

AAF 05/20 Assurance Report

Governance controls for master trusts report
for the period 1 April 2020 to 31 March 2021

Pension scheme registry number: 12005993

20|21



Contents



- 1** 1. Introduction
- 6** 2. Report of the Trustee of The People's Pension
- 7** 3. Report by Service Auditor
- 10** 4. Summary of control objectives
- 12** 5. Control objectives and control activities
- 55** Appendix – Letter of engagement

1. Introduction

The People's Pension Trustee Limited (the Trustee) is pleased to present its 6th annual report detailing the governance control procedures relating to The People's Pension Scheme (The People's Pension or the Scheme) established by the Trustee of the Scheme, that were in place and operating from 1 April 2020 to 31 March 2021.

The Founder of the Scheme is People's Financial Services Limited. The People's Pension is governed by a Trustee, who is responsible for running the Scheme and looking after all the assets held on behalf of the members. The Trustee appointed B&CE Financial Services Limited as administrator of the Scheme, who are authorised and regulated by the Financial Conduct Authority.

Throughout this document, B&CE Holdings are referred to as B&CEH and the Scheme administrator, B&CE Financial Services Limited, as B&CEFS. The B&CE Group is a not-for-profit organisation operating for the benefit of its members, with over 75 years' experience of providing financial benefits.

The People's Pension is a master trust – a multi-employer workplace pension scheme – founded by People's Financial Services Limited. As at 31 March 2021, it had more than 5.3 million members, with assets under management of approximately £13.7 billion making it one of the largest master trusts in the UK. It is a flexible and portable workplace pension, open to businesses of all sizes from all sectors.

Each master trust must be authorised by The Pensions Regulator (the regulator). The regulator is also responsible for the ongoing supervision and oversight of each master trust to ensure it continues to meet the authorisation criteria. As part of this process, the regulator requires each master trust to complete an annual supervisory return.

In the supervisory return, master trusts must demonstrate that their Trustee Board has oversight of, and monitors, certain governance activities, arrangements, relevant systems and processes. The Trustee of The People's Pension uses external assurance over relevant governance procedures so it can demonstrate to the regulator that these responsibilities have been fulfilled. Previously the Trustee met a standard of assurance known as AAF02/07.

For this reporting period, and future reporting periods until such time the framework is updated, a new master trust assurance framework came into effect, as developed by the Institute of Chartered Accountants in England and Wales (ICAEW) with representation from the regulator. The revised framework, known as TECH 05/20 AAF, aligns with certain relevant governance

arrangements expected by the regulator, and is used by the Trustee as part of its evidence to demonstrate operational effectiveness of relevant control activities.

Authorisation offers peace of mind for our members and employers through closer ongoing supervision of the Scheme by the regulator. This level of scrutiny means that, as a strong and well governed master trust, The People's Pension has the controls and oversight in place to help provide financial stability and protection to pension savers.



1. Introduction (continued)

Trustee

The Trustee Board was incorporated on 30 May 2012. It's entirely independent of B&CEH and its subsidiary companies, including the Founder.

The Trustee acts as corporate trustee of the Scheme.

Directors of The People's Pension Trustee Limited

The Directors of the Trustee who served during the period and up to the date of signing are listed below.



Steve Delo

Chair of the Trustee

Steve Delo is the Chairman of PAN Governance LLP, an award-winning independent trustee firm, and is a former President of the Pensions Management Institute. Steve has twice been named 'Independent Trustee of the Year' by Engaged Investor and been listed as one of the Top 50 people in pensions by Pensions Insight.

His 30 year career has included senior roles in scheme management, consulting, asset management and trusteeship. He now specialises in the governance of large scale pension arrangements. He is a leading independent trustee who has been sitting on major pension scheme trustee boards for the last 12 years. He currently works with a wide range of occupational defined benefit and defined contribution schemes, in most cases acting as chair of trustees, with total assets in excess of £20bn. He sits on three master trust boards – two defined contribution, one defined benefit. He is a Fellow of the Pensions Management Institute.



Chris Fagan

Trustee Director

Chris is an independent accredited professional trustee and investment specialist with 30 years of pensions industry experience. In addition to his role at The People's Pension, he is Chairman of Trustees at a final salary pension scheme and he works with Investment Governance Services which provides executive and non-executive support to pension schemes and other asset owners.

Prior to his appointment by The People's Pension, he was a Trustee of the Towers Watson Pension Scheme and worked in Willis Towers Watson's Investment Advisory and Fiduciary Management teams. He has also led the internal investment team at a major UK pension fund.

1. Introduction (continued)

Trustee

The Trustee Board was incorporated on 30 May 2012. It's entirely independent of B&CEH and its subsidiary companies, including the Founder.

The Trustee acts as corporate trustee of the Scheme.

Directors of The People's Pension Trustee Limited

The Directors of the Trustee who served during the period and up to the date of signing are listed below.



David Maddison

Trustee Director

David has over 30 years' pension industry experience across multiple functions. He's a Chartered Director with the Institute of Directors and a fellow of the Pensions Management Institute with a degree in Law.

David has retired from RPMI Ltd, the executive arm of the Railways Pension Trustee Company Limited, where he fulfilled a number of senior roles within the business.

David is also Senior Independent Director for Healthshield friendly society where he serves on the Audit and Nomination and Remuneration Committees.



Alan Pickering CBE

Trustee Director

Alan is President of BESTrustees and is a Trustee of a number of pension schemes, including The Plumbing Industry Pension Scheme.

He has over 40 years' experience across a wide variety of roles in the pensions industry. He has sat on the board of a number of important industry bodies, including serving as Chair of the former National Association of Pension Funds (now the Pensions and Lifetime Savings Association).

1. Introduction (continued)

Trustee

The Trustee Board was incorporated on 30 May 2012. It's entirely independent of B&CEH and its subsidiary companies, including the Founder.

The Trustee acts as corporate trustee of the Scheme.

Directors of The People's Pension Trustee Limited

The Directors of the Trustee who served during the period and up to the date of signing are listed below.



Baroness Jeannie Drake CBE

Trustee Director

Baroness Drake is a former member of the Turner Pension Commission which recommended the introduction of auto-enrolment. She was also on the Board of the Pension Protection Fund, the Board of The Pensions Advisory Service, and was Acting Chair of PADA, the forerunner of NEST.

She has more than 30 years' experience in the trade union movement, including as President of the Trade Union Congress (TUC) and was a member of the Equal Opportunities Commission.



Mark Condron

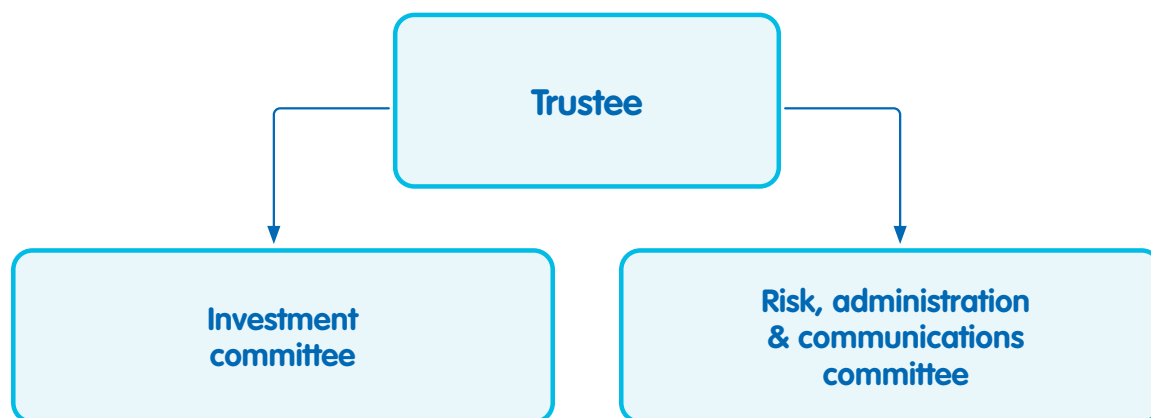
Trustee Director

Mark has 30 years' experience at Mercer, where he was a scheme actuary, senior partner, and non-executive member of the company's audit committee. He is also an independent trustee on the Scottish & Newcastle Pension Plan, part of Heineken.

1. Introduction (continued)

Strong governance is a key feature of The People's Pension. The Trustee operates a detailed governance schedule. It is committed to exceptional customer service, support and providing good value for members.

The Trustee has continued to develop its governance model to ensure that Trustee meetings remain effective and focused on key governance matters. The Scheme's current governance model is shown below:



Duties include:

For the Investment committee

- Implement the Scheme's investment strategies subject to appropriate advice
- Review investment performance
- Agree asset allocation and maintain the Statement of Investment Principles

For RACC

- Maintain the Trustee's risk register and mitigate risks
- Monitor the administrator's performance and service standards
- Review member communications and key Scheme documentation
- Review and monitor the delivery of the Scheme Annual Report and Accounts

The quality of the Scheme has been recognised by the awards won by The People's Pension and People's Financial Services Limited as the Founder of the Scheme.



Defaqto 5 Star Rating for Workplace Pension 2021



Winner of Best Master Trust 2019



Winner of Master Trust Offering of the year 2019



Winner of Multi-Employer DC Provider 2019

This report provides information and assurance on the design, description and operation of the governance control procedures, in relation to the business operations of the Scheme for providing pensions trustee services.

The Trustee has adopted the framework provided by the Audit and Assurance Faculty of the Institute of Chartered Accountants in England and Wales, entitled 'Assurance reporting on Master Trusts Technical Release TECH 05/20'.

This type 2 report relates to the period from 1 April 2020 to 31 March 2021.

2. Report of the Trustee of The People's Pension

As Trustee of The People's Pension, we're responsible for the identification of control objectives relating to the governance of the Scheme, and for establishing governance control activities, including oversight of systems and processes that provide reasonable assurance that the control objectives are achieved. Those control objectives are derived from standards of governance set out in the regulator's DC code of practice and DC guides.

In carrying out those responsibilities, we have regard to the interest of employers who've entrusted their employees' DC contributions to the Scheme (or are considering doing so) and members of the Scheme. We also have regard to the needs of the regulator who may use this report to help determine whether certain governance procedures including oversight of systems and processes relevant to Scheme supervisory requirements have been met and have been subjected to independent scrutiny.

We have evaluated the effectiveness of the Scheme's governance control activities including oversight of systems and processes having regard to ICAEW's TECH 05/20 AAF and the control objectives set out therein.

We set out in this report a description of the relevant governance control activities, including oversight of systems and processes established by the Trustee, together with the related control objectives which operated from 1 April 2020 to 31 March 2021.

We confirm that:

- Section 5 of the Trustee's report describes fairly the governance control activities established by the Trustee that relate to the control objectives referred to above, which were in place from 1 April 2020 to 31 March 2021.
- The governance control activities described in section 5 of the Trustee's report were suitably designed from 1 April 2020 to 31 March 2021, such that there is reasonable assurance that the specified control objectives would be achieved if the described governance control activities were complied with satisfactorily.
- The governance control activities described were operating with sufficient effectiveness to provide reasonable assurance that the related control objectives were achieved throughout the specified period.

Signed on behalf of the Trustee:



Steve Delo

Chair of The People's Pension Trustee Limited

Date: 15 June 2021



3. Report by Service Auditor



Crowe U.K. LLP

Chartered Accountants
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3. Report by Service Auditor

Independent Service Auditor's assurance report on governance control activities established by the Trustees of Master Trusts

To the Trustee of The People's Pension

Use of report

Our report, subject to the permitted disclosures set out below, is made solely for the use of the Trustee of The People's Pension ("the Trustee") and solely for the purpose of reporting on the governance control activities established by the Trustee, in accordance with the terms of our engagement letter dated 10 October 2020 attached in the Appendix.

Our work has been undertaken so that we might report to the Trustee those matters that we have agreed to state to it in our report and for no other purpose.

We permit the disclosure of our report, in full only, to verify to the recipient that a report by a Service Auditor has been commissioned by the Trustee and issued in connection with the governance control activities established by the Trustee without assuming or accepting any responsibility or liability to the recipient on our part.

To the fullest extent permitted by law, we do not and will not accept or assume responsibility to anyone other than the Trustee as a body for our work, for our report or the opinions we have formed.

Scope

We have been engaged to report on the description of governance control activities including oversight of systems and processes established by the Trustee throughout the period from 1 April 2020 to 31 March 2021 and on the suitability of the design and operating effectiveness of those governance control activities stated in the description.

Trustees' responsibilities

The Trustee's responsibilities and statements are set out in section 2 of the Trustee's report. The control objectives stated in the description include those control objectives set out in TECH 05/20 AAF that are considered relevant by the Trustee.

Our responsibilities

Our responsibility is to form an independent opinion, based on the work carried out in relation to the governance control activities established by the Trustee as described in section 5 of the Trustee's report and report this to the Trustee. We conducted our engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised) and with TECH 05/20 AAF. ISAE 3000 (Revised) and TECH 05/20 AAF require, among other things, that we comply with ethical and other professional requirements.

3. Report by Service Auditor (continued)



We plan and perform our procedures to obtain reasonable assurance about whether, in all material respects, the description is fairly presented and the governance control activities were suitably designed and operating effectively. The criteria against which the governance control activities were evaluated are the control objectives developed for Master Trusts as set out within TECH 05/20 AAF and identified by the Trustee as control objectives to be applied for the purpose of governance.

Our work involved performing procedures to obtain evidence about the presentation of the Trustee's description of the governance control activities including oversight of systems and processes and the design and operating effectiveness of those governance control activities. Our procedures included assessing the risks that the description is not fairly presented, and that the governance control activities were not suitably designed or operating effectively. Our procedures also included testing the operating effectiveness of those governance control activities that we considered necessary to obtain reasonable assurance that the control objectives stated in the control description were achieved. An assurance engagement of this type also included evaluating the overall presentation of the description and the suitability of the control objectives stated therein.

Our independence and quality control

We have complied with the independence and other ethical requirements of the 'Code of Ethics for Professional Accountants' issued by the International Ethics Standards Board for Accountants which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies International Standard on Quality Control 1 and accordingly maintains a comprehensive system of quality control, including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Inherent limitations

The Trustee's description of governance control activities including oversight of systems and processes was prepared to meet the common needs of a broad range of users and may not, therefore, include every aspect of the governance control activities that may be relevant to each employer company or member of the Peoples Pension Master Trust. Also, because of their nature, governance control activities may not prevent or detect and correct all errors or omissions in performing governance activities.

Our opinion is based on historical information. The projection of any evaluation of the fairness of the presentation of the description, or opinion about the suitability of the design or operating effectiveness of the control activities and systems and processes to future periods would be inappropriate.

3. Report by Service Auditor (continued)



Opinion

In our opinion, in all material respects:

- (i) section 5 of the Trustee's report fairly presents the governance control activities established by the Trustee that relate to the control objectives referred to above which were in place throughout the period from 1 April 2020 to 31 March 2021;
- (ii) the governance control activities established by the Trustee described in section 5 of the Trustee's report were suitably designed to provide reasonable, but not absolute, assurance that the specified control objectives would have been achieved if the described governance control activities operated effectively throughout the period from 1 April 2020 to 31 March 2021; and
- (iii) the governance control activities established by the Trustee that were tested were operating with sufficient effectiveness to provide reasonable, but not absolute, assurance that the related control objectives were achieved throughout the period from 1 April 2020 to 31 March 2021.

A handwritten signature in black ink, appearing to read "Crowe U.K. LLP", followed by a dotted line.

Crowe U.K. LLP
Chartered accountants
London

Date: 21 June 2021

4. Summary of control objectives

Value for members

Assessing value for members

1. A documented value for members assessment is undertaken at least annually and is formally approved by the Trustee Board.

Management of costs and charges

2. The Trustee Board ensures disclosure of information to members of transaction costs and charges is complete and accurate and has been disclosed in accordance with regulatory guidelines.

Investment governance

Protection of assets

3. A documented review of the suitability of the default arrangement(s) and range and risk profile of other investment options is undertaken and approved by the Trustee Board.
4. The Trustee Board undertakes a documented review of the Statement of Investment Principles. This review includes consideration of investment objectives and policies for the default arrangement(s) and all other investment options.
5. The Trustee Board ensures that the Statement of Investment Principles is made publicly available.
6. The performance of all investment options (including the default arrangement(s)) is reviewed and monitored against the investment objectives set out in the Statement of Investment Principles. This review is documented and approved by the Trustee Board.

The trustee board

7. New trustees are recruited and appointed in accordance with a documented procedure approved by the Trustee Board.
8. The fitness and propriety of trustees is assessed prior to appointment and reviewed annually thereafter in accordance with a documented policy. This review is documented and approved by the Trustee Board.
9. Collective skills and competencies of the Trustee Board as a whole are reviewed on an annual basis. This review is documented and approved by the Trustee Board.

10. Trustees' levels of knowledge and understanding are managed and maintained in accordance with an annual training and development plan approved by the Trustee Board.

Financial sustainability and compliance

11. A documented review of financial sustainability (including access to resources to cover running costs and financial reserves in the event of a triggering event) is undertaken by the Trustee Board within required timescales.
12. A documented review of the Business Plan is undertaken by the Trustee Board within required timescales.
13. A documented Continuity Strategy is maintained and reviewed by the Trustee Board.
14. A documented procedure is maintained and approved by the Trustee Board for reporting Significant Events and Triggering Events to the Regulator within required timescales.



4. Summary of control objectives (continued)

Scheme management skills

15. An annual business schedule/plan is maintained and reviewed by the Trustee Board.
16. Conflicts of interest are subject to ongoing monitoring and are identified, recorded in a conflict register and managed in accordance with a defined policy which is regularly reviewed by the Trustee Board.
17. Documented due diligence is undertaken by the Trustee Board prior to the appointment of all service providers, including fitness and propriety. Selection criteria is maintained by the Trustee Board to support service provider selection and decision making.
18. Roles and responsibilities of all advisers and service providers are documented and the performance and quality of their service is subject to documented reviews by the Trustee Board against documented performance criteria.
19. The Trustee Board maintains a risk management framework to identify, evaluate, manage and monitor scheme risks.

Trustee oversight of IT systems and administration processes

20. The Trustee Board monitors and reviews IT systems.
21. The capacity to take on new business is assessed, approved and regularly monitored by the Trustee Board.
22. Signed administration agreements are in place with service providers and include provisions for the rectification of maladministration. The agreements are approved by the Trustee Board.
23. The Trustee Board has arrangements in place for ensuring that core financial transactions (including decumulation related transactions) are processed promptly.
24. The Trustee Board has arrangements in place for ensuring that core financial transactions (including decumulation related transactions) are processed accurately and that payments are authorised and suitably controlled.
25. The Trustee Board ensures that member retirement options selected are processed and managed in accordance with documented procedures.
26. The Trustee Board ensures that transaction errors are identified and rectified in accordance with a documented procedure.

27. The Trustee Board ensures that late and inaccurate contributions are pursued and resolved in accordance with documented procedures. Late contributions are reported to the Trustee.

28. The Trustee Board ensures that contributions are invested and allocated in accordance with member instructions or the requirements of the default arrangement.

Data quality

29. The Trustee Board ensures member data is complete and accurate and is subject to regular data evaluation.

Communication and reporting

30. The Trustee Board maintains a documented member communications plan which is regularly reviewed.

31. Arrangements are in place for ensuring that the quality and accuracy of member communications are assessed by the Trustee Board.

32. The Trustee Board has established a process for reporting member feedback (including issues raised by members) and complaints to the trustees, including resolution procedures. Member feedback and issues are logged and reviewed by the Trustee Board.

5. Control objectives and control activities

This TECH 05/20 AAF focusses on the Trustee's governance of how B&CE conducts its business and controls and manages its risks. References to the Trustee includes the Trustee Board and Trustee Board sub committees.

Control objectives	Background information	Control activities	Crowe tests
Value for members			
<p>Assessing value for members</p> <p>Control objective 1</p> <p>A documented value for members assessment is undertaken at least annually and is formally approved by the Trustee Board.</p>	<p>Value for members is one of the key attributes of The People's Pension, which has a transparent annual management charge (AMC) consisting of 3 elements; a 0.5% management charge each year, a potential rebate on some of the management charge for savings over £3,000 and an annual charge of £2.50.</p> <p>B&CEH periodically reviews The People's Pension against the Government established NEST (National Employment Savings Trust) master trust and other major master trusts in the marketplace. This analysis includes a yearly Value for Member assessment.</p>	<p>B&CEH and the Trustee produce and approve a Value for Members report for each Scheme year which includes an assessment of value derived from the cost of scheme management and governance, administration, investment governance and communications.</p> <p>Conclusions in relation to Value for Members are included in the Chair's Statement. This is included in the Annual Report and Accounts and published on the website.</p> <p>The Trustee reviews each Value for Members report in accordance with the Trustee Governance Schedule.</p> <p>The review is recorded in the Trustee meeting minutes.</p>	<p>We obtained and inspected a copy of the Value for Members report.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Chair's Statement to confirm that it included conclusions in relation to Value for Members.</p> <p>No exceptions noted.</p> <p>We inspected The People's Pension website to confirm that the Chair's Governance Statement is available and included an assessment.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Trustee Governance Schedule to confirm that a review of the Value for Members report is scheduled.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of the Value for Members report has been undertaken.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Value for members			
<p>Management of costs and charges</p> <p>Control objective 2</p> <p>The Trustee Board ensures disclosure of information to members of transaction costs and charges is complete and accurate and has been disclosed in accordance with regulatory guidelines.</p>	<p>Upon joining the Scheme, new members are provided with a member booklet confirming there is an annual management charge (AMC) consisting of 3 elements; an implicit 0.5% management charge each year, a potential rebate on some of the management charge for savings over £3,000 and an explicit annual charge of £2.50.</p> <p>Scheme members can also find further details of the Scheme's AMC, including calculators that provide for estimated charges & rebates in a typical year (in percentages and pounds & pence):</p> <p>www.thepeoplespension.co.uk/member-annual-management-charge/</p> <p>The Scheme members' annual benefit statement also includes full details of the AMC, capturing the impact of the 0.5% implicit management charge and £2.50 explicit annual charge within fund projections.</p>	<p>The member booklet and member's annual benefit statements contain information to members about the Scheme's AMC as well as links to investment fund transaction costs.</p> <p>The Chair's Statement includes information relating to the levels of transaction costs and charges and is reviewed and approved by the Trustee Board.</p> <p>The Chair's Statement is made publicly available for members and other stakeholders.</p> <p>The RACC reviews the annual benefit statements template in accordance with the Trustee Governance Schedule. The review is recorded in the RACC meeting minutes.</p>	<p>We obtained and inspected a copy of the member booklet and observed a sample of annual benefit statements to confirm that information in relation to costs and charges is included.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Chair's Statement to confirm that it included information relating to the levels of transaction costs and charges.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of the Chair's Statement has been undertaken.</p> <p>No exceptions noted.</p> <p>We inspected The People's Pension website to confirm that the Chair's Governance Statement is available and included an assessment.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Trustee Governance Schedule to confirm that a review of the annual benefit statements is scheduled.</p> <p>No exceptions noted.</p> <p>We obtained and inspected meeting minutes to confirm that a review of the annual benefit statements template has been undertaken by RACC.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Investment governance			
<p>Control objective 3</p> <p>A documented review of the suitability of the default arrangement(s) and range and risk profile of other investment options is undertaken and approved by the Trustee Board.</p>	<p>The Trustee, in conjunction with an authorised and regulated investment adviser, regularly reviews the suitability of the Scheme's investment funds and profiles.</p> <p>The Trustee has taken professional advice from the current investment adviser on the default arrangement, and on the range and risk profile of other investment options available to members. The investment adviser also provides advice to the Trustee on an ad-hoc basis, as and when requested.</p> <p>The Trustee has established a sub-committee, the Trustee Investment Committee, which has responsibility for the monitoring of:</p> <ul style="list-style-type: none"> • member behaviours, identifying trends and recommending future strategy • developments within the market • setting asset allocation. <p>The Trustee decided that the Trustee Investment Committee would be chaired by Mr Alan Pickering, and would comprise of three Trustee directors.</p>	<p>The design and on-going suitability of the default arrangement and range and risk profile of other investment options are reviewed and monitored in accordance with the Trustee Governance Schedule.</p> <p>This review is documented in meeting minutes, including decisions for making changes to investment options.</p> <p>Changes to be made to the default arrangement and range of other investment options are formally managed through a documented plan.</p> <p>The Trustees obtains documented investment advice to support any Trustee Board decisions to change or retain investment options, including the default strategy.</p>	<p>We obtained and inspected the Trustee Governance Schedule to confirm that a review of the design and on-going suitability of the default arrangement and range and risk profile of other investment options is scheduled.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Trustee meeting minutes to confirm that a review of the design and on-going suitability of the default arrangement and range and risk profile of other investment options has been undertaken.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that decisions for making changes to investment options have been considered and recorded.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the documented plan and Trustee meeting minutes to confirm that a documented plan has been reviewed and agreed by the trustees for changes to the default arrangements and range of other investment options.</p> <p>No exceptions noted.</p> <p>Note: A documented plan is only required if changes to the default strategy are made. A review of the strategy was undertaken but no changes were made.</p> <p>We obtained and inspected investment adviser advice to support any Trustee Board decisions to change or retain investment options, including the default strategy is scheduled during the period.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that investment adviser advice to support any Trustee Board decisions to change or retain investment options, including the default strategy, has been considered.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Investment governance			
<p>Control objective 4</p> <p>The Trustee Board undertakes a documented review of the Statement of Investment Principles. This review includes consideration of investment objectives and policies for the default arrangement(s) and all other investment options.</p>	<p>The Trustee, in conjunction with an authorised and regulated investment adviser, formally reviews the suitability of the funds and the Statement of Investment Principles (SIP)</p> <p>Responsibility for the day-to-day management of all Scheme investments falls within the Finance Department's remit (including overseeing any changes where an amendment to the SIP is required.</p> <p>The Regulatory Compliance Team are responsible for notifying TPR of any significant event on behalf of the Trustee.</p> <p>The requirement for the Regulatory Compliance Team to notify TPR of any changes in the SIP is documented within the 'Updates to Statement of Investment Principles' flowchart and corresponding 'T1 Review of Statement of Investment Principles' procedure document owned by the 'Clients & Governance' Team within the Finance Department.</p>	<p>The IC reviews the SIP each year at the August IC meeting with formal review and approval by the Trustee Board at their September meeting.</p> <p>The Trustee includes the investment aims and objectives, and policies for investment options in the SIP.</p> <p>The requirement for the Regulatory Compliance Team to notify TPR of any changes in the SIP is documented within the 'Updates to Statement of Investment Principles' flowchart and corresponding 'T1 Review of Statement of Investment Principles' procedure document.</p>	<p>We obtained and inspected Trustee meeting minutes to confirm that the Trustee has reviewed the SIP in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the SIP to confirm that it included the investment aims and objectives, and policies for investment options.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the 'Updates to Statement of Investment Principles' flowchart and corresponding 'T1 Review of Statement of Investment Principles' procedure document to confirm that the requirement to notify TPR of any changes in the SIP by the Regulatory Compliance Team is documented.</p> <p>No exceptions noted.</p> <p>Through observation and inspection of Trustee meeting minutes, we confirmed that any changes made to any of the investment options within the reporting period have been reflected in the SIP.</p> <p>No exceptions noted.</p> <p>Through observation and inspection of email and significant event form, we confirmed that any changes made to SIP have been reported to the Pensions Regulator.</p> <p>No exceptions noted.</p>
<p>Control objective 5</p> <p>The Trustee Board ensures that the Statement of Investment Principles is made publicly available.</p>	<p>The Trustee has, as required by regulations, published the Scheme SIP online at:</p> <p>www.thepeoplespension.co.uk/statement-investment-principles.pdf</p> <p>Links to the Scheme SIP are published within the members' annual benefit statement.</p>	<p>The Trustee publishes the SIP for the Scheme online at:</p> <p>www.thepeoplespension.co.uk/statement-investment-principles.pdf</p> <p>Links to the SIP are also published within the members' annual benefit statement.</p>	<p>We inspected The People's Pension website to confirm that the Trustee publishes the SIP for the Scheme online.</p> <p>No exceptions noted.</p> <p>We obtained and inspected a sample of annual benefit statements to confirm that a link to the Scheme SIP is included within the members' annual benefit statement.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Investment governance			
<p>Control objective 6</p> <p>The performance of all investment options (including the default arrangement(s)) is reviewed and monitored against the investment objectives set out in the Statement of Investment Principles. This review is documented and approved by the Trustee Board.</p>	<p>The Trustee has taken professional advice on the range of investment options available to Scheme members. The Trustee usually asks the investment adviser to attend the quarterly Trustee meetings, and the investment adviser regularly attends these meetings.</p> <p>The Scheme offers passive tracking funds. The Trustee monitors whether the fund performance is within expected tolerances for the asset class in question on a quarterly basis. Any greater variance would be queried with the investment manager.</p> <p>The Trustee monitors the performance of each investment option including the default arrangement(s) against the investment objectives set out in the Statement of Investment Principles, through the investment manager's investment report for the quarter, or through the investment adviser's reports presented to the Trustee at Trustee meetings. The quarterly investment manager's investment report, or B&CEH investment overview reports, or Scheme administration reports, contain information about the performance of the funds compared with the total return of the relevant benchmark index.</p>	<p>In accordance with the Trustee Governance Schedule, the Trustee review the performance of each investment option including the default arrangement(s) at quarterly Trustee IC meetings and Trustee Board meetings.</p> <p>These reviews are documented in the IC and Trustee Board meeting minutes.</p> <p>Investment performance is monitored against investment objectives set out in the SIP and recorded in meeting minutes.</p>	<p>We obtained and inspected the Trustee Governance Schedule to confirm that the review of the performance of each investment option including the default arrangement(s) is scheduled for each quarterly Trustee IC meeting and Trustee Board meeting.</p> <p>No exceptions noted.</p> <p>We obtained and inspected IC and Trustee meeting minutes to confirm that a quarterly review of the performance of each investment option including the default arrangement(s) is undertaken.</p> <p>No exceptions noted.</p> <p>We obtained and inspected meeting minutes to confirm that monitoring of investment performance against investment objectives set out in the SIP is undertaken.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
The trustee board			
<p>Control objective 7</p> <p>New trustees are recruited and appointed in accordance with a documented procedure approved by the Trustee Board.</p>	<p>There is a documented Trustee policy in place for the recruitment and selection of Trustee directors (called the Appointment, Resignation and Removal of Trustee Directors) which is subject to ongoing review.</p> <p>The Trustee policy sets out the roles and responsibilities for Trustee recruitment and selection, and includes the skills and knowledge required.</p> <p>This policy is reviewed on a bi-annual basis and was last reviewed in January 2021.</p>	<p>The Trustee maintains a policy for the recruitment and selection of Trustee directors (the "Appointment, Resignation and Removal of Trustee Directors") which is subject to ongoing review in accordance with the Trustee Governance Schedule.</p> <p>The recruitment and appointment of the two new directors was carried out in accordance with the Trustee policy for the Appointment, Resignation and Removal of Trustee Directors.</p> <p>The Appointment, Resignation and Removal of Trustee Directors policy includes roles and responsibilities for Trustee recruitment and selection criteria.</p>	<p>We obtained and inspected the Appointment, Resignation and Removal of Trustee Directors policy to confirm in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of the Appointment, Resignation and Removal of Trustee Directors policy has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>Through enquiry and observation, we confirmed that new trustee appointments have been appointed in accordance with the Appointment, Resignation and Removal of Trustee Directors policy during the reporting period.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Appointment, Resignation and Removal of Trustee Directors policy to confirm that it included roles and responsibilities for Trustee recruitment and selection criteria.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
The trustee board			
<p>Control objective 8</p> <p>The fitness and propriety of trustees is assessed prior to appointment and reviewed annually thereafter in accordance with a documented policy. This review is documented and approved by the Trustee Board.</p>	<p>The People's Pension Trustee Limited acts as corporate trustee of the Scheme. The Directors of the Trustee who served during the reporting period are listed below:</p> <ul style="list-style-type: none"> • Steve Delo, Chairman of the Trustee • Chris Fagan, Trustee Director • David Maddison, Trustee Director • Alan Pickering CBE, Trustee Director • Baroness Jeannie Drake CBE, Trustee Director • Mark Condon, Trustee Director <p>The Trustee has a written Fitness and Propriety policy.</p> <p>Prior to their appointment, new Trustees are required to complete a declaration confirming their fitness and propriety.</p> <p>In addition, each year all Trustee Directors complete the declaration in accordance with the Trustee's Fitness and Propriety policy.</p> <p>The documented procedure for a new Trustee Director (Appointment, Resignation and Removal of Trustee Directors policy) includes roles and responsibilities for Trustee recruitment and selection criteria.</p>	<p>Fitness and propriety requirements for Trustees Directors are recorded and managed in accordance with a policy which is regularly reviewed and approved.</p> <p>In accordance with the Trustee Governance Schedule, the RACC reviews the Fitness and Propriety policy. This review is recorded in the RACC meeting minutes.</p> <p>The fitness and propriety of a potential Trustees Director is reviewed prior to appointment and, once appointed, annually thereafter. This review is documented and approved.</p> <p>In signed letters of appointment, the duties of Trustee Directors include 'using the skill and care expected of a competent independent trustee of a pension scheme of the size and nature of the Scheme'.</p> <p>The Articles of Association of the Corporate Trustee body sets out circumstances in which a Trustee director is required to vacate office.</p> <p>In accordance with the Trustee Governance Schedule, annually each director of the Trustee makes a declaration to B&CEH and other Trustee Directors, confirming their fitness and propriety.</p> <p>In accordance with the Trustee Governance Schedule, a review of the fitness and propriety (competency) of each Trustee Director is carried out by the Scheme Secretary. This review is recorded in the Trustee Board meeting minutes.</p> <p>Prior to their appointment, new Trustees are required to complete a declaration confirming their fitness and propriety.</p>	<p>We obtained and inspected the Fitness and Propriety policy to confirm in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Trustee Governance Schedule to confirm that a review of the Fitness and Propriety policy is scheduled.</p> <p>Note: A review of the Fitness and Propriety policy was not scheduled for this reporting period.</p> <p>No exceptions noted.</p> <p>We obtained and inspected RACC meeting minutes to confirm that a review of the Fitness and Propriety policy has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>Note: A review has been scheduled for 7 May 2021.</p> <p>Through enquiry and inspection, we confirmed that the fitness and propriety of new trustees is verified.</p> <p>No exceptions noted.</p> <p>For new Trustee Directors appointed in the period, we obtained and inspected signed letters of appointment to confirm that the duties of Trustee Directors include 'using the skill and care expected of a competent independent trustee of a pension scheme of the size and nature of the Scheme'.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Articles of Association of the Corporate Trustee body to confirm that it sets out circumstances in which a Trustee director is required to vacate office.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
The trustee board			
Control objective 8 (continued)		<p>The Appointment, Resignation and Removal of Trustee Directors policy includes roles and responsibilities for Trustee recruitment and selection criteria.</p>	<p>We obtained and inspected a sample of Trustee Fit and Proper Questionnaires to confirm that each year each director of the Trustee Board makes a declaration to B&CEH and other Trustee directors, confirming their fitness and propriety, in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of the fitness and propriety (competency) of each Trustee Director was carried out by the Scheme Secretary in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected a sample of declarations confirming fitness and propriety of new Trustee Directors prior to appointment during the reporting period.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Appointment, Resignation and Removal of Trustee Directors policy to confirm it includes roles and responsibilities for Trustee recruitment and selection criteria.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
The trustee board			
<p>Control objective 9</p> <p>Collective skills and competencies of the Trustee Board as a whole are reviewed on an annual basis. This review is documented and approved by the Trustee Board.</p>	<p>The Trustee maintains a Trustee policy on 'Obtaining and Improving Trustee Knowledge, Understanding and Skills', which includes action plans for Trustee training requirements.</p> <p>The Trustee also maintains:</p> <ul style="list-style-type: none"> • An 'Annual Trustee Training Plan' detailing training to be delivered and method of delivery; • 'Continuous Professional Development (CPD)' records at individual Trustee Director level; & • A skills matrix 'Skills Questionnaire Collative Responses' highlighting both individual Trustee Director and collective competence. <p>The Trustee Board has documented its collective skills and competencies and set these out in a statement that is issued to TPR annually.</p> <p>This statement provides an explanation of how the Trustee has the right balance of skills knowledge and experience collectively to run The People's Pension effectively.</p>	<p>The Trustee maintains a Trustee policy on 'Obtaining and Improving Trustee Knowledge, Understanding and Skills', which includes action plans for Trustee training requirements.</p> <p>In accordance with the Trustee Governance Schedule, the Trustee reviews the Trustee skills and competencies each year.</p> <p>A documented skills analysis considers the Trustee Directors skills and competencies individually and collectively. The output from this analysis is reflected in the Trustee training/development plan and a paper that is submitted to the Trustee for its approval.</p> <p>A copy of the Board's collective skill set is submitted to TPR each year.</p> <p>The Chair reviews the effectiveness of the Trustee Board annually. This documented review looks into individual knowledge and understanding of the Trustee Board and considers the expertise that appointed advisers provide and steps taken to address any training gaps identified to include in the training/development plan which is reviewed by the Trustee Board and recorded in meeting minutes.</p>	<p>We obtained and inspected 'Obtaining and Improving Trustee Knowledge, Understanding and Skills' policy to confirm in place and to confirm it includes action plans for Trustee training requirements.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Trustee Governance Schedule to confirm that a review of Trustee skills and competencies is scheduled each year.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the documented skills analysis which considered Trustee Directors skills and competencies individually and collectively.</p> <p>No exceptions noted.</p> <p>Through enquiry we confirmed that the output from the documented skills analysis is reflected in the Trustee training/development plan.</p> <p>No exceptions noted.</p> <p>We obtained and inspected, Trustee meeting minutes to confirm that a review of the training and development paper was undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>Through enquiry and observation, we confirmed that a copy of the Board's collective skill set is submitted to TPR each year.</p> <p>No exceptions noted.</p> <p>We obtained and inspected, Trustee meeting minutes to confirm that a review completed by the Chair of the effectiveness of the Trustee Board has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
The trustee board			
<p>Control objective 10</p> <p>Trustee levels of knowledge and understanding are managed and maintained in accordance with an annual training and development plan approved by the Trustee Board.</p>	<p>The Trustee maintains a Trustee policy on obtaining and improving Trustee knowledge, understanding and skills, alongside the Trustee Annual Training plan that sets out how and when Trustee training requirements will be delivered. Separate to the plan is a Trustee training schedule which is also maintained and confirms the training delivered and training to be delivered to the Trustee Board.</p> <p>The training undertaken by each director of the Trustee is recorded in their individual training logs.</p> <p>As documented in Trustee meeting agendas and minutes, B&CE provides the Trustee with briefings on matters relevant to the Scheme such as legislative changes and changes to Scheme documentation.</p> <p>The Trustee policy on obtaining and improving Trustee knowledge, understanding and skills includes a succession plan for maintaining skills on the Trustee Board.</p>	<p>Trustee levels of knowledge and understanding are managed and maintained in accordance with an approved training and development plan.</p> <p>The Trustee 'Annual Training Plan' details training to be delivered and method of delivery.</p> <p>The training and development plan is reviewed and updated in accordance with the Trustee Governance Schedule. This review is recorded in the Trustee meeting minutes.</p> <p>In accordance with the Trustee Governance Schedule, the Trustee reviews the Trustee policy on 'Obtaining and improving Trustee knowledge, understanding and skills, which includes action plans for Trustee training requirements. This review is recorded in the Trustee meeting minutes.</p> <p>Identified skills gaps and learning needs are added to the training and development plan.</p> <p>On an annual basis the Trustee Directors consider whether there are any other matters that they would like training on. This is documented in the Trustee meeting minutes.</p> <p>In accordance with the Trustee Governance Schedule, the skills and knowledge of the Trustee Directors is included in a review carried out by the Chairman of the Trustee. The review is recorded in the Trustee meeting minutes.</p>	<p>We obtained and inspected the training and development plan to confirm that it sets out how Trustee levels of knowledge and understanding are managed and maintained.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the 'Annual Trustee Training Plan' which included training to be delivered and method of delivery.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of the training and development plan has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Trustee policy on 'Obtaining and improving Trustee knowledge, understanding and skills' to confirm that it includes action plans for Trustee training requirements.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of the Trustee policy on 'Obtaining and improving Trustee knowledge, understanding and skills' has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>Through enquiry and inspection of the Trustee Board Skills Analysis we confirmed that identified skills gaps and learning needs are added to the training and development plan.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
The trustee board			
Control objective 10 (continued)			<p>We obtained and inspected Trustee meeting minutes to confirm that consideration by Trustee Directors has been given to whether there are any other matters that they would like training on.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review completed by the Chair in relation to skills and knowledge of the Trustee Directors has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Financial sustainability and compliance			
<p>Control objective 11</p> <p>A documented review of financial sustainability (including access to resources to cover running costs and financial reserves in the event of a triggering event) is undertaken by the Trustee Board within required timescales.</p>	<p>The Trustee reviews the financial stability of the funder annually.</p> <p>External independent reviews of financial sustainability will be undertaken from 2021 onwards.</p> <p>The Trustee has an update report from the Scheme Funder at each Trustee Board Meeting.</p> <p>Monthly certificates are provided to the Trustee.</p> <p>The capital requirements are compared to the assets available on a quarterly basis which is reviewed by the B&CEH Board. The Trustee Board of The People's Pension review the financial sustainability of B&CE annually, which includes updates on the Group's capital position.</p> <p>The latest Group financial projections are presented in detail to the Trustee on an annual basis (alongside the updated business plan and Costs Assets and Liquidity Plan (CALP) to be provided to The Pensions Regulator). Updated projections will be provided more frequently if the position materially deteriorates during the year.</p> <p>If the business plan and CALP deteriorate then the Strategist will consider how to address the issue before agreeing the approach with the Funder PFS Board and the Trustee.</p> <p>The Scheme Funder also specifically undertakes to provide information on its ongoing financial viability, to ensure the scheme funder and financial sustainability requirements can be monitored by the Trustee. The Disclosure, Engagement and Escalation Policy between B&CEH and the Trustees provides further details about the information and frequency with which the information will be provided.</p>	<p>A "Disclosure, Engagement and Escalation Policy" between B&CEH and the Trustees, which provides details about information that will be provided to support a financial review of the Scheme Funder and frequency with which the information will be provided, is maintained.</p> <p>A documented review of financial sustainability (including access to resources to cover running costs and financial reserves in the event of a triggering event) is undertaken annually and approved by the Trustee Board and evidenced in its meeting minutes.</p> <p>External independent reviews of the financial sustainability of the Scheme will take place biannually starting in May 2021 onwards. The results of this review will be presented to the Trustee Board for review at their September Board meeting</p>	<p>We obtained and inspected the "Disclosure Engagement and Escalation Policy" between B&CEH and the Trustees to confirm that it includes details that will be provided to support financial review of the Scheme Funder and frequency with which the information will be provided.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the documented review of financial sustainability to confirm that it includes access to resources to cover running costs and financial reserves in the event of a triggering event.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a biannual external review of financial sustainability has been undertaken and reviewed by the Trustee.</p> <p>Note – this control activity commences after this reporting period so will be tested as part of the 2022 assurance exercise.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Financial sustainability and compliance			
<p>Control objective 12</p> <p>A documented review of the Business Plan is undertaken by the Trustee Board within required timescales.</p>	<p>A documented review of the Trustee Business Plan for The People's Pension is undertaken annually and approved by the Trustee Board and evidenced in its meeting minutes.</p> <p>The Trustee adheres to a Procedure for The People's Pension business plan which is managed by B&CEH strategy team on the Trustee's behalf. This outlines the regulations that underpin the business plan, timeframes & key dates, roles & responsibilities & key governance body (including the Trustee Board) "sign-offs".</p> <p>The output from the first external review will take place in 2021 and will be shared with TPR.</p>	<p>A documented review of the Trustee Business Plan for The People's Pension is undertaken annually and approved by the Trustee Board and evidenced in its meeting minutes.</p> <p>A documented procedure for The People's Pension business plan is maintained which outlines the regulations that underpin the business plan, timeframes and key dates, roles and responsibilities and key governance body, including the Trustee Board "sign-offs".</p> <p>External independent reviews of the Business Plan will be undertaken from 2021 onwards.</p> <p>The Trustee receives an update report on B&CEH business planning from the Scheme Strategist at each Trustee Board Meeting and key elements of the discussion are included in meeting minutes.</p>	<p>We obtained and inspected the Trustee Business Plan to confirm in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that the Trustee Business plan was approved by the Trustee Board.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the documented procedure for The People's Pension business plan to confirm it outlines regulations that underpin the business plan, timeframes and key dates, roles and responsibilities and key governance body, including the Trustee Board "sign-offs".</p> <p>No exceptions noted.</p> <p>We obtained and inspected external independent reviews of the Business Plan and meeting minutes to confirm that these have been reviewed by the Trustee.</p> <p>Note: External independent reviews will be commissioned after the date of this report.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm the Trustee received an update report on B&CEH business planning from the Scheme Strategist at each Trustee Board Meeting and key elements of the discussion were included in meeting minutes.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Financial sustainability and compliance			
<p>Control objective 13</p> <p>A documented Continuity Strategy is maintained and reviewed by the Trustee Board.</p>	<p>A Continuity Strategy is one of the five Master Trust authorisation criteria. The strategy provides the framework for identifying key actions, decisions and owners of actions required to deal with a triggering event period. It sets out the principles by which decisions will be made, the timescales over which this will take place and how the costs of continuing to operate the Master Trust and resolve the triggering event will be paid for.</p> <p>Our Continuity Strategy was approved by the Pensions Regulator (TPR) when we received authorisation in August 2019 and was subsequently revised in early 2020 following the introduction of the management charge rebate.</p> <p>The Continuity Strategy includes a statement of all levels of administration charges, providing transparency of the scheme's charging structure.</p> <p>The relevant information setting out the new administration charges are on pages 26-27 of the current Continuity Strategy.</p>	<p>The Trustee maintains a documented Continuity Strategy.</p> <p>In accordance with the Trustee Governance Schedule, the Trustee reviews the Scheme's Continuity Strategy. This review is recorded in the Trustee meeting minutes.</p>	<p>We obtained and inspected the Continuity Strategy to confirm it is in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected, Trustee meeting minutes to confirm that a review of the Continuity Strategy has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Financial sustainability and compliance			
<p>Control objective 14</p> <p>A documented procedure is maintained and approved by the Trustee Board for reporting Significant Events and Triggering Events to the Regulator within required timescales.</p>	<p>The Trustee adheres to a documented procedure for reporting significant events and triggering events.</p> <p>This procedure outlines the regulations that underpin the timeframes and key dates, roles and responsibilities.</p> <p>To comply with significant event reporting duties of each party, B&CEFS shall notify the Trustees immediately of any failure of the systems and processes used in running the master trust (either B&CE or service provider / adviser), which has a significant adverse effect on the security or quality of data or on service delivery.</p> <p>This includes any incident that significantly affects member data or member benefits, including those relating to cyber security incidents or near-misses, data integrity issues that impact common/conditional data and any significant IT incidents or near-misses, or any incident where a member has suffered financial or non-financial detriment.</p> <p>The Trustee and B&CEH maintain a Disclosure, Engagement and Escalation Policy which sets out the procedures for the provision of information between B&CEH and the Trustee to enable:</p> <ul style="list-style-type: none"> • continued compliance with the master trust legislation to be monitored (and other risks that may affect the running of the Scheme); • to enable compliance with significant event reporting; and • the policy for escalation of issues or concerns arising. 	<p>The Trustee maintains a documented procedure for reporting significant events and triggering events. This procedure outlines the regulations that underpin the timeframes and key dates, roles and responsibilities.</p> <p>The Trustee and B&CEH maintain a Disclosure, Engagement and Escalation Policy which sets out the procedures for the provision of information between B&CEH and the Trustee to enable compliance with significant event reporting.</p>	<p>We obtained and inspected the procedure for reporting significant events and triggering events to confirm that it includes regulations that underpin the timeframes and key dates, roles and responsibilities.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Disclosure, Engagement and Escalation Policy to confirm that it includes procedures for the provision of information between B&CEH and the Trustee to enable compliance with significant event reporting.</p> <p>No exceptions noted.</p>

5. Control objectives and pcontrol activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Scheme management skills			
<p>Control objective 15</p> <p>An annual business schedule/ plan is maintained and reviewed by the Trustee Board.</p>	<p>The Trustee meets with B&CE each quarter to discuss key issues affecting the Scheme.</p> <p>The Trustee Business Activity Plan sets out the tasks to be undertaken at Trustee meetings and the review of these items is documented in Trustee meeting agendas and minutes. It includes business as usual activity, strategic items and meeting details.</p> <p>The governance plan also provides details of activity and is focused on compliance and regulatory items and meetings.</p>	<p>An annual business activity plan is prepared by the Trustee each year. This plan has been approved by the Trustee at their Board meetings and copies are submitted to the RACC and Trustee Board with updates during the year.</p> <p>The Trustee Governance Schedule includes the standard items that are included on Trustee meeting agendas. This Schedule is submitted to the Trustee Board for review and approval.</p> <p>Both of the plans contain details of key events and activities.</p>	<p>We obtained and inspected the annual business activity plan to confirm it is in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected, Trustee meeting to confirm that a review and approval of the annual business activity plan has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>Through enquiry and inspection of meeting minutes we confirmed that during the year updates to the annual business activity plan are submitted to the RACC and Trustee Board.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Trustee Governance Schedule to confirm that it sets out the standard items that are included on Trustee meeting agendas.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm the Trustee Governance Schedule has been approved.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Trustee Governance Schedule and annual business activity plan to confirm they contain details of key events and activities.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Scheme management skills			
<p>Control objective 16</p> <p>Conflicts of interest are subject to ongoing monitoring and are identified, recorded in a conflicts register and managed in accordance with a defined policy which is regularly reviewed by the Trustee Board.</p>	<p>The Trustee has a written Conflicts of Interest policy. This sets out the Trustee's process for determining when a potential conflict situation might arise, how the Trustee would evaluate this and how the Trustee will deal with it once it has been identified.</p> <p>The Trustee also maintains a Conflicts of Interest register recording any actual conflicts of interest as well as any potential and perceived conflicts of interest.</p> <p>In their letters of appointment, the Trustee director declared they were not aware of any conflict of interest or potential conflict of interest arising from their appointment.</p> <p>The Trustee directors also agreed to notify B&CEH and other Trustee directors if they became aware of any such conflict during their appointment.</p> <p>In their letters of engagement, service providers are asked to inform the Trustee of any conflict of interest that may arise as soon as reasonably possible.</p> <p>The Trustee has a policy for working practices between the Trustee, Scheme strategist and the Scheme funder. This includes Scheme funder and/or Scheme strategist conflicts of interest.</p> <p>Conflicts of interest is a standing agenda items at Trustee meetings. At all Trustee Board and sub-committee meetings the Trustee is asked whether there are any conflicts of interest to be considered.</p>	<p>Conflicts of interest are subject to ongoing monitoring and are identified, recorded and managed in accordance with a defined policy which is reviewed and approved in accordance with the Trustee Governance Schedule.</p> <p>Conflicts of interest is a standing agenda items at Trustee meetings. This is documented in the Trustee and sub-committee meeting agendas and minutes.</p> <p>In accordance with the Trustee Governance Schedule, the Trustee reviews the Conflicts of Interest register outside of meetings.</p> <p>Note: The 'Conflicts of Interest register' is maintained by the Scheme Secretary who reviews this against any conflicts disclosed and included in the Trustee Board/Sub-Committee minutes. No conflicts of interest have been recorded for the Scheme year ending 31.03.21. The Trustee is able to access the register on request to the Scheme Secretary.</p> <p>The Trustee maintains a Disclosure, Engagement and Escalation Policy between the Trustee, the Scheme strategist and Scheme funder which clarifies the policies and principles in relation to the working practices between The Trustee, the Scheme Strategist and the Funder where risks or issues arise that impact the running of the Scheme or B&CEH.</p>	<p>We obtained and inspected the Conflicts of interest policy to confirm in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review and approval of the Conflicts of Interest policy has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee and sub-committee meeting agendas and Trustee and sub-committee minutes to confirm conflicts of interests is a standing agenda item at meetings.</p> <p>No exceptions noted.</p> <p>Through enquiry and inspection, we confirmed that a Conflict of Interest Register is maintained and reviewed outside formal Trustee meetings, in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Disclosure, Engagement and Escalation Policy between the Trustee, the Scheme strategist and Scheme funder to confirm it clarifies the policies and principles in relation to the working practices between the Trustee, the Scheme Strategist and the Funder, where risks or issues arise that impact the running of the Scheme or B&CEH.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Scheme management skills			
<p>Control objective 17</p> <p>Documented due diligence is undertaken by the Trustee Board prior to the appointment of all service providers, including fitness and propriety. Selection criteria is maintained by the Trustee Board to support service provider selection and decision making.</p>	<p>Each of the Trustee's service providers and advisers are appointed following an appropriate process that is proportionate to the adviser being sought.</p> <p>This may include a full market tender exercise and 'beauty parade' of shortlisted providers, and completion of the due diligence questionnaire. This requirement is documented in the Trustee's Policy on Monitoring and Reviewing Service Providers and Advisers.</p> <p>Service providers and advisers are asked to complete a due diligence questionnaire prior to the assessment of their suitability.</p>	<p>Service providers and advisers are appointed in line with the Trustee approved policy "Monitoring and Reviewing Service Providers and Advisers".</p> <p>This policy confirms advisers and suppliers are expected to provide evidence of services levels and performance indicators, resource skills and capacity, scope of services and any conflicts of interest.</p> <p>Service providers and advisers are asked to complete a due diligence questionnaire prior to the assessment of their suitability.</p> <p>This due diligence is reviewed by the Trustee or one of its sub committees and appointed representative.</p> <p>Prior to appointment and thereafter the fitness and propriety of advisers and service providers will be formally assessed by the Trustee against documented fitness and propriety criteria.</p>	<p>We obtained and inspected the "Monitoring and Reviewing Service Providers and Advisers" policy to confirm in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the "Monitoring and Reviewing Service Providers and Advisers" policy to confirm that advisers and suppliers are expected to provide evidence of services levels and performance indicators, resource skills and capacity, scope of services and any conflicts of interest.</p> <p>No exceptions noted.</p> <p>For a sample of new service providers in the period, we obtained and inspected due diligence questionnaires completed prior to the assessment of their suitability to confirm they were completed.</p> <p>Note: There were no new service providers appointed in 2020/21.</p> <p>No exceptions noted.</p> <p>We obtained and inspected minutes to confirm that completed due diligence questionnaires have been reviewed by the Trustee or one of its sub committees and appointed representative.</p> <p>Note: There were no new service providers appointed in 2020/21.</p> <p>No exceptions noted.</p> <p>Through enquiry and observations, we confirmed that prior to appointment and thereafter the fitness and propriety of advisers and service providers is formally assessed by the Trustee against documented fitness and propriety criteria.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Scheme management skills			
<p>Control objective 18</p> <p>Roles and responsibilities of all advisers and service providers are documented and the performance and quality of their service is subject to documented reviews by the Trustee Board against documented performance criteria.</p>	<p>The contracts between the Trustee and its advisers set out the expectations around responsibilities which are agreed at appointment and detailed in contracts and or letters of engagement between the Trustee Board and the relevant party.</p> <p>The Trustee Board and its sub committees reviews the performance of the service providers and the Chairman of the Trustee reviews the effectiveness of the Trustee directors and reports his finding to the Board.</p>	<p>Service providers and advisers are reviewed in line with the Trustee approved policy "Monitoring and Reviewing Service Providers and Advisers".</p> <p>The performance of advisers and service providers is reviewed in accordance with the Trustee Governance Schedule against documented performance criteria.</p> <p>Prior to appointment and thereafter the fitness and propriety of advisers and service providers will be formally assessed by the Trustee against documented fitness and propriety criteria.</p> <p>Advisers and suppliers are monitored on an ongoing basis by the Trustee and the Trustee Pensions Manager and are reviewed fully in accordance with a schedule.</p> <p>The RACC reviews B&CEFS quarterly Scheme Administration reports which include performance against the service levels agreed with the Trustee. The review is recorded in the RACC and Trustee meeting minutes.</p>	<p>We obtained and inspected the "Monitoring and Reviewing Service Providers and Advisers" policy to confirm it is in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the documented performance criteria that is used to measure the performance of advisers and service providers to confirm it is in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of performance of advisers and service providers against documented performance criteria has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>Through enquiry and observations, we confirmed that prior to appointment and thereafter the fitness and propriety of advisers and service providers is formally assessed by the Trustee against documented fitness and propriety criteria.</p> <p>No exceptions noted.</p> <p>Through enquiry and inspection of meeting minutes we confirmed that advisers and suppliers are monitored on an ongoing basis by the Trustee and the Trustee Pensions Manager and are reviewed fully in accordance with a schedule.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Scheme management skills			
Control objective 18 (continued)			<p>We obtained and inspected the B&CEFS quarterly Scheme Administration reports to confirm they included performance against the service levels agreed with the Trustee.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of quarterly B&CEFS Scheme Administration has been undertaken by the Trustees in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Scheme management skills			
<p>Control objective 19</p> <p>The Trustee Board maintains a risk management framework to identify, evaluate, manage and monitor scheme risks.</p>	<p>The Trustee has implemented an effective risk management process which forms a key part of the Trustee's internal control and governance framework.</p> <p>The Trustee identifies the risks applying to the Scheme, assesses these by considering the impacts and likelihood of their occurrence, and manages the risks by identifying suitable controls and countermeasures to mitigate the risks.</p> <p>The Trustee records this information on a risk register, which is held on an electronic risk management software system. This allocates two scores to each risk, which are:</p> <ul style="list-style-type: none"> • an untreated score with no controls in place • a current risk score assuming all countermeasures to mitigate the risks have been implemented. <p>To support the Trustee Board, the Trustee delegated powers to the RACC comprising of at least two Trustee directors (there are currently 3).</p> <p>B&CEH regularly provide the Trustee/RACC with updates on risk and regulatory compliance matters at Trustee meetings. This is documented in the Trustee meeting agendas and minutes.</p> <p>All risks identified, including any risks associated with the delivery of the business plan, are recorded in the risk register. The risk register includes internal controls and a controls note for each risk identified.</p> <p>Responsibility for risks are allocated to designated risk owners.</p>	<p>A risk management framework is established to identify, evaluate and treat scheme risks. Risks are recorded in a risk register which is reviewed at least annually in accordance with the Trustee Governance Schedule.</p> <p>The Trustee maintains a risk register.</p> <p>The risk register includes internal controls and a controls note for each risk identified. Responsibility for risks are allocated to designated risk owners.</p> <p>In accordance with the Trustee Governance Schedule, the Trustee reviews a segment of the risk register at quarterly RACC meetings and annually at Trustee Board meetings. This is documented in the RACC and Trustee meeting agendas and minutes.</p> <p>These segmented reviews include consideration of the whole risk register risks, new risks, changes to risk ratings and changes in controls to mitigate risks. There are currently no closed risks but these will be monitored once risks are closed off.</p> <p>The RACC, comprising of at least two Trustee directors, has the power to investigate matters falling within its terms of reference and report to the Trustee on matters within its remit.</p> <p>B&CEH also provide RACC with a report on risk and regulatory compliance matters. This is reviewed by RACC and documented in the meeting minutes.</p>	<p>We obtained and inspected the risk management framework to confirm in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the risk register to confirm in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that an annual review of the risk register has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the risk register to confirm it includes internal controls and a controls note for each risk identified.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the risk register to confirm that responsibility for risks are allocated to designated risk owners.</p> <p>No exceptions noted.</p> <p>We obtained and inspected meeting minutes to confirm that a segmented review of the risk register at quarterly RACC meetings and annually at Trustee Board meetings has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected meeting minutes to confirm that the segmented reviews include consideration of the whole risk register risks, new risks, changes to risk ratings and changes in controls to mitigate risks.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Scheme management skills			
Control objective 19 (continued)			<p>Through enquiry and observation, we confirmed that the RACC has the power to investigate matters falling within its terms of reference and report to the Trustee on matters within its remit.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the report on risk and regulatory compliance matters provided by B&CEH to RACC.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of the report on risk and regulatory compliance matters has been undertaken by the RACC and documented in the meeting minutes.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
<p>Control objective 20</p> <p>The Trustee Board monitors and reviews IT systems.</p>	<p>B&CE Financial Services have established robust process & controls for the effective development, management and maintenance of the I.T systems that support The People's Pension. In accordance with the Trustee Governance Schedule, B&CEH Director of IT provides the Trustee with a report at RACC meetings which include B&CEH IT procedures and processes, including matters related to systems security.</p> <p>Monitoring the maintenance and development of systems:</p> <p>All electronic data at B&CE is held on servers in a secure, locked room. This room is equipped with air conditioning and a system is in place to control the temperature and humidity. The room is protected by an inert gas fire suppressant system.</p> <p>B&CEH regularly updates its website and mail servers with the latest security patches. These new patches and updates are logged on B&CEH TopDesk service management system. B&CEH then download these patches and deploy them to the Model Office testing environment as soon as practically possible and released to production following successful testing.</p> <p>B&CEH test the patches in the Model Office test environment for 2 weeks before applying them to their core site servers, web servers and half of the end user systems. The following weekend, B&CEH secure site in Leatherhead is updated along with the remaining user systems. Super critical patches may be fast-tracked after specific testing if required. B&CEH use software auditing solutions to ensure systems are maintained at the up-to-date patch state.</p>	<p>In accordance with the Trustee Governance Schedule, the B&CEH Director of IT provides a report (written / verbal) at RACC meetings which include B&CEH IT matters related to:</p> <ul style="list-style-type: none"> • systems and data security • physical and logical access to computer systems • monitoring of operations implemented to support the security of data transmissions • measures implemented to mitigate the threat of malicious electronic attack are regularly reviewed and documented. <p>The output from these reports are discussed at RACC quarterly meetings. The RACC then react to reports when weaknesses or issues are identified in relation to aspects of IT functionality and considers the implication of these matters before agreeing what remedial action or next steps should be taken by B&CEH on the Trustee's behalf.</p> <p>Separate reports are received by the Trustee at its Board meeting from the Scheme Strategist with general commentary on IT developments, and a further report from B&CEH on disaster recovery.</p> <p>The regulatory assurance report covers breaches in IT protocols. These reports are presented to the RACC at different times throughout the year and discuss the contents and agree appropriate actions or next steps with B&CE acting on their behalf.</p> <p>All report reviews are recorded in the RACC or Trustee Board meeting minutes.</p>	<p>We obtained and inspected RACC meeting minutes to confirm that a review of the report (written / verbal) provided by the B&CEH Director of IT has been undertaken.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the IT report provided by the B&CEH Director of IT to confirm that it includes B&CEH IT matters related to:</p> <ul style="list-style-type: none"> • systems and data security • physical and logical access to computer systems • monitoring of operations implemented to support the security of data transmissions • measures implemented to mitigate the threat of malicious electronic attack are regularly reviewed and documented. <p>No exceptions noted.</p> <p>We obtained and inspected RACC meeting minutes to confirm that where weaknesses or issues are identified in relation to aspects of IT functionality, RACC considers the implications of these matters before agreeing what remedial action or next steps should be taken by B&CEH on the Trustee's behalf.</p> <p>No exceptions noted.</p> <p>We obtained and inspected a sample of separate reports received from the Scheme Strategist to confirm they include general commentary on IT developments.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the report from B&CEH on disaster recovery and meeting minutes to confirm that this report had been reviewed by the Trustee.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
Control objective 20 (continued)	<p>Protection against viruses:</p> <p>As part of its Data protection policy, B&CEH uses encryption capability to protect the contents of files being transmitted via email. End users are trained in this functionality and the IT acceptable use policy mandates the encryption of sensitive data.</p> <p>B&CEH has an intrusion prevention system deployed to counter the threat from malicious activities on its perimeter UTM Firewall. This is a component of B&CEH firewall, from a leading provider, protecting the internal systems, in-house hosted website and mail server from unauthorised access from the internet.</p> <p>B&CEH has also deployed a next generation antivirus and Endpoint Detection and Response (EDR) solution to all servers, laptops and desktops.</p> <p>Event data from each endpoint is collected centrally and feeds B&CE's security operations centre (SOC) enabling a richer view of the network as a whole.</p> <p>Virus definitions are downloaded regularly to the server and on first boot of end user computers and regularly thereafter.</p> <p>Further protection is afforded by the EDR that runs on each computer to enable quarantining of a device with anomalous behaviour, mitigating the risk of further infection whilst forensic examination takes place.</p> <p>Security monitoring systems are in place and the definitions to these systems are regularly updated and monitored by B&CEH IT function.</p>		<p>We obtained and inspected meeting minutes to confirm that a review of regulatory assurance reports, which includes breaches in IT protocols, has been undertaken by the RACC.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
Control objective 20 (continued)	<p>B&CEH operates a secure corporate Wi-Fi network that restricts use to company equipment only, which is secured through the use of digital certificates. A further guest Wi-Fi network is made available for personal use for staff and visitors and to segregate this non-business traffic from B&CEH internal network.</p> <p>B&CEH has partnered with a security information and event management (SIEM) cyber security system provider that offers 24/7 monitoring and assurance from a centralised security operations centre (SOC).</p> <p>B&CEH also engages leading IT security specialist firms to carry out regular IT penetration testing. These tests are performed internally and externally to provide assurance that B&CE's systems and network are protected against known vulnerabilities.</p> <p>B&CEH has an active network discovery tool that identifies all assets on the network and scans them comprehensively to identify vulnerabilities. This vulnerability data is compared against real-time external threat intelligence feeds in B&CEH risk platform. Risk based vulnerability management decisions prioritise B&CE update management schedule to remediate the most important risks to B&CEH business.</p> <p>Physical & logical access to systems and member/scheme data:</p>		

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
Control objective 20 (continued)	<p>B&CEH locations are protected by a combination of security measures which can include CCTV systems providing 24-hour security monitoring, a 24-hour guard, electronic-card operated barrier access, electronic card-based door access and also alarms. The DR site is protected by CCTV and 24-hour guard security – access also requires pre-notified entry and photo ID such as a driving licence or passport – all access is recorded. Access to the servers and network equipment is monitored in all locations by movement detected video recording that triggers alerts to IT staff when activated.</p> <p>All electronic data is held on servers in a secure, locked room. Only authorised members of B&CEH IT department have access and B&CEH Facilities department holds administrative access to the control system.</p> <p>B&CEFS administrators are allocated user names and a password is required to access servers, PCs and other network devices. These passwords expire frequently and users are prompted to change them. The system requires best practice from users in relation to setting passwords. Active directory permissions segregate levels of access and VLAN security is in place. Role based administration is in place within the IT teams and physical floor ports are protected by network access control.</p> <p>User functionality within B&CEH in-house system is restricted using appropriate permissions. Functional groups of users are maintained, each with appropriate levels of access permissions based upon their job function.</p>		

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
Control objective 20 (continued)	<p>Only authorised IT administrators can define users and user group policies, rights and permissions, which are enforced by the system. Updates to system records have an audit trail, showing the user ID, date and timestamp.</p> <p>B&CEH has an intrusion prevention system deployed to counter the threat of unauthorised access from the internet. This is a component of B&CEH's firewall protecting its internal systems, in-house hosted website and mail server. B&CEH has also engaged a leading IT security specialist firm to carry out regular IT security testing.</p> <p>To access server and network devices from remote locations, a secure connection to B&CEH firewall using a network logon account is required, as well as having remote access enabled by B&CEH IT department. This is all controlled using Windows Active Directory security.</p> <p>Reusable components such as memory disks have data erased in-house. Non-recyclable components, such as hard disks, are destroyed on-site using a specialist waste company's wrecking equipment to render the components inoperable.</p> <p>Physical access to server rooms is restricted to authorised IT personnel and a video monitoring system records all access events.</p> <p>Disaster recovery, business continuity & systems back up:</p>		

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
Control objective 20 (continued)	<p>The People's Pension Scheme member and employer customer records are held on B&CEH in-house IT systems. These records are also replicated at its Disaster Recovery (DR) site, and additional data backups are also remotely stored in fireproof safes at a secondary site. The DR site is operated by a specialist provider in data and recovery centres who adhere to multiple ISO standards including ISO27001.</p> <p>B&CEH replicates its transactional SQL Server data via its dedicated secure internet link to the DR site with "Always on" replication in an availability group. This replication ensures that B&CEHs disaster recovery database is in step with that of the primary database at its in-house location. The same approach is taken for B&CEH corporate files and folders using a Distributed File System (DFS) for replication across all sites.</p> <p>B&CEH utilises Veeam Backup & Replication software to support with the Scheme's data protection and disaster recovery requirements.</p> <p>All core application systems and associated data within B&CEH data centres is stored on servers with RAID disk systems which has built in resiliency. B&CEH have a SAN which is mirrored and there is no disruption should one of the servers fail. RAID will automatically manage any failures in the event of hardware failure, thus providing resilient data storage.</p> <p>Additional data backups are taken at the end of each business day. Data is backed up to B&CEFS DR site where it is stored on the local SAN. It is then transferred to encrypted tapes.</p>		

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
Control objective 20 (continued)	<p>B&CEH IT Department regularly test the core application systems and associated databases for business recoverability and follow documented procedures and checks.</p> <p>Each of B&CEH business areas have their own individual Business Continuity Plan, detailing the steps each area will take following an incident, to return to 'business as usual' in the quickest possible time. These plans are reviewed every 6 months and are stored on an electronic information software system. B&CEH has a Corporate Business Continuity plan, which outlines how it will respond at a strategic level to a major incident, such as a premises closure. This includes the structure and responsibilities of B&CEH crisis management team.</p> <p>B&CEH regularly tests its business continuity and disaster recovery capability by operating the application systems from its DR site which is located away from the B&CE offices. The business recovery exercises are set up and co-ordinated by the business continuity function, which sits in the second line of defence governance model. The test is performed by the B&CEH IT department in conjunction with business owners.</p> <p>A Business recovery exercise was successfully carried out on 19 September 2020. An exercise was planned for February 2021 but due to current COVID restrictions, it was agreed that the testing of the operational workplace recovery suite at Leatherhead would be postponed due to B&CEHs current working from home capabilities.</p> <p>To meet TPR requirements for regular DR testing, the risk function is working with IT to secure a date in April for delivery of the next IT technical test.</p> <p>B&CEH provided a report to the Trustee with the results of the September exercise.</p>		

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
<p>Control objective 21</p> <p>The capacity to take on new business is assessed, approved and regularly monitored by the Trustee Board.</p>	<p>The Trustee in conjunction with B&CEFS regularly reviews the capacity of the systems and resources in place.</p> <p>The Trustee receives quarterly reports from the Scheme Strategist and administrator with details and forecast expectations around any planned changes or needs to meet their requirements for scheme design, capacity and resource planning.</p>	<p>In accordance with the Trustee Governance Schedule the Trustee and RACC review the capacity of the systems to take on new business and these tasks are assessed, approved and regularly monitored by the RACC and the Trustee Board.</p> <p>These reviews are documented in the quarterly RACC and Trustee Board meeting agendas and minutes.</p> <p>The Trustee monitors B&CEFS capacity through the Scheme Strategist/Funder reports and administration reports provided to the Trustee at RACC and Trustee Board meetings.</p> <p>These separate reports include details about IT Platform activity and Scheme membership movements and statistics.</p> <p>The Trustee considers and approves proposals about changes to the proposition where appropriate received from the Strategist, Funder or administrator and this is documented in Trustee Board or RACC meeting minutes.</p>	<p>We obtained and inspected Trustee meeting minutes to confirm that the Trustee and RACC have undertaken quarterly reviews of the capacity of the systems to take on new business in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Scheme Strategist/Funder reports and administration reports to confirm they address B&CEFS capacity and meeting minutes to confirm these reports have been reviewed by the RACC.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Scheme Strategist/Funder reports and administration reports to confirm they included details about IT Platform activity and Scheme membership movements and statistics.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the proposals about changes to the proposition received from the Strategist, Funder or administrator to confirm they are in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected RACC meeting minutes to confirm that a review of proposition proposals has been undertaken.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
<p>Control objective 22</p> <p>Signed administration agreements are in place with service providers and include provisions for the rectification of maladministration. The agreements are approved by the Trustee Board.</p>	<p>The provisions, roles, responsibilities and source of funds for resolving errors that impact members are documented within the Trustees' and B&CEFS 'Administration Services Agreement in relation to the People's Pension Scheme' (the 'Agreement') dated 18 December 2012.</p> <p>This Agreement includes a detailed list of all the services B&CEFS provide the Trustee. This Agreement lists roles and responsibilities relating to administration services to be provided to the Trustee.</p> <p>The current agreement is currently under review and a new agreement will be in place in the 2021/22 Financial Year. This agreement will be approved by the Trustee Board.</p> <p>Whilst the Agreement focuses on the delivery of administration related services to the Trustee, it also specifically addresses IT services delivery.</p> <p>There are third party service provider agreements that include provisions, roles, responsibilities and source of funds for resolving errors that impact members.</p>	<p>A signed administration Agreement is in place which includes provisions, roles, responsibilities and source of funds for resolving errors that impact members.</p> <p>There is a document process for the reporting of significant & triggering events.</p> <p>The Trustee also receives a report at its quarterly Trustee Board and RACC meetings from the B&CE Compliance Team that confirms details of any regulatory breaches/near misses and the decision if to report such matters to TPR under code of practice 1. The Trustee discusses this report and agrees any reporting to TPR by B&CE on its behalf.</p>	<p>We obtained and inspected the signed administration agreement to confirm in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the signed administration agreement to confirm it includes provisions, roles, responsibilities and source of funds for resolving errors that impact members.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the procedure for reporting significant events and triggering events to confirm in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of the quarterly report from the B&CE Compliance Team that confirms whether there are details of any regulatory breaches/near misses and the decision if to report such matters to TPR, has been undertaken.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
<p>Control objective 23</p> <p>The Trustee Board has arrangements in place for ensuring that core financial transactions (including decumulation related transactions) are processed promptly.</p>	<p>The Trustee works with its administrator B&CEFS to ensure it has systems and procedures in place for processing core Scheme transactions which provide assurances that related income and expenditure are completely and accurately processed in a timely manner and recorded in the proper period.</p> <p>B&CEH internal audit function provides the Trustee with a report at Trustee meetings summarising the internal audit work conducted during the reporting period in relation to The People's Pension.</p> <p>Going forward, the internal audit function will be formalising the arrangements under the Trustee Governance Agreement. This will allow the internal audit function to agree audit requirements with the Trustee (which will include an option for them to request additional work in excess of The Pensions Regulator's expectations).</p>	<p>In accordance with the Trustee Governance Schedule, the Trustee monitors B&CEFS administration of core financial transactions. This is reviewed at quarterly RACC and Trustee meetings and documented in the RACC and Trustee meeting agendas and minutes.</p> <p>The Trustee reviews the performance of the processing of core financial transactions through the Scheme administration reports provided to the Trustee at RACC and Trustee meetings. These reports show B&CE's performance against the service levels agreed with the Trustee.</p> <p>B&CEH internal audit function provides the Trustee with a report at RACC meetings summarising the internal audit work conducted during the reporting period in relation to The People's Pension. This includes work relating to the completeness and timeliness of processing of core Scheme financial transactions by B&CEFS.</p> <p>In accordance with the Trustee Governance Schedule, the RACC reviews the internal audit reports. These reviews are recorded in the RACC and Trustee meeting agendas and minutes.</p>	<p>We obtained and inspected the RACC and Trustee meeting minutes to confirm that a quarterly review of core financial transactions has been undertaken.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the quarterly Scheme administration reports to confirm they include B&CE's performance against the service levels.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of quarterly Scheme administration reports has been undertaken in accordance with Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the B&CEH internal audit report to confirm that it summarises the internal audit work conducted during the reporting period in relation to The People's Pension, including work relating to the completeness and timeliness of processing of core Scheme financial transactions by B&CEFS.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee Governance Schedule and Trustee minutes to confirm the B&CEH internal audit report was reviewed in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
<p>Control objective 24</p> <p>The Trustee Board has arrangements in place for ensuring that core financial transactions (including decumulation related transactions) are processed accurately and that payments are authorised and suitably controlled.</p>	<p>The RACC reviews, discusses and challenges the findings of B&CEH internal audit function reports that are presented at its quarterly meetings. These reports summarise the internal audit work and testing that has been undertaken in relation to The People's Pension for example Bounced Direct Debits, Business Plan and CALP, Investment Governance, Annual Charge.</p> <p>The internal audit function will present and agree its formal internal audit plan annually with the RACC and the Trustee Board.</p> <p>This will allow the internal audit function to agree audit requirements with the Trustee (which will include an option for them to request additional work in excess of The Pensions Regulator's expectations).</p> <p>To support the process for demonstrating how financial reconciliations will be completed and by whom, a detailed valuation process is maintained for unitisation including investment and disinvestment related activities.</p> <p>The BAPP system and the underlying SQL database process all core financial transactions automatically, including calculations around investments and disinvestments. Internal validations are performed to confirm investment and disinvestment detail to expected levels via the use of information received from the Custodian. There are both automated and manual controls in place to confirm that transactions are being processed automatically and accurately. These include the controls dashboards reviewed by Member Services and Client Services, the internal validation that BAPP runs before investment/disinvestments, daily bank reconciliations, daily cash agreement checks and BACS checks.</p>	<p>The internal audit function provides and seek agreement from the RACC to an annual programme of work, the annual audit plan which is structured in line with TPR's requirements relating to administration processes.</p> <p>The RACC receive a report summarising the internal audit work conducted during the reporting period and this includes work relating to the accuracy of processing of core Scheme financial transactions by B&CEFS, and work relating to the effectiveness of B&CEFS valuation and unit reconciliation process plus the wider reconciliations (bank, investment and contributions) in line with the annual audit plan.</p> <p>B&CEH discuss any process changes as a result of audit work with the RACC and the outcome will be documented in the minutes of the RACC meetings.</p>	<p>We obtained and inspected the internal audit annual plan to confirm in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the internal audit report to confirm it summarises the internal audit work conducted during the reporting period, including work relating to the accuracy of processing of core Scheme financial transactions by B&CEFS, and work relating to the effectiveness of B&CEFS valuation and unit reconciliation process plus the wider reconciliations (bank, investment and contributions).</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of the B&CEH internal audit report has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that B&CEH discuss any process changes as a result of audit work with the RACC.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
<p>Control objective 25</p> <p>The Trustee Board ensures that member retirement options selected are processed and managed in accordance with documented procedures.</p>	<p>The Trustee has delegated the process of managing the retirement process to its Scheme Administrator B&CEFS.</p> <p>The Trustee reviews processes from time to time during discussions at the RACC or Trustee Board meetings when appropriate. The retirement option process was last reviewed as part of the Master Trust Authorisation process and this was documented in the Crowe LLP AUP report paragraph. There has been no change to the retirement process since it was last reviewed by the Trustee in 2019.</p> <p>During the first half of 2020/21 sample checking of retirement processes was carried out by the B&CE risk and regulatory team on behalf of the Trustee and discussed with the Trustee Board at their meeting 3 September.</p> <p>Details of the retirement process is found in the member booklet and sections of the TPP web site.</p> <p>B&CEFS maintains a documented set of procedures and controls in place for managing the retirement process. The retirement process and options available at retirement are documented on The People's Pension website at:</p> <p>www.thepeoplespension.co.uk/employees/your-retirement</p>	<p>Retirements are managed in accordance with a documented process which has been reviewed and approved by the Trustee.</p> <p>The Trustee monitors changes in the retirement process and options available at retirement through B&CE's reports provided to the Trustee at RACC and Trustee Board meetings.</p> <p>These reports provide the Trustee with details of changes in the retirement process and options available at retirement together with changes to the relevant key Scheme documents.</p>	<p>We obtained and inspected the retirements documented process to confirm in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected email correspondence to confirm that a review of the retirements process has been undertaken by the Trustee Board.</p> <p>No exceptions noted.</p> <p>We obtained and inspected B&CE reports provided to the Trustee at RACC to confirm they include changes in the retirement process and options available at retirement and meeting minutes to confirm that these reports have been reviewed.</p> <p>Note: Throughout the Scheme year, there were no changes to the retirement processes and options available at retirement. As such, no such reviews have been completed.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
<p>Control objective 26</p> <p>The Trustee Board ensures that transaction errors are identified and rectified in accordance with a documented procedure.</p>	<p>The Trustee monitors B&CEFS administration performance. This is reviewed at quarterly Trustee Board and RACC meetings and is documented in the Trustee Board and RACC meeting agendas and minutes.</p> <p>In the event of any transaction errors occurring, B&CEFS will provide the Trustee with details of the error, what actions have been taken to prevent a reoccurrence, whether the member has suffered a loss and what actions have been taken to remedy the situation.</p> <p>Documented procedure; 'Identifying & reporting significant events to The Pensions Regulator (The People's Pension)' captures the 'key internal controls' established for the identification, escalation and reporting of such events, including any incidents resulting in member financial detriment, failures in systems & processes impacting member investments, etc.</p>	<p>Transaction errors are identified and rectified in accordance with a documented procedure which is reviewed and managed by its delegated authority B&CE Financial Services as administrator.</p> <p>The Trustee reviews the administration report provided by B&CE Financial Services quarterly and papers provided at its RACC and Trustee Board meetings where it questions the B&CE Director of Customer services about any transaction errors and resolution, breaches and complaints.</p> <p>In accordance with the Trustee Governance Schedule, the Trustee reviews B&CEFS performance through the quarterly Trustee meeting packs (including Scheme administration reporting) provided to the Trustee at RACC and Trustee meetings, which include B&CEFS reference to any transaction errors and resolution, breaches and complaints.</p> <p>B&CEH internal audit function provides the Trustee with a report at RACC meetings summarising the internal audit work conducted during the reporting period in relation to The People's Pension. This includes work relating to B&CE's administration performance and resolution of transaction errors.</p> <p>The Internal audit reports identifies any issues with controls and processes, including material transaction errors and recommends changes to processes or controls which are reported to the Trustee at its RACC meetings.</p> <p>In accordance with the Trustee Governance Schedule, the RACC reviews the internal audit reports. These reviews are recorded in the RACC meeting agendas and minutes.</p>	<p>We obtained and inspected the documented procedure for identification and rectification of transaction errors to confirm it is in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the quarterly Scheme administration reports to confirm they include B&CEFS performance against the service levels agreed with the Trustee, and include B&CEFS references to any transaction errors and resolution, breaches and complaints.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of the quarterly administration report and related papers, including discussions in relation to any transaction errors and resolution, breaches and complaints, has been undertaken.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the internal audit reports to confirm that it identifies any issues with controls and processes, including material transaction errors and recommends changes to processes or controls.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the RACC meeting minutes to confirm that a review of the B&CEH internal audit reports was undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
<p>Control objective 27</p> <p>The Trustee Board ensures that late and inaccurate contributions are pursued and resolved in accordance with documented procedures. Late contributions are reported to the trustees.</p>	<p>B&CEFS has procedures in place for the monitoring and resolution of late and inaccurate contributions. This includes validation checks on the payroll data submitted by employers designed to help reduce inaccurate contributions.</p> <p>The Trustee has reviewed B&CEFS procedures for monitoring the payment of contributions in accordance with The Pensions Regulator's Code of Practice No. 5 - Reporting late payment of contributions to occupational pension schemes.</p> <p>The Trustee had identified scenarios which could result in a higher risk of material payment failure and approved B&CEFS manual testing of a sample of payroll data from each risk scenario identified.</p> <p>The Trustee then reviewed B&CEFS sample testing at quarterly RACC meetings, and this is documented in the RACC meeting agendas and minutes.</p> <p>The Trustee Board has approved an updated version of B&CE's automated monitoring of contribution underpayments and a new reporting process. A pilot Scheme has been rolled out and the full process will be introduced in 2021/22.</p>	<p>Late and inaccurate contributions are pursued and resolved in line with a documented procedure which is reviewed and managed by its delegated authority B&CE Financial Services as administrator.</p> <p>Details of late contributions are reviewed by the Trustee at its RACC and Trustee Board quarterly meetings. Details of late payment of contributions are considered and discussed.</p> <p>In accordance with the Trustee Governance Schedule, the Trustee monitors the timeliness of contributions, B&CEFS sample testing and automated monitoring, through the quarterly Scheme administration reports provided to the Trustee at RACC and Trustee meetings.</p> <p>These reviews are documented in the RACC and Trustee meeting minutes.</p> <p>Scheme administration reports submitted to the Trustee Board for review show the results of B&CE's sample testing, details of any late payments and any employers reported to the Pensions Regulator for material breaches.</p> <p>These reviews are documented in the RACC and Trustee meeting agendas and minutes.</p> <p>B&CEH internal audit function provides the Trustee with a report mainly at RACC meetings summarising the internal audit work conducted during the reporting period in relation to The People's Pension. This includes work relating to the assessment of B&CEFS chasing and resolution of late and inaccurate contributions.</p>	<p>We obtained and inspected the documented procedures for late and inaccurate contributions to confirm it is in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the RACC and Trustee Board meeting minutes to confirm that details of late contributions are reviewed.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the quarterly Scheme administration reports to confirm they include the results of B&CEFS sample testing, details of any late payments and any employers reported to The Pensions Regulator for material breaches.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the RACC and Trustee meeting minutes to confirm that a review of quarterly Scheme administration reports has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the internal audit report to confirm it summarises the internal audit work conducted during the reporting period in relation to The People's Pension, including work relating to the assessment of B&CEFS chasing and resolution of late and inaccurate contributions.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
Control objective 27 (continued)	<p>B&CEH internal audit function provides the Trustee with a report at Trustee meetings summarising the internal audit work conducted during the reporting period. This includes work relating to the assessment of B&CEFS chasing and resolution of late and inaccurate contributions. Going forward, the internal audit function will agree the Scheme Internal audit requirements with the Trustee mainly at RACC meetings (which will include an option for them to request additional work in excess of The Pensions Regulator's expectations). The B&CEFS procedure for the monitoring and resolution of late and inaccurate contributions includes procedures for insolvent employers and redundancy payment services. B&CEFS maintains a log of late contributions which includes action undertaken to collect payment.</p>	<p>In accordance with the Trustee Governance Schedule, the Trustee reviews the internal audit reports. These reviews are recorded in the RACC and Trustee meeting minutes.</p> <p>In accordance with the Trustee Governance Schedule, the Trustee monitors breaches of pensions legislation, identified by B&CE, through B&CE's reports provided to the Trustee at Trustee meetings.</p>	<p>We obtained and inspected Trustee meeting minutes to confirm that a review of the B&CEH internal audit report has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the B&CE's reports to confirm they include information in relation to breaches of pensions legislation, identified by B&CE.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
<p>Control objective 28</p> <p>The Trustee Board ensures that contributions are invested and allocated in accordance with member instructions or the requirements of the default arrangement.</p>	<p>B&CEFS has processes and procedures in place for carrying out investments in accordance with each member's instructions. The Trustee reviews this through internal audit, Scheme administration and risk and regulatory (breaches) reports provided to the Trustee at RACC and Trustee meetings.</p> <p>These reports show B&CEFS performance against service levels agreed with the Trustee.</p> <p>These reports also include details of contributions invested together with a summary of fund and profile switches and investments within each fund. As noted in the current control procedure.</p> <p>B&CEH internal audit function provides the Trustee with a report at Trustee meetings summarising the internal audit work conducted during the reporting period in relation to The People's Pension. Going forwards, the internal audit function will be formalising the arrangements under the Trustee Governance Agreement. This will allow the internal audit function to agree audit requirements with the Trustee (which will include an option for them to request additional work in excess of The Pensions Regulator's expectations).</p> <p>In terms of addressing member investment requests and managing associated data (and member records), B&CEFS also has member specific procedures for both members in the default (Change in Glidepath) and members with self-select funds (Fund Switches).</p>	<p>Contributions are invested and allocated in line with a documented procedure which is reviewed and managed by its delegated authority B&CEFS as administrator.</p> <p>The Trustee reviews administration and risk and regulatory reports, at its IC, RACC and Trustee Board meetings, which detail the Scheme's receipt and allocation of contributions and report any breaches of procedure to invest and allocate contributions in line with Service Levels.</p> <p>The minutes of IC, RACC and Trustee meetings record details of any actions required in relation to contribution investment.</p> <p>B&CEH internal audit function provides the Trustee with a report at RACC meetings summarising the internal audit work conducted during the reporting period. This includes work relating to the assessment of B&CEFS procedures relating to the investment of contributions in accordance with member instructions or the default policy.</p> <p>In accordance with the Trustee Governance Schedule, the Trustee reviews the internal audit reports. These reviews are recorded in the Trustee Board and RACC meeting agendas and minutes.</p>	<p>We obtained and inspected the documented procedure for the investment and allocation of contributions to confirm in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the administration and risk and regulatory reports to confirm they include details of the Scheme's receipt and allocation of contributions and reported any breaches of procedure to invest and allocate contributions in line with Service Levels.</p> <p>No exceptions noted.</p> <p>We obtained and inspected IC, RACC and Trustee meeting minutes to confirm that a review of administration and risk and regulatory reports has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the IC, RACC and Trustee meeting minutes to confirm that they include any actions required in relation to contribution investment.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the internal audit report to confirm it summarises the internal audit work conducted during the reporting period in relation to The People's Pension, including work relating to the assessment of B&CEFS procedures relating to the investment of contributions in accordance with member instructions or the default policy.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of the B&CEH internal audit report has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Trustee oversight of IT systems and administration processes			
Control objective 28 (continued)	<p>The documented procedures set out the operational process starting from a member requesting a change to their investment holdings right through to receiving written confirmation of the changes made.</p> <p>The valuation process is a one-day cycle. Members who have selected the default arrangement are subject to automated life styling. The Change in Glidepath documented procedure and Fund Switches documented procedure confirms the processes for switching funds and life-styling to ensure accurate processing of member investment transactions and member instructions. They also set out the end to end process for member investment change request including accuracy of new investment allocation.</p>		

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Data quality			
<p>Control objective 29</p> <p>The Trustee Board ensures member data is complete and accurate and is subject to regular data evaluation.</p>	<p>The Trustee ensures member data is complete and accurate as is possible through the delegation of regular data integrity evaluation by its Scheme Administrator B&CEFS.</p> <p>The Scheme Administrator's IT system records are updated daily through ad-hoc instructions received from Scheme members and information received from employers participating in the Scheme.</p> <p>B&CEFS regularly reviews the completeness and accuracy of the common data and conditional data it holds for members of The People's Pension.</p> <p>B&CEFS provide the Trustee with administration reports to enable a review of the completeness and accuracy of member data at Trustee meetings.</p> <p>These reports will show the percentage of Scheme membership where common data and conditional data are present.</p> <p>B&CEH internal audit function provides the Trustee with a report at Trustee meetings summarising the internal audit work conducted during the reporting period in relation to The People's Pension. This includes work relating to the assessment of B&CEFS data evaluation processes and procedures.</p> <p>B&CEFS run monthly data quality reports on the completeness and accuracy of common and conditional data.</p>	<p>In accordance with the Trustee Governance Schedule, the Trustee monitors and reviews the completeness and accuracy of member data through the Scheme administration reports provided to the Trustee at Trustee Board and RACC meetings.</p> <p>These reviews are documented in the Trustee meeting agenda and minutes and include data scores for both common and conditional data in line with TPR guidance.</p> <p>The Trustee also discusses the Scheme administrator's data strategy and improvement plan to improve the data scoring and the output is reflected in the reports to the RACC.</p> <p>These reviews are documented in the RACC meeting agenda and minutes.</p> <p>B&CE's internal audit function provides the Trustee with a report at RACC and Trustee Board meetings summarising the internal audit work conducted during the reporting period in relation to The People's Pension.</p> <p>This is discussed by the Trustee with the internal auditor and includes work relating to the assessment of B&CE's data evaluation processes and procedures. In accordance with the Trustee Governance Schedule, the Trustee reviews the internal audit reports. These reviews are recorded in the Trustee meeting agendas and minutes.</p>	<p>We obtained and inspected the quarterly administration reports to confirm they include data scores for both common and conditional data.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the RACC and Trustee Board meeting minutes to confirm that a review of quarterly administration reports has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Scheme administrator data strategy and improvement plan to confirm in place.</p> <p>No exceptions noted.</p> <p>Through enquiry and inspection of meeting minutes, we confirmed that the output from the Scheme administrator data strategy and improvement plan is reflected in the reports to the RACC.</p> <p>No exceptions noted.</p> <p>We obtained and inspected RACC meeting minutes to confirm that a review of the output from the Scheme administrator data strategy and improvement plan has been undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the internal audit report to confirm it summarises the internal audit work conducted during the reporting period in relation to The People's Pension, including work relating to the assessment of B&CEFS data evaluation processes and procedures.</p> <p>No exceptions noted.</p> <p>We obtained and inspected RACC meeting minutes to confirm that a review of the B&CEH internal audit report was undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities(continued)

Control objectives	Background information	Control activities	Crowe tests
Communications and reporting			
<p>Control objective 30</p> <p>The Trustee Board maintains a documented member communications plan which is regularly reviewed.</p>	<p>The Trustee has delegated the delivery of communication services to B&CEH Communications and Marketing team.</p> <p>B&CEH maintain a communications plan and provide this to the Trustee annually at a RACC meeting. This plan sets out the business and marketing objectives for the financial year and the channels of communication that will be used to communicate these messages.</p> <p>The Trustee has agreed the key Scheme documentation which should be referred to the RACC for approval. As part of B&CEH documentation re-approval process, documentation is reviewed at least once each year to ensure they continue to provide accurate information.</p> <p>The progress of the Communications Plan is discussed by the Trustee at its quarterly RACC meetings and this includes any materials to be approved (ratification where items approved by circulation), key activity and communication material developed or delivered material over the last 3 months and expected over the next 6 months.</p>	<p>In accordance with the Trustee Governance Schedule and Business Activity Plan, B&CEH provides the Trustee with a Communications Plan annually.</p> <p>The Communication Plan outlines key objectives (including approaches to enhance member engagement) metrics, target audiences, channels of communication and delivery timings.</p> <p>The RACC reviews this Communications Plan and discusses it with B&CEH. Any comments and or actions are recorded in RACC meeting minutes and matters arising.</p> <p>The progress of the Communications Plan is discussed by the Trustee at its quarterly RACC meetings.</p> <p>In accordance with the Trustee Governance Schedule, the Trustee monitors and reviews material changes to key Scheme communications at RACC Meetings. These reviews are documented in the RACC meeting minutes.</p>	<p>We obtained and inspected the Communication Plan to confirm in place.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that the Communications Plan has been provided to the Trustee in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Communication Plan to confirm it outlines key objectives (including approaches to enhance member engagement) metrics, target audiences, channels of communication and delivery timings.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the RACC meeting minutes to confirm that a review of the Communications Plan has been undertaken.</p> <p>No exceptions noted.</p> <p>We obtained and inspected RACC meeting minutes to confirm that any comments and/or actions in relation to the Communications Plan are recorded.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the RACC meeting minutes to confirm that a review of the progress of the Communications Plan has been undertaken.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the RACC meeting minutes to confirm that a review of material changes to key Scheme communications is undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Communications and reporting			
<p>Control objective 31</p> <p>Arrangements are in place for ensuring that the quality and accuracy of member communications are assessed by the Trustee Board.</p>	<p>The Trustee has delegated the delivery of communication services to B&CEH Communications and Marketing team.</p> <p>B&CEFS has procedures in place for managing the retirement process and ensuring that communications to members approaching retirement meet regulatory requirements, using a bespoke digital approval system.</p> <p>All communication materials go through a robust process of approval for content, style, tone of voice and regulatory compliance. This allows the Trustee to ensure all communication materials are audience appropriate, adhere to clear English standards and are fully compliant with underlying regulation.</p>	<p>An audit trail of any changes to any communication material is tracked using Digital Approval System (DAS) which enables the Trustee to oversee what is being produced for members and approve key documents.</p> <p>All documentation is reviewed at least annually by the B&CE Communication and Marketing team.</p> <p>The Trustee reviews material changes to relevant web content and key documents that include, the Member Booklet, Your Options on Retirement, the Member Protection Statement, any documents relating to new joiners.</p>	<p>We obtained and inspected the Digital Approval System (DAS) to confirm that an audit trail of any changes to any communication material is tracked.</p> <p>No exceptions noted.</p> <p>Through enquiry and inspection of meeting minutes, we confirmed that a review of all documentation is undertaken at least annually by the B&CE Communication and Marketing team.</p> <p>No exceptions noted.</p> <p>We obtained and inspected Trustee meeting minutes to confirm that a review of material changes to web content and key documents is undertaken in accordance with the Trustee Governance Schedule.</p> <p>No exceptions noted.</p>

5. Control objectives and control activities (continued)

Control objectives	Background information	Control activities	Crowe tests
Communications and reporting			
<p>Control objective 32</p> <p>The Trustee Board has established a process for reporting member feedback (including issues raised by members) and complaints to the trustees, including resolution procedures. Member feedback and issues are logged and reviewed by the Trustee Board.</p>	<p>The Trustee draws upon the expertise of B&CEH Marketing and Communications research team who are dedicated to the testing and delivery of communication materials.</p> <p>The Trustee has adopted processes to ensure that appropriate administration standards are satisfied, and mechanisms are in place for all members' views to be represented at Trustee Board level.</p> <p>Each year the Trustee delivers a live webinar or pre-recorded event that enables members to raise questions directly with the Trustee.</p> <p>The Trustee (or B&CEH on its behalf) engages with customers across a number of platforms, through direct communications, website and online portals and social media.</p> <p>The Scheme's 2 stage Internal Disputes Resolution Procedure (IDRP), allows members to escalate their concerns directly to the Trustee. All 2nd stage IDRP decisions on submissions are tabled and discussed at quarterly Trustee Board meetings. All complainants reaching the second stage of the process receive a letter from the Chair of the RACC explaining the reasons for the decision. In the event the Chair of RACC is unavailable the Chair of the Trustee Board will sign the letter.</p> <p>The lessons learned from complaints or IDRP's are also fed back to the Scheme Administrator and the Trustee for use in training or communication methods or materials.</p> <p>All members have the facility to make a submission to the Trustee at:</p> <p>www.thepeoplespension.co.uk/contact-us</p>	<p>Reports are provided to the RACC annually with the results of members surveys and focus groups, together with opinions from employers and advisers.</p> <p>The feedback captured from members is reported at RACC and at Trustee Board meetings with comments submitted via the email link in the Chair's Statement and where appropriate, used for training purposes and or fed into the development or introduction of new or updated communication materials and channels.</p> <p>The Trustee is participant at The People's Pension annual webinars or pre-recorded events (alongside senior representatives from Scheme Administrator, Strategist and Founder). This enables members to raise questions directly with the Trustee.</p>	<p>We obtained and inspected the annual report provided to the RACC to confirm it includes the results of member's surveys and focus groups, together with opinions from employers and advisers.</p> <p>No exceptions noted.</p> <p>We obtained and inspected RACC meeting minutes to confirm that a review of feedback captured from members has been undertaken.</p> <p>No exceptions noted.</p> <p>We obtained and inspected the Chair's Statements to confirm that it includes a link for members to submit comments.</p> <p>No exceptions noted.</p> <p>Through enquiry and inspection, we confirmed that member feedback is used for training purposes and/or fed into the development or introduction of new or updated communication materials and channels.</p> <p>No exceptions noted.</p> <p>Through enquiry and inspection, we confirmed that the Trustee is participant at The People's Pension annual webinars or pre-recorded events.</p> <p>No exceptions noted.</p>

Appendix – Letter of engagement



Our ref: AP/PS/LOP00034

10 October 2020

The Trustee of The People's Pension
C/O Philip Crisp
B&CE
Manor Royal, Crawley
West Sussex
RH10 9QP

Dear Sirs

This letter sets out the basis on which we shall be pleased to act for you and includes your and our respective responsibilities.

Under 'Other Matters' below, we set out our maximum legal liability. This letter is subject to the annexed Terms of Business and these include other important details, including provisions that further limit the amount of our liability in certain circumstances. Please read this letter and the Terms of Business carefully, and raise with me any questions that you might have.

1. Scope of our work

- 1.1 You have asked us to act as Service Auditor to deliver services to you in connection with the governance control procedures established by the Trustee of The People's Pension ("the Master Trust") for the period from 1 April 2020 to 31 March 2021 (the "Specified Period").

2. Responsibilities of the Trustee

- 2.1 The Trustee of the Master Trust ("the Trustee") in relation to which the Service Auditor's assurance report is to be provided is and shall be responsible for the design, implementation and operation of governance control procedures at the Master Trust. The Trustee's responsibilities are and shall include:
- a) acceptance of responsibility for governance control procedures;
 - b) evaluation of the effectiveness of the governance control procedures established by the Trustee using suitable criteria; and
 - c) supporting its evaluation with sufficient evidence, including documentation.
- 2.2 The Trustee acknowledges and accepts its responsibility for providing a written statement ("the Trustee's Report") about whether in all material respects, and based on suitable criteria:
- a) The Trustee's Report describes fairly the governance control procedures established by the Trustee that relate to control objectives which were in place throughout the Specified Period;
 - b) The governance control procedures described were suitably designed throughout the Specified Period such that there is reasonable assurance that the specified control objectives would be achieved if the described governance control procedures were complied with satisfactorily; and
 - c) The governance control procedures described were operating with sufficient effectiveness to provide reasonable assurance that the related control objectives were achieved during the Specified Period.

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Appendix – Letter of engagement

10 October 2020



- 2 -

2.3 This written statement will be included in, or attached to, the Trustee's description of the Trustee's governance control procedures in the Trustee's Report and provided to user entities as part of the final Trustee's Report issued by the Trustee.

2.4 In drafting this report the Trustee has regard to, as a minimum, the criteria specified within TECHNICAL RELEASE TECH 05/20 ASSURANCE REPORTING ON MASTER TRUSTS issued by the Institute of Chartered Accountants in England and Wales.

3. Responsibilities of the Service Auditor

3.1 It is our responsibility to form an independent opinion, based on the work carried out in relation to the governance control procedures established by the Trustee as described in the Trustee's Report and report this to the Trustee.

4. Scope of the Service Auditor's work

4.1 We conduct our work in accordance with the procedures set out in TECHNICAL RELEASE TECH 05/20 ASSURANCE REPORTING ON MASTER TRUSTS. Our work will include enquiries of key individuals at the Master Trust.

4.2 In reaching our conclusion, the minimum criteria against which the governance control procedures are to be evaluated are the control objectives developed for assurance reporting on Master Trusts as set out within TECHNICAL RELEASE TECH 05/20 ASSURANCE REPORTING ON MASTER TRUSTS, together with additional governance control procedures as considered appropriate

4.3 Any work already performed in connection with this engagement before the date of this letter will also be governed by the terms and conditions of this letter.

4.4 We may seek written representations from the Trustee in relation to matters on which independent corroboration is not available. We shall seek confirmation from the Trustee that any significant matters of which we should be aware have been brought to our attention.

4.5 Our objective will be to conduct an examination that will include procedures to obtain reasonable assurance, in all material respects and based on suitable criteria, to enable us to express an opinion as to whether:

- a) The Trustee's Report fairly presents the governance control procedures established by the Trustee that relate to the control objectives specified in the Trustee's Report which were in place throughout the Specified Period;
- b) The governance control procedures established by the Trustee described in the Trustee's Report were suitably designed to provide reasonable, but not absolute, assurance that the specified control objectives would have been achieved if the described governance control procedures operated effectively throughout the Specified Period; and
- c) The governance control procedures established by the Trustee that were tested were operating with sufficient effectiveness to provide reasonable, but not absolute, assurance that the related control objectives were achieved throughout the Specified Period.

4.6 In conducting our work we will examine on a test basis, evidence supporting the Trustee's description of controls, including the operating effectiveness of the related controls, and perform other procedures as we consider necessary in the circumstances to provide a reasonable basis for our report. Our examination will not include other systems, controls, operations or services not specified herein including internal control at user organisations and, accordingly, we will express no opinion on such items.

Appendix – Letter of engagement

10 October 2020



- 3 -

5. Inherent limitations

- 5.1 The Trustee acknowledges that governance control procedures designed to address specified control objectives are subject to inherent limitations and, accordingly, errors or irregularities may occur and not be detected. Such procedures cannot guarantee protection against fraudulent collusion especially on the part of those holding positions of authority or trust. Furthermore, the opinion set out in our report will be based on historical information and the projection of any information or conclusions in our report to any future periods will be inappropriate.

6. Use of our report

- 6.1 Our report will, subject to the permitted disclosures set out in paragraph 6.3 below, be made solely for the use of the Trustee and solely for the purpose of reporting on the governance control procedures established by the Trustee, in accordance with these terms of our engagement.
- 6.2 Our work will be undertaken so that we might report to the Trustee those matters that we have agreed to state to it in our report and for no other purpose.
- 6.3 We permit the disclosure of our report, in full only, to verify to the recipient that a report by the Service Auditor has been commissioned by the Trustee and issued in connection with the governance control procedures established by the Trustee without assuming or accepting any responsibility or liability to the recipient on our part.
- 6.4 To the fullest extent permitted by law, we do not and will not accept or assume responsibility to anyone other than the Trustee as a body for our work, for our report or for the opinions we will have formed.

OTHER MATTERS

7. Limitation of liability

- 7.1 Our aggregate liability in respect of all claims by you under or in connection with this Contract shall be limited to the amount of £1,000,000. This limit shall apply to any and all causes of action against us in respect of or arising from or in any way connected with our engagement by you. However, we never seek to exclude or restrict our liability to the extent that we cannot do so by law for any reason, or any liability for our fraud or dishonesty. If you wish to discuss this or other provisions before we carry out work for you, please let us know.

8. Fees

- 8.1 Our fees are calculated on the basis of the time spent on your affairs by the partners and staff and on the levels of skill or responsibility involved and will be billed at approximately monthly intervals during the course of our work and once a particular assignment has been completed. The amount of our fee to provide Type 2 Service Auditor assurance services will be agreed with you annually. We shall charge in addition any disbursements and VAT, and reserve the right to charge interest on unpaid bills and suspend work until they are paid.
- 8.2 You undertake to ensure that our bills are settled in accordance with the attached statement of our terms of business "Terms and Conditions".
- 8.3 If we need to do work outside the responsibilities outlined in our engagement letter, we will advise you in advance. This will involve additional fees. Accordingly it is in your interest to ensure that your records and information requirements are completed at the agreed stage.

Appendix – Letter of engagement



10 October 2020

- 4 -

9. Terms of Business

- 9.1 The Terms of Business accompanying this letter contain further information about the basis on which we will be pleased to carry out work for you. In the event of a conflict between the Terms of Business and what is set out in this letter, this letter will prevail.

10. Confirmation of your agreement

- 10.1 Please let me know if you have any questions in relation to this letter and the Terms of Business. If you are content with them, then would you please confirm your agreement by signing and returning one of the enclosed copies.
- 10.2 If I do not hear from you regarding this letter but it is clear that you wish us to proceed with the work, then this letter and the Terms of Business will govern the terms of our engagement.

Yours faithfully

A handwritten signature in black ink that reads "Crowe U.K. LLP".

Crowe U.K. LLP

AGREEMENT OF TERMS

I acknowledge receipt of this letter, which together with the Terms of Business fully records the agreement between us concerning your appointment to carry out the work described in it.

Name Steve Delo

Signed

A handwritten signature in black ink, appearing to be "S. Delo".

Position Trustee Chair

Date 11/12/2020

For and on behalf of the Trustee.

Appendix – Letter of engagement



10 October 2020

- 5 -

TERMS OF BUSINESS

1. Definitions

- 1.1 In these Terms of Business and any associated engagement letter:
- 1.1.1 "We" means Crowe U.K. LLP, and shall include any successor or assignee;
- 1.1.2 "You" means the person or company with whom the Contract is agreed and that is named as such in the engagement letter;
- 1.1.3 "Contract" means the terms of engagement agreed between Crowe U.K. LLP and you to which these terms of business relate and into which they are incorporated;
- 1.1.4 "Services" means the services we agree to provide you with under the Contract, as set out in the engagement letter.

2. Limitation of liability

- 2.1 We never seek to exclude or restrict our liability for our fraud or dishonesty, or otherwise to the extent that we cannot do so by law for any reason.
- 2.2 We accept that we owe you a duty of care to provide the Services with reasonable skill and care, regardless of whether the people we decide to use are members or employees (who may also be described as 'partners') of Crowe U.K. LLP or agents or sub-contractors retained by us. You in turn agree that you will not bring any claim based on any cause of action in respect of or in any way connected with the Contract against anyone other than Crowe U.K. LLP.
- 2.3 Where we are liable to you, and in addition any other person is also liable to you, or any such person or you have caused or contributed to the same loss or damage for which we are liable, either in whole or in part, then our liability shall be limited to such amount as is just and equitable having regard to the extent to which each of us and/or such other person is liable for and/or has otherwise caused or contributed to such loss or damage. For the purposes of this clause, the liability for and/or cause or contribution of any such other person shall be determined by disregarding any limitation, exclusion or restriction of legal liability or any inability to pay or insolvency, even if it means that you cannot recover any compensation from such other person.
- 2.4 Any action (including any proceedings in a court of law) in connection with this Contract or the Services must be brought within 3 years of the date of the act or omission that is alleged to have given rise to the action.

3. Crowe Global and its member firms

- 3.1 Crowe U.K. LLP is a member of Crowe Global, a Swiss Verein. Each member firm of Crowe Global

is a separate and independent legal entity. There is no ownership, agency, partnership or control relationship amongst any of Crowe Global and its member firms. Crowe Global does not perform services and you agree that you will not bring a claim against it.

- 3.2 It is possible that we may retain another member firm of Crowe Global to act for us as a sub-contractor in providing the Services to you under this Contract. In that event, we accept that we owe you a duty of care to provide the Services for which we have retained that other member firm as a subcontractor, as set out in Clause 2.2, and you in turn agree that you will bring any claim against us and not against that other member firm, as set out in Clause 2.2.

- 3.3 If we have not retained another member firm as a sub-contractor, then you agree that any services that may be provided to you by another member firm are separate from the Services provided by us under this Contract. You will be responsible for entering into a separate contract of engagement with that other member firm, on such terms as you and that other member firm may agree. You agree that we shall not under any such circumstances be responsible or liable in any way whatsoever for any acts or omissions of Crowe Global or of any other member firms of Crowe Global.

4. Responsibility to third parties

- 4.1 We shall provide the Services for your exclusive use and for the purpose for which you engage us, and you agree that you will not disclose our advice or the product of our Services to anyone else without our specific written agreement.
- 4.2 We do not accept any responsibility to anyone other than you ("third party") for any aspect of our Services, whether because any work of ours is made available to the third party or for any other reason.
- 4.3 To the extent that the law imposes on us any responsibility to any third party even though we do not accept that, our liability to that third party shall be limited in accordance with the "Limitation of liability" section of the engagement letter. You therefore agree that you will share a single limit of liability as set out in those provisions in the event that we have a liability to you and to a third party.

5. Nature of our Services

- 5.1 You acknowledge that we will rely on information and documentation provided to us by you, your management, employees and third parties in the course of our work. We will not be responsible for the consequences of any deficiency in the information or documentation provided to us, whether as a result of it being false, misleading or incomplete. You agree to inform us if you are or become aware of anything inaccurate or misleading in respect of information or documentation provided to us.
- 5.2 Except as expressly agreed in the description of the Services in the engagement letter, our work will not

Appendix – Letter of engagement



10 October 2020

- 6 -

- be an audit as conducted in accordance with applicable auditing standards. Unless expressly agreed, we will not seek to verify the accuracy of the information provided to us in the course of carrying out our Services, and we will not seek to or be responsible for detecting fraud by you or by your management, employees or third parties. We shall satisfy ourselves that the information provided is consistent with other information provided to us, but we will otherwise generally accept the explanation and assurances we receive from the directors, officers and employees of the entity that is the subject of the Services under this Contract or other third parties in the course of our work.
- 5.3 It may be necessary or desirable to instruct other professional advisers or third party suppliers in connection with the Services, upon whom we may place reliance and/or in conjunction with whom we may carry out our work. You shall be responsible for the appointment of such other professional advisers or suppliers and for their fees and expenses. We shall have no liability for the non-delivery, non-performance or any acts, errors or omissions of such other advisers or suppliers (other than our express agents), regardless of any role that we may perform in relation to communications with such advisers or suppliers.
- 6. Fees**
- 6.1 You agree to pay our fees within 30 days from the date of the invoice.
- 6.2 Payment of our fees from a bank based outside the UK must be made via transfer to our bankers and must quote our invoice details.
- 6.3 We will claim for relief for any fees falling within the scope of the VAT Regulations 1995 (SI 1995/2518).
- 7. Non-payment of fees**
- 7.1 If you fail to pay our fees within 30 days from the date of the invoice we reserve the right:
- 7.1.1 to charge monthly interest on the unpaid amount at 5% over the Barclays Bank plc Base Rate in accordance with the Late Payment Legislation;
- 7.1.2 to suspend the Services and any other work which we are carrying out for you;
- 7.1.3 to take whatever legal remedy exists in order to obtain payment; and
- 7.1.4 to claim the cost of debt recovery.
- 8. Communicating with you**
- 8.1 Please let us know if you have a preferred method of communication e.g. telephone or email or letter. Unless we hear from you, we will use whatever mode of communication appears appropriate in the circumstances.
- 8.2 All email messages sent to us will, if properly addressed, arrive on the terminal of the person to whom they are addressed. Please be aware of the following points:
- 8.2.1 the firm is connected to the internet, but the exchange of email messages may be subject to delays outside of our control;
- 8.2.2 the safe delivery of email via the internet should not be assumed;
- 8.2.3 the confidentiality of email cannot be guaranteed.
- 8.3 Please ask about our secure portal solutions. Unless you ask us, we shall not encrypt or promise to password-protect any email or attachment sent by us to you.
- 8.4 You and we shall not be responsible for each other's loss or damage arising from any corruption or alteration, or any unauthorised interception, redirection, copying or reading, of emails including any attachments.
- 8.5 You and we shall not be responsible for the effect on each other's hardware or software (or any loss or damage arising from any such effect) of any emails or attachment which may be transmitted by the other.
- 8.6 The recipient is responsible for carrying out a virus check on attachments.
- 9. Improving our service**
- 9.1 If at any time you would like to discuss with us how we could improve our service to you or you are dissatisfied with the service you are receiving, please let us know by contacting the engagement partner or Peter Varley, the Managing Partner of this office. Alternatively the Chief Executive of the firm Nigel Bostock, Crowe U.K. LLP, 55 Ludgate Hill, London, EC4M 7JW.
- 9.2 Should our service be less than satisfactory we will take all reasonable steps to correct the situation. We undertake to investigate any complaints carefully and promptly and to report our findings to you.
- 9.3 If you are still dissatisfied you may take the matter up directly with the Institute of Chartered Accountants in England and Wales at:
- Professional Conduct Department
ICAEW
Level 1, Metropolitan House
321 Avebury Boulevard
Milton Keynes MK9 2FZ
- 10. Professional rules and practice guidelines**
- 10.1 We will observe the bye-laws, regulations and ethical guidelines of the Institute of Chartered Accountants in England and Wales and accept instructions to act for you on the basis that we will act in accordance with them. The requirements are

Appendix – Letter of engagement



10 October 2020

- 7 -

- available on the internet at www.icaew.com/membershandbook.
- 10.2 We are eligible to conduct audits under the Companies Act 2006 and details about our audit registration can be viewed at www.auditregister.org.uk, under reference number C001095468.
- 10.3 Details of our professional indemnity insurer can be found on our internet web site (www.crowe.com/uk/croweuk) on the legal information page, in accordance with the disclosure requirements of the Services Regulations 2009.
- 10.4 Our Services for you shall not be exclusive, and you agree that this Contract shall not prevent or restrict us from carrying on our business. We reserve the right during our engagement with you to act for other clients who may be competitors of yours or in respect of whom issues of commercial conflict may arise, subject to the Confidentiality section below.
- 10.5 Where a specific legal or ethical conflict of interest, actual or potential, is identified, and we believe that implementing appropriate procedures can properly safeguard your interests, we will promptly notify you and discuss the position with you. Please note that there may be circumstances where we are unable to fully explain all of the aspects of the conflict because of obligations that we owe to other clients or third parties. It may also not be possible to put effective safeguards in place, or you may not be content with the situation, in which case it may be necessary for us to terminate the Contract. You also agree to inform us immediately if you should become aware of, or believe that there may be, a conflict affecting our provision of the Services.
- 10.6 Our files are periodically reviewed by an independent regulator or quality controller as part of our on-going commitment to providing a quality service. The reviewers are bound by the same rules of confidentiality as our partners and staff.
- 11. Confidentiality**
- 11.1 We confirm that where you give us confidential information we shall at all times keep it confidential, except as required by law or as provided for in regulatory, ethical or other professional statements relevant to our engagement or for the purpose of notifying insurers concerning any actual or potential dispute relating to the Services.
- 11.2 You agree that we will be complying sufficiently with our duty of confidence if we take steps that we in good faith think fit to keep appropriate information confidential during and after our engagement.
- 11.3 You agree to reimburse any reasonable costs that we may incur in complying with any requirement for disclosure of your information that is imposed on us in any proceedings or regulatory process that does not involve any substantive claim or proceeding against us, provided that we promptly notify you in writing of any such requirement (to the extent we are legally permitted to do so) and that we reasonably cooperate with you in any efforts to protect against such disclosure.
- 11.4 You agree to keep confidential any methodologies and technology used by us to carry out the Services.
- 12. Data Protection**
- 12.1 When acting for you, we are a data controller in respect of any personal data you provide to us or to which we have access. This is because accountants and similar providers of professional services work under a range of professional obligations which oblige them to take responsibility for the personal data they process. For example if we detect malpractice whilst performing our services we may, depending on its nature, be required under our regulatory obligations to report the malpractice to the police or other authorities. In doing so we would not be acting on your instructions but in accordance with our own professional obligations and therefore as a data controller in our own right.
- 12.2 Where we and you are deemed in accordance with the data protection laws to be joint data controllers, you shall be liable for the personal data you process and we shall only be liable for the personal data we process.
- 12.3 You confirm that you have the right to supply personal data to us and this will not breach applicable data protection laws. Where you are providing personal data to us about a third party, for example a family member, a partner, a director (including a non-executive director), and/or any other type of member, business associate or third party, you confirm that you have their authority and express permission to provide us with their personal data.
- 12.4 Neither of us will by our act or omission put the other in breach of the applicable data protection laws.
- 12.5 Where we and you are joint data controllers, you should provide all relevant information to data subjects relating to the processing of their personal data (including the processing carried out by us) and to the exercise of their rights in relation to the processing of their personal data as required by the data protection laws ("Fair Processing Notice") and you will be the contact point for the data subject.
- 12.6 To enable us to discharge the services agreed under our engagement, and for other related purposes including updating and enhancing client records, analysis for management purposes and statutory returns, crime prevention and legal and regulatory compliance, we may obtain, use, process and disclose personal data about you or your entity, its officers and employees, as applicable. We confirm when processing data on your behalf we will comply with the relevant provisions of the applicable data protection laws.
- 12.7 Where we act as a data processor in relation to your personal data, we will:
- 12.8 process personal data:

Appendix – Letter of engagement



10 October 2020

- 8 -

- 12.8.1.1 for the purpose of performing our services and obligations to you; and
- 12.8.1.2 for such other purposes as may be instructed by or agreed with you or as otherwise notified in writing from time to time; and
- 12.8.1.3 in accordance with the applicable data protection laws;
- 12.8.2 implement appropriate technical and organisational measures to protect the personal data against unauthorised or unlawful processing and against accidental loss, destruction, damage, alteration or disclosure;
- 12.8.3 not otherwise modify, amend, remove or alter the contents of the personal data or subject to clause 12.1 above disclose or permit the disclosure of any of the personal data to any third party without your prior written authorisation;
- 12.8.4 adopt measures to maintain up to date records of our processing activities performed on your behalf which shall include the categories of processing activities performed, information on cross border data transfers and a general description of security measures implemented in respect of processed data;
- 12.8.5 unless otherwise required by data protection laws, or our own retention policy, we will return or delete all personal data upon the termination of our relationship with you;
- 12.8.6 adopt measures to ensure that only those personnel who need to have access to your personal data are granted access to it and that all of the personnel required to access your personal data are reliable and have been informed of its confidential nature;
- 12.8.7 not appoint a sub-processor without your prior written consent, not to be unreasonably withheld, and ensure an agreement is entered into with the relevant sub-contractor which includes terms which are substantially the same as the terms set out in this clause 12;
- 12.8.8 where we transfer your personal data to a country or territory outside the European Economic Area, to do so in accordance with data protection laws (including for the avoidance of doubt entering into standard form contracts);
- 12.8.9 notify you without undue delay if we receive: (i) a request from a data subject to access your personal data; or (ii) a complaint or request relating to the data protection laws;
- 12.8.10 assist you should you need to carry out a privacy impact assessment;
- 12.8.11 notify you in the event we become aware without undue delay of any breach of the data protection laws; and
- 12.8.12 permit without charge, on an annual basis, and / or where you become aware of a data breach or alleged breach of the data protection laws by us, reasonable access to the relevant records, files, tapes, computer systems, for the purposes of reviewing compliance with the data protection laws.
- 12.9 When acting for you in a personal capacity how we process your personal data is described in our privacy notice. This is available on our internet page. We will tell you if, in our opinion, your instructions may breach the applicable data protection laws.
- 12.10 Each of you and us shall indemnify and keep indemnified the other in full from and against all claims, proceedings, actions, damages, costs, fines, expenses and any other liabilities which may arise out of, or in consequence of, the indemnifying party's breach of the data protection laws or the performance or non-performance by its sub-processor(s) and personnel of its obligations in connection with this Contract in relation to the data protection laws, including loss of or damage to property, financial loss arising from any breach of the data protection laws or any other loss which is caused directly or indirectly by any act or omission arising from any breach of the data protection laws. Any amount payable by us under this clause shall form part of, and not be in addition to, the aggregate limit of liability.
- 13. Ownership and retention of documents**
- 13.1 All correspondence and papers in our possession or control and generated for our internal purposes (including our working papers) or addressed to us relating to the Services or the subject matter of the Services shall be our sole property.
- 13.2 We retain copyright and other intellectual property rights in everything produced by us before or during the Services.
- 13.3 We will keep correspondence and other papers and electronic data relating to the Contract, for such period as we may consider reasonable or that is required by law, and for at least eight years. After that time, we may destroy them without further reference to you.
- 14. Termination**
- 14.1 In relation to Services as Auditor under any statutory provisions, you or we may terminate the Contract only in accordance with the provisions of the relevant Act or regulation. In relation to any other Services, you or we may terminate the Contract at any time by giving not less than 30 days' notice in writing. We shall be entitled to payment for any work performed in relation to the Services by us prior to such termination.
- 15. Miscellaneous**
- 15.1 Neither of us may transfer nor assign this Contract, or any rights or obligations under it, without the prior written consent of the other party.

Appendix – Letter of engagement



- 9 -

10 October 2020

- 15.2 Neither of us will be liable to the other for any delay or failure to fulfil obligations caused by circumstances outside our reasonable control.
- 15.3 This Contract replaces and supersedes any previous proposal, discussion, correspondence, representation or agreement between us in relation to the Services, and forms the whole agreement between us in relation to such Services.
- 15.4 Any variation to the Contract shall only be effective if it is agreed in writing between you and a member in Crowe U.K. LLP, and only if agreed by reference expressly to the specific term to be amended.
- 15.5 Upon the termination of this Contract, we shall be under no further obligation to perform any part of the Services. However, the provisions of many clauses of these Terms of Business will, by their nature, continue to apply notwithstanding termination.
- 15.6 Unless we both agree otherwise, these Terms of Business (as amended from time to time) will apply to any future instructions that you may give us.
- 15.7 If at any time any provision of these Terms of Business or any engagement letter is or becomes illegal, invalid or unenforceable in any respect under the law of any jurisdiction, then that shall apply to the minimum extent required and shall not affect or impair the legality, validity or enforceability in that jurisdiction of any other provision of these Terms of Business or any engagement letter.
- 16. Applicable law and enforcement**
- 16.1 Our Contract with you is governed by, and interpreted in accordance with the laws of England and Wales.
- 16.2 A person who is not a party to the Contract has no right under the Contracts (Rights of Third Parties) Act 1999 to enforce any of the terms of the Contract. This clause does not prejudice you in relation to any right or remedy that exists independently of the Act.
- 16.3 However, clause 16.2 does not apply to members, employees, agents, sub-contractors and others who have the benefit of the exclusion of liability in their favour under clauses 2.2 and 3. Accordingly, such persons may enforce that exclusion in their favour under the Contracts (Rights of Third Parties) Act 1999.
- 16.4 The Courts of England and Wales shall have exclusive jurisdiction in relation to any claim, dispute or difference concerning this Contract and any matter arising from them. Each party irrevocably waives any right it may have to object to any action being brought in those Courts, to claim that the action has been brought in an inconvenient forum, or to claim that those Courts do not have jurisdiction.

For more information:

 01293 586666

 info@bandce.co.uk

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Registered in England and Wales No. 8089267.

The People's Pension Trustee Limited is the corporate Trustee of The People's Pension Scheme.

To help us improve our service, we may record your call.

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