ITEM 7

North Yorkshire County Council

Pension Board

11 April 2019

Administration Report

1. Purpose of the Report

To provide Pension Board members with an update on key initiatives undertaken by the administration team of the North Yorkshire Pension Fund.

2. Pension Fund Committee paper

Included for information at Appendix 1 is the administration paper and appendices provided to the Pension Fund Committee at their January 2019 meeting.

3. Breaches Log

Included at Appendix 2 is the North Yorkshire Pension Fund's Breaches Log for review. There are no new entries.

4. Annual Benefit Statements

Work is well underway on the 2019 year end and benefit statement process. The statement templates have been updated and signed off and year end data is due to be received by the 30 April. A later date of 31 May has been agreed with NYCC for their main payroll with the agreement we receive the other payrolls they manage by 30 April.

The deadline is particularly pertinent this year as it is also the triennial valuation year so data has to be finalised before being sent to the Actuary in mid June.

5. Letter Review Project

The additional resource that has been trained is having a positive impact on the delivery of the letter review project. Unfortunately the latest release of the administration software has broken some key functionality. We are in discussions with the supplier, Heywoods, to try and have the issues resolved so we can recommence development.

6. GMP Reconciliation Project

The reconciliation stage of the project is continuing to progress and a project plan has been developed to deliver the rectification stage of the project. It is expected the active and deferred member records will be corrected in May 2019 with all pensioners being corrected by the March 2020 pension instalment.

7. Pension Team Restructure

Following a lengthy review of the current pensions team structure and analysis of the flow of work through the team it has been determined that a restructure of the section is required.

The objectives of the restructure are:

- To improve the flow of work through the team
- To re-engage with employers
- To cross skill team members through the operation of rotation between smaller teams
- To improve new staff induction and development
- To develop resilience and cross team capability when activities or demand require it
- To provide a clear career path with the capability to develop the relevant skills along the way

The benefits expected are:

- Better relationships with employers
- Improved customer service through
 - Better data received from employers
 - Better and more timely information from employers regarding member movements
 - Fewer queries being raised resulting in less delays
- Improved efficiency through
 - Smaller task specific teams more targeted on a few key deliverables
 - Cross skilling of staff leading to knowledge transfer & less specialisms
- More time to undertake value added activities like data cleansing, promotion of member self-service and stakeholder presentations
- More time to handle complex cases
- Fewer complaints
- Improved turnaround times
- Improved performance against SLAs
- Rotations enable
 - Cross skilling of staff whilst on the job
 - o Removal of knowledge drain when staff leave
 - Keep staff interested reducing turnover

8. Recommendation

8.1. That Pension Board members note the contents of this report.

8.2. That Pension Board members note the contents of the Breaches Log.

Phillippa Cockerill Head of Pensions Administration County Hall Northallerton

03 April 2019 Background Papers - Nil

Appendix 1

North Yorkshire County Council

Pension Fund Committee

21 February 2019

Administration Report

Report of the Treasurer

1. Purpose of the Report

1.1. To provide Members with information relating to the administration of the Fund over the year to date and to provide an update on key issues and initiatives which impact the administration team.

2. Admission Agreements & New Academies

2.1. The latest position relating to Admission Agreements and schools converting to academy status in the year are shown in **Appendix 1**. Whilst the numbers in progress have decreased we have a large volume of academy conversions in the pipeline.

3. Administration

3.1. Membership Statistics

Membership Category	At 30/09/2018	+/- Change (%)	At 31/12/2018	
Active	32,263	+2.22		32,979
Deferred	36,545	+0.63		36,774
Pensioner	22,130	+1.11		22,377
(incl spouse & dependant members)				
Total	90,938			92,130

3.2. Throughput Statistics

• Period from 1 October to 31 December 2018

Casetype	Cases Outstanding at Start	New Cases	Cases Closed	Cases Outstanding at End
Transfer In quotes	6	30	27	9
Transfer Out quotes	22	112	125	9
Employer estimates	9	184	178	15
Employee estimates	33	197	230	0
Retirement quotes	61	558	588	31
Preserved benefits	263	725	870	118
Death in payment or in service	36	59	70	25
Refunds	55	676	702	29
Actual retirement procedure	134	429	501	62
Interfund transfers	51	112	120	43
Aggregate member records	86	227	268	45
Process GMP	135	2	5	132
Others	90	420	426	84
Total Cases	981	3731	4110	602

- Alongside the above cases the Pensions team also handled 4,811 phone calls (average 100 per day) and 1,273 emails received via the Pensions Inbox (average 21 per day) in the quarter to 31 December 2018.
- The weekly focussed work days continue and continue to be successful in driving down the volume of outstanding work.

3.3. **Performance Statistics**

• The performance figures for the period 1 October 2018 to 31 December 2018 are as follows:

Performance Indicator	Target in period	Achieved
Measured work achieved within target	98%	93%
Customers surveyed ranking service good or excellent	94%	85%
Increase numbers of registered self-service users by 700 per quarter	700	627

 High work volumes and high demand within the team continue to impact our ability to meet the agreed performance indicator for work achieved within target however, we have seen an improvement in this quarter compared to the last one. The administration team continue to focus on reducing the outstanding work and focusing on ensuring the day to day business as usual work is being processed within agreed timescales. We continue to chase employers on a regular basis for all outstanding queries.

3.4. **Commendations and Complaints**

• This quarter the following commendations and complaints were received:

Commendations

Date	Number	Summary
Oct 2018	1	Knowledgeable, approachable and patient
Nov 2018	5	Helpful staff & service was exceptional
Dec 2018	2	Excellent service

Complaints

Compiai	1113									
Date	Number	ummary								
Oct 2018	1	Regulatory - Incorrect AVC options provided to member by Prudential								
	1	IHER appeal								
Nov 2018	1	IHER appeal								
Dec 2018	2	Administration - Member transferred benefits out in 2014 and it has become apparent it was a scam - Tell Us Once notification not received and pension instalment paid in error								
	1	IHER appeal								

- The complaint categories are:
 - 1. Administration these can relate to errors in calculations, delays in processing and making payment of benefits.
 - 2. Regulatory these relate to a complaint where regulations prevent the member being able to do what they want to.
 - 3. Ill Health Early Retirement appeal these are where members have been declined for early retirement on the grounds of ill health and are appealing the decision through the Internal Disputes Resolution Procedure.

Lessons Learned

Having reviewed the complaints received in the period there were no obvious trends or lessons to be learnt. It has however, become apparent that we appear to have a problem receiving some notifications via the Tell Us Once system which we are following up with the DWP.

3.5. Annual Benefit Statements 2018

• The final position relating to the 2018 annual benefit statement exercise is as follows:

Actives: 96.25% issued (29,098 statements produced out of 30,233)

The remaining 1,135 are unable to be issued due to the following reasons:

254 – member did not work in post in 17/18

881 – record marked as having an issue, could be data query or ongoing task. Queries continue to be pursued with the relevant parties.

Deferreds: 100% issued (36,317 statements produced out of 36,317)

Work is well underway on the 2019 year end and benefit statement process.

4. Issues and Initiatives

4.1. **GMP Reconciliation**

- The reconciliation stage of the project is continuing to progress. HMRC have now stopped accepting scheme reconciliation queries and responses to outstanding queries which are already in progress will be received until 6th April. ITM are preparing the rectification stage document and this was expected to be received week commencing 14th January.
- Once this is received the rectification stage can be planned and scheduled to correct records.
- Current position:

Status	Reconciled	Unreconciled
Active	24,542	2,531
Deferred	31,204	2,082
Pensioner	17,536	2,112
Other admin	1,026	2,515
HMRC		4,040
Totals	74,308	13,280

4.2. Data Score and Improvement Plan

 In line with the requirement introduced by the Pensions Regulator, to include each fund's data score in the annual return with effect from 2018, NYPF have submitted the following scores:

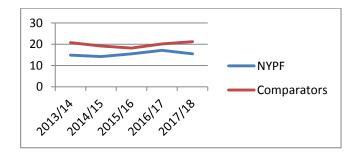
Common Data:	93.47%
Conditional Data:	85.26%

- Common data is that set of data that is defined as necessary and applicable to all members of all schemes. This data is that required to identify scheme members. For example, surname, date of birth, national insurance number, address, etc. There are 10 data items listed by the Pensions Regulator as being classed as common data.
- Conditional data is that set of data that is defined as additional detailed data required for the administration of a pension scheme. This data is dependent on scheme type, structure and system design. For example, employer, salary history, contributions, transfer in details, etc.
- The valuation data extract was used this year as we are still awaiting clarification from the Regulator regarding which data items should be included. Aon have undertaken a pre valuation data quality check and it was this report we used to measure the data quality against.
- From this a data improvement plan is being created to ensure quality and scores improve from year to year.

- The target set by the Pensions Regulator is 100% for common data created after June 2010 and 95% for common data created after this date. Targets for the standards of conditional data should be set by the Committee in conjunction with the administrators of the scheme. The NYPF proposes a target of 95% as being both reasonable and achievable taking account of the volume and nature of this data.
- Alongside this we are using the Aon report to cleanse the data as much as possible prior to the 2019 valuation.

4.3. CIPFA Benchmarking Return 2017/2018

- The benchmarking results for the year 2017/2018 showed the unit cost for NYPF Pensions Administration was £15.46 compared with an average unit cost across the whole of the CIPFA Benchmarking Club of £21.16.
- NYPF continues to provide an administration service at a lower cost than funds of a similar size.



4.4. Breaches Policy & Log

• Included at **Appendix 2** is the North Yorkshire Pension Fund's Breaches Log for review. There are no new entries.

4.5. Efficiency Initiatives

 The letters project continues to make progress with new letters being created to support changes to processes. Progress was impacted by the upgrade of the administration system but issues are now resolved and work can recommence.

5. Member Training

- 5.1. The Member Training Record showing the training undertaken over the year to 31 December 2018 is attached as **Appendix 3**.
- 5.2. Members will be asked to complete the CIPFA Skills Matrix by the end of March as agreed in the 13 September 2018 PFC meeting. These responses will be collated and used to produce a training plan that will address any gaps.
- 5.3. Upcoming courses, seminars and conferences available to Members are set out in the schedule attached as **Appendix 4**. Please contact Adam Tennant (01609 535916 or email adam.tennant@northyorks.gov.uk) for further information or to reserve a place on an event.

6. Meeting Timetable

6.1 The latest timetable for forthcoming meetings of the Committee and Investment Manager meetings is attached as **Appendix 5**.

7. Recommendations

- 7.1. Members to note the contents of the report.
- 7.2. Members to note the contents of the Breaches Log.

Gary Fielding Treasurer of North Yorkshire Pension Fund NYCC County Hall Northallerton

13 February 2019

Name of School	Local Education Authority	Multi Academy Trust (MAT) Name	Conversion Date	Current Position
Ainderby Steeple CoE Primary NYCC School		Dales Academies Trust	1.1.2019	Complete
George Pindar School NYCC		Hope Learning Trust	1.3.2019	Will be progressed nearer the time
Graham School	NYCC	Hope Learning Trust	1.3.2019	Will be progressed nearer the time
Danesgate Community School	COYC	South York Multi Academy Trust	1.3.2019	Will be progressed nearer the time
Northallerton School & Sixth Form College	NYCC	Arete Learning Trust	1.4.2019	In progress
Skelton Primary School	COYC	Hope Learning Trust	1.4.2019	Will be progressed nearer the time
Starbeck Primary School	NYCC	Northern Star Academies Trust	1.4.2019	Will be progressed nearer the time
Sherburn High School	NYCC	Star Multi Academy Trust	1.8.2019	Will be progressed nearer the time
Sacred Heart Roman Catholic Voluntary Aided Primary School, Northallerton	NYCC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
St Francis Xavier RC/CofE	NYCC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
St Benedict's Roman Catholic Primary School, Ampleforth	NYCC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
St George's Roman Catholic Primary School, Scarborough	NYCC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
St Augustine's RC Secondary	NYCC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
St Hedda's Roman Catholic Primary School	NYCC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
St Hilda's Roman Catholic Primary School	NYCC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
St Joseph's Roman Catholic Primary School, Pickering	NYCC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
St Mary's Roman Catholic Primary School, Malton	NYCC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time

Name of School	Local Education Authority	Multi Academy Trust (MAT) Name	Conversion Date	Current Position
St Mary's Roman Catholic Primary School, Richmond	NYCC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
St Peter's Roman Catholic Primary School	NYCC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
St George's RC Primary School, York	COYC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
All Saints, York	COYC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
St Wilfrid's RC Primary School	COYC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
St Aelred's York	COYC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
OLQM York	COYC	St Margaret Clitherow Academy Trust	1.9.2019	Will be progressed nearer the time
Naburn CoE Primary School	COYC	South York Multi Academy Trust	Not known	Delayed from 1.10.2018. Will be progressed nearer the time
Lord Deramore's Primary School	COYC	South York Multi Academy Trust	Not known	Delayed from 1.11.2018. Will be progressed nearer the time
Fishergate Primary School	COYC	South York Multi Academy Trust	Not known	Delayed from 1.12.2018. Will be progressed nearer the time
Escrick CoE VC Primary School	NYCC	South York Multi Academy Trust	Not known	Will be progressed when conversion date known
St Oswald's CE Primary School	COYC	South York Multi Academy Trust	Not known	Will be progressed when conversion date known
Elvington CoE Primary School	COYC	South York Multi Academy Trust	Not known	Actuarial calculations provided based on conversion date of 1.7.18. Conversion delayed, new date not yet known
Langton Primary School	NYCC	Evolution Schools Learning Trust	Not known	Original conversion date was 1.10.2016 but MAT advised it has been delayed. New date not yet known.
Thirsk School & Sixth Form College	NYCC	Arete Learning Trust	Not known	Original conversion date was 1.2.2018. MAT has advised no definite agreement in place at present
Stillington Primary School	NYCC	Not yet known	1.2.2019	Proposed conversion date was 1.2.2019 with Hope Learning Trust. Project now on hold. School no longer converting with Hope Learning Trust and new sponsor being sought

Admission Bodies –14 'in progress'

Name of Employer	Name of Contractor	Staff Transfer Date	Current Position
City of York Council – Youth Persons Counselling Services	York Mind	1.1.2019	Complete
Tockwith CoE Primary Academy	Hutchison Catering Limited	10.12.2018	Complete
Outwood Primary Academy Greystone (Outwood Grange Academies Trust)	ISS Mediclean	5.11.2018	In progress – transfer of catering staff
Baldersby St James CoE Primary Academy (Hope Learning Trust)	Absolutely Catering Limited (part of the CH&Co Catering Group)	5.11.2018	In progress - transfer of catering staff
NYCC – catering contracts at: Bedale CoE Primary School Colburn Community Primary School Masham CE (VC) Primary School	Mellors Limited	1.9.2018	Not advised of transfers until October! Now in progress
NYCC - catering contracts at: Spofforth CoE Primary School Follifoot CoE Primary School Goldsborough CoE Primary School Sicklinghall Community Primary School	P&A Catering	TBC	Not advised of transfers until October! Now in progress
Barlby High School (Hope Learning Trust)	Hutchison Catering Ltd	4.3.2019	In progress - transfer of catering staff
Skelton School (COYC school joining the Hope Learning Trust 1.4.19)	Absolutely Catering Limited (part of the CH&Co Catering Group)	1.4.2019	Will be progressed nearer the time
City of York Council libraries	Contract not yet awarded	1.4.2019	Future service rate provided, admission agreement will be progressed nearer the time
City of York Council (Haxby Hall Care Home)	Yorkare Homes Ltd	June 2019	Future service rate provided, admission agreement will be progressed nearer the time. Transfer delayed from January 2019
Yorkshire Coast Homes			Possible merger with Coast & Country Housing Ltd. Coast & Country Housing Ltd transferred its engagements to YCH on 1.10.2018 and YCH changed its name to Beyond Housing Limited. Waiting to see if a merger goes ahead.

Exiting Employers – 6

Name of Employer	Date exited the Fund
OCS Group UK Limited	31.3.2017
Superclean Services Limited	16.7.2017
Joseph Rowntree Charitable Trust	31.12.2017
York Arts Education (Community Interest Company)	31.3.2018
Housing & Care 21	31.8.2018
Be Independent	TUPE transferred back to the City of York Council wef 1.8.18. Exit calculation in progress

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Date	Category	Description of Breach		Regulation being breached	Effect of Breach & Wider	Response to Breach	Referred to PFC	Referred to PB	Outcome of Referral to PFC & PB		Progress Review 1	Progress Review 2	
		Statutory deadline for issuing of Annual Benefit Statements not met for all eligible members	Large backlog meant we were unable to establish which category members should fall into at statement date. Year End queries still outstanding at issue date.		85.88% of Active members received a statement = 14.12% did not 94.51% of Deferred members received a statement = 5.49% did not	Large backlog means we do not yet know actual total eligible for a statement. Continue to reduce the backlog with targetted initiatives. Target is to have a controlled work throughput by end 2018. Continue to work through errors & queries & issue ABS' when able to. Introduce monthly returns for our 2 largest employers by end of 2018 so that errors can be identifed in real time rather than at year end.	14/09/2017	19/01/2018	Noted the position, no requirement to report. Creation of Breaches Log to record position.				30/05/2018
		Statutory deadline for issuing Personal Savings Statements not met for all members Incorrectly paid trivial commutation to a member who has benefits with another fund	Human error Human error		2 members received statements after the 6/10/2017 deadline. 192 manual calculations undertaken and 56 statements issued. 3.5% of members affected Member received benefits he wasn't entitled to. No other member affected.	Statements issued immediately. Process under review by team leader. Checklist created and process will be audited in 2018 to ensure checklist being used and process being robustly followed As soon as realised payment was unauthorised, informed member and reported	22/02/2018 22/02/2018	19/01/2018 19/01/2018	PB - Noted the position, no requirement to report. PFC - Noted the position, no requirement to report. PB - Noted the position, no requirement to report.	N N - Reported to	30/04/2018	31/08/2018	30/09/2018
21/08/2018	Administration	and had not commuted those benefits Statutory deadline for issuing of Annual	Voor End guariaa atill autotanding at		Payment is an unauthorised payment &	build of the second sec	22/11/2018	11/10/2018	PFC - Noted the position, no requirement to report. PB - noted the position, agreed not	HMRC	N/A	N/A	N/A
51/06/2018			Year End queries still outstanding at issue date.		statement = 13.48% did not 99.76% of Deferred members received a statement = 0.24% did not	position regarding correct eligibility for statements. Significant year end queries (2,399) have impacted statement production. Ers being chased for response. Continue to work through errors & queries & issue ABS' when able to. Viability of monthly returns being investigated	22/11/2016	11/10/2018	to report this time but will in 2019. PFC - noted position, agreed not to report this time.	N			
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Date	Title or Nature of Course	Blackie J	Mulligan P	Swiers H	Weighell J	Clark J	Portlock D	M Chambers	A Solloway	A Thompson	C Lunn	I Gillies	C Steward	Unison (Vacancy)	Unison (Vacancy)
28 February - 2 March 2018	LGC Investment Seminar, Carden Park, Cheshire	✓													
7-9 March 2018	PLSA Investment Conference, Edinburgh	✓	~	~	√	√									
21-23 May 2018	PLSA Conference					\checkmark									
25 May 2018	Property Debt Workshop	\checkmark			\checkmark										
18 June 2018	CIPFA Pension Board						\checkmark								
27 June 2018	CIPFA Pension Board Annual Event						✓								

UPCOMING TRAINING AVAILABLE TO MEMBERS

Provider	Course / Conference Title	Date(s)	Location	Themes / Subjects Covered
CIPFA	LGPS Members Spring Seminar	25 February 2019	Barnett Waddingham Leeds	They will provide the latest information updates, training on specific topics and opportunities for discussion and networking with members of other funds' boards.
CIPFA	LGPS Spring Officers Spring Seminar	25 February 2019	Barnett Waddingham Leeds	They will provide the latest information updates, training on specific topics and opportunities for discussion and networking with members of other funds' boards.
LGC	Investment Seminar	28 February - 1 March 2019	Carden Park Cheshire	Keeping the LGPS affordable and accessible through austerity and uncertain times. Content tbc.
				The conference is aimed at trustees, chief investment officers, pension scheme managers, asset managers and investment specialists.
PLSA	Investment Conference	6-8 March 2019	EICC Edinburgh	The forward looking programme focusses on the major trends and events affecting UK investors and markets. The conference consists of plenary and specialist stream sessions focusing on Defined Benefit, Defined Contribution, Investment & Governance as well as a new stream on Asset Allocation.

PLSA	Local Authority Conference	13-15 May 2019		A specialist pension event for Local Authorities, designed to look at the ever-changing Local Authority Pension Scheme.				
			De Vere Water Park Hotel Gloucestershire	The conference includes keynote speeches, specialist breakout sessions, a Learning Zone, fringe meeting, a welcome drinks reception, conference dinner and exhibitions				
PLSA	Annual Conference & Exhibition 2019	16-18 Oct 2019	Manchester Central, Windmill Street, Petersfield, Manchester, M2 3GX	Our flagship event, a three day conference attracting over 1,500 attendees – the most important event of the year for anyone involved in pensions (trustees, pension scheme managers, administrators, HR specialists, finance directors and their advisers). The event includes a trade exhibition of approximately 80 exhibition stands.				
LAPFF	Annual Conference	4,5,6 December 2019	TBC	TBC – Save the date				

APPENDIX 5

PENSION FUND COMMITTEE TIMETABLE FOR MEETINGS IN 2019

Meeting Date	Time & Venue	Event	Fund Managers
21 February 2019	10am, Oak Room	Pension Fund Committee	
23 May 2019	10am, Brierley Room	Pension Fund Committee	
24 May 2019	10am, TBC	Pension Fund Committee	2 Managers TBC
4 July 2019	10am, Brierley Room	Pension Fund Committee	
12 September 2019	10am, Brierley Room	Pension Fund Committee	
13 September 2019	10am, TBC	Pension Fund Committee	2 Managers TBC
21 November 2019	10am, Brierley Room	Pension Fund Committee	
22 November 2019	10am, TBC	Pension Fund Committee	2 Managers TBC

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Date	Category	Description of Breach		Regulation being breached	Effect of Breach & Wider Implications	Response to Breach	Referred to PFC	Referred to PB	Outcome of Referral to PFC & PB		Progress Review 1	Progress Review 2	
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		Statutory deadline for issuing Personal Savings Statements not met for all members Incorrectly paid trivial commutation to a member who has benefits with another fund	Human error Human error		2 members received statements after the 6/10/2017 deadline. 192 manual calculations undertaken and 56 statements issued. 3.5% of members affected Member received benefits he wasn't entitled to. No other member affected.	Statements issued immediately. Process under review by team leader. Checklist created and process will be audited in 2018 to ensure checklist being used and process being robustly followed As soon as realised payment was unauthorised, informed member and reported	22/02/2018 22/02/2018	19/01/2018 19/01/2018	PB - Noted the position, no requirement to report. PFC - Noted the position, no requirement to report. PB - Noted the position, no requirement to report.	N N - Reported to	30/04/2018	31/08/2018	30/09/2018
21/08/2018	Administration	and had not commuted those benefits Statutory deadline for issuing of Annual	Voor End guariaa atill autotanding at		Payment is an unauthorised payment &	build of the second sec	22/11/2018	11/10/2018	PFC - Noted the position, no requirement to report. PB - noted the position, agreed not	HMRC	N/A	N/A	N/A
51/06/2018			Year End queries still outstanding at issue date.		statement = 13.48% did not 99.76% of Deferred members received a statement = 0.24% did not	position regarding correct eligibility for statements. Significant year end queries (2,399) have impacted statement production. Ers being chased for response. Continue to work through errors & queries & issue ABS' when able to. Viability of monthly returns being investigated	22/11/2016	11/10/2018	to report this time but will in 2019. PFC - noted position, agreed not to report this time.	N			
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