LGPS Advisory Board (SAB) Code of Transparency

Compliance system Specification

The system described below will be purchased/developed in one of two versions these being

1. Portal - upload and reporting online hosted as a fully secure and completely ring fenced system
2. Lockbox - upload and reporting via manual intervention - hosted offline

Costs/resource requirements should be provided for both

Data receipt

1. Datasets will be received from approximately 300 sources (institutional pension investment service providers) in either standard excel file format or standard readable import file format (e.g. csv)
2. There will be up to 3 standard formats for datasets
3. Datasets will arrive either quarterly or annually and will be in respect of any one or more of 96 clients (88 LGPS administering authorities and 8 LGPS pools)
4. Each source will submit one dataset for each mandate it holds with a client therefore there could be up to 1000 datasets arriving each period
5. Sources should be able to upload their datasets online (portal version) or by submitting them to a system administrator (lockbox version)
6. Datasets must be accompanied by a self-certified 'true and fair' declaration (online for portal version)

Data

1. Datasets will include approximately 200 data items with multiple data types
2. Datasets will need to be indexed to both the source and the client it is in respect of
3. The relationship between sources and clients will be many to many both ways
4. Datasets will also require indexing by relevant period, date submitted, asset category (listed equity, property, unlisted debt, multi asset etc) and investment vehicle (direct mandate, fund, hedge, joint ventures etc)
5. Sources and clients will require login and contact data (updatable by source and client for portal version or by administrator for lockbox version)
6. Source/client agreed submission periods will need to stored
7. Datasets will contain some mandatory fields (to be defined by SAB)
8. Datasets will include data items with tolerances (to be defined by SAB)
9. System will need to store regulatory requirement check rules (to be defined by SAB or by third party) and the data items or combination of data items these checks will need to be performed against

Data security

1. The datasets are to be stored in encrypted format accessible only by trusted users
2. Trusted users will be required to login in to the system using a three level process
3. Storage and use of data must comply with all relevant data protection legislation
4. Data must be stored within the EU preferably within the UK
5. Data cannot be used for any other purpose or shared with any third party without the permission of the SAB
6. Data must be held separately from any other datasets
7. The data for the lockbox version must have no physical or wireless connection to any external networks

8. The portal version must use Extended Validation Certificate SSL
9. The portal version must regularly and successfully complete CREST approved penetration testing
10. A comprehensive Business Continuity service must be included to cover the system to ensure immediate access to a real time mirror system and full recovery within 48 hours

Functionality

On submission of a dataset the system should

1. Check the format of the file and reject if not correct
2. Check that all mandatory fields are present and reject if not
3. Check the 'true and fair' declaration is complete and reject if not
4. Check regulatory requirements and reject if fail
5. Check that data values are within tolerances and set warnings if not
6. Reasons for rejection will be notified to the source immediately (online for portal system or via email for lockbox)
7. Where the file is valid upload the dataset and notify the source and client and include details of any warnings (online for portal email for lockbox)
8. Where the file is rejected also notify the client (online for portal email for lockbox)

Exception Reporting

1. Weekly check of expected submission dates for source/client against valid file receipt dates - report where a valid file has not been received within x days of expected date, include records of invalid submissions and reasons for rejection
2. Reporting will be to source, client and SAB
3. Reporting output will be online for portal system and email for lockbox

Requested reporting

The system must be;

1. Compatible with a standard reporting software (online for Portal version)

Extended facilities

Although not included in the initial purchase/development project indicative costs should be provided for the following functionality in the Portal Version

1. Cost and performance summary screen- to show the client a real-time summary of costs and performance across selectable time period, asset category and investment vehicles
2. Cost drill down screen - the ability for a client to drill down from the summary into individual elements of cost both within and across sources, asset classes, investment vehicles and periods
3. Cost comparison summary screen - to enable the client to compare costs and performance at the summary level with those of all other clients
4. Cost comparison drill down screen - to enable a client to compare individual cost elements with those of all other clients
5. Online report builder - to enable the client to build and store their own reports and run them either on the fly or as timed jobs with the output available on screen and downloadable in both PDF and csv format

6. Screen output for all of the above should be selectable between table and chart formats

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