Master trust authorisation

# Fit and proper: role identification form

Scheme name	
Pension scheme registration (PSR) number	

The Pensions Regulator

September 2018

Contents	page
About this form	3
Section 1: Scheme trustees	5
Section 2: Scheme strategist	10
Section 3: Scheme funder	16
Section 4: Scheme establisher	20
Section 5: Persons who can appoint or remove trustees	22
Section 6: Persons who have the power to vary the terms of the trust, or vary the master trust if it's not held under trust	25
Section 7: Scheme promoter or marketer	28
Section 8: Other connected persons	30
Section 9: Additional information	31
Checklist	33
Next steps	34
How to contact us	back cover

## About this form

We must be satisfied that all relevant persons involved in the master trust are fit and proper persons.<sup>1</sup> We can assess<sup>2</sup> persons fulfilling one or more of the following role functions (either directly or on behalf of a person) in relation to the master trust scheme:

- Scheme trustee
- Scheme strategist
- Scheme funder
- Person who establishes the master trust (scheme establisher)
- Person who can appoint or remove trustees
- Person who has power to vary the terms of the trust, or vary the master trust if it is not held under trust
- Scheme promoter or marketer

You must use this form to do the following:

- 1. List all individuals you have identified as fulfilling one or more of the roles subject to the fit and proper assessment.
- 2. Provide a statement on how the collective knowledge, skills and experience of your trustees are appropriate for your master trust.
- 3. Provide a statement on how the collective knowledge, skills and experience of persons fulfilling the scheme strategist role are appropriate. This is applicable where you have more than one person fulfilling this role function.

In this form, references to 'the 2017 Act' are to the Pension Schemes Act 2017 and those to 'the Regulations' are to the Occupational Pension Schemes (Master Trusts) Regulations 2018. References to 'the code' are to our **Code of Practice no. 15: Authorisation and supervision of master trusts**, as published by TPR and laid before Parliament on 02 July 2018.

1 2017 Act Section 7(1)

<sup>2</sup> Although we may take into account such other matters as we consider appropriate (including, in particular, matters relating to a person connected with a person subject to the fit and proper assessment). (2017 Act, Section 7(4)(b))

It is important that you answer the questions in this form honestly and openly, and include relevant information. Any mistakes or omissions could lead to delays in carrying out our assessment and individuals are advised to familiarise themselves with the code and guidance<sup>3</sup> before completing the form. We have aligned the paragraph numbers in this form with this guide where possible.<sup>4</sup>

Our expectation is that before applying for authorisation, those running master trusts will carry out due diligence (to the extent possible) to determine if the relevant persons meet the requirements to be fit and proper, and to address any issues identified before submitting the application to us.

### Please note

This form is interactive. Please save the PDF to your computer, fill in your response to the questions as appropriate and submit it via the online master trust portal. You are also advised to keep a copy of the completed form for your records.

<sup>3</sup> Including the guide to identifying persons for fit and proper assessment

<sup>4</sup> Available on our website at: www.tpr.gov.uk/trustees/master-trust-authorisation.aspx

## **Section 1: Scheme trustees**

## 1.1 Identifying the trustees

We recognise that trustee boards can be formed in a number of different ways. No matter how your trustee board is structured, you need to identify all individual persons who carry out the trustee role function for your master trust, including those that are appointed as individuals or who act on behalf of a corporate trustee or corporate trustee director.

Please select the applicable statement for your trustee board structure:

**My scheme has multiple appointed trustees**. Please list all your appointed trustees in Table 1a.

My scheme's trustee board is solely a corporate body.

The corporate name is:

Company registration number:

Please list all the current directors of this corporate trustee in Table 1a.

#### Table 1a: Scheme trustees

You should use this table to list all individual appointed trustees or trustee directors for your scheme. You must have at least three trustees, or where there is a sole corporate trustee in place that isn't a professional trustee body (note that a professional trustee body is treated as one trustee), at least three directors.

Continue over for Table 1a...

#### Table 1a: Scheme trustees

Name of appointed trustee/trustee director	Are you also a scheme establisher?	<b>Type</b> (Please select)
	Yes No	Individual Individual's date of birth (dd/mm/yy) Corporate body Please go to Table 1b
	Yes No	Individual Individual's date of birth (dd/mm/yy) Corporate body Please go to Table 1b
	Yes No	Individual Individual's date of birth (dd/mm/yy) Corporate body Please go to Table 1b
	Yes No	Individual Individual's date of birth (dd/mm/yy) Corporate body Please go to Table 1b
	Yes No	Individual Individual's date of birth (dd/mm/yy) Corporate body Please go to Table 1b
	Yes No	Individual Individual's date of birth (dd/mm/yy) Corporate body Please go to Table 1b

Table 1a: Scheme trustees continued...

**Please note:** Additional space has been provided in Section 9 if required. Tick here if you have provided details for additional trustees in Section 9.

#### Table 1b: For individuals who perform the trustee role on behalf of a corporate

You should use this table to list the individuals who are performing the trustee role function and decision-making on behalf of the named corporate bodies for the scheme listed in Table 1a.

Company name 1	
Company registration number	
Name of assigned individual	<b>Date of birth</b> (dd/mm/yy)
Company name 2	

Company registration number	

Company name 3

Name of assigned individual	<b>Date of birth</b> (dd/mm/yy)

Company registration number	
Name of assigned individual	<b>Date of birth</b> (dd/mm/yy)

Table 1b: For individuals who perform the trustee role on behalf of a corporate continued
Please note: Additional space has been provided in Section 9 if required. Tick
here if you have provided details for additional trustees in Section 9.

## **1.2 Trustees' collective competency**

Please explain in Table 1c how your trustee board collectively has the knowledge, skills and experience to run your master trust effectively. This statement should explain how:

- the balance of skills and experience of the board is appropriate for your master trust
- the knowledge and skills are spread throughout the board and not concentrated in one or two members
- the board has diverse range of skills and experience, including those relating to DC pensions, trusteeship, investment, governance and administration
- the board maintains knowledge, skills and experience, including how skills gaps are identified, addressed and informs succession planning, and
- the board ensures individuals subject to contract, employment or delegation are themselves persons that possess relevant skills, knowledge and experience

You may also wish to upload your board skills matrix, board evaluation, training needs assessment, training plans, performance reviews<sup>5</sup> and any succession plans with your application.

Continue over for Table 1c...

5 You can find further information at: www.thepensionsregulator.gov.uk/5-skills-experience.aspx

Section 1: Scheme trustees

#### Table 1c: Statement of the collective competency of your trustee board

## **Section 2: Scheme strategist**<sup>6</sup>

## **2.1 Identifying the scheme strategist**<sup>7</sup>

We recognise that the scheme strategist may be an individual, multiple individuals, legal entity or operate collectively as a group of individuals. Please explain how you have identified your scheme strategist.

6 Section 39 of the Pension Schemes Act 2017

7 Please refer to section 3 of the Guide to identifying persons for the fit and proper assessment

Please select all applicable statements for your strategist structure:

<b>My scheme has a single individual carrying out the strategist function.</b> Please list this individual in Table 2a then go to section 3.	
<b>My scheme has a collection of individuals carrying out the strategist function.</b> Please list all these individuals in Table 2a then go to section 2.2.	
<b>My scheme has corporate entities carrying out the strategist function.</b> Please list these corporate entities in Table 2a and all the current directors of the relevant corporate in Table 2b then go to section 2.2.	
<b>My scheme trustee board carries out the strategist function.</b> No need to list trustees in Table 2a. Please go to section 2.2.	

Continue over for Table 2a...

#### Table 2a: Scheme strategist

Name of scheme strategist	Are you also a scheme establisher? <sup>8</sup>	<b>Type</b> (Please select)
	Yes No	Individual Individual's date of birth (dd/mm/yy) Corporate body Please go to Table 2b
	Yes No	Individual Individual's date of birth (dd/mm/yy) Corporate body Please go to Table 2b
	Yes No	Individual Individual's date of birth (dd/mm/yy) Corporate body Please go to Table 2b
	Yes No	Individual Individual's date of birth (dd/mm/yy) Corporate body Please go to Table 2b
	Yes No	Individual Individual's date of birth (dd/mm/yy) Corporate body Please go to Table 2b
	Yes No	Individual Individual's date of birth (dd/mm/yy) Corporate body Please go to Table 2b

8 A person who established the scheme, or is in the process of doing so. This may be the person who set up the trust deed and rules and may have provided the initial financial backing for the master trust.

Table 2a: Scheme strategist continued...

**Please note:** Additional space has been provided in Section 9 if required. Tick here if you have provided details for additional strategists in Section 9.

#### Table 2b: For corporate bodies listed in Table 2a

Company name 1	
Company registration number	
Name of assigned individual	Date of birth (dd/mm/yy)

Company name 2	
Company registration number	

Name of assigned individual	<b>Date of birth</b> (dd/mm/yy)
Company name 3	

Company registration number	
Name of assigned individual	Date of birth (dd/mm/yy)

Table 2b: For corporate bodies listed in Table 2a continued...Please note: Additional space has been provided in Section 9 if required. Tickhere if you have provided details for additional corporate bodies in Section 9.

### 2.2 Strategists' collective competency

You do not need to complete this section where you have only one individual performing the role of the scheme strategist, which should be covered separately by the individual's fit and proper form.

Where you have multiple individuals carrying out the scheme strategist role function, please explain in Table 2c how the knowledge, skills and experience of individuals collectively are appropriate for your master trust. This statement should cover:

- how, collectively, they possess the appropriate skills, knowledge and experience to perform their role for your master trust
- how the balance of skills and experience are evenly spread across all individuals, and
- how skills gaps are identified and addressed on an ongoing basis

For the latter two points, you can signpost the relevant part of your business plan in Table 2c. You may also wish to upload a skills matrix to support your statement.

Continue over for Table 2c...

Section 2: Scheme strategist

## Table 2c: Statement of the collective competency of your scheme strategist

## **Section 3: Scheme funder**<sup>9</sup>

## 3.1 Identifying the scheme funder

Please select the applicable statement for your scheme funder:

My scheme funder is omitted from the requirement to be assessed against the fit and proper criteria. <sup>10</sup> Please go to Section 4.	
My scheme doesn't have a scheme funder as it operates from its own resources and has no legally enforceable support from a third party or participating employers. Please go to Section 4.	
<b>My scheme has a scheme funder.</b> Please list your scheme funder and all current directors/partners in Table 3a, then go to Section 4.	

#### Table 3a: Scheme funder

Name of scheme funder 1		
Company registration number		
Funder function (Please select one or more)		
Liable to provide funds to enable your scheme to continue to run if it cannot meet its running costs from member charges.		
Entitled to receive profits from your scheme where member charges exceed running costs.		
Liable to pay for the cost of running the master trust following a continuity option if there is a triggering event.		
Agrees the business plan and continuity strategy with the trustees and strategist.		
Are you also a scheme establisher?	Yes No	

continued over...

9 The scheme funder will most commonly be the person who is financially supporting the master trust, with, where relevant, the expectation of being able to later draw profits. The definition of 'scheme funder' is found in section 39 of the Act.
10 Description 20

10 Regulation 28

Table 3a: Scheme funder continued...

Has this corporate been listed in previous sections?	Yes – please tick relevant section, and then move to the next scheme funder table.	
	Section 1 – scheme	trustee
	Section 2 – scheme	strategist
	No – please list all the curr the section below.	rent directors in
Names of all current directors		Date of birth (dd/ mm/yy)
Name of scheme funder 2		
Name of scheme funder 2 Company registration number		
Company registration number		
Company registration number Funder function (Please select one or more) Liable to provide funds to enable your scher	charges.	
Company registration number Funder function (Please select one or more) Liable to provide funds to enable your scher cannot meet its running costs from member Entitled to receive profits from your scheme	charges. where member charges	

Table 3a: Scheme funder continued...

Are you also a scheme establisher?	Yes No	
Has this corporate been listed in previous sections?	Yes – please tick relevant section, and then move to the next scheme funder table.	
	Section 1 – scheme trustee	
	Section 2 – scheme strategist	
	No – please list all the current directors in the section below.	
Names of all current directors	<b>Date of</b> <b>birth</b> (dd/ mm/yy)	
Name of scheme funder 2		
Company registration number		
Funder function (Please select one or more)		
Liable to provide funds to enable your schem cannot meet its running costs from member o		
Entitled to receive profits from your scheme v exceed running costs.	where member charges	
Liable to pay for the cost of running the mast option if there is a triggering event.	er trust following a continuity	
Agrees the business plan and continuity strat and strategist.	egy with the trustees	

Table 3a: Scheme funder continued...

Are you also a scheme establisher?	Yes No	
Has this corporate been listed in previous sections?	Yes – please tick relevant section, and ther move to the next scheme funder table.	
	Section 1 – scheme trustee	
	Section 2 – scheme strategist	
	No – please list all the current directors in the section below.	
Names of all current directors	Date of birth (dd/ mm/yy)	
<b>Please note:</b> Additional space has been prohere if you have provided details for addition		

## Section 4: Scheme establisher

## 4.1 Identifying the scheme establisher

Please select all applicable statements for your scheme establisher:

The scheme establisher(s) have been listed as the scheme trustee (Section 1 above). Please go to Section 5.	
The scheme establisher(s) have been listed as the scheme strategist (Section 2 above). Please go to Section 5.	
The scheme establisher(s) have been listed as the scheme funder (Section 3 above). Please go to Section 5.	
The scheme establisher(s) are no longer connected to the scheme.	
The name of such scheme establisher is: Please go to Section 5.	
The scheme establisher(s) have not been listed in the previous sections, and they are still connected to the scheme. Please list the scheme establishers in Table 4a.	

#### Table 4a: Scheme establisher

Name of scheme establisher		
<b>Type</b> (Please indicate)	Individual	Date of birth (dd/mm/yy)
	Corporate body Please list all the current	: directors below
	C	Company registration number
Describe the current connection	to the scheme	

Table 4a: Scheme establisher continued...

Name of all current directors	Date of birth (dd/ mm/yy)
<b>Please note:</b> Additional space has been provided in Section 9 if required. Tick here if you have provided details for additional scheme establishers in Section 9.	

## Section 5: Persons who can appoint or remove trustees

## 5.1 Identifying the persons who can appoint or remove trustees

Please provide the relevant extract or signpost the relevant sections of your trust deed and rules as supporting evidence of who has power to appoint and remove trustees.

#### Table 5a: Evidence of the persons who can appoint or remove trustees

Please select the applicable statement for your scheme in relation to such persons:

<b>All trustees are voted for as part of a member election process.</b> Please go to Section 6.	
<b>Not all trustees are voted for as part of a member election process.</b> Please list all the persons who can appoint or remove trustees in Table 5b.	

#### Table 5b: Persons who can appoint or remove trustees

Name of person		
<b>Type</b> (Please indicate)	Individual	Date of birth (dd/mm/yy)
	Corporate body	
	Со	mpany registration number
Has this person been listed in previous sections?	Yes – please tick relevant section and then move to section 7.	
	Section 1 – scheme	trustee
	Section 2 – scheme	strategist
	Section 3 – scheme funder	
	Section 4 – scheme establisher	
	No – please list all the cur the section below.	rent directors in

continued over...

Table 5b: Persons who can appoint or remove trustees continued...

Name of all current directors	Date of birth (dd/ mm/yy)
<b>Please note:</b> Additional space has been provided in Section 9 if required. Tick here if you have provided details for additional persons who can and appoint or remove trustees in Section 9.	

## Section 6: Persons who have the power to vary the terms of the trust, or vary the master trust if it is not held under trust

## 6.1 Identifying the persons who have the power to vary the terms of the trust, or vary the master trust if it is not held under trust

Please provide an extract or signpost the relevant sections of your trust deed and rules as supporting evidence of who has power to vary the terms of the trust, or vary the master trust if it is not held under trust.

Table 6a: Evidence of the persons who have the power to vary the terms of the trust, or vary the master trust if it is not held under trust

Please list all the persons who have the power to vary the terms of the trust, or vary the master trust if it is not held under trust in Table 6b.

## Table 6b: Persons who have the power to vary the terms of the trust, or vary the master trust if it is not held under trust

Name of person		
<b>Type</b> (Please indicate)	Individual	Date of birth (dd/mm/yy)
	Corporate body	
	Cor	npany registration number
Has this person been listed in previous sections?	Yes – please tick relevant section and then move to section 7.	
	Section 1 – scheme	trustee
	Section 2 – scheme	strategist
	Section 3 – scheme	funder
	Section 4 – scheme	establisher
	Section 5 – persons appoint or remove t	
	No – please list all the curr in the section below	ent directors

Table 6b: Persons who have the power to vary the terms of the trust, or vary the master trust if it's not held under trust continued...

Name of all current directors	Date of birth (dd/ mm/yy)
<b>Please note:</b> Additional space has been provided in Section 9 if required. Tick here if you have provided details for additional persons in Section 9.	

## Section 7: Scheme promoter or marketer

## 7.1 Identifying the scheme promoter or marketer

Our **Guide to identifying persons for fit and proper assessment** has provided criteria to apply when determining which promoters and marketers you need to identify for your master trust.

Please select all applicable statements for your scheme promoter or marketer:

<b>My scheme does not have a scheme promoter or marketer.</b> Please explain how your scheme is being promoted in Table 7a, and then go to Section 8.	
My scheme has scheme promoter or marketer, but they do not meet either of the criteria as set out in the guidance. Please explain why your scheme promoter or marketer does not meet the criteria in Table 7a, and then go to Section 8.	
My scheme has scheme promoter or marketer, and they are meeting one or more of the criteria as set out in the guidance. Please list your scheme promoter or marketer in Table 7b, and then go to Section 8.	

#### Table 7a: Please provide an explanation as indicated in the above statements

#### Table 7b: Scheme promoter or marketer

Name of scheme promoter or marketer		
Name of person		
<b>Type</b> (Please indicate)	Individual	Date of birth (dd/mm/yy)
	Corporate body Please list all the current	directors below
	Ca	ompany registration number
Describe how this scheme promoter/marketer meets one or more of the criteria as set out in the guidance		

Name of all current directors	Date of birth (dd/ mm/yy)
<b>Please note:</b> Additional space has been provided in Section 9 if required. Tick here if you have provided details for additional scheme promoters or marketers in Section 9.	

## **Section 8: Other connected persons**

Please use Table 8a to list any additional persons (individuals or corporate bodies) who are connected<sup>11</sup> to any of the individuals on this form and have the ability to influence the scheme design or operation through this connection. Please note that we will not undertake a full fit and proper assessment of connected persons. However, we may look at matters relating to them when conducting the fit and proper assessment of the person to whom they are connected.

#### Table 8a: Details of connected persons

Name of the individuals who are listed in Sections 1-7	Name of connected person	Explain the nature of influence in relation to the scheme
<b>Please note:</b> Additional space has been provided in Section 9 if required. Tick here if you have provided details of additional connected persons in Section 9.		

11 Please see section 7(5) of the Act for the meaning of 'connected' in this context

## Section 9: Additional information

Please include any additional information indicated in previous sections of the form or any other information you consider to be relevant to the application. If there is insufficient space, please continue on a separate sheet of paper and clearly identify the question to which the additional information relates.

Section	Table	Supplementary information

Section 9: Additional information continued...

Section	Table	Supplementary information

## Checklist

## Please check:

Sections 1-7 are mandatory to complete. Please ensure you answer the questions in these 7 sections as required.	
Any additional information that you have provided in Section 9 is clearly referenced to the relevant sections and tables in Sections 1-7.	
All supporting evidence has been appropriately named and emailed to: mastertrustauthorisation@tpr.gov.uk	

Form completed by:	
Role in relation to the scheme:	
Date completed: (dd/mm/yy)	

## **Next steps**

Once you have completed this form, please upload it and all your supporting documents to the master trust portal.

## **Data protection statement**

The Pensions Regulator (TPR) is a data controller for the purposes of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. We process personal data held by us for the purpose of the exercise of any of our statutory functions and objectives. We may also process personal data under other legislation such as the Fraud Act. This includes, for the avoidance of doubt, taking regulatory or enforcement action for breaches of any of this legislation.

We will only store your personal data for as long as our retention schedule allows. During this time, you may be able to exercise certain rights in relation to your personal data such as the right to access, objection and data portability. If you feel that we have handled your personal data in a manner inconsistent with your rights, you may lodge a complaint with the Information Commissioner's Office (ICO).

If you have any questions about how we handle your personal data please contact our Data Protection Officer (DPO) by email at: dpa@tpr.gov.uk or write to us at Telecom House, 125-135 Preston Road, Brighton, BN1 6AF. Further information on how your personal data is used, kept secure and your rights can be found by reading our privacy notice.

Any information, including any third party data, supplied to TPR may be used (including further disclosure) in connection with any of our statutory functions. TPR may check information it receives about you with what it already holds on its records. This includes information that you have provided as well as that given by others, such as government departments. We will not give information to anyone outside TPR unless the law allows us to do so.

#### How to contact us

The Pensions Regulator Telecom House 125-135 Preston Road Brighton BN1 6AF

www.thepensionsregulator.gov.uk

www.trusteetoolkit.com Free online learning for trustees

Master trust authorisation **Fit and proper – role identification form** © The Pensions Regulator September 2018

You can reproduce the text in this publication as long as you quote The Pensions Regulator's name and title of the publication. Please contact us if you have any questions about this publication. We can produce it in Braille, large print or on audio tape. We can also produce it in other languages.

The Pensions Regulator