Information sheet

Code of practice no: 13 – Governance and administration of occupational trust-based schemes providing money purchase benefits (Aid to Chair's Statement)

Chair Statement	We will not be hosting websites for schemes to publish their Chair's Statement. We do not have the facility to collate a Chair's Statement with the annual benefit statements or show a scheme's website address on them. Information to aid your Chair's Statement is available in this leaflet
Independent voluntary accreditation	We do not hold accreditation such as that offered by the Pension Administration Standards Association.
Account manager or team leader for direct contact	We do not have named contacts for our group schemes, but if you call us on 0330 159 1531 we will be able to help.
Attendance at Trustee meetings	We are rarely asked to attend Trustee meetings, but if there are specific administration topics which the Trustees wish to raise, please contact us and we will do our best to help.
Administration reporting including Service Level Agreements (SLA)	We have a set of service level standards, rather than targets at product or scheme level. Generally, we aim to reply to most requests within 10 days, with payments completed within 5 where possible.
Administrator training and experience	We have internal standards which ensure that staff are properly trained, qualified, supervised and monitored. Staff are encouraged to enhance their skills and knowledge by also attending external training courses where appropriate.
Quality assurance and continuity	Our administration procedure manuals are regularly reviewed and updated. Both automated and manual processes are subject to checking and/or regular quality sampling.
Disaster recovery and business continuity planning	Our Business Continuity and Disaster Recovery arrangements meet the regulatory requirements set out by the FCA Principles for Business (PRIN), PRA Fundamental Rules (FR), Senior Management Arrangements Systems and Controls (SYSC) and EIOPA Guidelines on Systems of Governance. These plans are tested annually, or more frequently if required.
Accuracy – data and record-keeping	We carry out regular data integrity exercises covering both core and conditional data. Any errors identified are investigated and corrected. As we are not the scheme administrator, we do not hold full details of the common or conditional data. We do not, therefore, measure the data or calculate data scores.
Data security	**Data protection** We are a Data Controller registered with the Information Commissioner's Office in accordance with the Data Protection Act 2018 (the "DPA").

(45Z147a Chair 01.20)

We have appointed a Privacy Compliance Officer who is responsible for ensuring we comply with the DPA.

We have a published Data Protection Policy and all staff, including contractors and temporary staff, are required to comply. This is reviewed annually.

All staff, including contractors and temporary staff, receive regular Data Protection training.

There is a full Governance and escalation process in place to deal with any data protection issues. All data protection breaches and actions taken are escalated internally on a monthly basis.

Information security

We have reviewed our approaches to Information Security against ISO 27001, the International Standard for Information Security and Cyber Security against the Government's 10-Steps to Cyber guidelines.

We have a published Information Security Policy and supporting Framework with which all staff, including contractors and temporary staff, are required to comply. This is reviewed annually.

All staff, including contractors and temporary staff, receive regular Information Security training.

Our IT Architect has responsibility for monitoring compliance with our Information Security Policy and Framework and for cyber related matters.

There is a full Governance and escalation process in place to deal with any information security or cyber-related issues. Issues are escalated internally on a monthly basis.

Access control

We enforce strict perimeter security protocols with swipe card access to our premises and a third party security presence at our office in Aylesbury.

CCTV surveillance is in operation at points of entry.

System access is robustly controlled with strict segregation of duties, protocols and the adherence to a complex password policy (We do not utilise a single sign-on policy).

The network

Our network is protected by perimeter, hardware and software firewalls, with a demilitarised zone for appropriate servers and applications.

Updated anti-virus and anti-malware software is used continuously.

A patching programme is maintained with an appropriate change control procedure in place.

Full electronic backups are taken and data securely stored off site.

An annual penetration test of our network is undertaken by an independent 3rd party.

Data destruction	All paperwork is treated as confidential. It is securely disposed of by a contracted third party company which holds BS EN 15713 Secure Destruction of Confidential Material Certification.
	All electronic or mobile equipment is securely wiped before internal reissue.
	Decommissioned equipment is securely disposed of having undergone appropriate secure data erasure and a certificate of secure destruction obtained.
Data transfer	Electronic communications with attachments are password protected and WinZip encrypted to 256 bit AES (Advanced Encryption Standard).
	TLS protocols are in place for designated domains.
	Information burnt to disk or removable media is strictly controlled and monitored. Data is password protected and encrypted to 256 bit AES as required.
Third parties	We always ensure that appropriate agreements are in place where it is necessary to provide data (including personal data) to a third party. Due diligence is also undertaken where necessary.
Assurance activity	The adequacy and effectiveness of Governance and control over Data Protection, Information Security and Cyber Security is periodically reviewed by our Internal Audit function.
Member data & accuracy	Membership data is issued at each scheme anniversary which we request the Trustees check, and notify us of any errors.
Member communications	We do not deal directly with members. All communications must be made to them by the Trustee or their appointed administrator. Any member queries should be directed to the Trustees or administrator.
Complaints	As we do not deal directly with members all complaints should be made through the Trustees. They should have a note of any complaints and the outcome or current status.
Restrictions on costs and charges – Charge controls	'Charge controls' are not applicable as our schemes are not suitable for auto-enrolment purposes.
Illustration of the impact of Costs and Charges	This is available upon request at scheme level. We do not provide this illustration at member level
Member borne charges	There are no member borne charges. Contribution charges ceased on 30 June 2018. We have never charged or deducted member borne commission.
Investment fund transaction costs	We publish a table detailing the overall transaction costs and charges for all our investment funds. These are prepared in compliance with FCA requirements to disclose transaction costs and administration charges in workplace pension schemes. Please refer to our website (the charges are updated quarterly)
Unit-linked Funds	A list of funds and performance is available on our website
Pricing errors	We make every effort to calculate prices accurately and all are thoroughly checked before publication. If a

	significant error does occur, we will do everything we can to correct it as soon as possible so the position is as close as can be to that had the error not occurred. In line with industry practice, we will always consider an error of 0.5% or more in unit prices to be significant. We reserve the right to recover any benefit from a pricing error.
Misallocations	If member contributions are made or a fund switch requested, we work on information received from the Trustees and apply as instructed. We issue annual benefit statements to the Trustees which provide details of any contributions and the funds scheme members are invested in. We would expect the Trustees to let us know if there were any discrepancies.
Timely financial transactions	Any contributions are allocated from the date of receipt. Any switch or payment requests received are processed as quickly as possible. We aim to complete payments within 5 days, where possible. Further information on the fund switch process is available on our website