



NHS Pension Board Annual Report

April 2017 to March 2018

Published 30 October 2018

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Introduction

This is the third annual report by the NHS Pension Board (NHSPB). NHSPB was established, as required under the Public Service Pensions Act 2013. From 1 April 2015, the NHSPB has had responsibility for “assisting the Scheme Manager” (Secretary of State for Health and Social Care) in securing compliance with all relevant pensions law, regulations and directions in respect of the National Health Service Pension Scheme (NHSPS) for England and Wales, as well as with the Pension Regulator’s Code of Practice no.14 Governance and administration of public service pension schemes.

Executive Summary

The NHSPB met four times during 2017/18. Its main priorities during the year have been:

- continued development of its capability to ensure the 2015 NHSPS and the older 1995 and 2008 sections are rigorously governed;
- ensuring compliance with relevant legislation and regulations in pursuit of its statutory obligations and;
- working with the NHS Business Services Authority (NHSBSA), which administers the NHSPS on behalf of the Scheme Manager, to continue improving scheme administration and service to members.

In the first half of the year NHSBSA service levels continued to be impacted by some of the administrative challenges which initially emerged as a result of the implementation of the 2015 NHSPS. The delays which materialised were reflected in higher complaint volumes than would normally be experienced. The NHSPB challenged the NHSBSA over the length of time it had taken to restore service to normal levels, and in response, NHSBSA has improved the forecasting of activity volumes and has enhanced staff skills resulting in service standards and complaint volumes returning to pre-implementation levels by the end of the reporting year.

The NHSPB established an Engagement and Communications Steering Group (ECSG) in 2015. ECSG is administered by NHSBSA and includes NHSPB members to oversee improved communications with employers and NHSPS members. The ECSG has established a strategy for enhancing member communication and engagement going forwards through the adoption of more advanced digital communication techniques. The NHSBSA has also established a Stakeholder Engagement Team (SET) to work collaboratively with employers to enhance mutual understanding.

The NHSPB has continued to build constructive working relationships with The Pensions Regulator (TPR) to ensure full compliance with TPR codes of practice. A small number of potential breaches of law have been identified during the course of the year and these have been reported to TPR.

Increased communication and collaboration with the Chairs of other Public Service Pension Schemes has also been a feature during the year with greater focus on the benchmarking of cost effectiveness and service provision between schemes, and the sharing of best practice.

The resignation and term expiry of a small number of members of the NHSPB has meant that succession planning has been a higher priority in the last year, together with the on-

boarding and induction of new NHSPB members, and this is likely to continue to be a feature as further member terms expire in the years ahead.

Going forwards the NHSPB will continue its focus on enhancing NHSPS member experience whilst encouraging improved administrative efficiency and effectiveness to ensure optimum value is obtained from the NHSPS levy (0.08% of pensionable pay) which employers have been paying since 1 April 2017.

Background – NHS Pension Scheme

The NHSPS provides pensions to NHS employees and eligible staff of third parties providing healthcare services. The 1995 and 2008 sections provide defined benefits based on final salary for most members, with the exception of practitioners (practitioners include General Medical Practitioners and General Dental Practitioners) and locums whose benefits are calculated on a career average basis.

The 2015 NHSPS provides benefits on a career average basis for all members.

There are 1.57million contributing members across the NHSPS with pensionable pay of over £43 billion per annum (pa). Pensions are paid to around 0.9 million pensioners and dependants amounting to around £8.1 billion pa paid as regular weekly or monthly payments. A further 0.65 million members no longer contribute to the NHSPS (known as deferred members) but retain an entitlement to receive a pension at retirement. Both members and employers contribute to the NHSPS. Member contribution rates are tiered based on members' pay with members contributing between 5% and 14.5% of their pensionable pay, depending on their earnings and 8,658 employers pay 14.38% of their pensionable paybill. Of this 0.08% is to cover the cost of NHSPS administration. Total contributions to the NHSPS are around £10.8 billion pa; with benefit payments of around £10.3 billion pa (this includes lump sum payments). The cost of NHSPS administration was £0.04 billion during 2017-2018.

Both NHSPSs are unfunded occupational pension schemes backed by the Exchequer.

NHSPB – Membership

Members of the NHSPB are listed in Annex A.

NHSPB member changes during the year were as follows:

Amanda Bromley (Tameside and Glossop Integrated Care NHS Foundation Trust) replaced Penny Brodie (Royal Berkshire NHS Foundation Trust) who resigned on 19 January 2017.

Two-thirds of the voting members of the NHSPB will represent a quorum for NHSPB meetings to go ahead. The Chair must be present for meetings to be quorate. All meetings during 2017/18 have been quorate.

NHSPB Terms of Reference

Terms of Reference for the NHSPB as at 31/03/2018 are at Annex B. They are reviewed annually and were last updated in February 2018

2017/18 Objectives and Work Plan

The NHSPB work plan for 2017/18 has been completed, and is at Annex C.

A summary of performance against the 2017/18 objectives is as follows:

- 1. Ensure that all responsibilities under the NHSPB's Terms of Reference are met, including legislative and regulatory compliance, efficient and effective service delivery and the provision of the necessary assurance to the Scheme Manager.**

The NHSPB believes that the NHSPS has been administered in compliance with legislative and regulatory requirements throughout the year, with a very small number of exceptions.

The table in Annex D shows how the NHSPS complies with the key aspects of TPR's Code of Practice No. 14.

During the year, the NHS BSA submitted breach of law reports to TPR in respect of 5 employers who failed to pay employer and employee pension contributions by the legislated deadline.

Two reports of breaches of law were also submitted in respect of failures of the organisation commissioned to administer pension contributions, reports and returns on behalf of practitioners, to effectively administer General Medical and Dental Practitioner pensions. One report was submitted in May 2017 and another in March 2018 due to the increasing severity of the issues.

- 2. Continue the development of the Risk Management framework, and ensure that key risks are effectively identified and managed.**

During 2017/18, administrator risks have been reviewed and updated at the NHSPB pre-meetings between the Chair, NHSBSA and the Department of Health and Social Care (DHSC) and then reported to the NHSPB. NHSPB risks and external risks (those which can only be mitigated by stakeholders other than the NHSPB and its partners), are considered by the NHSPB at each of its meetings. The latest risk dashboard is at Annex

F. These are aligned to specific NHSPB meeting agenda items to ensure that mitigation of risks is adequately considered at each meeting.

3. Ensure that the Engagement and Communication Strategy (ECS) is reviewed and remains fit for purpose, and oversee its ongoing delivery. In particular, commission work to explore the options for providing members with pension projections through total reward statements/website modelling.

The ECS is being delivered via the ECSG which oversees the development of communications to meet the various audiences' information needs by ensuring:

- information is explained in the simplest terms using plain English;
- communications are cost effective and represent value for money.

The focus of ECSG activity during 2017/18 has been

- the re-development of the NHSBSA website
- the development of ways in which to measure the effectiveness of NHSBSA communications
- identification of opportunities to promote the value of the NHSPS to members and potential members.

ECSG priorities for the coming year will be

- further re-development of the NHSBSA website to respond to stakeholder feedback
- the identification of key messages for members about the benefits of the NHSPS
- the development of e-learning facilities for employer administration
- ECSG reports to the NHSPB at each of its meetings. A summary report on the work of the ECSG is at Annex I.

4. Consolidate and continue NHSPB member training and development, to ensure all members are able to perform their responsibilities effectively and ensure suitable succession planning is in place as member terms begin to expire.

- Individual and generic NHSPB training needs were identified through a series of one to one discussions between NHSPB members and the Chair, as well as through

collective NHSPB discussion. NHSPB member training and development was then incorporated into the 2017/18 work plan

- A review of the terms of office of NHSPB members has been initiated, with a view to ensuring that appropriate succession planning is carried out in a timely manner going forwards

5. Engage in the process to agree Key Performance Indicators (KPIs) for NHSBSA.

The DHSC has agreed KPIs with NHSBSA which are incorporated into the Management Information pack that NHSBSA prepares for review at each of the NHSPB meetings. NHSPB were asked to take a more strategic overview of KPIs, devoting time to periodic 'deep dives' in key performance areas to help the NHSPB understand more about the overall administration of the NHSPS, leaving more detailed operational oversight to NHSBSA's internal governance and monthly service level agreement reviews with the DHSC. KPIs for 18/19 have been reviewed by the NHSPB following discussions between NHSBSA and DHSC.

6. Continue to focus on the role of employers in delivering effective outcomes for their staff who are NHSPS members and ensuring areas for improvement in employer performance are identified and implemented.

The NHSBSA SET works with employers to identify areas for improvement, for example the submission of end of year data and applications for access to the scheme for non-NHS bodies. In addition, the Service Improvement and Development Board (SIDB) has been established to allow employers to directly advise NHSBSA about areas for improvement. The Terms of Reference for SIDB are at Annex K. The NHSPB receives regular reports on the progress being made by the SET in improving employer performance and relationships. The SET presented to the NHSPB in November 2017 and a further deep dive on stakeholder engagement is planned for November 2018.

Particular areas of focus for the SET in 2017/18 have been:

- Allocating Stakeholder Engagement Managers to employers based on their organisation type. The Managers have made regular contact with their employers through various methods:
 - Attendance at regional pension forums

- Stakeholder Engagement Events
- Specific employer newsletters
- Direct email with items of interest.
- Telephone contact for queries.
- Introducing Stakeholder Engagement events. Sixteen were carried out during the year at various locations across the country, to give as many employers the opportunity to attend. Topics covered were:
 - Legal responsibilities/Roles and Responsibilities as an employer
 - Data management responsibilities
 - Overview of the NHSPS
 - Administrative obligations and processes
- Establishing the SIDB as a result of the introduction of the administration levy. The SIDB enables employers to submit changes to systems/processes, giving them more of a voice in the administration of the NHSPS.
- Significantly improving the outcome of the employer annual customer satisfaction survey. The net promoter score (an index ranging from -100 to 100 that measures the willingness of customers to recommend a company's products or services to others) increased from -6 to +6 since the previous year.
- Introducing Customer Insight surveys to obtain current feedback on specific subjects enabling the business to look at performance in particular areas.
- Creation of technical guides for employers, some of which have already been published on the NHSBSA website.

7. Consider and respond to any findings made by The Pensions Regulator Annual Survey

The table below sets out the key findings from the 2018 survey, together with the position of the NHSPS in respect of these findings. Overall, the NHSPS is in a good position in terms of its adherence to Regulatory requirements and its responsiveness to key areas of Regulatory focus.

Key findings table from The Pensions Regulator Annual Survey 2018 and NHSPS Position

| Key finding (from 2018 survey) | NHSPS Position |
|---|---|
| Schemes are making progress in establishing the processes that TPR regards as key in supporting compliance with legal requirements and meeting TPR standards. | <p>The key processes are:</p> <ul style="list-style-type: none"> • conflicts of interest policy • ensuring NHSPB members acquire and retain key knowledge and understanding • documented procedures for managing risk • monitoring member records • resolving payment issues and assessing failures • identifying, assessing and reporting breaches of law • NHSBSA and/or the NHSPB have all such processes in place with regular reviews scheduled to take place throughout the year. |
| Concerns over the frequency and rigour of data reviews | <p>A Data Manager has been appointed at the NHSBSA and a Data Strategy developed. Regular engagement takes place with TPR to discuss progress of the improvement plans contained within the Strategy to prioritise data amendments and improve the quality of NHSPS record keeping.</p> <p>Currently the accuracy of NHSBSA data is:</p> <ul style="list-style-type: none"> • For Active members (those who continue to make NHS pension contributions to the NHSPS) – 78.83% (an increase of 5.83% from last year) • Deferred (those who have protected benefits but no longer make NHS pension contributions) – 99.34% (an increase of 10.34%) • Pensioner (those who are drawing their NHS pension) – 98.16% (an increase of 3.16%) |

| | |
|--|---|
| <p>Concerns over the thoroughness and rigour of administrator controls – especially over outsourced administrators</p> | <p>The NHSPB monitors compliance with KPI and quality targets and holds the NHSBSA to account in respect of any breaches. The NHSBSA has a comprehensive suite of internal controls, and a Compliance Team which conducts ‘second line’ checks to ensure they are operating effectively. This has identified a number of areas for improvement, and these were reported to the NHSPB.</p> <p>The format is as follows</p> <p>Area - Timing of Review - Review Outcomes (see Annex L):</p> <p>Deferred Benefits Process - May 2017 - Unsatisfactory</p> <p>Reporting to the Pensions Regulator - May 2017 - Moderate</p> <p>Employer Statement of Contributions - June 2017 - Limited</p> <p>Ill Health Retirement Process - August 2017 - Moderate</p> <p>Transfers Out Process - August 2017 - Unsatisfactory</p> <p>Additional Pension casework - October 2017 - Unsatisfactory</p> <p>New Joiners Process - November 2017 - Unsatisfactory</p> <p>Refunds of Contributions - November 2017 - Limited</p> <p>Officer Estimates - January 2018 - Moderate</p> <p>Redundancy Award payments - January 2018 - Moderate</p> <p>Normal Pension Age Eligibility - March 2018 - Unsatisfactory</p> <p>Various recommendations have come from the compliance reports which have been turned into an Action Plan which the NHSBSA are working through to ensure changes are made. 288 recommendations have been implemented at 31 March 2018.</p> <p>Examples of recommendations are:</p> <ul style="list-style-type: none"> • to complete the production of Process Guides for all administration areas, • to make improvements to the Pensions Website and • to ensure that staff use appropriate forms and service and pensionable pay calculators |
|--|---|

| | |
|--|--|
| | <p>In addition to the work ensuring compliance with TPR's codes of practice, the NHSBSA's internal audit programme provides 'third line' oversight and its findings are also reported to the NHSPB. Audits completed in 2017/18 are below in the following format</p> <p>Area - Review outcome:</p> <p>Pensions workflow management - Substantial assurance</p> <p>Pensions Finance - Substantial assurance (There is a sound system of control, designed to address relevant risks but there is evidence of non-compliance with some of the controls)</p> <p>Pensions Contracting Out - Moderate assurance (Whilst there is a basically a sound system of control, designed to address the relevant risks, there are weaknesses in the system, that leaves some risks not addressed and there is evidence of non-compliance with some of the controls)</p> <p>Pensions Complaints - Moderate assurance</p> <p>Pensions Scheme Access - Moderate assurance</p> |
| <p>Member Communications, in particular the provision of Annual Benefit Statements</p> | <p>Annual Benefit Statements (ABS) or Total Reward Statements (TRS) which include the benefits of working for individual NHS employers alongside an ABS are provided to active and deferred members of the NHSPS via the Government Gateway or Electronic Staff Record (ESR) Self Service.</p> <p>The current volume of TRS or ABS provided to NHSPS members is 90% of the total membership broken down as:</p> <p>1995 Section - 258,570 active - 419,685 deferred - 678,255 total</p> <p>2008 Section - 22,601 active - 55,804 deferred - 78,405 total</p> <p>2015 Scheme - 1,044,787 active - 118,378 deferred - 1,163,165 total</p> <p>Total - 1,325,958 active - 593,867 deferred - 1,919,825 total</p> |

8. Ensure continued focus on developing and implementing a programme of activities driving service improvement in respect of NHSPS administration,

utilising the output from benchmarking and considering employers and members' priorities.

At each of its meetings, the NHSPB considers opportunities for making service enhancements. Some examples of the continuous improvement activity undertaken in 2017/18 are at Annex J.

Continuous improvement activities for 2018/19 will include:

- an alternative verification and authentication system to replace Government Gateway to enable NHS staff to access their ABS or TRS more easily;
- the modernisation of pensioner administration service provision which is due to complete in Summer 2018;
- further development of our digital service including on-line applications for benefits and personalising our website;
- introduction of a digital service to allow all employers to submit contribution information to reduce administration costs and late payments.

A Benchmarking survey undertaken in 2017/18 demonstrated that total costs for the NHSPS are more than £16 per member lower than other public service pension schemes and about £12 per member lower for administration costs.

9. Review the performance of the NHSPB, to ensure any areas for improvement are identified and addressed.

The NHSPB self-assessed its effectiveness at the end of its third year concluding that it is operating effectively in most areas. Further development was identified as being required as follows:

- enhancement of the appointments process for new members, to ensure the position of new/reappointed members is formalised as quickly and efficiently as possible;
- further development of the approach to induction training for new NHSPB members, to ensure their knowledge is brought to the right level as quickly as possible. This might include the development of a joint training approach with newly appointed members of the NHS Pension Scheme Advisory Board;
- ensuring that appropriate challenge is provided to the NHSBSA by including periodic sessions on the agenda for voting members only;

- further development of the rigour of the NHSPS's approach to risk management, following improvements to the structure and presentation of risk management information during the past year.

10. Deliver an annual report summarising the work of the NHSPB, making recommendations as appropriate.

This is the NHSPB's third annual report.

11. Continue the development of effective working relations with all key stakeholders.

The NHSPB has developed working relationships as follows:

- DHSC – presenting the annual report to ministers on time. The NHSPB Chair met Philip Dunne MP, the former Minister of State for Health to discuss the NHSPB's second annual report covering potential areas for improving communication and member understanding.
- TPR – the Chair has attended Scheme Advisory Board events co-ordinated by TPR on behalf of all Public Service Pension Schemes. TPR has also been invited to present to the NHSPB on the findings of its Survey of Public Service Pension Schemes.
- Other Public Service Pension Board Chairs – the Chair has also met informally with the Chairs of the other centrally administered Public Service Pension Schemes, to share experience and identify potential areas for collaboration and sharing of best practice (e.g. benchmarking, communication etc.). Further meetings are planned.

12. Ensure future legislative and regulatory developments which may impact on NHS Pension provision are identified and responded to in a timely and effective manner.

DHSC has reported to the NHSPB on forthcoming changes in legislation and regulation as they have arisen. The NHSPB has a specific item on its work plan each year to 'horizon scan', identifying potential future changes which may impact on the administration of the NHSPS in the future.

13. Oversee any impact from the ongoing re-procurement exercise on NHSPS administration.

DHSC have approved NHSBSA plans to resource and support the ongoing re-procurement programme. Where KPI performance has been impacted, NHSBSA has kept the DHSC and the NHSPB up to date.

2018/19 Objectives and Work Plan

The NHSPB has agreed the following objectives for 2018/19:

1. Ensure that all responsibilities under the NHSPB's Terms of Reference are met, including legislative and regulatory compliance, efficient and effective service delivery and the provision of the necessary assurance to the Scheme Manager.
2. Continue the development of the Risk Management framework, and ensure that key risks are effectively identified and managed.
3. Ensure that the ECS is reviewed and remains fit for purpose, and oversee its ongoing delivery.
4. Consolidate and continue NHSPB member training and development, to ensure all members are able to perform their responsibilities effectively, with particular focus on the induction and upskilling of new NHSPB members.
5. Ensure suitable succession planning is in place as member terms expire. Ensure that the process for the recruitment of a new Chair to replace the current incumbent, whose term expires on 31 March 2019, is initiated in a timely and effective way.
6. Continue to focus on the role of employers in delivering effective outcomes for their staff who are NHSPS members and ensuring areas for improvement in employer performance are identified and implemented.
7. Consider and respond to any findings made by TPR in its annual survey of public service pension schemes.
8. Ensure continued focus on developing and implementing a programme of activities driving service improvement in respect of NHSPS administration, utilising the output from benchmarking, member feedback activities and employers' priorities.
9. Continue the development of effective working relations with all key stakeholders.

10. Ensure future legislative and regulatory developments which may impact on NHS Pension provision are identified and responded to in a timely and effective manner.

The work required to oversee delivery against these objectives has been built into a new work plan for 2018/19 as set out below.

Work Plan 2018/19



| April 18 | Jul 18 | Oct 18 | Jan 19 |
|---|--|--|--|
| <ul style="list-style-type: none"> • MI & compliance pack review • Review key risks • Engagement & comms update • Horizon scanning – future developments • Sign off work plan for 2018/19 • Pension Board effectiveness review – agree template • Complaints & Ombudsman cases deep dive • One to ones training needs assessment • Formal Review of MI Pack • Continuous improvement initiatives • Board input into setting of KPIs • Review progress with GDPR implementation • Re-procurement update | <ul style="list-style-type: none"> • MI & compliance pack review • Full review of key risks • Re-procurement update • Review Terms of Reference • Continuous improvement initiatives • Agree 19/20 meeting dates • Review PB member appointments • Review Pension Board Annual Report for 2017/18 • Review impact of move to employer payment of pensions admin costs • Finance Deep Dive • Pension Board effectiveness review – review results | <ul style="list-style-type: none"> • MI & compliance pack review • Review key risks • Engagement & comms update • Review Risk Mgt approach • Review • Continuous improvement initiatives • Update from Stakeholder Engagement Team • Data Quality deep dive • Pensioner Admin update • GAD Valuation outcome • Review of Engagement & comms strategy for 2018 | <ul style="list-style-type: none"> • MI & compliance pack review • Review key risks • Engagement & comms update • Continuous improvement initiatives • Agree outline of Pension Board Annual Report 2018/19 • Consider changes to MI pack for 19/20 • TPR Survey results • GDPR implementation review • Measuring Customer Experience Deep Dive • Benchmarking output • Training plan review • Training Policy and Process • One to ones and training needs review • Digital Deep Dive |

In addition to the planned agenda, it is anticipated that any 'live' issues emerging from the quarterly performance management information presented to the NHSPB may result in additional work on specific issues as they arise.

Updates from recommendations from the NHSPB's Second Report, 2016/17

1. Seeking feedback

The NHSPS administration service is provided for the benefit of employers and members. There has been greater focus on developing further routes for feedback on the service quality (as measured by user experience) by the introduction of targeted surveys in particular areas of administration. Action plans have been developed based on these results. The SIDB has also been implemented to initiate employer-led changes.

The NHSPB will work with the NHSBSA to use the results of these surveys and SIDB to evaluate and shape service provision and inform future investment priorities.

2. Proactive working between the Public Service Pension Scheme Boards

It was recommended that pro-active working between the centrally administered Public Service Pension Scheme Boards be further developed, with particular focus on:

- consistency in working with TPR and the Pensions Ombudsman to identify common areas for improvement in pensions' administration and dealing with suspected breaches of law and regulation;
- consistency in risk identification and management, with the aim of collectively enhancing services to employers and scheme members;
- considering how schemes engaged in administrative services re-procurement can co-ordinate activities to improve cost-effectiveness and efficiency;
- effective utilisation of benchmarking across schemes to share best practice and enhance service provision;
- consistency in engagement with members, sharing best practice in use of technology to support self-service options;
- considering a consistent approach to the calculation of pensions outcomes in Annual Benefit Statements.

There have been regular meetings between the Chairs of the NHSPB and the Pension Boards for the Teachers, Civil Service and Armed Forces Schemes during the last year. These have resulted in sharing results of benchmarking activity and additional thinking as to how schemes which are actively engaged in re-procurement might co-operate more effectively. It is recommended that this constructive approach should be continued to optimise outcomes for the centrally administered Public Service Pension schemes as a whole.

Conclusion

The third formal year of operation has demonstrated the NHSPB to be effective in overseeing NHSPS administration and providing robust challenge and effective governance. Going forwards, the NHSPB will increase its focus on continuous improvement in communication, service provision, cost effectiveness and NHSPS member experience, as well as continuing to ensure effective compliance of the NHSPS with all relevant legislation and regulations.

I would like to thank all members of the NHSPB for their contributions during the past year, as well as all stakeholders and observers who continue to play a key role in our work.

Any queries on the content of this report should be sent in the first instance to pension.board@dh.gsi.gov.uk

Rachel Court

Chair

Annex A - NHS Pension Board – Membership

Chair:

Rachel Court

Member Representatives:

Dr David Bailey - British Medical Association

Geoff Lester - Federation of Clinical Scientists

Nicola Lee - Royal College of Nursing

Paul Moloney - Society of Radiographers

Alan Fox - Unison

Colenzo Jarrett-Thorpe - Unite

Employer Representatives:

Andrea Hester - NHS Employers – Deputy Director of Employment Relations and Reward

Wayne Evans - NHS Wales Shared Services Partnership – Deputy Payroll & Pensions Manager

Bryan Logan - Torbay and South Devon NHS Foundation Trust – Payroll Manager

Christine Boon - Care UK – Group Pensions Manager

Louise Tibbert - University Hospitals of Leicester NHS Trust - Director of Workforce and Organisational Development

Amanda Bromley - Tameside and Glossop Integrated Care NHS Foundation Trust - Director of Human Resources

NHS Pension Board meetings – Members’ attendance 2017/18

April 2017 – 92%

July 2017 – 83%

November 2017 – 75%

February 2018 – 92%

Annex B - NHS Pension Board – Terms of Reference

Introduction

The Public Service Pensions Act 2013 (the Act) required the establishment of a Pension Board with responsibility for “assisting the Scheme Manager” in securing compliance with all relevant pensions law, regulations and directions – as well as the Pension Regulator’s relevant codes of practice. This role is one of providing assurance over and governance of the pension scheme’s administration.

The Act also specified that Pension Boards should have equal numbers of member and employer representatives – currently six each on the NHS Pension Board (NHSPB).

The NHSPB covers England and Wales.

Regulation 4 of the National Health Service Pension Scheme Regulations 2015 (UK Statutory Instrument 94 of 2015), effective from 1 April 2015, established the NHSPB in law. Schedule 1 of those Regulations adds further detailed regulatory provisions relating to the NHSPB.

In addition to the member and employer representatives, government representatives attend NHSPB meetings, including DHSC, and Wales. Government representatives are non-voting board members. Professional advisors, for example, accountants, Government Actuary’s Department and lawyers can be instructed from the DHSC’s resource allocation providing the requirement for that advice is in line with the NHSPB’s legislative responsibilities.

The scheme administrator (NHSBSA) will provide the necessary input to support the NHSPB in delivering its assurance responsibilities.

The NHSBSA will provide the secretariat with DHSC seeking nominations and making appointments to the NHSPB based on the regulatory provisions. The NHSPB meets quarterly.

Accountability

The NHSPB collectively and members individually are accountable to the Scheme Manager, the Secretary of State, the responsible authority for the NHSPS.

DHSC continues to be responsible for contractual arrangements, including delivery against agreed KPIs, for NHSBSA.

Responsibilities of the NHSPB

The NHSPB is responsible for assisting the Scheme Manager in:

- overall assurance and governance of the NHSPS administration;
- assuring effective and efficient administration of the NHSPS;
- assuring that decisions made by NHSBSA are fully legally compliant, including consideration of cases that have been referred to TPR and/or the Pension Ombudsman; recommending changes to processes, training and/or guidance where necessary;
- supporting continuous improvement in the administration of the NHSPS;
- assuring NHSBSA supports employers to communicate the benefits of the NHSPS and fully utilise it as part of the NHS total reward offer through effective communication to members;
- assuring NHSBSA supports members with a range of tools to improve their understanding of their pension benefits as part of the total reward offer, and to inform their personal financial and career planning;
- supporting effective implementation of the Employer Charter (which can be found [here](#));
- enabling data quality improvements to deliver Career Average Revalued Earnings (CARE) pension outcomes;
- complying with TPR's codes of practice;
- fostering good working relationships with TPR;
- consideration of TPR reports including responses to recommendations;
- producing an annual report outlining the work of the NHSPB throughout the NHSPS year.

Membership

The membership of the NHSPB includes:

- member representatives nominated by the staff side of the NHS Staff Council to ensure a broad representation of NHSPS membership; for example to include deferred and pensioner representation. Member representatives will be voting members;
- employer representatives nominated by NHS Employers to ensure a broad representation of employers with NHSPS members including for example, NHS employing organisations, general medical practice and independent providers of clinical services as defined within a standard NHS contract. Employer representatives will be voting members
- an independent Chairperson appointed via the Public Appointments process. The Chair holds the deciding vote if any vote taken by the member and employer representatives on the Board results in an equal number of votes for and against the proposal;
- representatives from DHSC, who are non-voting members;
- representative from the Welsh Government, who is a non-voting member

Attendance is expected of all NHSPB members at all meetings; no alternate representation or substitution is allowed. The employer and member representatives will remain equal in number at all times.

Decision Making Process

The NHSPB operates on a consensus basis; however each member (except government representatives) has individual voting rights. In the event that consensus cannot be reached, a vote is taken. The Chair does not vote at this stage; only if the vote is equal will the Chair have the deciding vote. The scheme manager is made aware when a decision is reached in this manner.

Quorum

Two-thirds of the voting members of the NHSPB represent a quorum for Board meetings to go ahead. The Chair must be present for the meeting to be quorate. Non-quorate meetings may proceed in exceptional circumstances, but no binding decisions are made nor votes taken.

Conflicts of Interest

The Act requires that members of the NHSPB do not have conflicts of interests. All members of the NHSPB are required to declare any interests and any potential conflicts of interest in line with legal requirements in the Act and TPR's code of practice. These declarations are required as part of the appointment process, as well as at regular intervals throughout a member's tenure.

Training requirements

Members of the NHSPB will be expected to have a good, sound knowledge and understanding of the NHSPS rules, the NHSPS's administration policies and pension law. This will require on-going updates and training as legal requirements change and develop including relevant regulations and directions from Her Majesty's Treasury and the Department for Work and Pensions. This is set out in TPR's Code of Practice number 14, "governance and administration of public service pension schemes".

Meeting arrangements

The NHSPB meets quarterly. Frequency of meetings is kept under review to ensure NHSPB responsibilities are discharged. There is the possibility for ad-hoc meetings if required at the Chair's discretion.

The NHSBSA undertakes the NHSPB's secretariat function ensuring:

- facilities are available to hold meetings;
- an annual schedule of meetings is organized;
- suitable arrangements are in place to hold additional meetings if required – ensuring adequate notice;
- papers are distributed 7 days before each meeting except in exceptional circumstances;
- minutes of each meeting are circulated within 14 working days following each meeting.

Expertise

It may be necessary to draw on particular experts or expert groups to support the responsibilities of the NHSPB, such as actuaries and lawyers. This is done on an 'as

required' basis; any expert advisor attending the meeting is not a NHSPB member and does not have a vote. If required, sub-groups may be established to assist the NHSPB.

Relationship to the NHS Pension Scheme Advisory Board

Whilst the function of the NHS Pension Scheme Advisory Board (SAB) is to provide advice to the Responsible Authority (i.e. Secretary of State) about the desirability of NHSPS changes – there are occasional needs for some sharing of information and discussion between the Boards. The NHSPB Chair holds regular meetings with SAB co-chairs; and the SAB minutes are a standing agenda item for NHSPB meetings.

Remuneration

Remuneration for NHSPB members is limited to a refund of actual expenses incurred in attending NHSPB meetings, in accordance with DHSC's expenses policy. The Chair's remuneration is agreed on appointment.

Tenure

Tenure period for NHSPB members is three to five years on a rolling appointment basis – with a maximum of nine years in any continuous period of 12 years.

Tenure is decided by the scheme manager during the appointment process; NHSPB members have different tenures to ensure continuation of membership in equal numbers for the employer and staff-side members. The Chair's tenure is agreed on appointment, again between three and five years.

Resignation of NHSPB members is documented in writing to the NHSPB Chair and DHSC. A minimum 1 month notice period must be given to enable a replacement member to be found in time for the next NHSPB meeting.

The performance of NHSPB members is assessed on a periodic basis to ensure all members are adequately meeting their duties. Poor performance will result in corrective action being taken, and in exceptional circumstances the removal of the NHSPB member.

Review

These terms of reference are reviewed periodically.

Annex C - 2017/18 Work plan

Work plan 2017/18

| April 17 | Jul 17 | Nov 17 | Jan 18 |
|--|--|---|--|
| <ul style="list-style-type: none"> • MI & compliance pack review • Review key risks • Review Pension Board Annual Report for 2016/17 • Sign off work plan for 2017/18 • Pension Board effectiveness review • One to ones – training needs review • Formal Review of MI Pack • Continuous improvement initiatives • Data deep dive | <ul style="list-style-type: none"> • MI & compliance pack review • Review Key risks • Final sign off of Annual Report • Re-procurement update • One to ones – training needs review • Review Terms of Reference • Continuous improvement initiatives • Agree 18/19 meeting dates • Review PB member appointments • TPR Governance presentation | <ul style="list-style-type: none"> • MI & compliance pack review • Review key risks • Engagement & comms update • Training plan review • Review Risk Mgt approach • Update from Stakeholder Engagement team on employer engagement • Review Training Policy and Process • Continuous improvement initiatives • KPI & Work management tool deep dive • Customer satisfaction • One to one Training Needs Review | <ul style="list-style-type: none"> • MI & compliance pack review • Review key risks • Agree outline of Pension Board Annual Report 2017/18 • Consider changes to MI pack for 18/19 • Benchmarking outputs • Presentation by Capsticks • GAD Valuation presentation • GDPR • Re-procurement update |

Annex D - Pension Regulator Code Compliance

Code of Practice - Pension Board

Governing your scheme

Knowledge and understanding required by NHSPB members:

New members carry out a Training Needs Analysis (TNA), this is reviewed by the member and the Chair, and an individual training plan is produced. Annually all existing NHSPB members will be asked to complete a further

TNA to establish if any new needs have arisen. Other training needs may be identified on an ad hoc basis during the course of the year.

Conflicts of interest and representation:

The NHSPB has a Conflict of interest policy and at the start of every meeting members are asked to declare if they are aware of any potential conflicts of interest.

Publishing information about schemes:

The NHSPB has established a media policy and a 1-page summary of the key issues discussed at each meeting is published on Gov.uk.

Managing Risks:

The NHSPB has established a risk management policy and risk register. This is reviewed at each meeting.

Administration

Scheme record keeping:

NHSBSA compliance activity includes reviews of record keeping by NHSBSA and employers.

Maintaining contributions:

NHSBSA compliance activity includes reviews of maintaining contribution payments. Employers are reported to TPR if they fail to pay contributions within 90 days of the due date

Providing information to members:

NHSBSA compliance activity includes reviews of disclosure obligations and effectiveness of member communications for all areas of scheme administration.

Resolving Issues

Internal dispute resolution:

Unresolved internal disputes are referred to the Pensions Ombudsman.

Reporting breaches of law:

Suspected breaches of pensions law are reported to TPR.

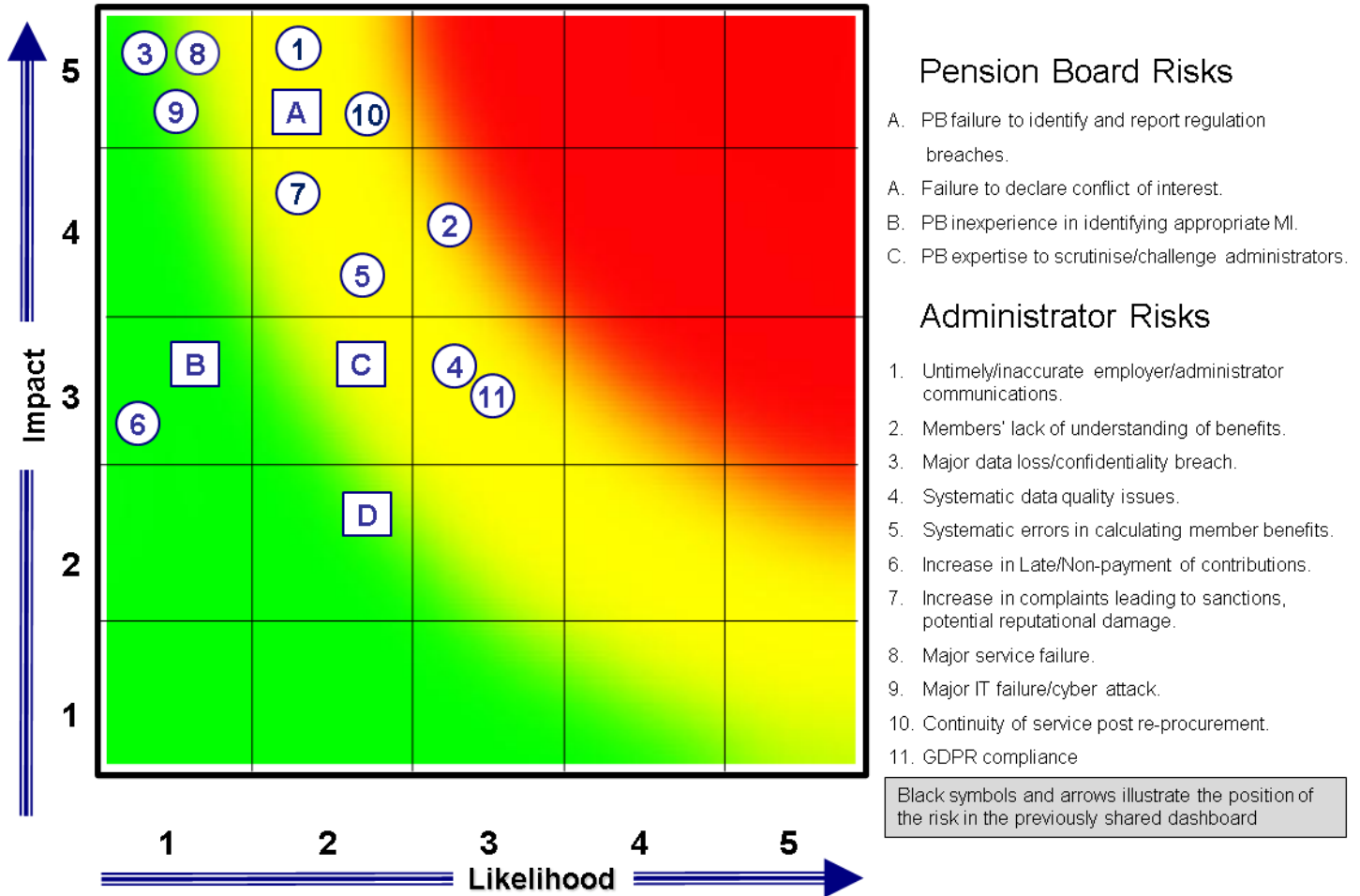
Annex E – Training delivered in 2017/18

Training Module and Purpose table

| Training Module | Purpose |
|---|--|
| Data Management | To provide an overview of the NHSPS Data Strategy |
| The Pensions Regulator (TPR) Governance | To provide an overview of TPR approach to governance of public service pension schemes |
| NHSPS Work Management Tool | To provide an overview of the work management tool that has been introduced to support NHSPS administration. |
| Governance and Valuation | To provide an overview of the governance arrangements for and processes underpinning the next valuation of the NHSPS |
| Capsticks presentation – legal rulings | To provide an overview of the rationale behind the legal view of the alternative pension arrangements offered by some Trusts and the Walker judgment |

Annex F – Pension Board Risk Dashboard – March 2018

Pension Board Risk Dashboard (March 2018)



Annex G – Key Performance Indicators

NHS PENSIONS - KEY PERFORMANCE INDICATORS (KPIs) FOR 2017/18

The section is split into topic, followed by area, then the KPI.

Late payment cases

Awards

99.50% by 1 calendar month from the due date

Substitute Awards to revise pension benefits

98.00% by 1 calendar month from the due date

Death (Death Gratuity)

99.00% by 1 calendar month from the due date

Death (Widow/Widowers Pension)

97.00% by 1 calendar month from the due date

Death (Child Allowance)

98.50% by 1 calendar month from the due date

Refunds of contributions

99.95% by 1 calendar month following due date

Statutory Cases

Estimate (Practitioner)

97.50% within 40 working days

Estimate (Officer)

95.00% within 40 working days

Pensions on Divorce CETV (Cash Equivalent Transfer Value)

95.00% within 3 calendar months

Transfer In (Estimate)

98.00% within 2 calendar months

Transfer Out (Estimate)

95.00% within 3 calendar months

Transfer Out (Payment)

99.70% within 6 calendar months

5 Year Rejoiner (CETV)

99.00% within 3 calendar months

Data Integrity

Data Integrity

By the end of each quarter, 94% of member records requiring updates are updated.

Call Centre (Newcastle)

Employer Line

Average speed of answer 120 seconds

Employer Line

Abandoned call rate does not exceed 5%

Member Line

Average speed of answer 120 seconds

Member Line

Abandoned call rate does not exceed 5%

Call Referral clearance

98.00% in 48 hours

Accuracy

Payments & Case Administration

98.50% (cumulative) is error free

Finance – Statutory

Main employers

98% pay pension contributions by 19th of each month following the prior month payroll

Direction (Non-NHS Body) Employers

95% pay pension contributions by 19th of each month following the prior month payroll

GP Practice employers

95% pay pension contributions by 19th of each month following the prior month payroll

General Practitioners and Dental Practitioners

98% pay pension contributions by 19th of each month following the prior month payroll

New Fair Deal Employers

95% pay pension contributions by 19th of each month following the prior month payroll

Independent Providers

95% pay pension contributions by 19th of each month following the prior month payroll

Performance of Equiniti Paymaster for Pensioner Payment

Payment of all pensioners

100% after initial payment made

BACS (formerly Bankers Automated Clearing Services Payment Schemes Limited) automatic notifications paid within 7 working days

100%

BACS manual notifications paid within 7 working days

85%

BACS manual notifications paid within 10 working days

100%

Payment issued for printing in Voucher (voucher payments are the old fashioned payable order or cheque payments for those pensioners who do not receive their payment by BACS. There are still a relatively small number of these but Equiniti [which makes pension payments to NHSPS retired members] do not accept requests for cheque payments any more) cases in 3 working days

85%

Payment issued for printing in Voucher cases in 6 working days

100%

Accuracy

99.9% for all pension payments

Annex H – Referrals to the Pensions Ombudsman

The NHSBSA has dealt with 70 cases accepted for investigation by the Pensions Ombudsman (TPO) from April 2017 to March 2018. In respect of the 50 cases TPO has responded to so far, the number of Final Determinations where TPO has upheld or partially upheld a complaint against the NHSBSA within this period is 11, with 39 complaints not upheld. The upheld and partially upheld cases are described in the table below.

Pensions Ombudsman upheld and partially upheld cases April 2017 to March 2018

| Type | Partly Upheld/Upheld | Month |
|------------------------|----------------------|--------|
| Service/Membership | Partly Upheld | Mar-18 |
| Pensions on Divorce | Partly Upheld | Mar-18 |
| Service/Membership | Partly Upheld | Jul-17 |
| Age Benefits | Partly Upheld | Jul-17 |
| Service/Membership | Partly Upheld | Jul-17 |
| Service/Membership | Partly Upheld | Jul-17 |
| Age Benefits | Partly Upheld | May-17 |
| Ill Health | Upheld | Mar-18 |
| Service and Membership | Upheld | Jan-18 |
| Transfers | Upheld | Dec-17 |
| Age Benefits | Upheld | May-17 |

In respect of these cases, the NHSBSA has taken the remedial action required to prevent a recurrence of the same errors in future.

Annex I – ECSG

NHS Pensions

Engagement and Communications Steering Group (ECSG) summary – April 2017 to March 2018

Over the past year ECSG, which meets quarterly has:

1. input into the development of a communications and customer service dashboard which will help enable effectiveness and performance to be tracked or investigated. It provides a platform for ECSG to determine what they want to understand and inform what additional information needs to be collated or commissioned;
2. input into major changes to the NHS Pensions Website which has continued to evolve and improve based on user feedback and content redesign;
3. had an overview of the targeted customer insight survey plan and initial findings and input into the joiner review survey whose findings and resulting actions will be a main focus of ECSG's work in 2018/19;
4. discussed findings from NHS Pension's annual customer satisfaction surveys of members and employers and tracked delivery against resulting actions at subsequent meetings;
5. approved plans for a series of mini-campaigns for 2018/19 including tax relief on contributions, value of life assurance and death benefits, flexibility to increase benefits and different retirement options;
6. discussed the success of the pilot pre-retirement workshops with members and plans for greater face to face member engagement activities in the future;

7. been updated on the employer meetings and events attended and hosted by the Stakeholder Engagement Team and the positive feedback they were receiving from attendees.

Annex J – Continuous Improvement Activity April 2017 – March 2018

Continuous Improvement Activity table including benefits and updates from April 2017 to March 2018

| Activity | Benefits | Update |
|---|--|--|
| Automation of Award payment calculations and worksheets | Improved accuracy and processing time | Over the last 12 months a number of new calculation tools have been developed and released to the Awards Team. At development stage, the users have been involved in the design and testing of each calculator and they have supported the roll out to the team. Currently completing the benefits realisation documents for these calculators. 3 have been completed and have estimated an annual saving of £35K |
| Amendments to Death benefit claim forms | Reduced call volumes and processing time | Amendments have been made to a number of death benefit claim forms. Some forms have been amalgamated and some updated with relevant declaration forms. This should improve customer experience and ensure more efficient provision of any relevant supporting information. |
| Creation of Death benefit worksheets | Improved customer service, consistent approach for staff | All manual calculation worksheets have been fully reviewed collaboratively with users. Amendments have been made and worksheets released to the Bereavement Team and updated within our document management system. Under the next phase potential automation will be considered. |
| Improvement of Direction application | Reduced processing time, improved quality, consistent approach for staff | Improvements have been made in 2 areas: Scheme access staff list: |

| | | |
|--|---|---|
| process | | <p>This automatically pre-populates member information on to a spreadsheet so the user does not have to access each individual member record to obtain information that needs to be provided to the employer End of Year Return Form:</p> <p>This automatically pre-populates member information on to a spreadsheet of members that requires annual updates to be provided to NHS Pensions. This enables employers to complete the updates in a more efficient way ensuring the accurate recording of member data</p> |
| Introduction of processing and quality checklist | Consistent identification of errors, standard approach for staff and Quality Coaches | <p>A project has been completed to implement processing and quality checklists into Service Delivery. The Continuous Improvement Team have worked with subject experts and Quality Coaches to help design and pilot the checklists. All Quality checklists reviewed in the last 12 months ensure forms, worksheets and letters are latest versions and correct tools to support manual processing are used. All checklists have now been embedded as part of the process.</p> |
| Process for location of missing NHSPS membership information | Improved customer service has a clear process for members to help them provide any missing NHSPS membership details reducing NHSBSA administration. | <p>Membership enquiries new web process introduced: which removes archive searches and duplication; With: a Factsheet to help deflect some enquiries Web enquiry forms for direct contact with employer or NHSP where relevant An Employer reply form with member details An Administrator reply template and training guidance for new process</p> <p>Benefits realisation for Membership enquiry process estimated: Annual reduction in enquires 9714 £111,870.00 annual resource saving Unquantifiable training and processing</p> |

| | |
|--|---|
| | time savings for employer, call handlers and other stakeholders |
|--|---|

Annex K – SID Board Terms of Reference

NHS Pensions - Terms of Reference for the Service Improvement and Development Board

Purpose

This board is a senior forum for the discussion of NHS Pension Scheme administration between the NHSBSA (NHS Pensions) as central Scheme administrator, employers as local scheme administrators, NHS Electronic Staff Record (ESR) and NHS Employers (NHS E).

The purpose of the board is to:

- Provide a forum for the NHSBSA, NHS E and NHS ESR to discuss with employers updates on high level strategic issues within the NHS Pensions landscape in terms of current and future changes.
- Provide a forum for employers to be solution ambassadors
- Provide a senior group of stakeholders which the NHSBSA can discuss with to help deliver statutorily required change or service enhancements. This may involve board members becoming involved in other change specific projects or meetings.
- represent the views of NHS employers to NHS Pensions
- oversee that mechanisms are in place so that Scheme administration is being correctly undertaken - from the submission of membership information, the update of

individual records, the collection and transfer of Scheme contributions and the effective administration of pension events.

This will enable:

- the Chair / Representative of each regional employer group to feedback to their respective membership in terms of the discussion and actions of the Service Improvement and Development Board.
- a two-way discussion between the NHSBSA and employers about current and future Scheme administration, establishing a solid base from which to work in partnership to successfully manage the NHSPS and implement future changes effectively.
- identification and subsequent prioritisation for action of current / future issues in regard to maintaining effective NHSPS administration.

The purpose of the Board is not to:

- discuss minor technical or individual service issues regarding NHSPS administration with NHS Pensions; the regional forums or NHS Pensions Stakeholder Engagement Team are the correct channels for these to be raised.

Ethos of the board:

- all members of the board are required to act in a business-like and professional manner during the meetings themselves and in any related correspondence.
- it is a requirement that everyone in attendance is given the opportunity to contribute freely with the ability to share their views openly and honestly without hindrance.
- all attendees are expected to be transparent in terms of the constraints and issues that they are facing in terms of NHSPS administration. Attendees will respect this openness and keep such matters confidential within the meeting.
- the notion is that this meeting is proactive and constructive in nature and seek to resolve issues collectively. All attendees are encouraged to share ideas, issues, lessons learnt or best practice to improve overall NHSPS administration.

Membership of the board

The NHS Pensions Service Delivery Manager will chair the meeting.

A representative from each regional group will attend as well as any required third party organisation.

Meeting agenda

- The standing agenda items for the meeting are as follows:
- Introductions
- Overview of agenda (noting AOB and allocating sufficient time)
- Approval of minutes from last meeting
- Review of actions from last meeting
- Relevant strategic updates
- Review and prioritise business justifications
- AOB
- Date of next meeting

Governance arrangements

- The meeting will be chaired by the NHS Pensions Service Delivery Manager. The meeting will be minuted by the NHSBSA with all actions recorded. These will be written up and distributed to all attendees by email as soon as possible following the meeting (within a maximum of two weeks).
- Attendees are requested to submit business justifications at least two weeks before the meeting.
- An agenda will be issued one week before the meeting is held.

- The meeting will be held on a quarterly basis with dates set in advance. The NHSBSA will organise meeting dates with attendees.
- An email list of attendees will be held and managed by the NHSBSA. This will be used to issue meeting papers and should be used for any correspondence between board members.
- The terms of reference will be prepared and updated by the NHSBSA. These will be reviewed by the board on an annual basis.

Development requests

- Change requests will follow the procedure agreed by the board.
- Pension SIDB representatives will forward the business justifications to be considered by the board to nhsbsa.stakeholderengagement@nhs.net

Justifications must be forwarded at least two weeks before the meeting. Any requests received after this time will be submitted at the following meeting

Annex L

Compliance Rating Definitions table

| Compliance Rating | Definition |
|-------------------|---|
| Satisfactory | Internal controls, processes and procedures are adequate and effective, ensuring a high level of regulatory/legislative Compliance |
| Moderate | Some improvements are required to enhance the adequacy and effectiveness of internal controls, processes or procedures to ensure a high level of regulatory/legislative Compliance |
| Limited | There are significant weaknesses in the internal controls, processes or procedures meaning that there is, or is likely to be, a risk of regulatory/legislative non-Compliance. Escalation to the Pensions Regulator to be considered |
| Unsatisfactory | There are fundamental weaknesses and/or systemic issues with the internal controls, processes or procedures meaning that there is a high risk of regulatory/legislative non-Compliance. Escalation to the Pensions Regulator to be considered |

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