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Pensions Management Institute
ACHIEVING PENSIONS EXCELLENCE

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Raising the bar

By Lesley Carline
PMI President

Last year's Pensions Aspects Live was a hugely successful event for PMI and won a prestigious award. As a result, the bar was set particularly high for this year's event. It did not disappoint.

This year, we chose a new venue, The Institution of Engineering and Technology (IET), as it offered the opportunity to develop further the practice of allowing attendees to select one of three sessions during the course of the day. Splitting the programme into streams had been a new development in 2018, and its success prompted its expansion this year.

After greeting attendees, the keynote address was given by Sir Hector Sants, who is Chair of what is now known as the Money and Pensions Service (MaPS).

Sir Hector discussed the difficulties associated with ensuring that the public had access to impartial information about increasingly complicated financial products. He stressed the importance of helping people make informed decisions about their finances, but before developing a strategy, he would be in listening mode and welcomed input from the industry.

Adrian Cooper of TPT Solutions then considered the issues associated with the consolidation of Defined Benefit Consolidation, and predicted that new consolidation models would enter the market in the near future. This is likely to be an area where many PMI members will develop a career.

The final session before the morning coffee break saw Mark Baker of Pinsent Masons discuss the forthcoming Pensions Bill. He was followed by Richard Gibson of Barnett Waddingham and Mark Grant of CMS, who considered the possibility that the 29 year-old problem of GMP equalisation might soon be resolved. It is galling for older members to note that there are PMI members who were not even born at the time of the Barber Judgment!

Matt Richards of the Pension Insurance Company, John H Smith of Siemens, and Stuart O'Brien of Sackers then delivered a joint presentation on the role of buy-ins in a derisking strategy. The session covered the provider market and how it was segmented, then moved onto the practical aspects with a case study of a buy-in.

This was followed by the first of two breakout sessions serving three separate streams. PMI's Technical Consultant moderated a fascinating panel discussion in the Royal Mail's adoption of a Collective Defined Contribution Scheme. Elsewhere, Lesley Carline led a discussion on Financial Wellbeing with the University of Lincoln, providing an engaging and informative case study which provided much food for thought. Elsewhere Vice President Lesley Alexander chaired a session addressing the Roadmap to Retirement.

The first session after lunch saw PMI Board Chair Alan Whalley lead a discussion about Environmental and Social Governance (ESG). Panellists included Ingrid Holmes of Hermes, Cindy Rose of Aberdeen Standard Investments, and Dr Gabrielle Walker. Takeaways included the need for positive engagement rather than exclusion. They were followed by Gary Crockford of Buck, and Kay Libby of Age UK Bristol, who presented jointly on the impact on retirees of pension scams and the measures needed to combat them.

The day's business concluded with a second round of breakout sessions. Council member Chris Parrott moderated an engaging discussion about Employer Covenant followed by presentations on transfers and scheme mergers. Lesley Carline led sessions addressing cyber security, what pensions could learn from open banking, and finished off with the pensions dashboard. Finally, Lesley Alexander's three sessions examined DC governance, Communications, and Master Trust authorisation.

Given the sheer amount going on within the pensions industry, it needed to be a very ambitious programme, but the thorough work of PMI's events team ensured that all ran to time and was of a consistently high quality. Streaming allowed our attendees to select topics that were of particular interest to them and once again, PMI delivered an outstanding conference. ***Bring on 2020!***

Pensions Aspects LIVE/19

PMI

ANNUAL DINNER /19

WEDNESDAY 3RD APRIL 2019

Thank you to all our guests, we hope you had an enjoyable evening.

With very special thanks to our guest speaker Lucy Worsley.

Many congratulations to Kim Gubler, on receiving her award for **'Outstanding contribution to the PMI'**.

A huge congratulations to David Weeks, Co-Chair, AMNT, on collecting his award for **'Outstanding contribution to the pensions industry'**.

Cheque Payments

Please note that effective 1st June 2019 we will no longer be accepting cheques as payment for all membership subscriptions, renewals or qualifications.

Obituary

We are saddened to hear that **Michael David Anthony MCISI FPMI ACII FPAS** has recently passed away. Vince Linnane, former PMI Chief Executive, reflects on the sad passing of our Former President, Mike Anthony:

It is with deep regret that we announce the death of the former PMI President, Mike Anthony. Mike was PMI President 1989-91 following a term as Vice President and having been a PMI Council Member and Chairman of the Membership Services Committee. During his presidency, the PMI launched the Qualification in Pensions Administration (QPA), the first qualification aimed purely at pensions administrators. In the three decades since its launch, literally thousands of administrators have passed it and the various successor qualifications it generated.

Mike spent a long and illustrious career in the pensions investment business, holding senior roles at Henderson, SEI and Julius Baer, amongst others. He was a keen sportsman, acting as a referee in local Kent football leagues when his playing career was behind him. He also enjoyed playing golf and supported West Ham United FC.

APPT Renewal

APPT renewals are due on 1st July 2019 and renewal notices will be issued on the 1st May 2019. APPT members are reminded to complete and submit their 2018 CPD to the PMI Membership Department.

Enter the ITM Student Essay Competition and win £500!

PMI Students, Affiliate Student Members and any member currently undertaking a PMI qualification will have the chance to win £500 and have their essay published in Pensions Aspects. Two runners up will also win £250.

See page 26 for more details on how to submit your entry.

Fellow Membership Fee Waiver – Limited time only

Upgrade now and pay an administration cost of only **£35**.

For a limited time only, PMI will waive the election fee of £150 and the upgrade fee of £90 for Associate members who would like to upgrade to Fellow membership. This covers your membership subscription until 31st August 2019.

To be eligible for this upgrade, members must confirm the following:

- **Have submitted at least 5 years CPD**
- **Have been an Associate member for at least 5 years.**

Completed application form and payment to be submitted by **Thursday 30th May 2019**.

To find out if you are eligible, or for more information, contact the Membership Department.

Continuing Professional Development (CPD)

Fellows and Associates are reminded that meeting the PMI CPD requirement is compulsory (except where retired/non-working). Under our CPD Scheme, PMI members are required to record at least 25 hours during the year. Please log on to the website and update your CPD record.

Fellow and Associate members with outstanding CPD have been notified to complete and submit their CPD to the PMI Membership Department. Failure to comply will result in the withdrawal of their designatory initials FPMI and APMI.

PMI Trustee Group Board Certificate

If your Board is a member of the PMI Trustee Group and each member has achieved 15 hours of CPD, then you are eligible for the PMI Certificate of Achievement. Please contact Denise or Sarah at **membership@pensions-pmi.org.uk** for more information.

Membership update

Certificate membership

Certificate membership is open to those who have completed one of our qualifications at the Certificate Level; for more information please see the PMI's website. We are pleased to announce that **Alan Fox** has been elected to Certificate Membership and can now use the designatory initials **'CertPMI'**.

Diploma Membership

Diploma membership is open to those who have completed one of our qualifications at the Diploma Level; for more information please see the PMI's website. We are pleased to announce that **Robert Armstrong**, **John Hotchkin** and **Amanda Sands** have been elected to Diploma Membership and can now use the designatory initials **'DipPMI'**.

Associate Membership

Associate membership is open to those who have completed the Advanced Diploma in Retirement Provision qualification; for more information please see the PMI's website. We are pleased to announce that **Stephen Ellul** and **Estelle Hughes** have been elected to Associate Membership and can now use the designatory initials **'APMI'.**

Contact us

For further information or queries regarding membership, please contact Denise or Sarah at membership@pensions-pmi.org.uk or on 020 7392 7410/020 7392 7414 for more information.

Fellowship

Fellowship is open to Associates with five years' membership and five years' logged CPD.

We are pleased to announce that the following people have been elected to Fellowship and can now use the designatory initials **'FPMI'**:

Catherine Allen
Ian Armitage
Laura Aukolls
Kevin Bowall
Neil Brennan
Louise Brentley
Sara Brown
Gary Cowler
Andrew Currie
Steven Davidson
Benjamin Fowler
Shailesh Gopal
David Guest
Samantha Hanton-Abrahams
Karen Henderson
Paul Hopkins
Andrew Linster
Richard Marks
Kerry Merryweather
Andrew Mutter
Sarah Oliver
Mark Paul
Simon Pilcher
Jessica Rigby
Glenda Robinson
Colin Ross
Ian Smith
Michael Spink
Kevin Stratford
Paul Trott

PMI AGM

The PMI's 43rd Annual General Meeting will be held at Tower 42, Floor 20, 25 Old Broad Street, London, EC2N 1HQ on **Wednesday 10th July 2019 at 4.30pm**. There will be four ordinary resolutions for which only Fellows and Associates of the PMI will be able to vote for. If you have any queries about this, please contact Fran Schiller on **fschiller@pensions-pmi.org.uk**

By Robert Wakefield, Head of Pensions Administration, First Actuarial

Fellowship Network Session

The first session of the PMI Fellowship Network for 2019 involved a presentation from The Pension SuperFund to discuss Defined Benefit Consolidators. I was lucky enough to be co-chairing both the Bristol and Leeds sessions and this was obviously a topic which piqued the interest of many Fellows; both were well attended and produced active discussion.

Antony Barker from the Pension SuperFund started each session with a presentation which formed the basis of the discussion. A number of attendees confessed to not knowing a great deal about the consolidators which helped the discussion be open and honest without any preconceived ideas.

The presentation

Antony gave a high level review of the 5,500 plus defined benefit schemes in the UK, together with details of the numbers of schemes failing and transferring into the Pension Protection Fund. The presentation covered both The Pension SuperFund and Clara-Pensions' methodology.

The main features of both arrangements are:

Selected Features	The Pension SuperFund	Clara-Pensions
Sectionalised?	No. Single non-sectionalised fund for all transferred schemes.	Yes. Single fund but sectionalised for each transferred scheme.
End game	Funds run off in the long term. No specified finite lifetime or wind up target.	Fund targets buyout and winding up of each section after 5-10 years.
Price and top up	'Purchase price' is 105% of self-sufficiency technical provisions. Investors add capital of 10% on top.	'Purchase price' is c.90% of buyout liabilities. Investors add capital of c.10% on top.
Investor returns	Investors receive regular returns subject to capital adequacy.	Investors only receive their returns once buyout target achieved.
Profit share	Members benefit from a share of the upside (e.g. as DC top up).	Members do not receive a share of the upside.

The discussion

The discussions raised a few interesting points/questions including:

- Required funding levels: both arrangements require a funding level of 90% or 105% either with or without an employer top up of some description.

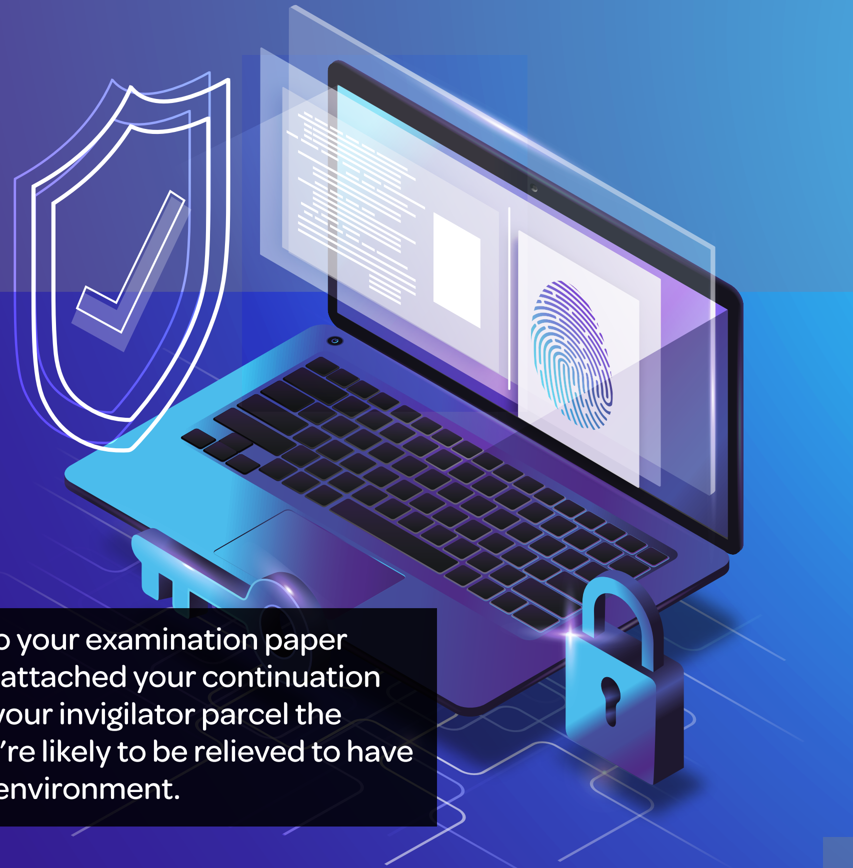
  A number of smaller schemes with much lower funding levels and little chance of an employer top up are effectively excluded.
- Returns and top ups: the efficiencies The Pension SuperFund are looking to achieve via a single fund, thus reducing valuation and investment costs, are unlikely to be achieved by Clara as they are still remaining as separate schemes with a focus on buyout.
- Are insurers happy about this alternative? The Pensions SuperFund is not in competition with the insurers as they are a single fund and not looking to buyout. Clara will ultimately go to buyout with an insurer.

  The point raised here was that at present the insurance market only receives around 1% of pension fund liabilities per annum, so it shouldn't impact on their share of the market.
- It is getting more difficult to attain a quote from the insurers as the market seems to be full with the current providers, so another product such as these is probably needed. These funds could be seen to compliment insurance companies.

Having been involved with the Fellowship Network for a couple of years now, I believe this was a fantastic example of bringing together Fellows to openly discuss and challenge important issues in our industry.

If you are a Fellow of the Institute, I suggest you attend these important events when they arise.

Cyber security and your future exams



Have you ever wondered what happens to your examination paper once you've answered the final question, attached your continuation sheets using a treasury tag and watched your invigilator parcel the papers up for postage? Probably not; you're likely to be relieved to have finished and eager to get to a less formal environment.

For your paper the amazing journey starts here: it is posted back to PMI at Tower 42, checked off against a master sheet of who did which exam where, scanned and saved to a secure cloud, and then it recommences its relationship with the UK postal services. If you have been selected for a post exam sample then your paper will be copied and sent to several different examiners for standardisation: they'll meet to confer and agree their marking, then all of the exam papers will be sent to the individual markers who will mark your paper once, then post your paper out to be marked again. There will then be a second meeting, and final marks will finally be agreed at a board of examiners' meeting.

All of the above is good practice and is based on a spirit of fairness and shared expertise. It is also essentially precarious as your paper re-engages with external postal services at several different moments. At least we have a back up in the cloud!

In the meantime, learners who have completed the exam online have clicked return and the exam is now stored in the cloud and ready for e-distribution to the markers.

The PMI is moving towards a position of digital by default for as many of its services as possible and lifelong learning has been leading the change. Carol Perry FPMI, Chair of the Lifelong Learning Committee, remarked:

"Our examinations should reflect the demands of the workplace; using laptops and PCs for examinations helps to make the tests more realistic and authentic …"

The removal of paper based examinations make both the exam papers and also the candidate's answers and results more secure by eliminating the need for conventional methods of transport to and from exam centers.

Exams are delivered from secure servers based in the United Kingdom and accessed by the computer on which the exam will be taken. The data is encrypted and is accessed by strict password control. This means that the data can only be intercepted, breached and accessed by authorised persons.

Any marking required can also be completed online, securely, through the system which again removes the risks involved in physical movement of exam materials.

Systems add layers of security by having Intelligent Intrusion detection and Denial of Service prevention to automatically detect and stop any malicious activities and block them as they occur.

Ongoing security of the applications is ensured by frequent ethical hacking and penetration testing exercises designed to actively identify security issues before they can be exploited.

Cyber security: is your scheme at risk? / We are at a landmark moment for pensions, and quality of data is crucial / Data management is a time bomb under the pension industry

Cyber Adviser

Safeguarding members from scammers

Continue reading on pages 12-17...

Cyber Security:

Is your scheme at risk?

Pension schemes transfer millions of pounds every month and hold sensitive and private information. This makes them a potential target for criminals who can manipulate money transactions or steal data and sell it on the dark market. Trustees and Sponsoring Employers potentially face severe reputational damage for getting it wrong. Trustee Boards and Company Directors can be sued if not enough is done to protect the scheme.

In April 2018, the Pensions Regulator released the guidance 'Cyber security principles for pension schemes' which defines cyber risk as follows:

'The risk of loss, disruption or damage to a scheme or its members as a result of the failure of its information technology systems and processes. It includes risks to information (data security) as well as assets, and both internal risks (e.g. from staff) and external risks (e.g. hacking).'

The Pensions Regulator sets an expectation that Trustees are actively managing their cyber risk and notes the following:

'The cyber risk is complex and evolving and requires a dynamic response. Your controls, processes and response plan should be regularly tested and reviewed. You should be regularly updated on cyber risks, incidents and controls, and seek appropriate information and guidance on threats.'

Unfortunately due to the ever-changing nature of cyber crime no one consistent approach will ultimately prevent attacks. Therefore the focus is on finding a balance between the degrees of cyber security protection and cost.

To help understand whether you have the right balance, check you can answer the following **7 key questions**:

1. Are you aware of your responsibilities and liabilities?

The Pensions Regulator has released guidance setting out their expectation for trustees but there are also other regulatory and governmental bodies such as the Information Commissioners Office, Data Protection Act, General Protection Data Regulation and many more, that will provide further guidance and requirements. In the event of a breach it is vital for Trustees to ensure that they have complied with all the various requirements.

2. Do you have an agreed definition of risk appetite and tolerance?

Trustees need to have determined the amount of risk they are willing to accept in relation to cyber security. This understanding will allow you to begin planning what your protection looks like. You must be confident that the minimum amount of controls and processes are in place to reflect your agreed risk appetite, and to be able to defend these actions and report back to members in the event of a breach.

Co Authors: James Berkley, Associate Partner, Pensions & Tal Mozes, Partner, Cyber Security, EY

3. What are your most valuable information assets?

Cyber criminals are not necessarily targeting the financial assets held by the fund but a wide variety of information. The EY Global Information Security Survey (GISS) 2018-19, a survey of over 1,400 CIO, CISOs and other executives across the globe on the most important cybersecurity issues facing organizations today, shows customer information was the most valuable information to cyber criminals followed by financial information and strategic plans. Your scheme may hold confidential information on both your members and your sponsor.

Top 10 most valuable information to cyber criminals

1. Customer information
2. Financial information
3. Strategic plans
4. Board member information
5. Customer passwords
6. R&D information
7. M&A information
8. Intellectual property
9. Non-patented IP
10. Supplier information

4. Where are your most obvious cybersecurity weaknesses?

Pension schemes hold and regularly transfer significant volumes of member information and interact with a large number of stakeholders. Due to high dependency on 3rd parties for transferring money, hosting data, and any other services, third party risk needs to be managed with the right contracts, technical controls and insurance. You will need to be confident of security across all areas where members' information is held including the security of those third party vendors.

5. What are the threats you are facing?

The GISS highlights that most successful cyber breaches contain 'phishing' and/or 'malware' as starting points. Attacks focused on disruption rank in third place on the list, followed by attacks with a focus on stealing money. Although there has been quite a lot of discussion about insider threats and state-sponsored attacks, these are considered a lower threat.

Top 10 biggest cyber threats to organisations

1. Phishing
2. Malware
3. Cyberattacks (to disrupt)
4. Cyberattacks (to steal money)
5. Fraud
6. Cyberattacks (to steal IP)
7. Spam
8. Internal attacks
9. Natural disasters
10. Espionage

6. Have you already been breached or compromised?

Many organisations are unclear about whether they are successfully identifying breaches and incidents. Our survey showed, among organisations that have been hit by an incident over the past year, less than a third say the compromise was discovered by their security centre. Pension schemes should be regularly reviewing their detection protocols to ensure they remain secure and in the event of a breach have a well defined incident response plan, that is exercised and kept up to date.

7. How does your protection compare with other pensions schemes and industry expectations?

Pension schemes across the UK will all be facing the same difficulties on deciding what level of protection is appropriate to protect members interests. You should seek to understand how your scheme compares to the wider market on cyber spend and protection.

In summary, Trustees should have an understanding of where their cyber risk exposure is and establish a plan on what needs to be addressed to ensure members' information is adequately protected. Although no amount of protection will completely prevent a breach from occurring, Trustees need to ensure that a reasonable minimum level of protection is in place and processes are operating as expected.

We are at a landmark moment for pensions

and quality of data is crucial

With the Pensions Regulator's master trust authorisation deadline now behind us, and the consolidation of schemes currently held by withdrawing trusts now an inevitable next step for the industry, it is crucial that everyone involved is prepared to deal with an influx in scheme transfers.

The key to managing these transfers in a safe and timely fashion will be in the quality of data held by trusts. To be fully prepared, and to safeguard member outcomes, master trust administrators and trustees need to think about the quality of their data, and its fitness for transfer; and they need to do it now.

Outgoing transfers are always a difficult beast, as the company losing the scheme will all too often see the jettison of their data as a mere formality. Our experience has shown time and again that as long as the security needs around data transfer are properly addressed, the transferring party are unlikely to be too moved by concerns about data quality, given that it's about to stop being their problem.

By Garreth Hiron, Head of Pensions at Intellica

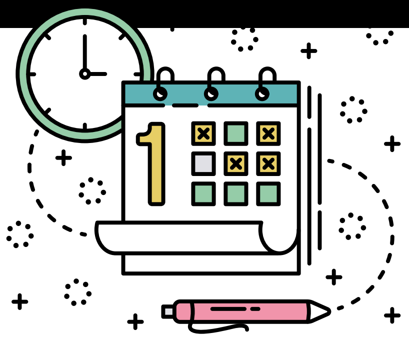
Master trusts must be ready

It is our hope that master trusts that have voluntarily withdrawn from the marketplace will already be accepting accountability for the state of their data and working out how best to discharge their responsibilities in a way that facilitates continuity of service for the member, such as by cataloguing, and, if possible, tackling any known issues with their data before transfer.

For those who apply but fail to attain authorisation, the process will doubtlessly be more chaotic, not to mention heartbreaking, as they will have been preparing for a future of continued operation. All this and more applies to any trusts who have their authorisation withdrawn as a penalty down the line.

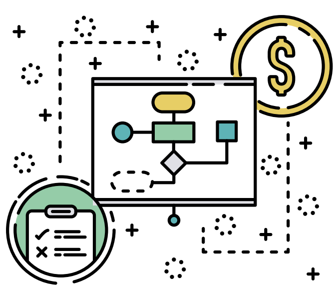
The consolation in the short term is that the Regulator appears solid in its deadlines on this one, and whilst, at the time of writing, eleven master trusts have been granted extensions, we should have a very good picture of who is left – or at least, who can be left – in the marketplace by October 2019, and any potentially volatile transfers should therefore be known up front.

Those who are authorised, or expect to be, at the end of the process, and are likely to take on schemes from those who are winding up, will therefore need to start making preparations, ensuring they have a robust migration process in place and getting their minimum data standards or checks in place, ready and waiting.



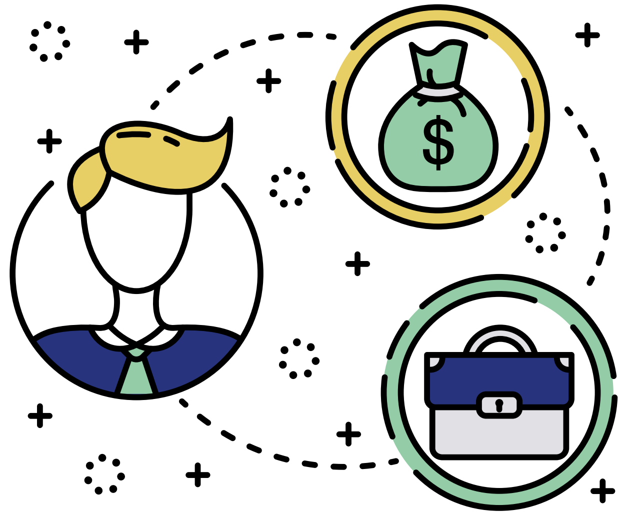
Prepare ahead or waste time later

Taking the time now to define their data needs, in terms of security, referential integrity and suitability for use, will save them time when they're staring down the barrel of a hard deadline for data transfer, and I guarantee they will appreciate that when the moment comes! Whether that takes the form of an outline of their minimum viable standard for incoming data in terms of file and field formats, or planning more stringent 'fit for purpose' checks to be put in place at transfer, they can certainly benefit from any intelligence gleaned up front, and get a head start on preparing temporary workarounds and a longer-term data cleansing plan. The migrations involved may well involve a number of systems, either actively if transferring between two different administration systems and perhaps an intermediate database for data mapping, or passively if the data in motion has previously been moved from one or more legacy systems, as is ever more common these days.



Do what can be done to avoid data failures

Such historic movements increase the possibility that data is incorrectly or obsoletely formatted, that unnecessary data has been captured or that necessary data is missing, but the good news on that front is that the data for these particular schemes is relatively new, so this will be less of a factor as it would be for an aging Defined Benefit (DB) scheme. Assuming the data can reach the new system, there will be a great opportunity to sample the quality of the data at the time of loading, if the correct preparations are made. This is of particular interest given the Regulator's recent guidance on measuring data quality, which indicated that members with a single data quality failure should be counted against a scheme's data quality score. Measuring data quality at the time of the initial load would allow master trusts taking on new schemes to establish the baseline for that scheme's quality before they even begin to run its administration, providing the perfect basis to demonstrate incremental progress to the Regulator.



Quality data will mean better outcomes and better member engagement in the future

As an industry, we stand at a crossroads in terms of member engagement. Millions more are now saving for their retirement thanks to auto-enrolment, and a great many of those are saving in master trust schemes, which are popular as auto-enrolment vehicles. There are fears that the rise in contributions in April will cause an exodus, partly based on how many people are saving at the bare minimum rate, and not helped by some rather lurid headlines in the mainstream press.

There's no getting away from the great risk that scheme continuity could be affected by a mass transfer of data. If this is perceived at member level, we could find more people turning away from pensions. The clarity and frequency of communication will be key, and it's another reason any data transfer needs to be spot on, as members who are engaged will be more vigilant to unusual changes in their next annual statements.

In what will be looked back on as something of a landmark moment for pensions, controlling data is crucial to keeping control of the message to the consumer; muddled messages to members who are being moved risks alienating the very people the industry has fought to involve, especially with the negative narrative being perpetuated in the headlines. For these reasons, I believe that data quality is the single biggest issue facing master trusts as we enter this new era, with member communication around transfers an ever present challenge. But whilst those of us working with pensions wrestle with some rather delicate predicaments, let's also remember that there are some great positives for the consumer. Through authorisation, the watchful eye of the Regulator, and the prospect of even larger master trusts, members of participating schemes should be given the extra protection and assurance they deserve.

Data management is a time bomb under the pension industry

By Jonathan Lister Parsons CTO, PensionBee

BOOM. That's the sound of a data management time bomb sitting under the pension industry going off at some point in the near future. Data management, whilst it sounds dry, is an area of governance that is one of the most relevant issues for today's pension industry. The risk of doing a bad job of data management, currently ticking below the surface, not only carries the risk of serious financial penalties, but also holds the industry back in terms of innovations like the long-awaited Pensions Dashboard. Fortunately, there are answers.

Before I get into that, what do we mean by data management? For the purpose of this article, data management is the ability to identify, secure and audit all the data held on a company's customers. There is an overlap with the field of data security but, as we will see the idea of managing data is broader. With this in mind, why is data management so important to today's pension industry, and what can companies do to defuse their data management time bomb?

Let's start with the General Data Protection Regulation (GDPR), which passed into UK law in May 2018, and is the most significant upgrade to data protection law in twenty years. GDPR not only grants sweeping rights to consumers over their own data, but also significantly raises the penalties for failing to protect these rights.

Poor data management can lead to a data breach, which is defined very broadly under GDPR. A breach is not just about loss or theft of data; any unauthorised processing, and even losing access to data, are also considered data breaches. Depending on the severity of the incident and the controls that were in place to prevent it, the fines can reach up to €20 million, or 4% of a company's global turnover. If a company is not on top of its data management it may not even know there has been a data breach, which GDPR also frowns upon, potentially doubling fines if you don't detect and report a breach in a timely manner.

Pension companies hold data on consumers that is highly sensitive; not only detailed personal information, such as national insurance number, age and gender, but also financial information about retirement benefits, annual earnings and savings behaviour. Running a pension scheme also generates all sorts of extra data about customers, such as information about tax relief claims and management fees.

> **Like banks, pension companies have a responsibility to guard their customers' data safely.**

And like banks, the pension industry has had to transition large numbers of customer accounts from paper records into the digital age.

I work at PensionBee, a pension company founded in 2014, that helps consumers get on top of their money by moving it into a single, online pot. We spend a large amount of our time tracking down people's pension policies, which means we get the opportunity to communicate with almost all of the UK's pension providers and learn about how they manage their customers' data. One of the clearest signals of a problem lurking under the surface is the sheer amount of paper that our industry generates. People can and do move their pensions between providers and so often this transfer of data is on paper; quite possibly the only transaction that person will carry out using paper all year. Let's be clear; paper is a problem. It can get lost, it can get wet, it can be left on a bus, and it's easy to make mistakes when you're manually transferring the contents of paper onto a computer system. Transitioning entirely to digital storage, processing and transfer is key to managing the large amount of data generated by the industry.

This is not a controversial point of view, however it is not obvious how to react to it if you are already immersed in a forest of paper processes. The pension industry has been around for a long time; in the UK pensions have been around since at least 1908, and several of its biggest players trace their origins back hundreds of years. Modern digital systems co-exist alongside old fashioned paper-based processes, and it is here that we need to take aim. How do you digitise a dead tree industry? There are three principles that you need to follow to get your data into digital form.

Leave only (digital) footprints: The first principle is to generate no more paper, and thereby stop contributing to the problem. This might sound easy, but there is a lot of fear in the industry that not sending out paper copies of policy documents or customer communication will leave people exposed to abuse. This is the opposite of the truth: you can't track whether someone has read a letter, whereas you can know if an email or a digital document has been opened; documents get lost in the post (shockingly frequently), whereas emails and digital downloads get delivered in an auditable way. So just stop.

Digitise at source: Next, look at all the entry points to the business and start the process of digitisation there. The post room is likely to be the main bottleneck. It used to be a mammoth task to digitise incoming mail in real time, but technology has now advanced to the point where a machine can take care of opening, scanning, reading and routing digital copies of letters to the correct department with minimal human assistance. Just ask lawyers, who routinely install post room automation, in order to reduce the chance of missing documents and the risk of lawsuits, not to mention the tedium of processing large volumes of documents by hand.

Maintain a 'golden record': A key principle is to avoid duplicating data - there should be one master record for each collection of data, and your team should know where that lives. When that data is needed in different business scenarios and departments, live links between systems (or regular batch sync jobs) should be used. Copying and pasting data between systems creates a data maintenance headache and should be avoided.

These principles are hard to implement without a strong culture of respect for customer data. It is important to train your company's employees, from their first day, to see data as the crown jewels of the business. Create a culture where people are mindful about data management. This goes hand-in-hand with good information security training, but encourages people to ascribe a physical quality and value to data and to think hard about what they are doing with it, where they are putting it and who they are giving it to.

It's helpful to look for tangible pressures pushing the industry in the direction of digitisation and good data management, other than the shadow of a data breach, which everyone assumes will happen to someone else. Fortunately, pensions are in the papers regularly as updates come out about the Government-led Pensions Dashboard. This is a good example of something that requires a solid base of digitally encoded data in order to provide universal coverage and a usefully comprehensive picture of your pension benefits, both policy objectives of this work. Simply put, without solid data management there is no way that the industry can deliver a platform that will bring positive consumer outcomes. It's time for the industry to rally around this initiative, move away from paper, and roll out strong data management practices that can benefit consumers everywhere.

Legal

Disaster,

all member records lost to hackers!

By Aaron Dunning-Foreman, Associate, Sackers LLP

This is not a headline you would want to wake up to ... Figures published last April set out the average prices cyber criminals are thought to be paying for personal data, with email addresses worth between 75p and £3, proof of identity £46, and bank account details around £167.

With that in mind, a pension scheme is the dream target for cyber criminals. Many schemes have tens, if not hundreds, of thousands of member records, encompassing email details, bank account details, dates of birth, addresses, and proofs of identity.

I will not attempt to calculate the dark web value of an average size scheme's data. But clearly, a cyber breach could have severe consequences for a pension scheme and its members. Beyond the potential losses to members and risks of claims and fines, knock-on service disruption and reputational damage to the scheme and employer are highly likely.

It is not surprising then that pension scheme trustees (and managers) have a variety of obligations, from a variety of sources, when it comes to cyber security.

The Pensions Regulator (TPR) has been paying increasing attention to the matter of cyber security in recent years. In April 2018 it published its 'Cyber security principles for pension schemes' Guidance, making it clear that TPR considers cyber security a vital aspect of the internal controls that trustees are required to operate.

Obligations also flow from the General Data Protection Regulation (GDPR), with severe penalties imposed for certain breaches. The GDPR's core principles oblige trustees to ensure 'appropriate security' of the data for which they are responsible.

Cyber resilience: steps schemes should be taking

Trustees should be looking to take the following precautions as a minimum, to build their 'cyber resilience':

1. Ensure you understand the cyber risks facing your scheme, record the issues on your risk register and keep them under regular review

2. Put in place, and test, effective and proportionate controls to mitigate the risks identified. Ensure that your service providers also have appropriate controls in place. This is not just about security software, but also about working systems and processes to protect scheme data

3. Ensure relevant people fully understand their roles and responsibilities: undertake training, train others, and keep abreast of industry standards in the area

4. Put in place an incident response plan which sets out how, when and by whom you will be notified of a cyber breach, what you and relevant third parties will do to investigate and mitigate a cyber breach once it has been detected, and when and how you will notify third parties of any incident, including the Information Commissioner's Office, TPR, and scheme members.

Cyber security is a rapidly evolving challenge, and one that all organisations and individuals need to manage on an informed and ongoing basis. Pension schemes should make sure that it is, and remains, high up on their agendas.

Pensions snapshot: March

In defiance of the current logic that says we can all only eat, sleep and think Brexit, somehow the regulatory wheels continued to quietly turn throughout March. Colin Jamieson of Barnett Waddingham takes a brief look at some of the hotter pension topics.

HMRC: Countdown bulletins 43 and 44

For schemes still in the thick of their GMP reconciliations (many, many schemes), HM Revenue & Customs (HMRC) published two countdown bulletins within days of each other in March. Countdown bulletin 43 covers the following:

> Information about asking future questions relating to the Scheme Reconciliation Service (SRS)

> A reminder that the deadlines for SRS queries and contracted-out contribution service requests was the 31 October 2018, and that the deadline for refreshed SRS data was 31 January 2019

> Confirmation that HMRC will stop issuing paper GMP statements from April 2019

Countdown bulletin 44 states that for schemes in deficit following financial reconciliation, letters will now be with scheme administrators in the week commencing 1 April 2019. This is earlier than as advised in Countdown bulletin 42, to give schemes more time to make payment to HMRC. Refreshingly, the deadline for payment of 21 May 2019 has not changed.

DWP: Collective defined contribution schemes

The Government has confirmed that legislation to facilitate collective defined contribution (CDC) schemes will be introduced in the UK. The initial priority will be to deliver a legislative framework for single employer schemes, to allow the proposed Royal Mail CDC scheme to be set up. However, it is expected that this framework will be expanded in due course to accommodate other types of CDC schemes.

Primary legislation will be introduced 'as soon as Parliamentary time allows' and this will be followed by draft regulation containing detailed CDC scheme provisions.

New name for SFGB

Time to re-draft your already re-drafted standard retirement paperwork as the Single Financial Guidance Body (SFGB), which launched in January 2019, has now been renamed the 'Money and Pensions Service' from 6 April 2019. The Money and Pensions Service will deliver what was previously provided by the Money Advice Service, the Pensions Advisory Service and Pension Wise.

TPR annual funding statement

In its latest Annual Funding Statement, the Pensions Regulator (TPR) provides guidance for trustees of defined benefit (DB) schemes and their sponsoring employers on how to approach a scheme valuation. The statement includes TPR's view on some of the topical issues (such as Brexit's uncertainty), along with sections on its expectations of trustees and what they can expect from TPR. In particular, TPR expects schemes to follow the principles in its DB code of practice and associated guidance.

As explained in the White Paper, 'Protecting defined benefit pension schemes', published in March 2018, it is TPR's intention to review and update the DB funding code as part of a package of measures to optimise scheme funding. TPR will be consulting in summer 2019 'on various options for a revised funding framework under the new code' and 'shortly after', consulting on the revised code itself.

By Colin Jamieson, Technical Analyst, Barnett Waddingham.

Wednesday 15 May 2019

Barnett Waddingham, 2 London Wall Place, London, EC2Y 5AU

Pensions Management Institute
ACHIEVING PENSIONS EXCELLENCE

INTRODUCTION TO PENSIONS

10:00	**REGISTRATION AND COFFEE**	
10:30	**Chairman's Introduction**	**Lesley Alexander**, Vice President, PMI
10:40	**Setting the Scene** • Essential Jargon • Parties involved in pensions schemes • Types of Trustees	**Lesley Alexander**, Vice President, PMI
11:10	**Pensions Law** • Role of Lawyers: Company vs Trustees • Complaints and the Ombudsman • Recent legislation and on the horizon	**Lucy Bennett**, Associate, Sackers
11:40	**Design of Trust Based Pension Schemes** • Defined benefit • Defined contribution • Retirement benefits • Early leavers • Ill health benefits • Death benefits	**Julian Mainwood**, Partner, Barnett Waddingham
12:10	**Pensions Administration** • Role of the administrator • Calculating benefits • Communicating benefits • Data	**Andy Greig**, Partner, Barnett Waddingham
12:40	**LUNCH**	
13:20	**Member Engagement** • Disclosure • Advice vs guidance • New communication channels	**Karen Bolan**, Head of Engagement, AHC
13:55	**Pension Scheme Funding** • Role of the actuary and Investment Consultant • Contributions • Investments • Actuarial valuation	**Alex Stobbart**, Consultant, Aon Hewitt
14:25	**CONCLUDING REMARKS AND Q&A**	

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Policy

Raising standards across all DC pensions

By Darren Philp, Director of Policy and Communication, Smart Pension

The window for authorisation of master trusts closed at the end of March. Ask any master trust that has gone through the process and they will tell you it's no small achievement to get everything in order to meet the Regulator's tough new tests. It is a worthwhile exercise that will undoubtedly raise standards throughout this increasingly important sector of pension provision.

As the authorisation window slammed shut, the DWP consultation on wider consolidation in pension schemes also came to a close on 1st April.

> **This consultation aims to drive scale and up standards in smaller schemes, so all pension savers have access to good quality pensions.**

Now, it sometimes frustrates me that the debate about quality often gets boiled down into scale = good, sub-scale = bad. For me, the prerequisite for achieving good outcomes is that the trustees of a scheme are well resourced to run the scheme properly (good governance is expensive), invest in good solutions (benefiting from best in class investment thinking), and good communications, and ensure that systems and processes are up to scratch so members' money is being well administered. Scale can help with all these points. Harnessing economies of scale and spreading the costs among a wide number of members certainly brings the unit cost down. However, that does not mean that smaller schemes can't achieve the same, it's just that they have to do it via a different route, namely by having a strong sponsoring employer that is committed to providing the necessary resource to the pension scheme. In a nutshell, if you are going to do pensions, then do it properly.

The recent DWP consultation takes a first, baby step to forcing smaller schemes to do pensions properly. It introduces reporting requirements on schemes via the chair's statement. If adopted, this means schemes below a certain size will have to consider whether they could achieve better value for their members by consolidating. This is a positive step and should help focus the minds of trustees of smaller schemes. But should the Government go further?

I would argue it should. Now, some readers will say that I would say that, wouldn't I? Being a representative of a master trust ... and yes, I accept that master trusts could benefit from future consolidation in this sector.

> **However, all members of all schemes deserve to benefit from good governance, good communications, good administration and service, and above all good value for money.**

For too long our pension system has failed the people that we are here to serve; the member. It is good to see the Government and Regulator now grasp the mettle of consolidation and raising standards, and doing it in a considered way. However, this is people's long-term savings we are talking about and only the highest standards should apply when it comes to looking after people's money. There is still some way to go to raise standards across the piece.

In summary, if the trustee of a scheme doesn't have access to resources from the employer, or the benefits of scale, then it is unrealistic to expect them to achieve the best outcomes for their members; the system is, in effect, failing those members. That is not to say that small schemes can't provide good pensions, they can, it's just that without the commitment and resources to do so this is unlikely to be the case.

DC comes of age

By Stephen Budge, Principal, Mercer

It has been a remarkable few years for defined contribution (DC) scheme design in the UK. Rather than taking incremental steps, we've seen more giant leaps forward with the recent master trust authorisation requirements, the push on charge transparency, and now the expected removal of the final barriers with, what I've termed, 'Freedom of Investing' initiatives.

With these initiatives concluded, the UK pension environment will become a world leader for DC scheme design, although not by value or by contribution level; the latter not necessarily being a DC-only problem.

> **We've had Freedom and Choice reforms. Now comes the 'Freedom of Investing' initiatives.**

With Freedom of Investing, I refer to the focus of allowing DC schemes to invest in illiquid assets. This has been driven in part by industry and the larger DC schemes to improve the quality of DC investment strategy design. But we're seeing the real drive come from the government to support both better growth opportunities for UK DC pension savers and also 'impact investing' by investing in UK infrastructure and funding UK small business ventures.

Illiquid assets are not actually that new to DC

When we talk about illiquid assets, we primarily refer to anything not valued and/or traded on an exchange on a daily basis. There has been much talk about why either of these are a prerequisite for DC savings, given their long-term investment horizon, but some may be surprised that illiquid holdings are not actually new to UK DC.

We only need to look at the use of UK commercial property as an example of how illiquid assets have been utilised in DC schemes. A recent estimate[i] suggests 30% of all DC schemes currently offer a fund in this asset class or access it through a multi-asset fund of some form. However, the same report quotes a much smaller estimate of only 1.8% of assets invested, although they are predicting this to increase.

That being said, there are clearly many more opportunities in private markets and other illiquid structures which other forms of pension arrangements access. There are a small number of large DC pension schemes which have been looking at this problem for a number of years now, and have successfully found ways to allocate.

One example, the JP Morgan UK Pension Plan, became a founding investor in the Partners Group's DC-friendly 'Generations Fund', and made their first allocation back in 2017 through their default investment option. The Fund offers access to a multi-sleeve private markets allocation, providing exposure to private equity, private debt, private infrastructure and private real estate investments.

[i] Real Estate Investment in UK Defined Contribution Pension Schemes, IPF Research Programme, May 2018
[ii] DC Scheme Investment in Illiquid and Alternative Assets, Pensions Policy Institute, March 2019

We also advise on DC schemes including a master trust arrangement who have allocated or are allocating to other forms of illiquid assets such as property secondaries, hedge funds and private debt.

There is much to be said for managers taking the bold step of launching DC-friendly vehicles which incorporate some form of liquidity offset. This has involved a significant amount of research and advisory effort from a range of teams at Mercer, working proactively with the small number of managers seeking to launch offerings. Then, working with the trustees as part of the selection process, their legal advisers, platforms and then, after appointment, the initial funding programme.

The illiquidity premium is the additional return expected in return for the higher associated costs, higher complexity and lower liquidity of investing in illiquid and alternative assets.

However, our main focus has been to seek out existing funds or solutions used by DB schemes and work through the issues for DC schemes, given the lower level of risk for all parties involved. This is where specific barriers remain through the restrictions not only through the technical requirements around the calculation of the charge cap, but also restrictions of investing through platforms (Permitted Links rules) through which the vast majority of the UK DC market accesses investments.

Moving to the mainstream
So, last year we were very pleased to be invited to work with the Treasury to provide the consultancy input to the Patient Capital Review – Pensions Investment Taskforce, to look at its potential in UK DC scheme design.

The Taskforce met during the course of 2018 and involved all of the regulatory stakeholders and key industry bodies. This review culminated in the announcement in last year's Budget and the launch of the second stage of the Patient Capital programme, working with some of the largest schemes in the UK to consider a central funding platform for new illiquid investment initiatives. Importantly, however, it also initiated action to remove some of the perceived barriers stopping DC schemes from investing beyond liquid and mainly listed assets. This includes a number of consultations and discussion papers from the Financial Conduct Authority (FCA) and the Department for Work & Pensions (DWP) through which we should see a positive outcome for providing a more supportive environment for DC schemes to invest in existing illiquid fund offerings.

We are also pleased to have been involved in the work from the Pensions Policy Institute (PPI) and their recent report looking at DC Scheme Investment in Illiquid and Alternative Assets[ii]. This work, sponsored by BlackRock, provides a comprehensive view on why DC schemes need to consider illiquid and alternative asset classes alongside the cost and operational challenges of investing, as well as the other governance and regulatory challenges. The report references the value of the illiquidity premium in both return generation and risk mitigation but also highlights why we should be striving for better returns for members given the substantial difference of an increased return of just 1% per annum over a 40-year saving period; I'll let you read the report to find out the answer.

With the early adopters already investing, the easing of regulatory hoops taking shape, and supportive research growing, it seems that investing beyond daily priced and traded funds is ready to move into mainstream DC.

Outcomes of efforts to calculate illiquidity premia range from 1% to 7% increase in return over the long-term.[ii]

Where will we end up?
Globally, we see in other markets schemes allocating somewhere in the region of between 10% to 15% in illiquid and private markets. Given the cashflow profiles of DC schemes in the UK an argument could be made to increase this further. However, noting the higher cost for accessing these types of investments, along with the higher level of governance required, we believe the global average seems a sensible objective for most.

Although there is a very good case to be made for expanding investment strategy into illiquid and alternative markets, we should not forget that schemes will still need to balance the value of an allocation to these asset classes against alternative improvements within the existing portfolio. However, with more options becoming available and more schemes allocating, it is an exciting time for DC and we should see DC investment strategy design finally catch up with the array of investment choices DB schemes have had for a while.

Events

DIARY DATES

Introduction to Pensions

Wednesday 15th May 2019

Barnett Waddingham, 2 London Wall Place, London, EC2Y 5AU

Wednesday 11th September 2019

Sacker & Partners LLP, 20 Gresham St, London EC2V 7JE

Wednesday 25th September 2019

Barnett Waddingham, 67 Albion Street, Leeds LS1 5AA

Are you working in either a pensions role or an allied business area where pensions knowledge would be advantageous?

This introductory workshop is designed for those with little or no previous pensions knowledge. Our expert panel will talk through the essentials of the pensions industry, from outlining the pensions law and defining the role of the administrator, to shedding light on the design of trust based pension schemes. We'll share our insights and update you on the core areas that professionals starting out in the pensions industry need to know, as well as answer any questions you have about the pensions industry.

Topics include:
>> Pensions law >> Design of Trust based pension schemes
>> Pensions administration >> Member engagement
>>Pension scheme funding

Member: £110 + VAT
Non-member: £165 + VAT

Trustee Workbench

Thursday 6th June 2019

Leonardo Royal Hotel London City, 8-14 Cooper's Row, London, EC3N 2BQ

Join us for an exclusive discussion with some of the most influential leaders in the pension industry.

Topics include:
>> Moving forward in uncertain times >> Buy in / Buy out
>> How not to fall foul of the Pensions Ombudsman
>> AI and pensions >> Funding options
>> Reflections on Pensions Bill

Trustee Group Members: FREE
Members: £250 + Vat
Non-members: £300 + Vat

Secretary to Trustee

Thursday 16th May 2019

Taylor Wessing, 5 New Street Square, London EC4A 3TW

This event will provide the opportunity to share experiences and gain insight into how others carry out the role of the Secretary to the Trustee effectively. Come along to learn more about managing conflicts, trustee effectiveness, preparing and monitoring an effective risk register, and working effectively with the Chair of Trustees.

Topics include:

>> The role of Secretary to the Trustees; effective meeting preparation/best practice at and post meeting
>> Preparing and monitoring an effective Risk Register
>> Working effectively with the Chair of Trustees
>> Effective minute writing
>> Regular annual activities
>> Trustee effectiveness
>> Effective complaint handling
>> Managing conflicts of interest
>> Development of meeting management

Members: £255.00 + VAT
Non-members: £355.00 + VAT

Event Calendar

// **Introduction to Pensions | 15th May**
// **Secretary to Trustee | 16th May**
// **Trustee Workbench | 6th June**
// **Introduction to Pensions**
11th September | 25th September
// **Annual Lecture | 26th September**
// **DC Workplace Symposium | 10th October**
// **PensTech and Administration Summit | 7th November**

Register your interest in any of our listed events by emailing **events@pensions-pmi.org.uk**

News from the regions

[North East region:]

Our 'Exploring Fiduciary Management' seminar was held on 28th March at the offices of Squire Patton Boggs. Thanks go to speakers Richard Lunt of First Actuarial and Alistair Jones of SEI.

Details of our other 2019 events are currently being confirmed and you can find out the latest updates by going to: **www.pensions-pmi.org.uk/membership/regional-groups/north-east/**

If you would like to be added to the distribution list for future regional events, please contact Jane Briggs at **jane.briggs@squirepb.com**

[London]

It's official: legislation is going to be passed to make CDC possible. But what does that mean for you and your organisation? We will be holding a business meeting to discuss the topic on 22nd May. Aon have kindly agreed to let us use the Aon Centre on Leadenhall Street.

Keep an eye on our LinkedIn page **https://bit.ly/2YHIunH** or follow us on Twitter **@pensionslondon** for more details of our business meetings and forthcoming social events.

[Southern]

We are looking forward to our half day seminar on Wednesday 15th May. This will be hosted by Aon in Epsom. Speakers will be Mark Baker of Pinsent Masons, Jeremy Lawson of Aberdeen Standard Life and our keynote speaker is Alan Pickering of BESTrustees. Full details are available from **Jacqui.hewitt@aon.com**.

[Scotland]

The Scottish group held a seminar in Edinburgh on 21st March looking at topical DC governance issues. Speakers from JLT EB and Hymans Robertson led an excellent discussion. The next PMI Scotland meeting will be our annual ½ day seminar. Details will follow.

[Eastern]

A reminder that our next event is our early evening AGM Seminar which will be held on 12th June 2019 at Mills & Reeve's Cambridge office. This will be a panel discussion on the topic 'Consolidation: will it create a brighter and better future for members and sponsors?' with well known panellists including Henry Tapper, Robin Ellison and Harus Rai who is head of Sole Trusteeship at Capital Cranfield. Final details are to be confirmed; we hope that a leading pensions barrister will shortly be confirmed as the chair of the debate.

Networking tea to start at 5pm, followed by a short AGM at 5.45pm and then the panel discussion 6pm. Full details will be emailed to members mid-May.

If you wish to be added to our distribution list, please contact Susan Eldridge at **susan.eldridge@aviva.com**

[South West]

The South West region's 2019 Gala Dinner takes place on Thursday 16th May 2019 at the Harbour Hotel, Corn Street, Bristol, with guest speaker Tom McPhail, Head of Retirement Policy at Hargreaves Lansdown. The Committee looks forward to welcoming PMI members to another successful and enjoyable event which also raises money for our chosen charity, Age Concern.

The Spring seminar was held on Friday 3rd May at the offices of TLT Solicitors in Bristol. Thank you to all our speakers who provided interesting and engaging presentations on a variety of topical subjects; their presentations will be posted online shortly, available via the regional PMI webpage.

Our Autumn seminar will take place in November, the date will be published in future editions of Pension Aspects. If you wish to be added to our distribution list to receive the booking information for this seminar and other forthcoming regional events, please contact David Saunders on **david.saunders@willistowerswatson.com**

If you have an idea for a topic you would like to suggest for a future seminar, or would like to speak at one of our seminars, we would be delighted to hear from you. Please contact Lizzie Stone on **lizzie.stone@TLTsolicitors.com**.

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ITM Student Essay Competition 2019

Are you a Student Member, Affiliate Student Member, or registered to sit one of the PMI's qualifications?

The PMI are delighted to launch its inaugural Student Essay Competition, sponsored by ITM.

Here's your chance to win £500! Two runners-up will also win £250. Enter by 10 May 2019 for your chance to win the cash prize and have your essay published in Pensions Aspects magazine.

To enter, you will need to write an essay of 1,200-1,500 words, answering the question:

The terms 'risk reduction' and 'de-risking' are used frequently in relation to pensions, but usually focus on investment strategy. What other ways can pension schemes reduce risk in the administration, provision and communication of pensions to individuals?

For more information please visit:

www.pensions-pmi.org.uk/student-essay-competition

Pensions for the self-employed

It is safe to say that Auto enrolment has done wonders for the amount of people paying into pensions via their workplace. The inertia to opt out appears to work as expected with very low opt out rates, even for the lowest earners. Because of this there is now a focus on the self-employed and if something similar could work for them.

I think there are two issues here: firstly that those who are self-employed aren't likely to be impacted in the same way by inertia as those targeted by auto enrolment. They are, by their very nature, keen to take charge of their own work, workplace and income. This means that if there was a way to auto enrol them then the opt out rate would surely be higher. Many self-employed do, in fact, plan for their retirement and I think we need to encourage this more.

The way to encourage the self employed to save, I feel, would be to make it simpler. Many that are self-employed have unpredictable incomes depending on the need for their type of service, so one year their earnings could be low with the following year it being double or triple the previous years. This means that they could over contribute in the years that they have low earnings (tax relief is only available up to 100% of earnings). In another year they could be restricted by the tapered annual allowance, so they can't fully utilise the allowances lost because of the years with low earnings.

> **They need to be able to plan a bit more than those with more stable salaries; I would personally just suggest getting rid of the tapered annual allowance or shift the whole set of calculations back to a year in arrears.**

This would at least give them a fighting chance to fully use their allowances.

The second issue I see is that any kind of compulsion to contribute would probably need to be done through the Government, be that a type of additional national insurance contribution that can be directed to a pension scheme, or some type of legislation that forces the self-employed to join a scheme. Either way, if it mirrors auto enrolment then they need to have the option to opt out and we are then back at square one.

All in all, I feel that education is the key to all of this; many of the self-employed are focussed on their businesses and not on the future. Understanding the impact that a decent pension will have on them when they are older should hopefully be enough to encourage more to save sooner.

> **The cost of delay is massive and for those who are self-employed the temptation to keep putting it off will be just as big.**

If they can see the benefit then they will contribute; forcing those that are self-motivated already will surely not have the desired result.

By Claire Trott, Head of Pensions Strategy, St. James's Place Group

Super skilled scheme secretaries

By Christine Kerr, Senior Pension Management Consultant at Barnett Waddingham

People outside of the pension world probably imagine the scheme secretary largely spends their day arranging lunches, booking meeting rooms and, once a quarter, taking a few meeting notes. That is, however, far from the reality of this highly demanding and critical role. The amount of legislation and governance that trustees must comply with has grown year on year. In these challenging times, it is hugely rare to see a board function to the best of its ability without a strong scheme secretary supporting and guiding it.

So, what is a typical scheme secretarial role?

Part of the Regulator's focus in its 21st Century Trusteeship campaign is about having clear roles and responsibilities. The scheme secretary's overall duty is to help facilitate the proper functioning of the trustee board. There is no one 'correct' definition of the trustee secretary role. The exact role will depend on a number of scheme specific factors such as the size and number of schemes they look after, and the numbers of meetings and committees they need to serve. Whether they are part of a wider pension scheme executive team and the amount of in-house pension resource is also an important factor. For example, in some schemes tasks are completed by a scheme secretary and in others by the pension manager or governance officer.

Understanding your scheme secretary's role

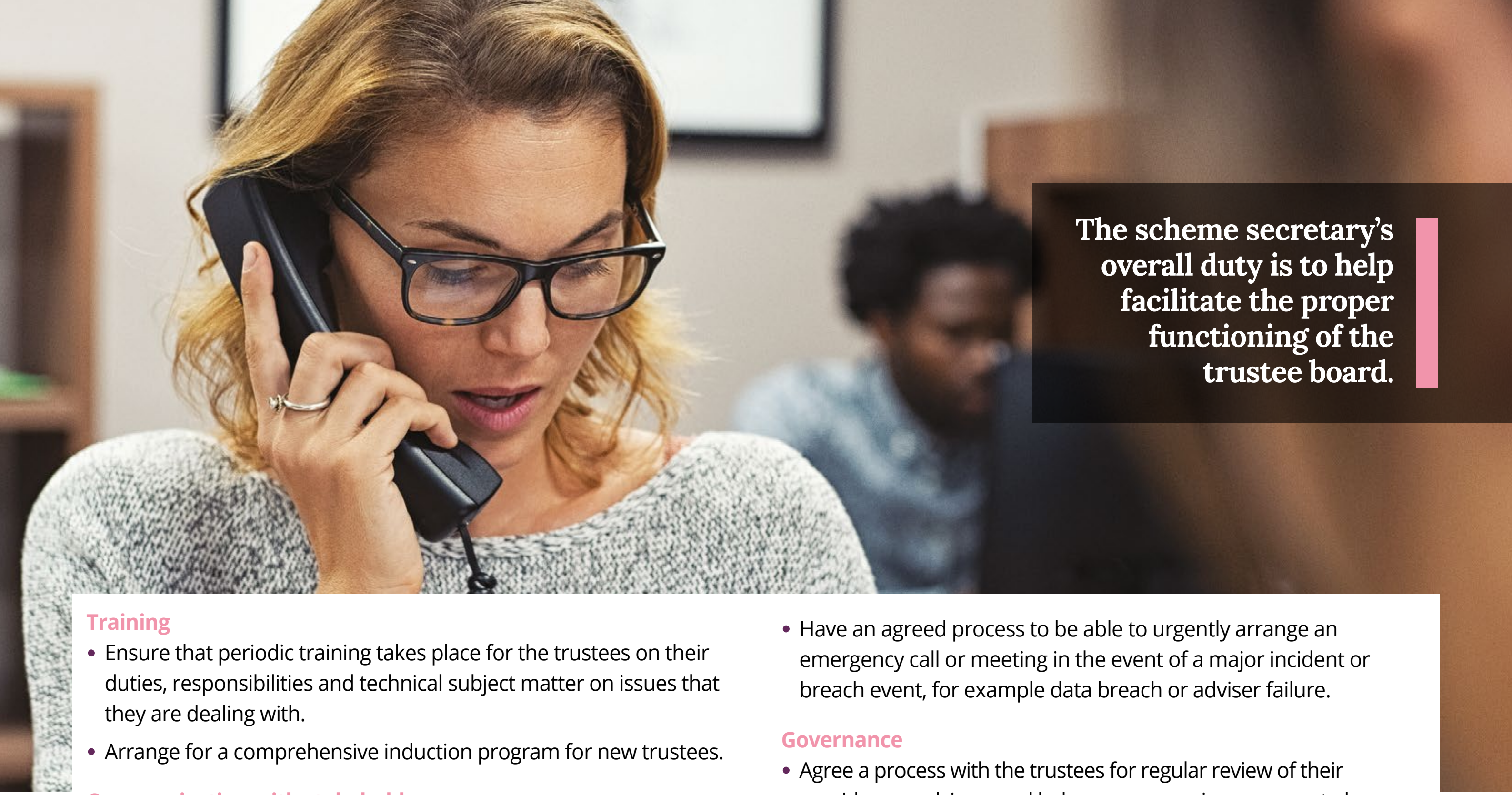
Transparency is key; the trustees should have full understanding and oversight about all the activity that the secretary performs. Any delegations from the trustees to their secretary should be clearly recorded. Every trustee board will have its own priorities and practices, however, the outline below gives a broad sense of the responsibilities that can be built into a secretarial role profile for your own scheme.

Trustees' meetings & decision making

- Arrange meeting dates with trustees and their advisers, ideally for the year ahead.
- Liaise with the chairman and advisers in setting meeting agendas.
- Ensure that any conflicts of interest are acknowledged, managed and recorded appropriately.
- Advise the trustees on correct procedures for the conduct of business covering meetings, decision making, preparation of audit trails and liaison with advisers, and provide help in implementing these procedures.
- Take minutes of the meetings, arrange for review by advisers and agree these with the chairman. Once agreed by the chairman, distribute to the full board and provide advisers with a final version (a redacted version for advisers, where appropriate).
- Produce a schedule of action points after the meeting and ensure that all parties are aware of what they need to do and by when. Monitor and update the schedule regularly. Escalate any matters which fail to make progress to the chairman.
- Ensure minutes of the previous meeting are signed as a true record of proceedings at the subsequent meeting.
- Ensure that any decisions are taken in accordance with the trustees' powers and procedures.

Provision of timely and accurate information to the trustees

- Ensure proper processes for maintaining all of the trustees' records are in place. Make sure the trustees have access to all key governance documents, for example, an online secure database.
- Provide the trustees with at least a quarterly update on the business plan and the main changes since the last meeting.
- Ensure that any sub-committees are in a position to report back on any recent committee meetings, and to report on the progress made against the tasks outlined in the relevant section of the business plan.



The scheme secretary's overall duty is to help facilitate the proper functioning of the trustee board.

Training

- Ensure that periodic training takes place for the trustees on their duties, responsibilities and technical subject matter on issues that they are dealing with.
- Arrange for a comprehensive induction program for new trustees.

Communication with stakeholders

- Ensure that the trustees' decisions are put into effect.
- Together with the chairman, liaise with the company on the trustees' behalf on issues requiring the company's agreement or their help in implementing.
- Ensure that all discussions with the company on scheme issues are recorded and provide clear and unambiguous evidence of a delineation of roles and responsibilities.

Communication with members

- Assist the trustees in having a clear communication policy and style.
- Where appropriate, assist the administrators and/or trustees with individual member communication, including management of member complaints and discretions.

Compliance

- Ensure that formal dispute procedures exist and are kept up to date.
- Prepare and maintain an annual calendar of tasks, for example statutory accounts, annual scheme return, and ensure that the providers and advisers responsible deliver them on time.
- Ensure that the trustees are aware of and are taking action on, relevant changes to legislation, and/or best practice.
- Make sure that the trustees have the required suite of governance documents, for example risk register, conflicts register, data protection processes, integrated risk management framework and risk management processes.
- Ensure that any reportable events are captured, in particular those that require reporting to the Pensions Regulator. Maintain a breaches log for both reportable and non-reportable events.
- Have an agreed process to be able to urgently arrange an emergency call or meeting in the event of a major incident or breach event, for example data breach or adviser failure.

Governance

- Agree a process with the trustees for regular review of their providers or advisers and help manage any improvement plans agreed.
- Ensure that terms of reference are agreed and maintained for any sub-committees or temporary working groups.
- Make sure there are robust budget settings and expenditure reporting processes in place.
- Agree a process with the trustees for election or selection of new member nominated trustees.
- Keep a record of any activities formally delegated by the trustees to others.

Don't forget about the scheme secretary's development

Trustees are required to set and follow training plans and it's just as important for the scheme secretary to undertake professional development activities. Scheme secretaries with Pensions Management Institute (PMI) qualifications or other professional qualifications, need to meet the professional bodies' CPD requirements. As secretary, they will also benefit from attending trustee training events.

The Pensions Management Institute also runs annual Trustee Secretary courses. The next one happens on 16th May 2019 **https://www.pensions-pmi.org.uk/events/secretary-to-trustee-may-19**

There is also an informal network of pension scheme secretaries called Sriba. Events currently tend to be based in London, but if you want to be added to their distribution list contact **David.Brooks@broadstone.co.uk**

GDPR has it been a year already?

By Katy Harries,
Senior Associate, Sackers

It's hard to believe that nearly 12 months have passed since the General Data Protection Regulation (GDPR) came into force on 25th May 2018. We were told back then that this was only "the beginning, not the end"; so is an end now in sight?

What's still to do?

Each pension scheme will be at a difference place in terms of GDPR compliance. For example, some schemes have already had to deal with a large number of 'subject access requests' (where members ask to see their personal data), whereas some haven't had any at all. Some will have agreed contractual terms with their key providers, but others may still be struggling on that front. These different experiences mean there is no 'one size fits all' approach to GDPR compliance. However, on the whole, the following are key areas that pension schemes should be focussing on:

1. Contractual terms with other providers

Data controllers (including trustees of pension schemes), are required to have GDPR compliant contractual terms in place with all their data processors. Many trustees have found this process long and drawn out. Given the risk of sanctions for not having GDPR compliant terms in place, trustees must continue to focus on getting terms agreed with their data processors as soon as possible.

2. Dealing with data subject access requests

Although individuals already had rights to access personal data held about them under the old regime, they are now much more aware of their rights. The number of requests has increased dramatically under GDPR. With only a month to respond to a subject access request, pension schemes should put processes in place for dealing with this type of query. When putting their approach together, trustees should think about:

+ **how to check the identity of the member**
+ **making sure any third party has appropriate authority from the member**
+ **clarifying the level and detail of information required**
+ **how to present the personal data to members.**

As the scheme administrator will hold the member records, trustees should work with them in setting up a process for responding to these requests.

3. Dealing with breaches

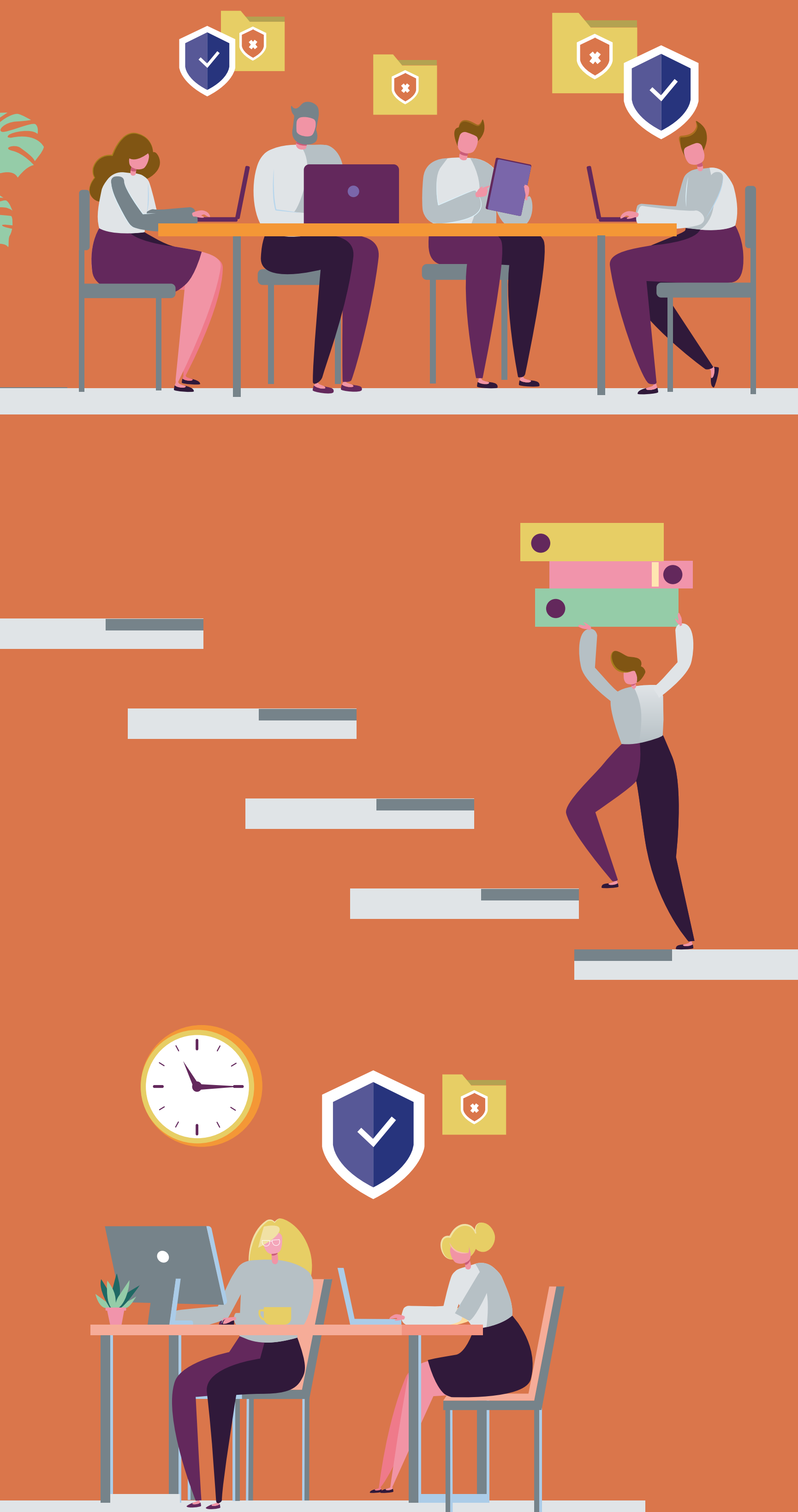
Even having a flawless data protection policy in place and properly implemented cannot, unfortunately, prevent breaches from happening, whether due to a malicious attack (e.g. viruses) or genuine human error (e.g. loss of a portable device containing personal data).

Where there is a breach, trustees may have to report it to the Information Commissioner's Office (ICO), and to the individual concerned, depending on the seriousness of the breach. A data controller is required to report a serious personal data breach to the ICO within 72 hours, where feasible.

In order to handle a potential breach efficiently, it is crucial to have a proper process in place. Trustees should consider the key individuals involved (e.g. who should be contacted initially, who will investigate the breach), and, where the breach is by a provider, how to work with that provider in investigating and reporting that breach.

4. Record keeping

In the run-up to May 2018, pension schemes were busy carrying out audits on the personal data they held. As the GDPR requires all controllers and processors to maintain a processing record, trustees should check that the relevant information has been pulled together for this purpose. The original personal data audit will provide a platform for this but, given the sheer volume of personal data held by schemes, this is proving a challenging area. The administrators will again play an essential role.



What's still to come?

GDPR compliance is a new area for all data controllers, not just for pension scheme trustees. It will take time for best practice to develop and to see how the ICO will enforce the GDPR. Key areas on the horizon include:

1. Brexit
At the time of writing, there was still no decision on whether we would leave with a deal, with no deal, or even what the eventual Brexit date would be. The ICO and the government have confirmed that GDPR will remain law post-Brexit, regardless of the circumstances of our departure. However, pension schemes should keep an eye on the position regarding transfers of data between the UK and the EU. Whilst the government has confirmed that it will continue to allow the free flow of data from the UK in the event of a no deal, transfers from the EU to the UK will need to be subject to the same 'appropriate safeguards' that apply to 'third countries'.

2. Best practice
The ICO has been publishing guidance on various aspects of the new data protection obligations and will continue to do so. As time goes on, the guidance, together with practical experience of pension schemes, should all help 'best practice' to develop. On the technological side, security measures will continue to improve. Trustees will need to review and update their processes and policies to keep in line with these developments.

3. Monitoring data processors
As well as keeping their own processes under review, trustees will also need to monitor their data processors, to check that they are processing data in a GDPR compliant manner.

Is the end in sight?

We expect the initial stage of updating processes and contracts to be well underway, and hopefully the end of this stage will be in sight for most trustees. However, trustees' data protection obligations are ongoing, as you can see from the list above. So, whilst you can give yourself a pat on the back when the initial stage is complete, don't skip off into the sunset just yet.

Steps to help employees & members make the most of their life savings

We are seeing increasing evidence that leaving employees and members to their own devices at-retirement can lead to them, at best, receiving less income than perhaps they could have achieved and, at worst, getting scammed. Last year, the FCA revealed that victims of pension fraud lost, on average, £91,000 each, with latest reports indicating that some victims have lost more than £1 million to fraudsters. Coupled with this, the Pension Scams Industry Group (PSIG) reviewed suspected scam cases flagged by pension schemes on transfer requests and revealed some worrying findings.

By Jonathan Watts-Lay, Director, WEALTH at work

A major concern highlighted was the lack of member awareness. In 49% of cases, the member had limited understanding or appeared to be unaware of who was providing the advice, the fees being charged, or the receiving scheme to which the transfer would be made.

Additionally, 20% of suspected scams related to the terms of the transfer including investment returns, guarantees made or the ability to access funds. Another 19% of suspected scams related to the receiving scheme itself being suspicious. It also found that 12% of suspected scams involved cold calling or similar.

It's evident that pension scams are evolving and moving away from traditional cold calls. The FCA recently reported that more people are being targeted online through emails, professional looking websites, and social media channels such as Facebook and Instagram. Events in recent times have also highlighted how factory-gating is being used as a means of contact by potential fraudsters.

It's really important that employees and members understand the risk of scams and how to protect themselves.

The PSIG point out that when Trustees can talk to members, they are better able to communicate their concerns and prevent suspected scam activity from going ahead.

It's therefore important to engage members with their pensions before any decisions are made.

But this isn't the only issue. A big aspect of financial planning is minimising tax on retirement income. However, the Office for Budget Responsibility reported that the Treasury will net an extra £400m in revenue raised from the pension

freedoms from the 2018/19 tax year, which is 50% more than forecast, indicating that individuals are paying tax when it could have been avoided.

Our poll of 70 employers found that 91% of them believe that employees do not understand the tax rules when withdrawing money from their pension.

Unfortunately, these findings could mean that many individuals will pay more tax than they need to at-retirement, ultimately resulting in less income than what could have otherwise been achieved.

Before any decisions are made at-retirement, employees and members really need to understand their options and the generic advantages and disadvantages of these, as well as considering any associated risks such as tax inefficiency, or losing money to scams.

But it's almost impossible to expect an individual to be prepared for these issues by simply directing them to a generic information pack or company website. Instead, there are some more effective steps that employers and trustees can take.

The first is to provide employees and members with financial education and guidance.

This can help them to gain a fuller picture of their sources of retirement income, understand the tax implications, and what to look out for when it comes to pension scams.

There are many forms of financial education, however, we find that seminars are a very effective method of improving understanding. This is based on the analysis of hundreds of thousands of responses from seminar attendees, who have rated their learning from such interventions. To explain all of the choices and implications, employees and members really need face-to-face interaction, so that they can understand all the different aspects of their retirement savings. This can be supported with helplines and interactive tools and modellers following a seminar.

Financial education also acts as a prompt for action, as it can help individuals to think about their next steps including being able to consider all the things that they may have not thought of before, such as being able to decide if they need further support in the form of regulated financial advice. For example, our experience is that following a financial education programme, 64% of attendees go on to seek further guidance or regulated advice.

Many people are concerned about the cost of regulated financial advice without realising that it could actually save them money in the long run. Studies have shown that those who take financial advice are more likely to increase their wealth than those who do not. For example, the International Longevity Centre revealed in 'The Value of Advice' report that those who receive financial advice are on average £40,000 better off than those who don't. As well as providing individuals with a plan tailored to their needs, regulated financial advice can also provide employees and members with the benefit of added consumer protection for the advice given, and can prevent them from making costly mistakes.

But it doesn't just end there; the next step is to ensure that employees and members can implement their chosen retirement income option(s) whether that is an annuity, income drawdown, cash withdrawal or a combination of options. As individual needs change overtime, support will also be needed throughout retirement.

Many employers and trustees are now realising that supporting employees and members at-retirement is vital if they are to optimise their income in later life.

An increasing number are now turning to specialist retirement service providers to help achieve good member outcomes.

After all, taking an active approach and supporting employees and members with the help of reputable firms will make the whole process far more robust as well as helping employees and members to make the most of their life savings.

Thursday 16 May 2019

Taylor Wessing LLP, 5 New Street Square, London EC4A 3TW

Pensions Management Institute

ACHIEVING PENSIONS EXCELLENCE

SECRETARY TO TRUSTEE

09:00 REGISTRATION AND COFFEE

09:30 Chairman's introduction

Amanda Burden, Head of New Business and Marketing, Pi Partnership Group

09:35 The role of Secretary to the Trustees – best practice approaches

- Effective pre and post meeting preparation
- Organising the meeting
- Drafting an effective agenda
- Drafting the minutes and dealing with actions
- Managing relationships and handling conflicts

Angela Sharma, Lawyer, Taylor Wessing

10:00 Managing conflicts of interest

- Identifying actual and potential conflicts
- Developing procedures
- Maintaining appropriate records

Manjinder Basi, Scheme Secretary, Inside Pensions

10:30 Development of meeting management

- Teleconferencing
- Paperless approach to document distribution
- Identifying constraints

Lucy Cresswell, Pensions Consultant and Operations Leader, Barnett Waddingham

10:55 COFFEE

11:15 Regular annual activities

- Annual timetables and reporting
- Managing scheme documentation
- Managing budgets and business plans
- Triennial submission of the declaration of compliance
- New statutory duties concerning DC schemes

Joel Eytle, Legal Director, DLA Piper

11:45 Preparing and monitoring an effective risk register

- Identifying key risks
- Assessing potential impact on the scheme
- Implementing effective controls
- Ongoing review

James Auty, Director of Trustee Proposition, JLT

12:10 Effective complaint handling

- Maintenance of procedure
- Compliance with deadlines
- Relations with TPAS / Ombudsman

Temi Osho, Pension Consultant, Pi Partnership Group

12:35 LUNCH

13:20 Effective minute writing

- Accurate recording
- Appropriate degree of detail
- Clear action points
- Timely distribution

Sarah Stimson, Senior Associate, Sackers

13:50 Working effectively with the Chair of Trustees

- Management information
- Document management
- Monitoring action points

Beth Brown, Senior Associate, Mayer Brown International LLP

14:20 Trustee effectiveness

- Maintenance of procedure
- Compliance with deadlines
- Relations with TPAS / Ombudsman

Alan Pickering, Chairman, BESTrustees

14:50 CHAIRMAN'S CLOSING REMARKS

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The Pensions Regulator continues

to be clearer, quicker and tougher.

We're continuing to be clearer, quicker and tougher in the way we work, both in tackling criminality but also in intervening to persuade employers, advisers, providers and trustees to do the right thing. The last few weeks have seen a number of enforcement firsts for TPR – the launching of our first money-laundering prosecution, the securing of our first convictions for fraud and making prohibited employer-related investments, and then the first defendant being jailed after a TPR prosecution.

The jailing of accountant and pension scheme trustee Roger Bessent for fraud and making prohibited employer-related investments showed that the courts will not tolerate abuse of the system. Sentencing Bessent, Judge Nicholas Barker highlighted that the defendant had breached the trust that the whole pensions system is based on – that savers can rely on pension scheme trustees to invest their funds prudently so they are available for their retirement.

DB scheme funding

We recently published our Annual Funding Statement (AFS), which clarifies how we expect trustees and employers to fund a defined benefit scheme. It is particularly relevant to those conducting valuations with effective dates between 22 September 2018 and 21 September 2019.

Compared to previous years, we have put additional focus on scheme maturity, more strongly emphasising that employers and trustees should establish a long term funding target, and for the first time set out our expectations on investment and covenant.

Trustees and employers should be setting a long term funding target and agreeing a clear strategy, or journey plan, to achieve it, recognising how the balance between investment risk, contributions and covenant support may change over time.

We have articulated how a comprehensive approach to Integrated Risk Management (IRM) should allow schemes to ensure they only take an appropriate level of risk with investments. IRM is an important approach that helps trustees to assess, prioritise and manage the employer covenant, investment and funding risks, only taking investment risk where it can be supported by the covenant.

Since the majority of schemes are closed to new members and future accrual, we expect scheme maturity issues to assume greater significance for setting funding and investment strategies in the future, particularly where schemes are experiencing high levels of transfer values. This year we are contacting more schemes before triennial valuations are submitted to identify potential risks which could impact on members.

Master trust authorisation

Following the official closure of the window for master trust applications for authorisation, TPR is now working hard to assess the large volume of submissions received. The last minute high volume of applications was expected and we are confident that we will process them within the legal time frame laid out in law. Our list of schemes which have achieved authorisation will be updated weekly.

Authorisation puts safeguards around master trusts by ensuring they are run by fit and proper people and have the right systems, processes, plans and finances in place. We are looking forward to the authorisation of more master trusts in the coming months and to a market of master trusts which millions of pension savers can have confidence in.

Looking ahead we'll be maintaining a close relationship with authorised schemes as part of our supervision work to ensure these standards continue to be met. We anticipated scheme consolidation and for those which did not apply or did not receive authorisation, we will continue to oversee their exit from the market.

Where a master trust is being wound up, trustees must provide us with a plan of how they will transfer out their members' assets. We'll be analysing elements of the transferring and receiving schemes, challenging trustees where necessary, to ensure members get the best outcomes.

Where trustees are managing an exit well, we'll be taking oversight and having regular engagement. However, if we have concerns about an exit, our engagement will be more frequent and intense.

Trustee Governance: learning from the Corporate Governance Code

By Lynda Whitney, Partner, Aon

Trustee boards have some very specific responsibilities, but in many ways they are not that different to corporate boards. Both make difficult decisions regarding millions of pounds that impact thousands of people, whilst only meeting infrequently.

The Financial Reporting Council refreshed its Corporate Governance Code in 2018 and trustees aiming for higher governance standards can learn a lot from it. The 2018 update to the Code broadens the definition of governance, including emphasising the need for positive relationships between stakeholders, a clear purpose and strategy, high quality board composition, and a focus on diversity.

The Code offers good principles, as well as useful supporting guidance on board effectiveness. By just replacing director with trustee, company with scheme, and stakeholder with member, you can challenge yourself under each heading from the Code. Most of the rest of this article is made up of these - only very slightly tweaked - quotes.

You can download the documents here:
The UK corporate governance code
Guidance on board effectiveness

// Board Leadership & Purpose

The board should establish the purpose, values and strategy.

The board should ensure that the necessary resources are in place.

The board should establish a framework of prudent and effective controls, which enable risk to be assessed and managed.

Ask yourself:

- *Is the balance between the focus on immediate issues and long-term success appropriate?*
- *Are we using scenario analysis to help us assess the strategic importance and potential impact of our challenges and opportunities?*
- *Have we listened properly to the member voice? What impact has this had on our decisions?*

// Division of Responsibilities

The chair is pivotal in creating the conditions for overall board and individual director effectiveness.

Directors should have sufficient time to meet their board responsibilities. They should provide constructive challenge, strategic guidance, offer specialist advice and hold advisers to account.

// Composition, Succession and Evaluation

The board and its committees should have a combination of skills, experience and knowledge.

Annual evaluation of the board should consider its composition, diversity and how effectively members work together to achieve objectives.

Succession plans should consider:

- *Contingency planning – for sudden and unforeseen departures*
- *Medium term planning – orderly replacement of current board members*
- *Long term planning – the skills needed to deliver the strategy now and in the future.*

// Audit, Risk & Internal Control

The board should establish procedures to manage risk, oversee the internal control framework and determine the nature and extent of the principal risks they are willing to take in order to achieve the long term strategic objectives.

The last area of the Code is Remuneration; one area where trustees have a different role to corporate boards. Even so, reviewing your trustee remuneration policy should still be a part of your regular process.

If you want to go further in using the Corporate Governance Code as a benchmark, ask what training and good practices your corporate board has? Can they be used for your trustee board? It may be time to consider a more in-depth internal assessment or to seek an external evaluation of your governance.

Can English law insurance policies **cover fines imposed under GDPR?**

When the General Data Protection Regulation (GDPR) came into force in 2018, the headline grabber was the Information Commissioner Office's (ICO) dramatic new power to impose fines of up to €20million, or 4% of global turnover (whichever is the higher), on organisations that breached the GDPR.

One of the questions asked by policyholders in the pensions industry was whether these fines could be covered by insurance.

Many cyber liability policies are sold on the basis that they will insure against ICO fines. But the reality is that the legal position (at least in England) as to the insurability of ICO fines remains unclear. This is unhelpful for policyholders in the pensions industry, particularly as the ICO becomes increasingly active in fining organisations for data protection breaches.

> **The starting point is that many insurances say that they will insure against fines, provided that these are insurable under the law of the policy.**

Insurance against fines imposed by a regulator or official body for criminal or quasi-criminal conduct is not permitted under English law for public policy reasons; an indemnity from an insurer would negate the fines deterrent effect. Indeed, some regulators like the Financial Conduct Authority expressly ban insurance against FCA fines.

What constitutes criminal conduct is clear. But quasi-criminal conduct? Less so.

The Court has provided some limited guidance and has referred to "infringement of statutory rules enacted for the protection of the public interest and attracting certain actions of a penal character".

So penalties or fines for quasi-criminal conduct may be regarded as involving some moral turpitude or reprehensibility by the transgressor.

An ICO fine is intended to have both a punitive and deterrent effect. The legislation sets out the matters that the ICO must take into account when considering the fine, including whether it would be effective, proportionate and dissuasive. This suggests that an ICO fine would be regarded by the court as a civil sanction of a punitive nature, quasi-criminal, designed to punish reprehensible conduct and to deter others.

So, as matters presently stand, that makes ICO fines for breach of GDPR probably uninsurable under English law.

But it could still be that fines for breaches at the most egregious (intentional or reckless breaches) end of the spectrum are regarded as punishment for quasi-criminal conduct (and therefore uninsurable). ICO fines imposed for much less serious breaches could be regarded in a different category and could still be insurable. Therefore, a case-by-case approach could emerge from the court on this issue.

These very important issues are still to be directly tested before the English Court and therefore the position remains unclear. And the ICO has refused to be drawn on the issue stating, **"a focus on insurance rather misses the point; an organisation should be looking to recognise the benefits that information rights practice to their efficiency, reputation and competitive edge".**

Therefore, for the time being, policyholders should not assume ICO fines will be covered by insurance.

By Garon Anthony, Partner, Squire Patton Boggs

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Pensions Administration Manager
Ref: HB17319 | Wiltshire | **To £60,000 pa**
Are you a strong leader, able to motivate, engage and lead a team of pension's specialists? These skills are essential along with extensive DB/DC pensions experience to manage this in house pensions' team on an 18 month contract.

Hayley Brockwell hayley@branwellford.co.uk

Pensions Management • Investment • Actuarial • Trustees • Interims

The University of Oxford

Head of Pensions

Oxford **£competitive package**

Only occasionally do we feel that an opportunity has all of the essential features necessary to offer the right candidate the prospect of an interesting, challenging and fulfilling role. This is one. As Head of Pensions you will become part of the University of Oxford, which is a stimulating and complex organisation enjoying an international reputation, having achieved top ranking in the Times Higher Education global league table for universities for the third year running. Pension provision is highly regarded. Over 9,000 of the academic staff, including those from the independent colleges and associated employers are active members of the national Universities Superannuation Scheme, whilst Oxford University's own scheme for non-academic staff has over 15,000 Members including over 5,000 Actives. Medical School and other specialist staff participate in the NHS and other appropriate schemes.

Reporting to the Director of Finance, the Head of Pensions, together with the in-house team, support the University and the Trustees of the Staff Pension Scheme and administer the same – the University is the principal employer and there are over 40 participating employers. You will also be the key interface for the academic staff who participate in the USS and for those who participate in other schemes. You will be the in-house source of expertise on pensions issues and will manage the relationship with external advisors and providers. For this role candidates need to demonstrate success at 'Pensions Manager' level and have experience of supporting a sponsoring employer and Trustees as well as members. Technical expertise, strong communication skills, experience of managing pensions administration and the ability to achieve credibility and influence are also required.

For a confidential discussion please contact GTF on 0207 489 2053 or email contact@gtfgroup.com
Direct applications will be forwarded to GTF.

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Associate Consultant
London **£excellent**
Establish and develop your pensions consultancy career, providing a range of services to a portfolio of trust/contract clients. Ref: 1374385 BC

Pensions Specialist
London **to £43500 per annum**
The key purpose of the role is to provide technical pensions support to all staff. You will be responsible for providing guidance and training to casework teams. Ref: 1375241 JW

Senior Pensions Administrators
Nationwide **£in line with experience**
Superb opportunities available with leading consultancies across the UK for experienced administrators seeking new challenges. Ref: 1370663 FR

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It's an exciting time to join our client's Communications Team expanding to improve communications channels and engagement with internal/external stakeholders. Ref: 1375205 JW

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Join these prominent and respected organisations. Develop your pensions career and deliver a first-class pensions administration service. Ref: 777300 NMJ

Pensions Research Assistant
West Midlands **to £25000 per annum**
Join this market-leading consultancy. Deliver legislative intelligence and communicate findings to the actuarial consultants. Ref: 1375236 NMJ

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London **£attractive**
Exceptional opportunity with this leading Pensions Specialist as they continue their successful expansion in the market. Ref: 1375244 SB

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Hertfordshire/London **c. £60000-£70000 per annum**
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Pensions Systems Consultant
Herts/West Yorks/Surrey **£to £50000 per annum**
Join this market-leading organisation as a Systems Consultant and be responsible for the installation of new clients to the administration system. Ref: 1375097 NMJ

We look forward to seeing you at PBUK 2019, where we will be hosting stand 25