

## Action plan

### Using this action plan

You can use this section to set out the actions you are planning to take to address any risks identified in your results report, or actions you will take to help you achieve best practice.

You should review progress against this plan regularly. To help you do so, you can put in a review date against each action.

### Action plan - Governing your scheme

#### Question 1 - Have you clearly defined and recorded the roles and responsibilities of the pension board?

Your Answer:	Yes	
Scheme Action Plan:	The Terms of Reference for the Essex Pension Fund Advisory Board (PAB) including roles and responsibilities has been reviewed and approved by ECC Full Council on 8 October 2019 and subsequently published within the ECC Constitution.	
Review Date:	Oct-20	

#### Question 2 - Have you published information about the pension board and ensured it is kept up to date?

Your Answer:	Yes – we publish information to legal requirements and provide additional information about the pension board and board business	
Scheme Action Plan:	The last Governance Compliance Statement was published within the Fund's 2018/19 Annual Report and Accounts. The revised Governance Policy and Compliance Statement is due to be approved by the Essex Pension Fund Strategy Board (PSB) on 4 March 2020.	
Review Date:	Mar-21	

**Question 3 - Do you have policies and arrangements in place to help pension board members acquire and retain the requisite knowledge and understanding?**

Your Answer:	Yes	
Scheme Action Plan:	The Fund have a LGPS Knowledge and Skills Training Strategy and monitor Members training against the strategy and plan using a training log. In addition to this, Members are encouraged to attend various conferences and seminars throughout the year.	
Review Date:	Mar-20	

**Question 4 - Do you use the following for your pension board?**

**a) Training Plans**

Your Answer:	Yes	
Scheme Action Plan:	The Fund have a LGPS Knowledge and Skills Training Strategy and monitor Members training against the strategy and plan using a training log. In addition to this, Members are encouraged to attend various conferences and seminars throughout the year.	
Review Date:	Mar-20	

**b) Individual training needs analysis**

Your Answer:	No	
Scheme Action Plan:	The current strategy is in the process of being reviewed by Fund Officers in consultation with the Independent Governance & Administration Advisor (IGAA) and will look to include individual training needs analysis of each Member of the Boards/Committee.	
Review Date:	Mar-20	

**c) Training log**

Your Answer:	Yes	
Scheme Action Plan:	The Fund have a LGPS Knowledge and Skills Training Strategy and monitor Members training against the strategy and plan using a training log. In addition to this, Members are encouraged to attend various conferences and seminars throughout the year.	
Review Date:	Mar-20	

**Question 5 - Do you have a conflicts policy and procedure for pension board members?**

Your Answer:	In development	
Scheme Action Plan:	The Fund have developed a Conflicts of Interest Policy in consultation with the IGAA and is due to be approved by the PSB on 4 March 2020.	
Review Date:	Mar-21	

**Do you have a register of interests (or equivalent)?**

Your Answer:	Yes	
Scheme Action Plan:	This is maintained by the Fund's Compliance Team and is updated after each PSB, ISC and PAB meeting.	
Review Date:	Ongoing	

## Action plan - Managing risks and issues

### Question 1 - Do you have procedures in place for assessing and managing risk?

Your Answer:	Yes	
Scheme Action Plan:	The Fund have a Risk Register which is maintained and updated as a continuous process. EPF Officers liaise with the Compliance Team to highlight any new risks as and when required. Risk are continually monitored and assessed by the Management Team but formally on a monthly basis at their MT Meeting.	
Review Date:	Ongoing	

### Question 2 - Do you have a risk register?

Your Answer:	Yes	
Scheme Action Plan:	The Fund have a Risk Register which is maintained and updated as a continuous process. EPF Officers liaise with the Compliance Team to highlight any new risks as and when required. Risk are continually monitored and assessed by the Management Team but formally on a monthly basis at their MT Meeting.	
Review Date:	Ongoing	

### Question 3 - Where you have outsourced services, do you ensure that providers demonstrate that they have internal controls in place?

Your Answer:	Yes	
Scheme Action Plan:	Fund Officers liaise with all 3rd party suppliers to ensure their mitigation actions are captured within the Fund's Risk Register.	
Review Date:	Ongoing	

**Question 4 - Do you have a service level agreement, or equivalent, in place with your scheme administrators, whether in house or outsourced?**

Your Answer:	Yes	
Scheme Action Plan:	A contract with CIVICA is monitored by the Systems Manager and Compliance Manager to ensure compliance against KPIs and the required Service Levels.	
Review Date:	Ongoing	

**Question 5 - Are your internal dispute resolution arrangements clearly communicated to members and others?**

Your Answer:	Yes	
Scheme Action Plan:	This is published on the Fund's Website and on all Retirement Letters.	
Review Date:	Ongoing	

**Question 6 - Do you have procedures in place to identify, assess and report breaches of the law?**

Your Answer:	Yes	
Scheme Action Plan:	Currently the Fund utilise the policy and process owned by the Administering Authority and therefore the Fund does not have its own Policy in place in relation to this. This is in the process of being reviewed by the Fund's Officers in consultation with the IGAA.	
Review Date:	Mar-20	

## Action plan - Administration

### Question 1 - Do you have a process in place to ensure that information is provided to TPR as required (eg through the scheme return)?

Your Answer:	Yes	
Scheme Action Plan:	The Technical Hub Manager and Compliance Manager ensure all TPR returns are completed by the deadlines provided.	
Review Date:	Ongoing	

### Question 2 - 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?

Your Answer:	Yes	
Scheme Action Plan:	Regular monitoring is conducted by the Systems Team and any issues identified are communicated to the Management Team for action.	
Review Date:	Ongoing	

### Question 3 - Do you have controls in place to ensure that your employer(s) provides timely, accurate and complete data?

Your Answer:	Yes	
Scheme Action Plan:	The Employer Team, Systems Team and Technical Hub Team ensure communications with Employers is utilised to the full. The Administration Strategy is the key document for communication between the Fund and its Employers detailing what is required and when.	
Review Date:	Ongoing	

**Question 4 - When did you last carry out a data review exercise?**

Your Answer:	Within the last year	
Scheme Action Plan:	The Systems Team carry out regular reviews on the data held within UPM (Pension Administration Software provided by CIVICA).	
Review Date:	Ongoing	

**Question 5 - Where you have identified poor quality or missing data, do you have an improvement plan to address issues?**

Your Answer:	Yes	
Scheme Action Plan:	The Fund have an annual data cleansing exercise that is carried out at year end. In addition to this, the Fund have been maintaining a data improvement plan since October 2018 to ensure 'Common Data' is clean to a 95% target. TPR have recently issued templates to enable Fund's to develop their scheme specific data reporting. The Fund are currently building these reports into	
Review Date:	Ongoing	

**Question 6 - Do you have processes in place for monitoring scheme contributions, resolving issues and assessing whether to report payment failures to TPR?**

Your Answer:	Yes	
Scheme Action Plan:	This is managed through the Employer Team, Systems Team and Technical Hub Team through the Administration Strategy.	
Review Date:	Ongoing	

**Question 7 - Have you reviewed your processes for issuing annual benefit statements to ensure they are fit for purpose?**

Your Answer:	Yes	
Scheme Action Plan:	This is reviewed annually to capture lessons learnt from the issuing of ABS.	
Review Date:	Annually	

**Question 8 - Have you taken steps to ensure that member communications are clear, accurate and easily accessible?**

Your Answer:	Yes	
Scheme Action Plan:	The Fund have a communcaitions policy which is published on the Fund's website. However, a review has just been undertaken and a revised Communication Policy will be approved by the PSB on 4 March 2020.	
Review Date:	Mar-21	