

Public access to Board meetings and information

48. The Board meetings can be open to the general public (unless there is an exemption under relevant legislation which would preclude part (or all) of the meeting from being open to the general public).
49. The following will be entitled to attend Board meetings in an observer capacity:
 - (a) Members of the Committee,
 - (b) Any person requested to attend by the Board.

Any such attendees will be permitted to speak at the discretion of the Chair.

50. In accordance with the Act the Administering Authority shall publish information about the Board to include:
 - (a) The names of Board members and their contact details.
 - (b) The representation of employers and members on the Board.
 - (c) The role of the Board.
 - (d) These Terms of Reference.

51. The Administering Authority shall also publish other information about the Board including:
- (a) Agendas and minutes
 - (b) Training and attendance logs
 - (c) An annual report on the work of the Board to be included in the Fund's own annual report.
52. All or some of this information may be published using the following means or other means as considered appropriate from time to time:
- (a) On the Administering Authority's website.
 - (b) As part of the Fund's Annual Report.
 - (c) As part of the Governance Compliance Statement.
53. Information may be excluded on the grounds that it would either involve the likely disclosure of exempt information as specified in Part 1 of Schedule 12A of the Local Government Act 1972 or it being confidential for the purposes of Section 100A(2) of that Act and/or they represent data covered by the Data Protection Act 1998.

Expenses and allowances

54. The Administering Authority may meet the expenses of Board members as agreed by the Corporate Director Resources in consultation with the Leader and Deputy Leader of the Council.
55. The Administering Authority shall not pay allowances for Board members.

Budget

56. The Board is to be provided with adequate resources to fulfil its role. In doing so the budget for the Board will be met from the Fund. The Board will seek approval from the Corporate Director Resources, as Section 151 Officer, at the Administering Authority for any expenditure it wishes to make.

Core functions¹¹

57. The first core function of the Board is to assist¹² the Administering Authority in securing compliance with the Regulations, any other legislation relating to the governance and administration of the Scheme, and requirements imposed by the Pensions Regulator in relation to the Scheme. Within this extent of this core function the Board may determine the areas it wishes to consider.

¹¹ In determining the role of the Board, further information can be found in paragraphs 3.27 to 3.29 of the Guidance.

¹² Please see paragraph 3.28 of the Guidance for more information on what assisting the Administering Authority means.

58. The second core function of the Board is to ensure the effective and efficient governance and administration of the Scheme. Within this extent of this core function the Board may determine the areas it wishes to consider
59. In support of its core functions the Board may make a request for information to the Committee with regard to any aspect of the Administering Authority's function. Any such request should be reasonably complied with in both scope and timing.
60. In support of its core functions the Board may make recommendations to the Committee which should be considered and a response made to the Board on the outcome within a reasonable period of time.

Reporting¹³

61. The Board should in the first instance report its requests, recommendations or concerns to the Committee. In support of this any member of the Board may attend a Committee meeting as an observer.
62. Requests and recommendations should be reported under the provisions of paragraphs 59 and 60 above.
63. The Board should report any concerns over a decision made by the Committee to the Committee subject to the agreement of at least 50% of voting Board members provided that all voting members are present. If not all voting members are present then the agreement should be of all voting members who are present, where the meeting remains quorate.
64. On receipt of a report under paragraph 63 above the Committee should, within a reasonable period, consider and respond to the Board.
65. Where the Board is not satisfied with the response received it may request that a notice of its concern be placed on the website and in the Fund's annual report.
66. Where the Board is satisfied that there has been a breach of regulation which has been reported to the Committee under paragraph 63 and has not been rectified within a reasonable period of time it is under an obligation to escalate the breach.
67. The appropriate internal route for escalation is to the Monitoring Officer or the Corporate Director Resources, as Section 151 Officer (as appropriate).
68. The Board may report concerns to the LGPS Scheme Advisory Board for consideration subsequent to, but not instead of, using the appropriate internal route for escalation.
69. Board members are also subject to the requirements to report breaches of law under the Act and the Code and the whistleblowing provisions set out in the Administering Authority's Confidential Reporting Policy.

¹³ See section 8 of the Guidance for more information on Reporting.

Review of terms of reference

- 70. These Terms of Reference shall be reviewed on each material change to those parts of the Regulations covering local pension boards and at least every four years.
- 71. These Terms of Reference were adopted on 1 April 2015

.....
Signed on behalf of the Administering Authority

.....
Signed on behalf of the Board

Published 25 February 2015

Examples of knowledge and understanding of the law relating to pensions

1. **Background and Understanding of the Legislative Framework of the LGPS**

- Differences between public service pension schemes like the LGPS and private sector trust-based schemes
- Role of the IPSPC and its recommendations
- Key provisions of the 2013 Act
- The structure of the LGPS and the main bodies involved including the Responsible Authority, the Administering Authority, the Scheme Advisory Board, the Local Pension Board and the LGPS employers
- An overview of local authority law and how Administering Authorities are constituted and operate
- LGPS rules overview (including the Regulations, the Transitional Regulations and the Investment Regulations)

2. **General pensions legislation applicable to the LGPS**

An overview of wider legislation relevant to the LGPS including:

- Automatic Enrolment (Pensions Act 2008)
- Contracting out (Pension Schemes Act 1993)
- Data protection (Data Protection Act 1998)
- Employment legislation including anti-discrimination, equal treatment, family related leave and redundancy rights
- Freedom of Information (Freedom of Information Act 2000)
- Pensions sharing on divorce (Welfare Reform and Pensions Act 1999)
- Tax (Finance Act 2004)
- IORP Directive

3. **Role and responsibilities of the Local Pension Board**

- Role of the Local Pension Board
- Conduct and conflicts
- Reporting of breaches
- Knowledge and understanding
- Data protection

4. **Role and responsibilities of the Administering Authority**

- Membership and eligibility
- Benefits and the payment of benefits

- Decisions and discretions
- Disclosure of information
- Record keeping
- Internal controls
- Internal dispute resolution
- Reporting of breaches Statements, reports and accounts

5. Funding and Investment

- Requirement for triennial and other valuations
- Rates and adjustments certificate
- Funding strategy statement
- Bulk transfers
- Permitted investments
- Restrictions on investments
- Statement of investment principles
- CIPFA guidance
- Appointment of investment managers
- Role of the custodian

6. Role and responsibilities of Scheme Employers

- Explanation of different types of employers
- Additional requirements for admission bodies
- Automatic Enrolment
- Deduction and payment of contributions
- Special contributions
- Employer decisions and discretions
- Redundancies and restructuring (including the Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2006)
- TUPE and outsourcing (including Fair Deal and the Best Value Authorities Staff Transfers (Pensions) Direction 2007)

7. Tax and Contracting Out

- Finance Act 2004
- Role of HMRC
- Registration
- Role of 'scheme administrator'
- Tax relief on contributions
- Taxation of benefits
- Annual and lifetime allowances
- Member protections
- National Insurance
- Contracting out (Pensions Scheme Act 1993)
- Impact of abolition of contracting out in 2016

- VAT and investments

8. Role of advisors and key persons

- Officers of the Administering Authority
- Fund actuary
- Auditor
- Lawyers
- Investment managers
- Custodians
- Administrators – in house v. third party
- Procurement of services
- Contracts with third parties

9. Key Bodies connected to the LGPS

An understanding of the roles and powers of:

- Courts
- Financial Services Authority
- HMRC
- Information Commissioner
- Pensions Advisory Service
- Pensions Ombudsman
- The Pensions Regulator (including powers in relation to Local Pension Boards)

Local Pension Board

14 March 2019

Communications Review



Report of John Hewitt, Corporate Director of Resources

Purpose of the Report

- 1 To provide Board Members with details of how different stakeholder groups receive communication from the Pension Fund, and to explain current plans to develop the communication strategy.

Executive summary

- 2 This report outlines the requirements of the Pension Fund to publish and maintain a Communications Policy Statement, how this requirement is met, and future developments that will improve communications with members and employers.

Recommendation(s)

- 3 The Board is asked note this report.

Background

- 4 Under the Local Government Pension Scheme (LGPS) Regulations 2013, a Pension Fund Administering Authority is required to publish a written statement setting out its policy concerning communications with members, representatives of members, prospective members and Scheme employers.
- 5 Specifically, the statement must set out the Administering Authority's policy on
 - a) the provision of information and publicity about the Scheme to members, representatives of members and Scheme employers;
 - b) the format, frequency and method of distributing such information or publicity; and
 - c) the promotion of the Scheme to prospective members and their employers.

Communications Policy Statement

- 6 The Council's Pension Fund Communications Policy Statement is attached as Appendix A. This Statement includes the Council's policy on the issues set out in paragraph 3 above. The Statement is published each year as part of the Pension Fund Annual Report and is available on the Council's website.
- 7 Key points to note include the following:
 - Newsletters for all categories of member are currently only produced as required. Typically, for active members this means newsletters are produced whenever there is a change to regulations or legislation that affects the benefits an active member is entitled to, or the choices they have. The last newsletter was sent out in August 2018 due to changes introduced by the Local Government Pension Scheme (Amendment) Regulations 2018. The newsletter brought to the attention the option to access their pension (with reductions) at an earlier date for some categories of deferred members.
 - All active members and deferred members receive an annual benefit statement. For actives this is issued by the end of August each year and for deferred members it is issued in April or May, shortly after the annual pension increase has been applied.
 - Scheme employers are communicated with by email.

Future developments

- 8 The Pensions Team is currently working closely with Civica, the Fund's pensions administration software provider, to develop its web-based communication platform for scheme employers. Currently, a number of scheme employers utilise the platform to run benefit estimates, allowing employers to see the cost of allowing an employee to access benefits early on redundancy or business efficiency grounds. The Team has also rolled out secure information exchange for employers, replacing many paper forms. The latest development for employers, is Monthly Data Collection (MDC) for employers, allowing automated data collection each month, significantly reducing the year end burden for both the Pensions Team and participating employers.
- 9 The pensions administration system also has a scheme member web facility that allows a range of on-line services to scheme members, including accessing estimate information about their prospective benefits, and providing online annual benefit statements. This facility is currently being tested and configured, before roll out to members can commence.

Contact: Paul Cooper

Tel: 03000 269798

Appendix 1: Communications Policy Statement (from the Pension Fund Annual Report)

COMMUNICATIONS POLICY STATEMENT

Durham County Council is the administering authority for the Durham County Council Pension Fund. This Communication Policy Statement has been drawn up to comply with regulation 106B of the Local Government Pension Scheme Regulations 1997 (as amended) and to ensure the Council offers clear communication to stakeholders of the Local Government Pension Scheme.

WHO WE COMMUNICATE WITH

- Scheme members (active members, pensioners and deferred members);
- Representatives of scheme members;
- Prospective scheme members;
- Employers participating in the scheme;
- Advisers (for example actuaries, investment advisers, Local Government Pensions Committee);
- Other bodies (for example prospective employing authorities and their representatives).

KEY OBJECTIVES

- To ensure communication is clear, factual and concise;
- To ensure communication is designed and delivered in a manner appropriate to its audience;
- To ensure that the correct information reaches the right people at the right time.

COMMUNICATING WITH SCHEME MEMBERS

Scheme members need access to detailed information about the scheme and their own benefits to allow them to make informed choices about their own pension benefits.

The Council provides:

- Scheme literature
The pension section produces a summary guide to benefits in the scheme along with specific guides for certain circumstances, such as how divorce can affect scheme benefits or on the internal dispute resolution procedure.
- Annual benefit statements

All active members are sent a benefit statement each year setting out the benefits they have earned in the scheme up to 31 March that year. All deferred members are sent a benefit statement each year setting out the current value of their deferred benefits payable at the earliest date on or after age 60 that unreduced benefits can be paid to them. The statement also sets out the effect of pension increases on their benefits since they left service.

- Newsletters

All active members and pensioners are sent a copy of each issue of the relevant newsletter.

- Telephone helpline

All newsletters contain contact telephone numbers for general enquiries. Active members, pensioners and deferred members can contact the Pension Administration Team by telephone between 8:30am and 4:30pm on weekdays. The newsletters also contain the email address where general enquires can be submitted.

COMMUNICATING WITH EMPLOYERS PARTICIPATING IN THE SCHEME

Employers need to be kept up to date with developments in the scheme and need to be informed of consultation exercises that could influence the future of the scheme.

Employers are sent written information on scheme developments as and when changes are proposed to the scheme. Employers are often sent copies of circulars provided by the Employers' Organisation or are directed to copies of these circulars via web-links.

Meetings with individual employers are arranged as necessary or as requested to deal with any significant pension issues that arise. Support is provided to employers who want to provide further pension information to their employees - this includes pre-retirement seminars and mid-life seminars.

All employers are invited to attend the Annual Meeting of the Pension Fund Committee. Copies of the annual report and accounts for the Pension Fund are distributed at this meeting and are also sent to all employers in the scheme.

COMMUNICATING WITH PROSPECTIVE MEMBERS

The Pension Administration Team issues pension packs to prospective members. These contain a summary of the benefits of scheme membership, information comparing the scheme with other pension options, a nomination form, an opt-out form and an authorisation form for investigating potential pension transfers into the scheme.

COMMUNICATING WITH REPRESENTATIVES OF SCHEME MEMBERS

The Pension Administration Team produces a summary guide to benefits in the scheme along with specific guides for certain circumstances, such as how divorce can affect scheme benefits or on the internal dispute resolution procedure. This information is

available to representatives of scheme members.

The Pension Administration Team telephone helpline is also available between 8:30am and 4:30pm on weekdays for any queries representatives of scheme members may have.

The main local government unions are represented on the Pension Fund Committee. This means they are sent agenda items and minutes from the meetings as well as being able to attend the meetings (albeit in a non-voting capacity).

FUND PUBLICATIONS

COMMUNICATION DOCUMENT	AVAILABLE TO	WHEN PUBLISHED
Starter Packs	Prospective members	When required
Summary scheme guide	Prospective members Active members	When required
Newsletter: Pensions News	Active members	When required
Annual benefit statement	Active members Deferred members	Once per year
Newsletter: Years Ahead	Pensioners	When required
Payslips	Pensioners	Once a year or upon a change to net pension of more than £5
P60s	Pensioners	Once per year
Pension Increase Information	Pensioners	Once per year
Update letter on changes to regulations and other issues	Employers	When required
Valuation report	Employers	Every three years
Report and accounts	All stakeholders	Once per year – distributed to all employers and available on the DCC website and on request to all

Local Pension Board

14 March 2019

**Internal Dispute Review Procedure
(IDRP) Cases**



Report of John Hewitt, Corporate Director of Resources

Purpose of the Report

- 1 To provide Board Members with a summary of the outcomes of any internal dispute cases or Pensions Ombudsman cases the Pension Fund has been involved in since April 2015.

Executive summary

- 2 Since 2015, 60 scheme members or their representatives have made an application to the adjudicator under the Pension Fund's IDRP process. The majority (51) of these applications related to ill health retirement applications. Of the 60 applications, in 44 cases the adjudicator upheld the Council's decision.

Recommendation(s)

- 3 The Board is asked note this report.

Background

- 4 Scheme members with an unresolved complaint about their pension benefits are able to make use of the Pension Fund's two stage internal dispute resolution procedure. Whenever a scheme member initially receives a benefit from the scheme they are made aware of this procedure – a copy of the information sent to scheme members about the procedure is enclosed as Appendix A.

Review of IDRP Cases

- 5 The first stage of the process is an application to the adjudicator. Over the four years from 1 April 2015 to 31 March 2019 there have been a total of 60 applications to the adjudicator (15 in the first two years and 17 in 2017/18, and 13 in 2018/19). Of these, all except nine related to complaints about an individual not being awarded an ill-health pension. The other nine complaints related to the following:
- An inaccurate benefit estimate being supplied prior to retirement (two instances of this)
 - A request that the individual should be able to have their benefits without early retirement reductions applied
 - A decision regarding the beneficiary of a death grant
 - An appeal from the family of a deceased member that the member should have been treated as dying in service not from deferred status
 - A dispute that a refund was paid
 - A dispute over the recovery of overpaid pension paid to a deceased pensioner
 - An appeal from the family of a deceased member that the member should have been treated as dying in service not from retired status
 - A dispute regarding the transfer of a pension
- 6 Of the 60 applications in 44 cases the adjudicator upheld the Council's decision. In one case (the dispute over the recovery of overpaid pension) the adjudicator recommended the Council reverse its decision (which it did). The remaining 15 (all relating to ill-health retirement applications) were referred back by the adjudicator to the scheme employer to obtain additional information and make a further decision on the ill-health retirement application.

- 7 The reasons the adjudicator gave in these cases related to ensuring up to date information was available from all the health professionals involved in the case and obtaining more information on the likelihood of success of any untried treatments.
- 8 The Council's Occupational Health Team is responsible for submitting ill health retirement application cases to an independent doctor for review where the individual worked (or formerly worked) for the Council. As the Council represents around two thirds of the active membership of the Pension Fund and a higher proportion of non-active members, most of the ill health retirement applications are initially processed by the Council's Occupational Health Team.
- 9 The Council's Occupational Health Team has revised the instructions it gives to the independent doctors that provide opinions in respect of ill health retirement applicants, partly as a consequence of the comments made by the adjudicator. For example, the instructions now make it clear that independent doctors need to be clear about the probability of success of any untried treatments if they are going to make reference to any such treatments in their report. The Fund continues to monitor the reasons for disputes referred back for further employer consideration.

Stage Two Appeals and Ombudsman Rulings

- 10 From April, the Pension Fund will monitor and detail the outcome of all Stage Two Appeals, and any rulings of the Pensions Ombudsman in respect of the Fund or its employers.

Contact: Paul Cooper

Tel: 03000 269798

Appendix 1: IDRP Procedure Information

The Local Government Pension Scheme Internal Dispute Resolution Procedure

A. Introduction

1. Decisions regarding your membership of the LGPS will initially be made by your employing authority in respect of such matters as the amount of your pensionable earnings, date of scheme entry etc.
2. Other matters regarding your membership will then be determined by Durham County Council in its role as administrator of the LGPS, e.g. the amount service transferred into the scheme from a previous employment.

Note: in the case of Durham County Council employees, both items (1) and (2) will be determined by the same authority. It will however be the responsibility of the employing service to determine issues under (1) and the Pensions Group to determine items in (2).

B. What should you do if you are unhappy with any aspect of your pension scheme membership?

1. Initially you should contact the Durham County Council Pensions Team by telephoning 03000 264322, or by email at pensions@durham.gov.uk. They will be able to explain any questions you have about scheme membership and service, and, if necessary, direct you to the contact person within your employing authority.
2. If you are still unhappy with the explanation you have been given, or if you have not been provided with an explanation, you may refer the matter to the adjudicator.
3. You must apply to the adjudicator within 6 months of being notified of the decision which is the cause of your complaint.

C. Who is the adjudicator?

1. The adjudicator for Durham County Council Pension Fund is:

Mr Yunus Gajra
Development Manager (Strategic)
West Yorkshire Pension Fund
PO Box 67
Bradford
BD1 1UP

2. When referring your complaint to the adjudicator, you must send a signed letter and include the following information:
 - (a) Your full name, address, date of birth, National Insurance number, the name of your employer and your job title.

- (b) If your complaint is on behalf of another person, you must submit all of the above details in respect of that person and explain your relationship to them.
- (c) A statement setting out the details of the disagreement, enclosing any relevant letters or documentation.

D. What happens next?

1. Within two months of receiving your complaint the adjudicator must reach a decision and confirm his decision in writing to you, your employer and Durham County Council Pension Fund
2. If he is not able to reach a decision within two months he must write to you to tell you why this is the case and give you an estimate of when he is likely to be able to reach a decision (the expected decision date).

E. What should I do if I am not satisfied with the findings of the adjudicator?

1. If you are not satisfied with the findings of the adjudicator you may refer the matter to the administering authority at the following address:

Pensions Group
Resources
County Hall
Durham
DH1 5UE

2. When referring your complaint to the Administering Authority you must send a signed letter which includes the information in section C2 and a statement that you wish the decision to be reconsidered by the Administering Authority.
3. Your application must be made by the relevant date as follows:
 - a. Within six months of the adjudicator's decision was received.
 - b. If the adjudicator was unable to reach a decision within two months, and he wrote to give you an expected decision date, you must submit your application within seven months from the expected decision date.
 - c. If the adjudicator did not make a decision and did not provide an expected decision date, you must submit your application within nine months from the date on which your application was made to the adjudicator.

Note: You may also refer your complaint to the Administering Authority should the adjudicator fail to reply to you within the timescales detailed in Section (D).

F. What happens next?

Within two months of receiving your complaint, the Administering Authority must confirm its decision in writing to you and to your employer. If it is not possible to reach a decision within two months it must write to you to tell you why this is the case and to give you an estimate of when a decision is likely to be made.

G. Is there anything else I can do after referring my complaint to the Administering Authority?

When the Administering Authority gives you its decision it will also advise you about the services provided by TPAS and the Pensions Ombudsman.

H. What is TPAS?

The Pensions Advisory Service (**TPAS**) is an independent non-profit organisation that provides free information, advice and guidance on all types of pension schemes. You can contact TPAS through your local Citizens Advice Bureau or in writing to:

11 Belgrave Road
London
SW1 1RB

Or by telephone on 0300 123 1047

Or online by visiting their website www.pensionsadvisoryservice.org.uk

Note: If you want the Pensions Ombudsman to consider your complaint, you should normally contact TPAS first. If TPAS is unable to resolve your complaint and believes that maladministration has occurred, or that a decision made by the Administering Authority is incorrect, they will recommend that you refer your complaint to the Ombudsman.

You can ask TPAS for help at any time if you are having difficulties in resolving your complaint under the dispute procedure.

I. What is the role of the Pensions Ombudsman?

The Pensions Ombudsman can investigate complaints of maladministration or disputes of fact or law relating to decisions made about your pension. Unless your complaint relates only to maladministration, you must follow the procedure set out in this leaflet before referring your complaint to the Ombudsman. This means that you must refer your complaint to the adjudicator and then to the Administering Authority before the Pensions Ombudsman will commence an investigation.

If, however, your complaint is about maladministration, i.e the way your case has been handled by either the adjudicator or the Administering Authority, you do not need to wait until the Internal Disputes Resolution Procedure has been completed.

You can contact the Pensions Ombudsman in writing at:

11 Belgrave Road
London
SW1 1RB

By telephone on 020 7630 2200

By emailing: enquiries@pensions-ombudsman.org.uk

You can find out more about the Pensions Ombudsman by visiting their web site at:
www.pensions-ombudsman.gov.uk