

| Type of Guidance | Requirement   | Reference   | Commentary   | Evidence   | Primary responsibility       | Current rating | Actions ahead of next review  |
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| Best Practice    | Expectations of a chair in particular the skills and behaviours which are expected to be shown are set out (see <b>Appendix 2</b> for more detail)  | Expectations of a chair -<br>page 19 - para 6                 | As per the requirement   | This area needs to be addressed  | Democratic Services Officers | Not completed  | This is an area that needs to be addressed.   |
| TPR Expectation  | Members of the pension board should be aware that their responsibilities and duties begin from the date they take up their post   | Governance of Knowledge and understanding -<br>page 32 para 4 | Scheme managers should consider how they share information with prospective board members prior to commencement of their duties. | Members receive induction training and information on appointment. Employee representatives have a document covering expectations as part of the role, however the employer representatives do not.  | Democratic Services Officers | Partially met  | Review current documents for prospective employee representatives, and produce a document for prospective employer representations that appointing bodies should consider in nominations.   |
| Best Practice    | Follow the processes set out for appointing advisers and service providers.<br><br>(see <b>Appendix 8</b> for more detail)  | Managing advisers and service providers -<br>page 39 para 7   | The scheme manager may consider liaising with their procurement team when considering best practice in this area.                | Current investment advisor (Hymans Robertson) has a conflicts policy. Process for managing workload agreed by officers in conjunction with advisers with scopes and costs agreed in line with framework. Need to more fully understand a data protection issues by asking Hymans for their policy  | Investment Officers          | Partially met  | Need to more fully understand data protection issues by asking Hymans for their policy.   |
| Best Practice    | Follow the processes set out for managing advisers and service providers.<br><br>(see <b>Appendix 9</b> for more detail)  | Managing advisers and service providers -<br>page 40 para 8   | The scheme manager may consider liaising with their legal team when considering best practice in this area.                      | Performance to date is in line with expectations. Need to introduce a formal annual review and record performance against KPIs.  | Investment Officers          | Partially met  | Need to introduce a formal review of performance against KPIs. Officers should check to see if other frameworks exist when current contract nears expiry date.  |
| TPR Expectation  | The governing body should design internal controls which ensure that the scheme is administered and managed<br><br>- Include a clear separation of duties for those performing them, and processes for escalation and decision-<br>- Require the exercise of judgement, where appropriate, in assessing the risk profile of the scheme and in | Internal controls -<br>page 48 para 6                         | As per requirement   | These internal controls are in place but a new document expanding on the financial sign off amounts to explicitly details these controls needs to be created.  | Pension Section Officers     | Partially met  | Create a document which expands on the authorisation levels for payments and includes a breakdown of each administration area, who deals with these and who checks. Plus links back to Job Descriptions, so could have tasks covered by Pension Assistants and those by Pension Officers etc. |
| TPR Expectation  | The governing body should make sure that their internal controls are documented.  | Internal controls -<br>page 48 para 7                         | As per requirement   | These internal controls are in place but a new document expanding on the financial sign off amounts to explicitly details these controls needs to be created.  | Pension Section Officers     | Partially met  | Create a document which expands on the authorisation levels for payments and includes a breakdown of each administration area, who deals with these and who checks. Plus links back to Job Descriptions, so could have tasks covered by Pension Assistants and those by Pension Officers etc. |
| TPR Expectation  | Reviews should also be carried out when:<br><br>- Substantial changes to the scheme take place. These include changes to pension scheme personnel, service  | Internal controls -<br>page 10                                | As per requirement   | Areas stated are all included in the quarterly review and as above those changes are referred to board/committee/ senior management. This was the case when the McCloud remedy was introduced along with changes to processes, including updating processes notes, systems updated, comms issued to members and employers. Any changes of this | Pension Section Officers     | Partially met  | Produce a document to explicitly state this, which is already current practice  |

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|                        | - A control is not working to the standard required by the law.   |   |   | and employers. Any changes of this nature also subject to an internal audit.   |                              |               |   |
| TPR Expectation        | When designing internal controls governing bodies should consider TPR expectations<br><br>(see <b>Appendix 12</b> for more detail)  | Internal controls -<br><br>page 49 para 17    | As per requirement  | These internal controls are in place but a new document expanding on the financial sign off amounts to explicitly details these controls needs to be created.  | Pension Section Officers     | Partially met | Create a document which expands on the authorisation levels for payments and includes a breakdown of each administration area, who deals with these and who checks. Plus links back to Job Descriptions, so could have tasks covered by Pension Assistants and those by Pension Officers etc. |
| TPR Expectation        | To maintain internal controls governing bodies should consider TPR expectations<br><br>(see <b>Appendix 13</b> for more detail)   | Internal controls -<br><br>page 49 para 18    | As per requirement  | These internal controls are in place but a new document expanding on the financial sign off amounts to explicitly details these controls needs to be created.  | Pension Section Officers     | Partially met | Create a document which expands on the authorisation levels for payments and includes a breakdown of each administration area, who deals with these and who checks. Plus links back to Job Descriptions, so could have tasks covered by Pension Assistants and those by Pension Officers etc. |
| Regulatory Requirement | Regarding the pension board, scheme managers of public service pension schemes should:<br><br>- Circulate the register of interests and the other relevant documents to the pension board for ongoing review<br><br>- Publish these documents (for example, on a scheme's website)  | Conflicts of interest<br><br>p59 para 24      | As per requirement  | Further investigations required in respect of this requirement.  | Democratic Services Officers | Partially met | Further investigations required in respect of this requirement.   |
| Regulatory Requirement | Scheme managers are required to establish and operate internal controls, which are adequate for<br><br>- Arrangements and procedures to be followed in the administration and management of the scheme,<br>- Systems and arrangements for monitoring that administration and management, and<br>- Arrangements and procedures to be followed for the safe custody and security of the assets of the scheme; | Systems of governance -<br><br>page 68 para 4 | References to internal controls occur throughout the GCOP in slightly different contexts. Under this requirement scheme managers should ensure that internal controls are in place and are adequate to ensure that LGPS regulations and wider law is complied with. | These internal controls are in place but a new document expanding on the financial sign off amounts to explicitly details these controls needs to be created.  | Pension Section Officers     | Partially met | Create a document which expands on the authorisation levels for payments and includes a breakdown of each administration area, who deals with these and who checks. Plus links back to Job Descriptions, so could have tasks covered by Pension Assistants and those by Pension Officers etc. |
| Best Practice          | It is best practice for governing bodies to meet the requirements set out in <b>Appendix 17</b>   | Investment Governance -<br><br>page 74 para 9 | As per requirement  | Discuss if inclusion of clearer roles and responsibilities are needed for LPC and ISC members. Also potentially Training for all members mandatory. All major decisions (new mandates or new managers, changes in strategic allocation) from guidance a-k most are met | Investment Officers          | Partially met | Improve the understanding of the LPC by running regular training and self assessment exercises. Make clear within Training for all members mandatory. All major decisions (new mandates or new managers, changes in strategic allocation) from guidance a-k most are met                      |
| Regulatory Requirement | Every scheme must operate internal controls which should include administration.  | Scheme administration -                       | The scheme manager must operate internal controls which include its administration function of the scheme   | These internal controls are in place but a new document expanding on the financial sign off amounts to explicitly  |                              |               | Create a document which expands on the authorisation levels for payments and includes a breakdown of each   |

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|                        |   | page 95 para 3                                  |   | details these controls needs to be created.  | Pension Section Officers | Partially met | administration area, who deals with these and who checks. Plus links back to Job Descriptions, so could have tasks covered by Pension Assistants and those by Pension Officers etc. |
| Regulatory Requirement | When deciding to grant statutory transfers, governing bodies must carry out appropriate checks to decide if one of the conditions for transfer are met.   | Transfers out - page 101 para 1                 | THE GCOP is referring to the first and second conditions as set out in regulations 7 and 8 of the Occupational and Personal Pension<br><br>Ultimate responsibility for compliance rests with scheme manager although in reality operational responsibility will be delegated to<br><br>These requirements should form part of the standard transfer out process | Current transfer notes cover these areas, though need to be more explicit in some areas. Also more recent changes are recorded separately and need to be combined into the main document.  | Pension Section Officers | Partially met | Merge transfer notes with changes document to create fully up to date single document.  |
| Regulatory Requirement | Before paying a transfer s the governing body must check that the receiving scheme is;<br><br>– Able to accept the transfer<br><br>– Willing to accept the transfer   | Transfers out - page 101 para 7a                | A requirement under s95(2) of Pension Schemes Act 1993.<br><br>Ultimate responsibility for compliance rests with scheme manager although in reality operational responsibility will be delegated to   | This is current practice but notes will need to be updated to ensure that this is all explicitly stated. Processes in place to check that payments are made to bank accounts held by the receiving scheme (Bankline). Where payments amount to over £100,000 then additional dilligence is done prior to payment being made. | Pension Section Officers | Partially met | Update notes to include this which is current practice.   |
| TPR Expectation        | Where the governing body suspect the receiving scheme is an illegitimate arrangement, they should report it to Action Fraud.  | Transfers out - page 102 para 7d                | This should be reflected in transfer out procedures   | In the event that this occurred this would be raised with Audit who would report this to Action Fraud. This is current practice but notes need amending to make this explicit.   | Pension Section Officers | Partially met | Update notes to include this which is current practice.   |
| TPR Expectation        | Where the governing body believe they will not meet the legislative deadlines, they should make an application to TPR before the deadline   | Transfers out - page 102, para 7e               | This should be reflected in transfer out procedures   | If this occurred then these would be reported to TPR (six month limit ). Notes need to amended to include this practice (this is where we would have concerns about paying, e.g. scams ).  | Pension Section Officers | Partially met | Update notes to include this which is current practice.   |
| Regulatory Requirement | The governing bodies of DB schemes that receive a request to transfer or convert safeguarded benefits of £30,000 or more, must check the scheme member (or survivor) has received appropriate independent advice. | Transfers out - page 103 paras 10 and 11        | Administering authorities must be satisfied that the financial advisor used by the fund member has permission to give advice and is listed on<br><br>The regulatory requirement can be found at Section 48 and 51 of the Pension Schemes Act 2015   | This is current practice, but notes need to be updated to state this.  | Pension Section Officers | Partially met | Update notes to include this which is current practice.   |
| TPR Expectation        | Governing bodies should have appropriate processes in place for monitoring scheme data (see <b>Appendix 29</b> for full details)  | Data monitoring and improvement page 110 para 5 | Scheme managers should be able to demonstrate its processes for monitoring scheme data such as data validation and improvement plans.   | The Fund has a Data Improvement plan in place and reviewed as and when required.   | Pension Section Officers | Partially met | Review Data Plan and consider whether this needs to be kept separate or incorporated into the Admin and Comms Plan  |
| TPR Expectation        | Governing bodies should have appropriate processes in place for reviewing scheme data   | Data monitoring and improvement                 | Scheme managers should be able to demonstrate its processes for monitoring scheme data such as data validation and  | Data reviewed as part of year end exercise prior to production of Annual Benefit Statements. Common and  | Pension Section Officers | Partially met | Consider whether to expand on data review processes currently in place  |

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|                        | (see <b>Appendix 30</b> for full details)   | and improvement page 110 para 6                                 | improvement plans.  | Scheme Specific Data assessed and reported on Quarterly to Board.  | Pension Section Officers | Partially met |   |
| TPR Expectation        | Governing bodies should take steps to make sure their service providers can prove they meet our expectations for maintaining IT systems as listed in <b>Appendix 32</b> | Maintenance of IT systems - page 113 para 4 and page 114 para 5 | This requirement applies to all IT systems relied upon by the scheme manager including, but not limited to, administration systems, payroll systems, employer and member interfaces, data storage and electronic communications | Fund Cyber Policy outlines procedures in place for ensuring service providers are managing systems appropriately.  | Pension Section Officers | Partially met | Review Cyber Policy to ensure that these areas are covered                                  |
| Regulatory Requirement | Scheme managers should establish adequate internal controls in relation to any regulatory or legal obligations in respect of cyber risk                                 | Cyber controls - page 115 para 4                                | No specific examples are given, however, the GCOP does refer to obligations under the law includes the Data Protection Act 2018   | Fund Cyber Policy covers internal controls including passwords, data breaches, access to system functionality  | Pension Section Officers | Partially met | Review Cyber Policy to ensure that these areas are covered                                  |
| Best Practice          | When managing cyber risk governing bodies should follow the procedures set out in <b>Appendix 34</b>  | Cyber controls - page 116 para 9                                | As per requirement  | Fund Cyber Policy covers these areas   | Pension Section Officers | Partially met | Review Cyber Policy to ensure that these areas are covered                                  |
| TPR Expectation        | Governing bodies should have processes in place to check contributions due to the scheme and to reconcile them with what is actually paid to identify payment failures. | Monitoring contributions - page 122 para 1                      |   | Schedules are received on a monthly basis from contributing employers and saved as pdf files. The details on the schedules, including the employee contributions, additional contributions, pensionable pay and date of receipt are input on our EPIC database and sense checked against the individual employer rate expected. A reconciliation of the current overall balances for the Pension Fund is performed on a monthly basis. | Pension Section Officers | Partially met | Processes need to be documented and regularly reviewed.                                     |
| TPR Expectation        | Governing bodies should develop and maintain records for monitoring contribution payments to the scheme.<br><br>(see <b>Appendix 35</b> for full details)               | Monitoring contributions - page 123 paras 6 and 7               |   | Schedules are received on a monthly basis from contributing employers and saved as pdf files. The details on the schedules, including the employee contributions, additional contributions, pensionable pay and date of receipt are input on our EPIC database and sense checked against the individual employer rate expected. A reconciliation of the current overall balances for the Pension Fund is performed on a monthly basis. | Pension Section Officers | Partially met | Processes need to be documented and regularly reviewed.                                     |
| TPR Expectation        | Governing bodies must also keep records of any employer contributions due to the scheme that have been written off.   | Monitoring contributions - page 123 para 9                      |   | No current policy in place - though in practice contributions haven't been written off. Will add to Admin and Comms strategy.  | Pension Section Officers | Not completed | Update Admin and Comms strategy document to reflect what would happen if this was to occur. |
| TPR Expectation        | When a payment failure is identified, the governing body should contact the employer quickly to resolve the overdue payment.  | Resolving overdue contributions - page 127 para 1               |   | Although payments received after the statutory deadline, when payments are late, these are queries with the relevant employer at the earliest opportunity. All correspondence is recorded on EPIC database records.  | Pension Section Officers | Partially met | Processes need to be documented and regularly reviewed.                                     |

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| TPR Expectation        | The governing body should obtain overdue payments and rectify administrative errors.<br><br>(see <b>Appendix 36</b> for more detail)   | Resolving overdue contributions -<br><br>page 127 para 4                            |  | Once an overdue payment request has been made, the Pension Fund bank statement is monitored daily to check for receipt. If the payment has not been received by the agreed date, further correspondence is sent to the employer. All correspondence relating to investigations is kept on our computer systems in our email folders. | Pension Section Officers | Partially met | Processes need to be documented and regularly reviewed.  |
| TPR Expectation        | Governing bodies should maintain a record of their investigation and the communications between themselves and the employer.   | Resolving overdue contributions -<br><br>page 127 para 5                            |  | All correspondence relating to investigations is kept in email folders on systems  | Pension Section Officers | Partially met | Processes need to be documented and regularly reviewed.  |
| TPR Expectation        | The governing body should review current processes to detect situations where fraud may be more likely to occur and where additional checks may be needed.   | Resolving overdue contributions -<br><br>page 128 para 6                            |  | Contributions are sense checked to establish if the employer rate used is broadly similar each month.  | Pension Section Officers | Partially met | Consideration needs to be given to whether any further checks are needed. Current process needs to be documented and regularly reviewed. |
| Regulatory Requirement | For members with defined contribution (DC) benefits, scheme managers must:<br>- provide a benefit information statement regarding their DC benefits to every member within 12 months of<br>- include the information required by law in any benefit information statement. | Benefit Information Statements (PSPS) - page 138 para 6                             | This section will apply in respect of members with AVCs<br><br>The reference to "information required by law" refers to Regulation 17 of the Occupational and Personal Pension Schemes (Disclosure of 2013 | Provided by Pru - But this is our responsibility, will add to A+C  | Pension Section Officers | Partially met | Add to Admin and Comms Strategy  |
| Regulatory Requirement | Where a member has a right to a cash transfer sum or a contribution refund the information in s101AC of the Pension Schemes Act 1993 must be provided within a reasonable period.  | Notification of right to cash transfer sum or contribution refund - page 142 para 2 | Note that a Cash Transfer Sum is a transfer of deferred refund.<br><br>See row below for details of a "reasonable period"  | This option is included in the Frozen Refund letter that is issued to leavers with less than two years - but this process doesn't appear to be covered by the A+C document   | Pension Section Officers | Partially met | Need further reference to this in process notes and/or Admin and Comms   |
| TPR Expectation        | The term "reasonable period" in the phrase above should be construed as 3 months from leaving. Governing bodies should advise members where  | Notification of right to cash transfer sum or contribution refund - page 142 para 2 |  | This is current practice but doesn't appear to be covered by Admin and Comms Strategy.   | Pension Section Officers | Partially met | Need further reference to this in process notes and/or Admin and Comms   |
| TPR Expectation        | The governing body should give members 3 months to confirm if they wish to transfer their cash transfer sum and can extend this deadline at their discretion. If the member does not respond, the governing body may arrange to pay a contribution refund                  | Notification of right to cash transfer sum or contribution refund - page 142 para 4 | Timescales and a process for extending timescales should be built into refund procedures   | Current practice would be to extend the deadline by default, i.e. where a refund has not been claimed then a transfer can be made. Needs to be added to Admin and Comms Strategy.  | Pension Section Officers | Partially met | Need further reference to this in process notes and/or Admin and Comms   |
| TPR Expectation        | Where a member elects for a cash transfer sum the governing body should pay it within 3 months but can extend in exceptional circumstances.  | Notification of right to cash transfer sum or contribution refund - page 142 para 4 | Timescales and a process for extending timescales should be built into refund procedures   | This is current practice but doesn't appear to be covered by Admin and Comms Strategy.   | Pension Section Officers | Partially met | Need further reference to this in process notes and/or Admin and Comms   |
| Regulatory Requirement | When processing a transfer, governing bodies must check that at least one of the conditions for the transfer to proceed is met (see Transfers out module within  | Scams - page 145 para 2   | This part of the GCOP references the Transfer Section of the GCOP but is included here for completeness  | This is current practice and we have notes, but recent changes need to be merged into main notes   | Pension Section Officers | Partially met | Notes need to be updated   |

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| TPR Expectation        | As part of their internal controls, governing bodies should ensure that they take the steps set out in <b>Appendix 39</b> .   | Scams - page 145 paras 5 - 9                     |   | This is current practice and we have notes, but recent changes need to be merged into main notes  | Pension Section Officers | Partially met | Notes need to be updated  |
| Regulatory Requirement | The governing body must provide information about the Money and Pensions Service and the Pensions Ombudsman to the complainant at certain stages of the dispute   | Dispute Resolution Procedures - page 152 para 7b | Ensure that letters and communications are regularly reviewed to include the required information   | We refer to the Pension Ombudsman and TPAS - needs to be updated.   | Pension Section Officers | Partially met | Check that all documentation has been updated to refer to MaPS, not TPAS.               |
| Regulatory Requirement | Report breaches of the law when:<br><br>- A legal duty which is relevant to the administration of a scheme, has not been, or is not being, complied with,<br>- The failure to comply is likely to be of material significance   | Who must report - page 158 paras 1 to 2          | The range of individuals required to report a breach is wide (see s70 of the Pensions Act 2004).<br><br>The scheme manager should note the comments from TPR that it classifies ' <i>administration</i> ' of a scheme to mean " <i>anything</i> " | We have a doc detailing when a breach is material and these are taken to the Board.   | Pension Section Officers | Partially met | Review the process and propose a report to Board to incorporate into an annual process. |
| TPR Expectation        | Governing bodies should be satisfied that those responsible for reporting breaches are aware of the legal<br><br>Training should be provided for the Governing body and any in-house administrators<br><br>(see <b>Appendix 41</b> for more details)  | Who has the duty to report - page 159 para 3     | The scheme manager should make clear to all stakeholders their responsibility to report breaches (deemed material to TPR) to TPR.   | Whilst a process for reporting breaches is in place, it needs to be reviewed and incorporated into an annual process.                                 | Pension Section Officers | Partially met | Review the process and propose a report to Board to incorporate into an annual process. |
| TPR Expectation        | Those responsible for reporting breaches, including the governing body, should establish and operate<br><br>(see <b>Appendix 42</b> for list of procedures governing bodies could have in place)  | How to report - page 165 paras 1 to 2            | The scheme manager should establish and operate a procedure that ensures they can meet their legal duties for reporting breaches.   | Process in place but does require a review to ensure full compliance.   | Pension Section Officers | Partially met | Review the process and propose a report to Board to incorporate into Annual Process     |
| TPR Expectation        | Reports of late contribution payments should be made to us within 14 days of the trustees having reasonable to believe that a material payment failure exists. Members should be notified within 30 days of the report to TPR. When reporting to members, governing bodies should provide payment | How to report - page 168 para 3                  | This requirement should be included in processes  | We write to scheme members where an employer has not fully complied with their statutory requirements, e.g. late signature of an admission agreement. | Pension Section Officers | Partially met | Review the process and propose a report to Board to incorporate into Annual Process     |