

# The Pensions Regulator

Public service governance and administration survey 2016

**Research report** 

**Prepared for The Pensions Regulator By OMB Research** 

# Contents

1. E	xecutive summary	1
2. l	ntroduction	5
3. N	/lethodology	6
3.1	Sampling	7
3.2	Fieldwork	7
3.3	Respondent profile	8
3.4	Analysis and reporting conventions	8
4. F	Research findings	9
4.1	Scheme governance	9
4.2	Managing risk	15
4.3	Administrator controls	19
4.4	Data	21
4.5	Communications	26
4.6	Resolving issues	28
4.7	Reporting breaches	30
4.8	Addressing governance and administration issues	34
4.9	TPR products and perceptions	37

# 1. Executive summary

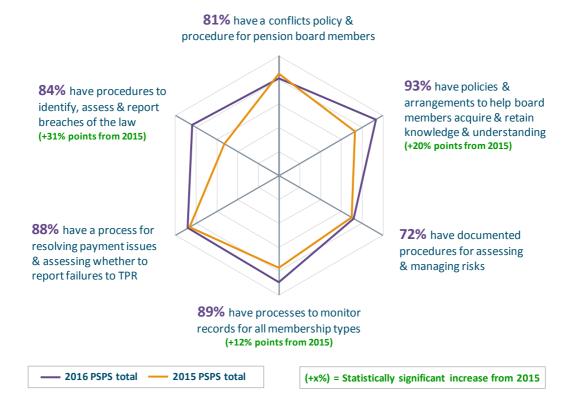
## 1.1 Key processes

The results of the survey showed that schemes were making progress in establishing the processes that The Pensions Regulator (TPR) regards as key in supporting compliance with legal requirements and meeting TPR standards. These processes were less likely to be in place in locally administered Firefighters' and Police schemes.

Figure 1.1.1 shows scheme performance against six key processes in 2015 and 2016.

The greatest improvement was seen in the proportion of schemes with procedures in place to identify, assess and report breaches of the law (84%, compared to 53% in 2015).

Figure 1.1.1 – Schemes' performance on key processes



There were also statistically significant increases in the proportion of schemes with arrangements to help board members acquire and retain the necessary knowledge and understanding, and the proportion with a process in place to monitor records for accuracy and completeness (increases of 20 percentage points and 12 percentage points respectively).

A minority of Police (26%) and Firefighters' schemes (32%) reported having all six key processes in place, compared to two-thirds of Local Government schemes (68%) and nearly all Other schemes (91%).

## 1.2 Managing risk

Risk management processes and registers were not consistently used across the public service pension scheme landscape.

Around three-quarters of schemes had documented procedures for assessing and managing risks (72%) and had a risk register (70%). Schemes which met these standards accounted for approximately 90% of all memberships.

Records and governance were named by schemes as top risk.

Schemes identified their top risks to good governance and administration as the quality of records (36%) and poor governance (29%). Funding/ investment was also identified as a top risk (34%) owing to the relatively large proportion of Local Government schemes (52%) citing this.

#### 1.3 Administrator controls

Attendance at meetings and provision of reports by administrators was widespread, but penalties were rarely applied where terms or standards were not met.

The majority of schemes indicated that administrators attend regular meetings with the scheme manager or pension board (84%) and that they deliver regular reports (78%).

A range of other processes were used to manage and monitor administrators, including the use of performance metrics in contracts or SLAs (67%), reviews by independent auditors (66%) and the provision of independent assurance reports (30%). The use of SLAs was notably less likely where schemes were administered in-house (43% compared to 83% where administered by another public body and 98% where administered by a commercial third party).

Penalties were infrequently used, with 14% of schemes imposing these if contractual terms or service standards were not met.

#### 1.4 Data

A significant minority of schemes were not conducting regular data reviews. Most schemes had identified data issues but few had implemented a data improvement plan.

Over three-quarters (79%) of schemes had undertaken a data review in the previous 12 months. A further 9% had done so less recently, 3% had never done so and 9% were unsure as to whether the scheme had ever carried out a review.

Just over half (53%) of schemes had identified issues in their most recent data review.

Approaching a fifth (18%) of schemes had implemented a data improvement plan. A third (35%) had identified issues but not instigated an improvement plan, and a similar proportion (35%) had not identified any issues in their latest review.

Nearly half of schemes reported that their employers did not regularly provide good data as a matter of course.

Just over half (55%) of schemes reported that at least 90% of employers consistently provided timely, accurate and complete data.

#### 1.5 Communications

Less than half of schemes sent members their Annual Benefit Statement (ABS) by the statutory deadline.

Less than half (43%) of schemes reported that all active members received their ABS on time. The mean proportion of members receiving their ABS by the deadline was 79%. This proportion was lowest among members of smaller schemes (a mean of 54% among those with less than 1,000 members). Almost a fifth (19%) of schemes reported that none of their members were provided with their ABS on time.

## 1.6 Resolving issues and reporting breaches

An estimated 8,000 complaints were made to public service schemes in the last year, amounting to 0.1% of all memberships.

The top types of complaints made to schemes were ill health retirement disputes (31%), delays in benefit payments (30%) and incorrect estimates of benefits (27%).

A significant minority of schemes did not have processes to identify and report breaches of the law. Overall two in five schemes had recently identified breaches, with half of these reporting a breach to TPR.

Most public service schemes (84%) had procedures in place to identify and assess breaches of the law, and report these to TPR if required.

In the previous 12 months 42% of schemes had identified breaches, and half of this group (21% of all schemes) had reported these to TPR.

The most commonly cited causes for breaches of the law were failure of employers to provide timely, accurate or complete data (60%), systems or process failure/issues (43%) and late or non-payment of contributions (13%).

## 1.7 Improving scheme governance and administration

The largest perceived barriers to improving scheme governance related to resourcing, legislation and employer compliance.

Resourcing (29%), the volume of legislative change and complexity of scheme regulations (28%) and employer compliance (20%) were the most widely identified barriers.

Improved scheme governance and administration was driven by a better understanding of standards and risks.

Improvements made to governance and administration in the last 12 months were mainly attributed to improved understanding of underlying standards and the action expected by TPR (69%), and improved understanding of the risks facing the scheme (57%).

## 1.8 TPR products and engagement

TPR products were widely used and well-regarded.

The majority of respondents had used the TPR website (81%) and the code of practice (77%). Perceptions of these products were overwhelmingly positive, with 97% finding the website useful and 99% finding the code useful.

TPR was generally felt to be effective at improving standards in public service pension schemes.

Overall 82% of schemes judged TPR to be fairly or very effective at improving standards of governance and administration. Only 1% of schemes perceive TPR as not effective.

#### 2. Introduction

The Public Service Pensions Act 2013 and the Public Service Pensions Act (Northern Ireland) 2014 (together, the 2013-2014 Acts) introduced new requirements for the governance and administration of certain public service pension schemes. Scheme managers must run their schemes according to these legal requirements, which generally came into force on 1 April 2015.

The 2013-2014 Acts also gave TPR an expanded role to regulate the governance and administration of these public service pension schemes from 1 April 2015. TPR's code of practice for the governance and administration of public pension service schemes (the PSPS code) sets out the standards of conduct and practice it expects of those responsible for public service schemes, as well as practical guidance about how to comply with the legal requirements. The code came into force on 1 April 2015.

TPR's expanded role covers schemes established or reformed as a result of the Acts in respect of eight public service workforces. Where schemes are locally administered TPR treats each part as a separate scheme, forming a total universe of 210 new or reformed schemes. TPR also regulates relevant connected legacy (closed) schemes. Between them these schemes cover over 16.5 million memberships.

A survey was undertaken in 2015 to assess how schemes were meeting the new requirements, and the standards to which they were being run. The 2016 survey aimed to provide a further assessment of performance, understand barriers to improvement, and delve deeper into the top risks of record-keeping, internal controls and communications.

# 3. Methodology

As with the 2015 survey, a self-completion approach was adopted for the following reasons:

- the large amount of data to collect would have made a telephone interview very long and burdensome for respondents
- it was anticipated that many respondents would need to do some checking/verification in order to answer the questions accurately; and
- the range of information requested meant that it was important to allow more than one person at the scheme to contribute

However, in contrast to the 2015 survey (where data was collected via an interactive pdf) an online survey platform was used. This reduced the volume of missing data by allowing respondents to be automatically routed through the relevant survey questions depending on their previous responses.

Owing to the nature and the amount of information required, a carefully structured research approach was necessary, giving respondents early warning of the kinds of information that we were seeking to collect and allowing them to devote an appropriate amount of time and effort to providing accurate and reliable information, liaising with colleagues if needed. Therefore, a multi-stage approach was adopted:

- Stage 1 Pre-notification emails were sent by TPR to scheme managers and the chairs of pension boards to explain the nature of the research, introduce OMB Research and notify schemes that their participation would be requested.
- Stage 2 OMB sent a tailored invitation email to each scheme manager contact. This contained a unique survey URL and a link to a pdf version of the questionnaire (for reference when compiling information prior to completion).
  - Any undelivered emails were re-sent once TPR had verified the correct email address.
  - In the case of referrals, sample details were updated so that the most appropriate scheme representative was contacted going forward.
- Stage 3 OMB sent a further two tailored reminder emails to schemes that had either not started the survey or had partially completed it.
- Stage 4 OMB executives undertook a phase of on-going telephone chasing. These calls ensured that the invitation email had been received, confirmed the identity of the most appropriate individual to complete the survey, and encouraged schemes to take part (including offering alternative methods of completion such as email return of a hard copy, recording responses over the phone, etc).

The approach was supported by other TPR communications and engagement (including promotion by key stakeholders such as scheme advisory boards).

## 3.1 Sampling

The sample for this research was extracted from TPR's scheme registry database. The target audience were the scheme managers of open public service schemes, namely the relevant government department/public body, fire and rescue authority, police pension authority or local administering authority.

Scheme managers were asked to work with the pension board chair to complete the survey and, where necessary, seek input from colleagues with specialist knowledge related to some aspects of their scheme.

Where scheme managers have responsibility for connected legacy schemes, we treated their responses as applying to all schemes for which they are responsible.

#### 3.2 Fieldwork

All surveys were completed between 31 October 2016 and 23 December 2016.

188 of the 210 public service pension schemes completed the survey, equating to a 90% response rate, and covering 98% of all memberships (new/reformed schemes and connected schemes).

Table 3.2.1 - Interview numbers and universe profile

		Sche	emes	Memberships <sup>1</sup>		
Scheme type	Interviews	Universe	Survey coverage	Universe	Survey coverage	
Other	11	11	100%	10,250,219	100%	
Firefighters	50	51	98%	100,572	99%	
Local Government	92	102	90%	5,960,190	95%	
Police	35	46	76%	379,891	76%	
Total	188	210	90%	16,690,872	98%	

61% of the surveys were submitted in response to the initial email and reminders, with the remainder completed during the telephone chasing phase.

<sup>&</sup>lt;sup>1</sup> Membership figures refer to 2015 and connected schemes

## 3.3 Respondent profile

Scheme managers (the relevant government department/public body, fire and rescue authority, police pension authority or local administering authority) contributed to 77% of completed surveys (and directly completed it in 66% of cases). Only 28% were completed with input from the pension board chair, although other board members were involved in a further 21%. Half (49%) of the surveys involved consultation with the scheme administrator.

Table 3.3.1 - Respondent role

Respondent role	Completed by	Consulted with	Total (involved)
Scheme manager (or employee of)	66%	11%	77%
Pension board chair	3%	25%	28%
Pension board member	7%	13%	21%
Administrator	14%	35%	49%
Other	6%	10%	15%
Unknown (did not answer question)	3%	-	-

## 3.4 Analysis and reporting conventions

Throughout the report results are reported at an aggregate level for all respondents and by 'type': Local Government, Firefighters', Police and Other<sup>2</sup> schemes. Schemes are grouped in this way to reflect the different workforces, governance structures, funding methods and employer profiles.

To ensure that results are representative of all public service pension schemes, the data throughout this report is shown weighted. **Scheme** data has been weighted based on the number of public service schemes of each type. **Membership** data has been weighted based on the total number of memberships in each scheme type.

Where relevant, comparable results from the 2015 PSPS survey have been included. Although data was reported **unweighted** in the published 2015 report, weights have been retrospectively applied to this data to ensure direct comparability with the 2016 results. For this reason, the 2015 results reported here may not exactly match those in the published 2015 report.

<sup>&</sup>lt;sup>2</sup> Centrally administered unfunded schemes excluding those Local Government, Firefighters and Police schemes which are centrally administered

# 4. Research findings

## 4.1 Scheme governance

Overall, 81% of schemes had a conflicts policy and procedure for board members, with these schemes covering 94% of public service pension scheme memberships.

Figure 4.1.1 - Proportion of schemes that had a conflicts policy and procedure for pension board members



Base: All respondents (Base, Don't know, Did not answer question)
Schemes (188, 7%, 3%), Memberships (188, 3%, 1%), Other (11, 0%, 0%), Fire (50, 6%, 4%), LG (92, 7%, 2%),
Police (35, 11%, 6%)

The likelihood of having a conflicts policy and procedure was highest among Other schemes (100%) and lowest among Police schemes (71%). Incidence also increased with scheme size; 96% of schemes with over 100,000 memberships had a conflicts policy compared to 87% of those with 30,000-100,000 memberships and 77% of those with less than 30,000 memberships.

In comparison to findings from 2015 there has been no change in the proportion of schemes with a conflicts policy and procedure.

Table 4.1.1 - Proportion of schemes that had a conflicts policy and procedure for pension board members - Time series

	Total	Scheme Type						
	schemes	Other	Firefighters	Local Govt	Police			
PSPS Survey 2016	81%	100%	80%	85%	71%			
PSPS Survey 2015	85%	100%	79%	87%	86%			
% Change	-4%	+0%	+1%	-2%	-15%			

Although the proportion of Police schemes with a conflicts policy and procedure fell (from 86% in 2015 to 71% in 2016), this change is not statistically significant, largely due to low base sizes among this group. The

2016 survey achieved much wider coverage of Police schemes (76% surveyed compared to 49% in 2015), with a greater proportion of the smaller schemes taking part. This could account for the above change, and other large differences between the 2015 and 2016 results for this group.

Just over four-fifths of schemes had a register of interests (85%), and this was the case for all 11 Other schemes. Police schemes were comparatively less likely to have this in place (74%).

Total

Scheme Type

100%

86%

87%

74%

Schemes Memberships Other Firefighters Local Govt Police

Figure 4.1.2 - Proportion of schemes that had a register of interests

Base: All respondents (Base, Don't know, Did not answer question) Schemes (188, 4%, 2%), Memberships (188, 2%, 1%), Other (11, 0%, 0%), Fire (50, 4%, 0%), LG (92, 5%, 2%), Police (35, 3%, 6%)

The proportion of schemes with a register of interests was also highest among larger schemes, with every scheme of over 100,000 memberships having one in place.

There has been a significant change over time in the proportion of schemes with a register of interests, from 75% in 2015 to 85% in 2016. This was mostly driven by Firefighters' schemes, where the proportion with a register of interests increased by 29%.

Table 4.1.2 - Proportion of schemes that had a register of interests – Time series

	Total	Scheme Type					
	schemes	Other	Firefighters	Local Govt	Police		
PSPS Survey 2016	85%	100%	86%	87%	74%		
PSPS Survey 2015	75%	92%	57%	77%	86%		
% Change	+10%	+8%	+29%	+10%	-12%		

Police schemes were the only group for which this proportion decreased (from 86% in 2015 to 74% in 2016), though this change is not statistically significant.

Overall, 93% of schemes (covering 97% of memberships) had developed policies and arrangements to help board members acquire and retain the knowledge and understanding they require.

Figure 4.1.3 - Proportion of schemes that had developed policies and arrangements to help pension board members acquire and retain the knowledge and understanding they require



Base: All respondents (Base, Don't know, Did not answer question) Schemes (188, 2%, 2%), Memberships (188, 0%, 1%), Other (11, 0%, 0%), Fire (50, 2%, 0%), LG (92, 1%, 2%), Police (35, 3%, 6%)

There were no significant differences by scheme type. However, schemes administered in-house were less likely to have developed these policies and arrangements (88%) than those administered externally (97%).

Since 2015 there has been a significant increase (+20%) in the proportion of schemes that had developed policies and arrangements to improve board members' knowledge and understanding. This was driven by a large increase among Firefighters' schemes, from just over a third (36%) in 2015 to almost all (94%) of these schemes in 2016.

Table 4.1.3 - Proportion of schemes that have developed policies and arrangements to help pension board members acquire and retain the knowledge and understanding they require - Time series

	Total	Scheme Type					
	schemes	Other	Firefighters	Local Govt	Police		
PSPS Survey 2016	93%	100%	94%	93%	89%		
PSPS Survey 2015	73%	92%	36%	85%	82%		
% Change	+20%	+8%	+58%	+8%	+7%		

Over three-quarters (78%) of scheme managers attended pension board meetings, and half had other face-to-face meetings with the board.

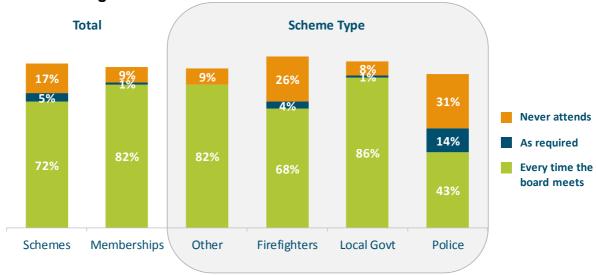
Table 4.1.4 - Interaction between the scheme manager and pension board

	Total					
	Schemes	Member- ships	Other	Fire- fighters	Local Govt	Police
Base: All respondents	188	188	11	50	92	35
The scheme manager attends pension board meetings	78%	89%	91%	72%	89%	57%
The pension board has face- to-face meetings with the scheme manager	50%	55%	55%	52%	58%	31%
The pension board submits written reports to the scheme manager	34%	45%	55%	28%	28%	49%
The scheme manager commissions advice from the pension board	31%	38%	45%	36%	26%	31%
Other	22%	26%	27%	26%	24%	11%
Don't know	3%	1%	0%	2%	1%	9%
Did not answer question	2%	1%	0%	0%	2%	3%

The majority of scheme managers for Other (91%) and Local Government (89%) schemes attended pension board meetings. This proportion was lowest among Police schemes (57%).

Just under three-quarters (72%) of scheme managers attended every pension board meeting, with 17% never attending.

Figure 4.1.4 - Frequency of scheme manager attendance at pension board meetings



Base: All respondents (Base, Don't know whether attends, Did not answer question, Did not answer whether attends board meetings)

Schemes (188, 3%, 2%, 2%), Memberships (188, 1%, 6%, 1%), Other (11, 0%, 9%, 0%), Fire (50, 2%, 0% 0%), LG (92, 1%, 2%, 2%), Police (35, 9%, 0%, 3%)

Firefighters' and Police schemes were most likely to report that the scheme manager never attended board meetings (26% and 31% respectively).

Schemes were asked to evaluate the pension board's ability to guide and advise the scheme manager on four different aspects using a 1-10 scale (where 1 was 'very poor' and 10 was 'very good').

In general, Firefighters' schemes had the lowest perception of the board's abilities (a mean score of 6.4 across all aspects). Police schemes had a comparatively higher estimation (a mean of 7.8 across all aspects) especially in terms of the board's ability to advise on scheme regulations (8.0) and to address poor standards (8.0).

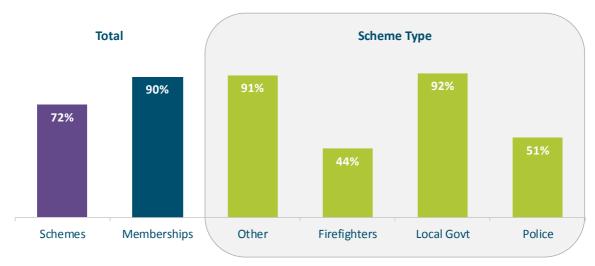
Table 4.1.5 - Pension board's ability to guide and advise the scheme manager - Mean ratings

	То	otal	Scheme Type			
	Schemes	Member- ships	Other	Fire- fighters	Local Govt	Police
Base: All respondents	188	188	11	50	92	35
Identify where there are poor standards or non-compliance with legal requirements	7.3	7.5	7.6	6.6	7.5	7.7
Set out recommendations on addressing poor standards or non-compliance with legal requirements	7.3	7.7	7.9	6.6	7.4	7.7
Advise on scheme regulations, governance and administration requirements set out in legislation, and standards expected by TPR	6.7	7.1	7.5	5.5	6.6	8.0
Take or secure actions to address poor standards or non-compliance with legal requirements	7.4	7.7	7.9	6.9	7.3	8.0
Average pension board rating (across all four aspects)	7.2	7.5	7.7	6.4	7.2	7.8

## 4.2 Managing risk

Almost three-quarters (72%) of schemes (covering 90% of memberships) had documented procedures for assessing and managing risk. Other and Local Government schemes were most likely to have such procedures in place (91% and 92% respectively), while Firefighters' and Police schemes were least likely (44% and 51% respectively).

Figure 4.2.1 - Proportion of schemes that had documented procedures for assessing and managing risk



Base: All respondents (Base, Don't know) Schemes (188, 10%), Memberships (188, 2%), Other (11, 0%), Fire (50, 16%), LG (92, 4%), Police (35, 20%)

The likelihood of having documented risk procedures increased with scheme size (ranging from 57% of those with less than 1,000 memberships to 92% of those with over 100,000 memberships). Schemes administered in-house were also significantly more likely than those administered externally to have these procedures (83% and 56% respectively).

When comparing findings from 2016 and 2015, there has been little overall change in the proportion of schemes that have documented risk procedures.

Table 4.2.1 - Proportion of schemes that had documented procedures for assessing and managing risk - Time series

	Total	Scheme Type					
	schemes	Other	Firefighters	Local Govt	Police		
PSPS Survey 2016	72%	91%	44%	92%	51%		
PSPS Survey 2015	70%	100%	36%	79%	82%		
% Change	+2%	-9%	+8%	+13%	-31%		

However, Local Government schemes were significantly more likely to have procedures for assessing and managing risk than was the case in 2015 (an increase of 13%). Police schemes were significantly less likely to (a decrease

of 31%), which likely reflects the broader coverage of police schemes in this survey rather than a drop in the presence of these processes across the police scheme population.

More than two-thirds (70%) of schemes had a risk register, and these schemes covered 90% of all memberships. The majority (91%) of Other and Local Government schemes had a risk register, with this less likely to be the case among Police and Firefighters' schemes (51% and 38% respectively).

Total

90%
91%
91%
51%
Schemes Memberships Other Firefighters Local Govt Police

Figure 4.2.2 - Proportion of schemes that had a risk register

Base: All respondents (Base, Don't know) Schemes (188, 5%), Members (188, 1%), Other (11, 0%), Fire (50, 8%), LG (92, 3%), Police (35, 9%)

The likelihood of having a risk register increased with scheme size (42% of those with less than 1,000 memberships up to 96% of those with over 100,000 memberships). Schemes administered in-house were also more likely to have a risk register than those administered externally (78% and 61% respectively).

When comparing results between 2016 and 2015, there were no statistically significant changes at the total level. Although significantly fewer Police schemes had a risk register than in 2015 (51% in 2016 compared to 82% in 2015), this is likely to be due to the more comprehensive survey coverage of this group in 2016.

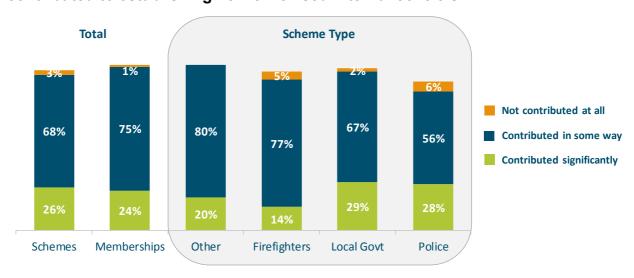
Table 4.2.2 - Proportion of schemes that had a risk register - Time series

	Total	Scheme Type					
	schemes	Other	Firefighters	Local Govt	Police		
PSPS Survey 2016	70%	91%	38%	91%	51%		
PSPS Survey 2015	76%	100%	36%	91%	82%		
% Change	-6%	-9%	+2%	+0%	-31%		

Schemes were asked to what extent risk management procedures contributed to establishing new or revised internal controls. The majority (94%) reported that these procedures had at least some influence, with a quarter (26%) stating that this contribution was significant.

There were no significant differences by scheme type.

Figure 4.2.3 - Extent to which risk management procedures have contributed to establishing new or revised internal controls



Base: All with documented procedures for assessing/managing risk (Base, Don't know) Schemes (135, 3%), Memberships (135, 1%), Other (10, 0%), Fire (22, 5%), LG (85, 1%), Police (18, 11%)

These findings were broadly consistent with comparative results for trust-based schemes. In the 2015 Trustee Landscape Quantitative Research<sup>3</sup> 17% of schemes reported that these procedures had contributed significantly to their internal controls, 70% that they had contributed in some way and 10% that they had not contributed at all.

<sup>&</sup>lt;sup>3</sup> http://www.thepensionsregulator.gov.uk/docs/trustee-landscape-quantitative-research-2015.pdf

All schemes with a risk register were asked to identify the top three governance and administration risks on their register. This was captured verbatim and the responses were then coded into broad themes for ease of analysis and interpretation.

The quality of records was the most commonly identified risk (36% of schemes), followed by funding or investment concerns (34%) and poor governance (29%).

Figure 4.2.4 - Top governance and administration risks on register (*Top mentions: 5%+*)



Base: All schemes with a risk register (131)

The most widespread risks differed by scheme type. Funding or investment concerns was the top risk for Local Government schemes (52%), poor governance for Police schemes (39%), securing compliance with legislation for Firefighters' (47%) and systems issues for Other schemes (50%).

#### 4.3 Administrator controls

Overall there was an equal split between schemes that were administered inhouse (47%) and those where the administration was outsourced (46%). Among those that were administered externally, similar proportions used other public bodies (23%) and commercial third parties (22%).

**Total Scheme Type** 10% 22% 27% 11% Other 36% 63% Outsourced to a 23% 16% 58% commercial third party 18% Outsourced to another 73% public body 14% 49% 47% **Delivered in-house** 36% 24% 20% Schemes Memberships Other **Firefighters Local Govt** Police

Figure 4.3.1 - Scheme administration

Base: All respondents (Base) Schemes (188), Memberships (188), Other (11), Fire (50), LG (92), Police (35)

There was some variation by scheme type. Three-quarters (73%) of Local Government schemes undertook scheme administration in-house, whereas Other, Firefighters' and Police schemes were comparatively more likely to outsource this (55%, 66% and 77% respectively). Specifically, Police schemes were most likely to outsource the administration to a commercial third party (63%).

When looking at scheme administration by size, larger schemes were significantly more likely to have in-house administration than smaller schemes. Three-quarters (77%) of schemes with over 100,000 memberships had administration services in-house, compared to a third (38%) of those with less than 1,000 members.

Schemes use a range of methods to monitor the performance of their administrators. The most common were administrators attending regular meetings with the scheme manager/board (84%) or delivering regular reports to the scheme manager/board (78%).

Provision of independent assurance reports and the application of penalties was less common (30% and 14% respectively). The exception to this was Other schemes, where 55% of administrators provided assurance reports and 45% applied penalties where contractual terms or service standards were not met.

Table 4.3.1 - Monitoring/managing the performance of administrators

	Total			Scheme	е Туре	
	Schemes	Member- ships	Other	Fire- fighters	Local Govt	Police
Base: All respondents	188	188	11	50	92	35
Administrators attend regular meetings with scheme manager or board	84%	78%	73%	82%	88%	80%
Administrators deliver regular reports to scheme manager or board	78%	88%	91%	74%	85%	63%
Performance metrics are set out in contracts or SLAs	67%	78%	91%	64%	55%	89%
Independent auditors review performance	66%	84%	91%	52%	74%	57%
Administrators provide independent assurance reports	30%	44%	55%	30%	28%	26%
Penalties are applied where contractual terms or service standards are not met	14%	32%	45%	12%	11%	14%
Other	13%	16%	18%	16%	14%	6%

Schemes administered in-house were less likely to use service-level agreements (SLAs) than those administered externally (43% compared to 83% of those administered by another public body and 98% of those administered by a commercial third party). Schemes administered by commercial third parties were also more likely to impose penalties than those with other administration arrangements (38%).

#### 4.4 Data

The majority of schemes had processes in place to monitor administration and record keeping. This ranged from 95% with processes to monitor the payment of contributions to 88% with processes for resolving payment issues and assessing whether to report failures to TPR.

Table 4.4.1 - Proportion of schemes with administration and record keeping processes in place

	Total		Scheme Type			
	Schemes	Member- ships	Other	Fire- fighters	Local Govt	Police
Base: All respondents	188	188	11	50	92	35
To monitor records for all membership types on an ongoing basis to ensure they are accurate and complete	89%	91%	91%	88%	90%	86%
With employers to receive, check and review data	90%	98%	100%	76%	96%	89%
For monitoring the payment of contributions	95%	94%	91%	88%	100%	94%
For resolving contribution payment issues and assessing whether to report payment failures to TPR	88%	93%	91%	68%	97%	91%

There was little variation in the prevalence of these processes by scheme type. However, Firefighters' schemes were the least likely to have processes to monitor data with employers and for resolving contribution payment issues (76% and 68% respectively).

Just over half (55%) of schemes reported that at least 90% of employers provided timely, accurate and complete data as a matter of course.

Figure 4.4.1 - Proportion of employers providing timely, accurate and complete data as a matter of course



Base: All respondents (Base, Not applicable, Don't know, Did not answer question) Schemes (188, 1%, 17%, 1%), Memberships (188, 0%, 16%, 6%), Other (11, 0%, 18%, 9%), Fire (50, 4%, 24%, 0%), LG (92, 0%, 11%, 0%), Police (35, 0%, 23%, 3%)

Reflecting the fact that they are single employer schemes, the mean proportion of employers providing timely, accurate and complete data was highest for Firefighters' and Police schemes.

When comparing results between 2016 and 2015, there has been very little change, with most employers reported as providing consistently good data.

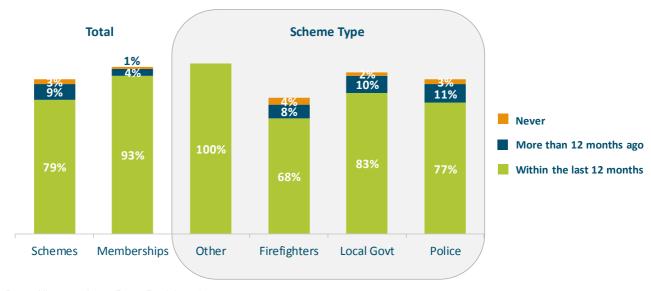
Table 4.4.2 - Proportion of employers providing timely, accurate and complete data as a matter of course - Time series

	Total		Schem	Scheme Type			
	schemes	Other	Firefighters	Local Govt	Police		
PSPS Survey 2016	88%	89%	96%	81%	97%		
PSPS Survey 2015	86%	92%	100%	76%	100%		
% Change	+2%	-3%	-4%	+5%	-3%		

Overall, 88% of schemes had carried out a data review. The majority (79%) of schemes had done so in the last year, and these schemes covered 93% of all memberships.

Only 3% of schemes had never conducted a data review. Although 9% did not know if or when they had done so, the vast majority of these were third party administered (84% of this group).

Figure 4.4.2 - Most recent data review



Base: All respondents (Base, Don't know) Schemes (188, 9%), Memberships (188, 2%), Other (11, 0%), Fire (50, 20%), LG (92, 5%), Police (35, 9%)

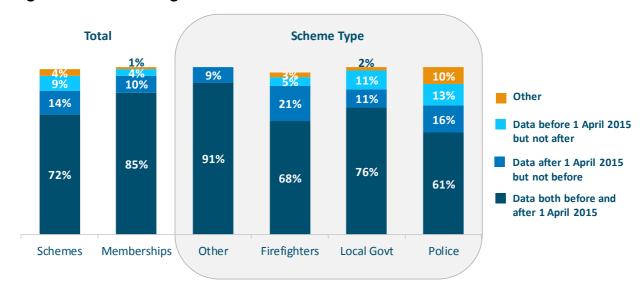
When comparing results between 2015 and 2016, although there was an overall increase in the proportion of schemes reviewing data in the last 12 months, this difference is only statistically significant among Other schemes (increasing from 58% in 2015 to 100% in 2016).

Table 4.4.3 - Proportion of schemes that had carried out a data review in the last 12 months - Time series

	Total	Scheme Type					
	schemes	Other	Firefighters	Local Govt	Police		
PSPS Survey 2016	79%	100%	68%	83%	77%		
PSPS Survey 2015	70%	58%	50%	77%	77%		
% Change	+9%	+42%	+18%	+6%	+0%		

Among those schemes that had reviewed their data, in almost three-quarters (72%) of cases this covered data collected both before and after the Public Service Pensions Acts came into force in April 2015. Police schemes were the least likely to have reviewed data collected both before and after April 2015, with three-fifths (61%) having done so.

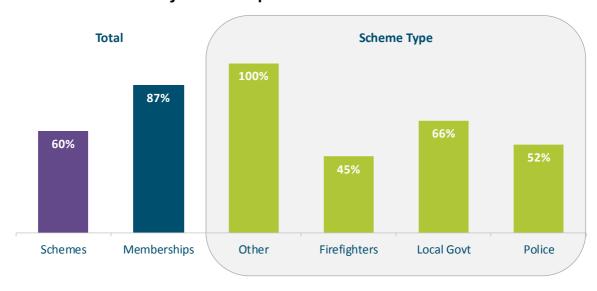
Figure 4.4.3 - Coverage of data review



Base: All that have carried out data review (Base, Don't know) Schemes (165, 1%), Memberships (165, 0%), Other (11, 0%), Fire (38, 3%), LG (85, 0%), Police (31, 0%)

Two-fifths (60%) of schemes that had carried out a data review identified issues or problems while doing so (which represents 53% of the total number of schemes in the survey). While all 11 'Other' schemes had identified issues, less than half (45%) of Firefighters' schemes had done so.

Figure 4.4.4 - Proportion of schemes where most recent data review exercise identified any issues or problems



Base: All that have carried out data review (Base, Don't know) Schemes (165, 3%), Memberships (165, 1%), Other (11, 0%), Fire (38, 3%), LG (85, 1%), Police (31, 10%)

Schemes that had identified issues during their data review were also asked what actions they had taken in response. The most widespread action was a data cleansing exercise (69%), and a third (34%) had instigated a data improvement plan (equating to 18% of all schemes).

Table 4.4.4 - Actions to address issues identified

	Total					
	Schemes	Member- ships	Other	Fire- fighters	Local Govt	Police
Base: All identifying issues during review	100	100	11	17	56	16
Data cleansing exercise	69%	78%	82%	53%	68%	81%
Address chasing exercises	40%	45%	45%	35%	43%	31%
Additional validation checks	37%	50%	55%	29%	38%	31%
Pensioner existence checks	37%	51%	55%	18%	43%	25%
Further/improved member communications (eg reminding members to check their records are up to date)	35%	37%	36%	35%	38%	25%
Data improvement plan put in place/updated	34%	56%	64%	6%	38%	31%
Other	32%	36%	36%	24%	38%	19%

Firefighters' schemes were least likely to have put a data improvement plan in place (6% of those identifying issues, equating to 2% of all Firefighters' schemes).

Schemes that had more rigorous processes for managing administrators were also more likely to have implemented a data improvement plan.

- 40% of those that had SLAs or contracts setting out performance metrics had a data improvement plan (compared to 21% of other schemes).
- 49% of those where the administrator provided assurance reports had an improvement plan (compared to 27% of other schemes).
- 44% of those that used independent auditors to review provider performance had an improvement plan (compared to 10% of other schemes).

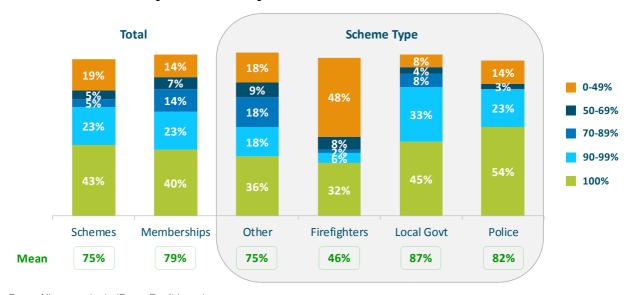
For almost half (48%) of schemes with a data improvement plan, the end date for this plan was 2017 (typically March). A fifth (18%) had an end date in 2018, and a small minority had an end date of 2016 or 2019.

The majority (83%) of schemes with a data improvement plan said this covered data collected both before and after 1st April 2015.

#### 4.5 Communications

A fifth (19%) of schemes reported that in 2016 less than half of their active members received their annual benefit statement by the statutory deadline. In almost all of these cases, the scheme indicated that no members received it on time.

Figure 4.5.1 - Proportion of active members receiving their annual benefit statement by the statutory deadline



Base: All respondents (Base, Don't know) Schemes (188, 4%), Memberships (188, 1%), Other (11, 0%), Fire (50, 4%), LG (92, 3%), Police (35, 6%)

Members of Firefighters' schemes were the least likely to receive their annual benefit statement on time; 48% of these schemes said that less than half of members received this by the statutory deadline.

Schemes were also asked whether they did anything to assess and, where necessary, improve the effectiveness of their member communications. Over two-thirds (70%) reviewed relevant innovations in technology, and a slightly lower proportion sought feedback from member representatives and had a communications plan (63% in each case). Overall, a third of schemes researched the views of their members (33%) and a quarter (27%) conducted an annual communications review.

Table 4.5.1 - Ensuring effective communications

	To	otal	Scheme Type			
	Schemes	Member- ships	Other	Fire- fighters	Local Govt	Police
Base: All respondents	188	188	11	50	92	35
Review relevant innovations in technology that could improve member access to communications, including interactive tools	70%	82%	82%	46%	84%	63%
Seek feedback from the pension board's member representatives	63%	80%	91%	68%	62%	54%
Have a communications plan	63%	71%	64%	42%	87%	31%
Research the views of members	33%	49%	55%	18%	42%	26%
Conduct an annual communications review	27%	43%	45%	12%	40%	11%
None of these	4%	1%	0%	8%	1%	9%
Don't know	3%	0%	0%	6%	0%	6%

Local Government and Other schemes were most likely to review innovations in technology (84% and 82%). The former were also most likely to have a communications plan (87%) and the latter to seek feedback from the board's member representatives (91%).

Smaller schemes were comparatively more likely to report that they had none of the procedures mentioned (10% of schemes with less 5,000 memberships, compared to none of those with over 30,000 memberships)

## 4.6 Resolving issues

The table below uses the survey data to estimate the total number of complaints received by public service schemes, and presents this as a proportion of all memberships. Overall, an estimated 8,000 complaints were made to public service schemes in the last year, amounting to 0.10% of all memberships.

Table 4.6.1 - Estimated total complaints received

	Total	Scheme Type					
	schemes	Other	Firefighters	Local Govt	Police		
Total complaints	8,011	5,450	155	1,969	437		
Share of complaints	100%	68%	2%	25%	5%		
Share of memberships	100%	57%	1%	40%	3%		
Complaints as % of memberships	0.10%	0.05%	0.17%	0.04%	0.19%		

In terms of the types of complaints received, the most common were ill health retirement disputes (31%), delays in benefit payments (30%) and incorrect estimates of benefits (27%).

Table 4.6.2 - Top types of complaints received

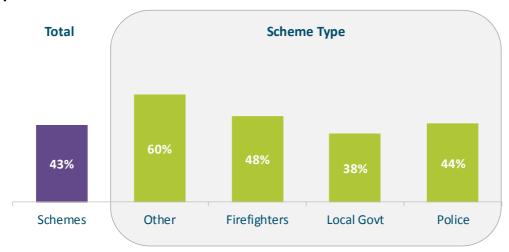
	Total -	Scheme Type					
Top Mentions (5%+)	schemes	Other	Fire- fighters	Local Govt	Police		
Base: All that received complaints	132	10	28	<i>75</i>	19		
Ill health retirement disputes	31%	20%	14%	44%	11%		
Delays in payment of benefits	30%	30%	18%	36%	26%		
Incorrect estimate of benefits	27%	50%	11%	25%	42%		
Transfer issues	22%	30%	18%	21%	26%		
Poor communication	21%	30%	21%	19%	26%		
Inaccurate data	11%	0%	7%	15%	11%		
Employer performance (ie not sending data in timely fashion)	10%	0%	0%	17%	0%		
Spousal benefits	7%	10%	11%	7%	5%		
Pension overpayment and recovery	7%	0%	14%	7%	0%		
Making allowance pensionable	5%	0%	18%	1%	5%		

There was some variation by scheme type in this respect. Complaints made to Other and Police schemes most frequently related to incorrect estimates of benefits (50% and 42% mentioned this as a top complaint). In contrast, Local

Government complaints were more likely to relate to ill health retirement disputes (44% of these schemes mentioned this as a top complaint).

Overall, around two in every five complaints entered the Internal Dispute Resolution (IDR) process (a mean of 43%).

Figure 4.6.2 – Mean proportion of complaints that entered the IDR process



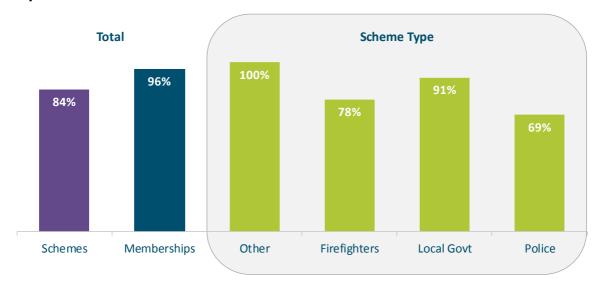
Base: All respondents (Base) Schemes (188), Other (11), Fire (50,), LG (92), Police (35)

When analysed by type of scheme, the mean proportion of complaints that entered the IDR process was 60% for Other schemes, 48% for Firefighters', 44% for Police and 38% for Local Government.

## 4.7 Reporting breaches

The majority (84%) of schemes had procedures in place to identify and assess breaches of the law, and report these to TPR if required. This equates to 96% of all memberships being in a scheme with these procedures.

Figure 4.7.1 - Proportion of schemes that had procedures in place to allow the scheme manager, pension board members and others to identify and assess breaches of the law, and report these to TPR if required



Base: All respondents (Base, Don't know)
Schemes (188, 8%), Memberships (188, 1%), Other (11, 0%), Fire (50, 10%), LG (92, 2%), Police (35, 20%)

All 11 Other schemes had breach identification procedures in place, compared to 69% of Police schemes.

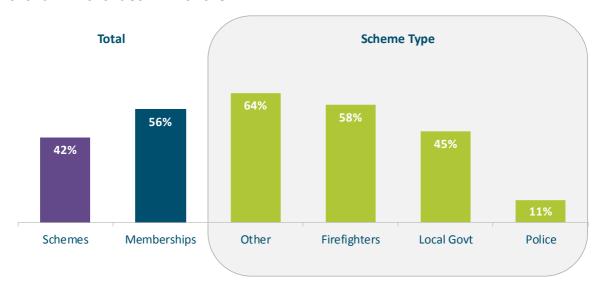
When comparing results from 2016 and 2015, there has been a significant increase in the proportion of schemes with processes in place to identify and assess breaches, from 53% in 2015 to 84% of in 2016. This increase was apparent for all scheme types apart from Police.

Table 4.7.1 - Proportion of schemes that had procedures in place to allow the scheme manager, pension board members and others to identify and assess breaches of the law, and report these to TPR if required - Time series

	Total		Scheme Type					
	schemes	Other	Firefighters	Local Govt	Police			
PSPS Survey 2016	84%	100%	78%	91%	69%			
PSPS Survey 2015	53%	67%	36%	51%	73%			
% Change	+31%	+33%	+42%	+40%	-4%			

Just over two–fifths (42%) of schemes had identified breaches of the law in the last year. Breach identification was most prevalent among Other schemes (64%) and least widespread among Police schemes (11%).

Figure 4.7.2 - Proportion of schemes that had identified any breaches of the law in the last 12 months



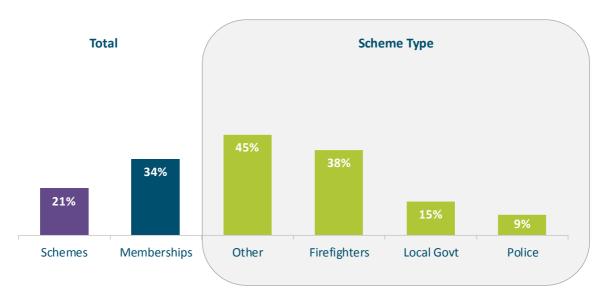
Base: All respondents (Base, Don't know, Did not answer question) Schemes (188, 2%, 1%), Memberships (188, 0%, 0%), Other (11, 0%, 0%), Fire (50, 2%, 0%), LG (92, 1%, 1%), Police (35, 3%, 3%)

Schemes that did not have processes in place to identify breaches were significantly less likely to have found any breaches in the last 12 months (25%, compared to 45% of those that had procedures in place).

Despite there being no notable differences in the proportion with breach identification procedures, schemes administered by commercial third parties were less likely to have found breaches in the last 12 months (16%, compared to 52% of those administered in-house and 47% of those administered by another public body).

Overall, 21% of schemes had reported breaches to TPR in the previous year. This equates to half of the 42% that had identified any breaches.

Figure 4.7.3 - Proportion of schemes that had reported any breaches to TPR as they thought they were materially significant



Base: All respondents (Base, Don't know if breaches, Did not answer question) Schemes (188, 2%, 1%), Memberships (188, 0%, 0%), Other (11, 0%, 0%), Fire (50, 2%, 0%), LG (92, 1%, 1%), Police (35, 3%, 3%)

Police schemes were least likely to have reported breaches (9%), but this is linked to the fact that just 11% had identified any such breaches. When calculated as a proportion of all those identifying breaches, Police schemes were in fact most likely to have reported them (75% compared to 71% for Other, 66% for Firefighters' and 34% for Local Government).

Table 4.7.3 – Summary: Proportion of schemes identifying and reporting breaches

	Total	Scheme Type					
	schemes	Other	Firefighters	Local Govt	Police		
Proportion of schemes identifying breaches	42%	64%	58%	45%	11%		
Proportion of schemes reporting breaches to TPR	21%	45%	38%	15%	9%		
Proportion of breaches reported	50%	71%	66%	34%	<b>75</b> %		

When breaches were identified, they were most commonly attributed to employer failings in providing accurate data (mentioned by 60% of schemes) or to issues with the schemes' systems or processes (mentioned by 43%).

Table 4.7.4 - Causes of breaches identified

	To	tal	Scheme Type				
Top Mentions (2%+)	Schemes	Member- ships	Other	Fire- fighters	Local Govt	Police	
Base: All identifying breaches of the law	81	81	7	29	41	4	
Failure of employers to provide timely, accurate or complete data	60%	62%	57%	41%	73%	50%	
Systems or process failure or issues	43%	50%	57%	55%	34%	25%	
Late/non-payment of contributions	13%	16%	14%	0%	22%	0%	
Management of transactions (eg errors or delays in payment of benefits)	11%	16%	14%	0%	20%	0%	
Failure to maintain records or rectify errors	9%	3%	0%	10%	10%	0%	
Lack of knowledge and understanding	9%	3%	0%	10%	10%	0%	
Capacity issues	5%	1%	0%	10%	2%	0%	

## 4.8 Addressing governance and administration issues

All schemes were asked to identify the top three barriers to improving their scheme governance and administration. This was captured verbatim and the responses were then coded into broad themes for ease of analysis and interpretation.

The most commonly identified barriers were limited resources (29%), the volume of legislative change and complexity of schemes (28%) and issues with employer compliance (20%).

Figure 4.8.1 - Barriers to improved governance/administration (*Top mentions:* 5%+)



Recruitment, Systems Failure of Time training, retention internal constraints of staff & know how controls

Base: All schemes (188)

The most commonly identified barriers differed by scheme type. Resourcing was the top risk for Local Government schemes (39%), volume of legislative change and scheme complexity for Firefighters' (23%), employer compliance for Other (45%) and poor or ineffective governance for Police schemes (23%).

Overall, 15% of schemes reported they faced no barriers to improving their governance and administration. This was most likely to be the case among the smallest schemes (29% of those with less than 1,000 memberships) and those administered by a commercial third party (27%).

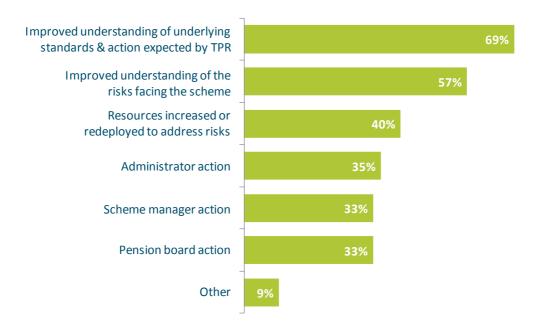
Schemes that had identified barriers to improving governance and administration were asked what steps they were currently taking to address those barriers. The most commonly reported actions were increased capacity, resource planning or specialist knowledge (26%), or improvements to systems/software (25%).

Table 4.8.1 - Addressing barriers

	Total					
	Schemes	Member- ships	Other	Fire- fighters	Local Govt	Police
Base: All identifying barriers	149	149	11	36	81	21
Increasing capacity/resource planning/specialist knowledge	26%	17%	9%	17%	33%	19%
Systems/software improvements	25%	40%	45%	11%	30%	19%
Employer engagement/training	18%	32%	36%	8%	25%	0%
Increase board size/training/engagement	17%	9%	9%	39%	9%	19%
Business/improvement plan/review	10%	4%	0%	14%	12%	0%
Introducing employer/member self service	7%	14%	18%	3%	7%	5%
Other	44%	50%	55%	47%	42%	43%
Did not answer question	5%	8%	9%	0%	5%	10%

All schemes were asked to what they would attribute any improvements made to their governance and administration in the last 12 months. The strongest reported drivers were an improved understanding of TPR's requirements (69%) and of the risks facing the scheme (57%). There were relatively few differences by scheme type.

Figure 4.8.2 - Drivers of improvements to governance and administration



Base: All respondents (Base, Don't know, No improvements made) Schemes (188, 8%, 1%)

## 4.9 TPR products and perceptions

All respondents were asked about their awareness and use of various relevant TPR products. Awareness was over 90% for each product, with the exception of the news by email service (76%) and the self-assessment tool (84%).

The most widely used products were the public service section of the website (81%), the guides to public service pension boards (80%) and the public service code of practice (77%).

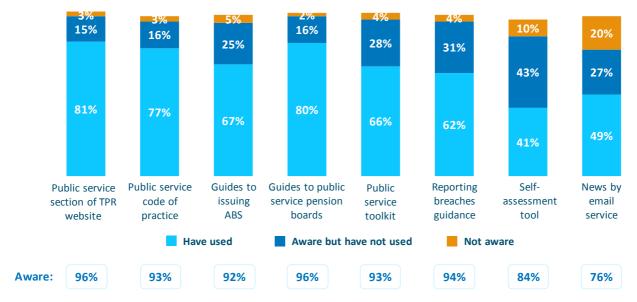


Figure 4.9.1 - Use of TPR products

Base: All respondents (Base, Don't know, Did not answer question)
TPR website (188, 1%, 0%), Code of practice (188, 2%, 1%), Guides to issuing ABS (188, 2%, 1%), Guides to public service pension boards (188, 0%, 2%), Public service toolkit (188, 2%, 1%), Reporting breaches guidelines (188, 1%, 2%), Self-assessment tool (188, 4%, 2%), News by email (188, 3%, 2%)

TPR products were most widely used by respondents from Other schemes (91%-100% across all products), but those from Police schemes were typically less engaged (23%-77% across all products). Respondents from larger schemes with more than 30,000 memberships were also more inclined to use these resources.

4

Respondents were also asked to rate the usefulness of these products. Perceptions were overwhelmingly positive, with no more than 4% of users judging any of the products to be not very/not at all useful.

The public service code of practice was rated most highly in this respect, with 99% of those that had used it finding it useful, including 57% who described it as very useful.

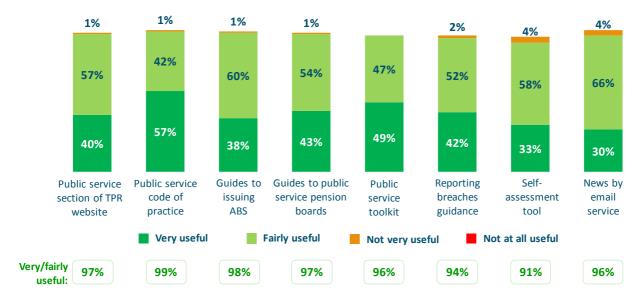


Figure 4.9.2 - Perceptions of TPR products

Base: All using each product (Base, Don't know, Did not answer question) TPR website (154, 1%, 2%), Code of practice (148, 0%, 1%), Guides to issuing ABS (127, 2%, 0%), Guides to public service pension boards (151, 2%, 1%), Public service toolkit (126, 3%, 1%), Reporting breaches guidelines (120, 3%, 1%), Self-assessment tool (79, 4%, 1%), News by email (94, 0%, 0%)

Although the majority of schemes (84%) did not suggest any specific products they would like TPR to provide that it does not currently offer, 1 in 10 (10%) proposed additional/enhanced guidance or processes.

Overall, 80% of respondents had visited TPR's website, and over half (54%) had done so in the last month. In contrast, a fifth (19%) had never visited it.

While Other scheme respondents were most likely to have visited the website recently (73% in the last month), 46% of respondents from Police schemes had never done so.

**Total Scheme Type** 9% 19% 6% 18% Never 4% 20% 18% Over 6 months ago 17% 4-6 months ago 2-3 months ago 11% In the last month Schemes Other **Firefighters Local Govt** Police

Figure 4.9.3 - Frequency of visiting TPR website

Base: All respondents (Base, Don't know/can't remember, Did not answer question) Schemes (188, 1%, 1%), Other (11, 0%, 0%), Fire (50, 0%, 0%), LG (92, 0%, 0%), Police (35, 3%, 3%)

Among those who had visited TPR's website, a fifth (19%) said they got 'everything' they wanted, and 60% got 'most' of what they wanted. Satisfaction was lowest for Other schemes, where almost half (45%) of respondents felt that they only got 'some' of what they wanted.

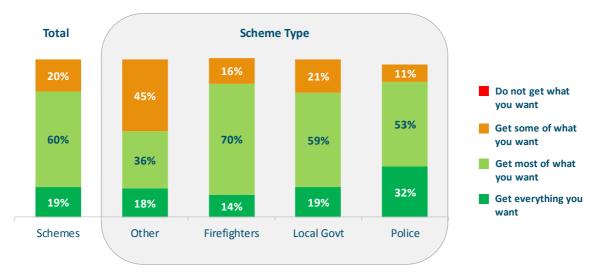
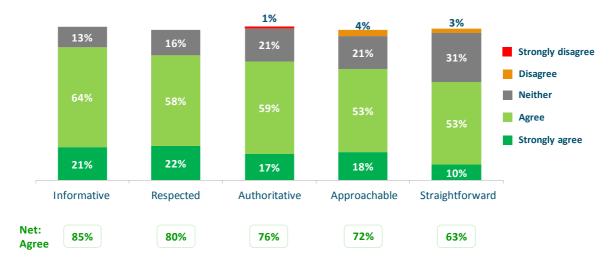


Figure 4.9.4 - Satisfaction with TPR website

Base: All that have visited TPR's website (Base, Don't know, Did not answer question) Schemes (154, 1%, 1%), Other (11, 0%, 0%), Fire (43, 0%, 0%), LG (81, 1%, 0%), Police (19, 0%, 5%)

When asked for their perceptions of TPR, schemes were most likely to agree that the organisation is 'informative' (85%) and least likely to agree that it is 'straightforward' (63%).

Figure 4.9.5 - Overall perceptions of TPR



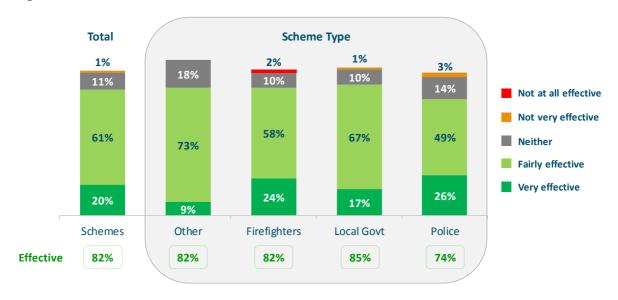
Base: All respondents (Base, Don't know) Schemes (188, 2-4%)

Police schemes tended to have the least positive perception of TPR, ranging from 74% agreeing it is 'respected' to 54% agreeing it is 'straightforward'.

Schemes that had reported breaches of the law were among the most likely to see TPR as 'informative' (93%), 'approachable' (90%) and 'straightforward' (76%).

Overall, 82% of schemes judged TPR to be effective (either 'very' or 'fairly') at improving standards in governance and administration in public service pension schemes. While few schemes judged TPR to be ineffective, Police schemes were somewhat less positive than other public service schemes (74% rating TPR as effective).

Figure 4.9.6 - TPR effectiveness



Base: All respondents (Base, Don't know) Schemes (188, 5%), Other (11, 0%), Fire (50, 6%), LG (92, 4%), Police (35, 9%)