

Commentary	Evidence	Primary responsibility	Current rating	Actions ahead of next review
As per the requirement	A document detailing the expectation of the Chairman has been prepared and is currently awaiting sign-off (28/8/24)	Democratic Services Officers	Not completed	A document detailing the expectation of the Chairman has been prepared and is currently awaiting sign-off (28/8/24)
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.
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 advisors 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.
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.
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 Section Officers	Partially met	by Pension Assistants and those by Pension Officers etc.
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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 nature also subject to an internal audit.	Pension Section Officers	Partially met	Produce a document to explicitly state this, which is already current practice
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.
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	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.
As per requirement	Further investigations required in respect of this requirement.	Democratic Services Officers	Partially met	Further investigations required in respect of this requirement.
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.
As per requirement	Discuss if inclusion of clearer roles and responsibilities are needed for LPC and ISC members. Also potentially			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 from guidance a-k most are met	Investment Officers	Partially met	Training for all members mandatory. All major decisions (new mandates or new managers, changes in strategic allocation) from guidance a-k most are met
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 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.
THE GCOP is referring to the first and second conditions as set out in regulations 7 and 8 of the Occupational and Personal Pension	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.
Ultimate responsibility for compliance rests with scheme manager although in reality operational responsibility will be delegated to				
These requirements should form part of the standard transfer out process				
A requirement under s95(2) of Pension Schemes Act 1993.	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.
Ultimate responsibility for compliance rests with scheme manager although in reality operational responsibility will be delegated to				

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.
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.
Administering authorities must be satisfied that the financial advisor used by the fund member has permission to give advice and is listed on	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.
The regulatory requirement can be found at Section 48 and 51 of the Pension Schemes Act 2015				
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
Scheme managers should be able to demonstrate its processes for monitoring scheme data such as data validation and improvement plans.	Data reviewed as part of year end exercise prior to production of Annual Benefit Statements. Common and Scheme Specific Data assessed and reported on Quarterly to Board.	Pension Section Officers	Partially met	Consider whether to expand on data review processes currently in place
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

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
As per requirement	Fund Cyber Policy covers these areas	Pension Section Officers	Partially met	Review Cyber Policy to ensure that these areas are covered
	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.
	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.

	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.
	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.
	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.
	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.
	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.
This section will apply in respect of members with AVCs	Provided by Pru - But this is our responsibility, will add to A+C			Add to Admin and Comms Strategy

<p>The reference to "information required by law" refers to Regulation 17 of the Occupational and Personal Pension Schemes (Disclosure of 2013</p>		Pension Section Officers	Partially met	
<p>Note that a Cash Transfer Sum is a transfer of deferred refund.</p> <p>See row below for details of a "reasonable period"</p>	<p>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</p>	Pension Section Officers	Partially met	Need further reference to this in process notes and/or Admin and Comms
	<p>This is current practice but doesn't appear to be covered by Admin and Comms Strategy.</p>	Pension Section Officers	Partially met	Need further reference to this in process notes and/or Admin and Comms
<p>Timescales and a process for extending timescales should be built into refund procedures</p>	<p>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.</p>	Pension Section Officers	Partially met	Need further reference to this in process notes and/or Admin and Comms
<p>Timescales and a process for extending timescales should be built into refund procedures</p>	<p>This is current practice but doesn't appear to be covered by Admin and Comms Strategy.</p>	Pension Section Officers	Partially met	Need further reference to this in process notes and/or Admin and Comms
<p>This part of the GCOP references the Transfer Section of the GCOP but is included here for completeness</p>	<p>This is current practice and we have notes, but recent changes need to be merged into main notes</p>	Pension Section Officers	Partially met	Notes need to be updated



	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
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.
The range of individuals required to report a breach is wide (see s70 of the Pensions Act 2004).  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.
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.

<p>The scheme manager should establish and operate a procedure that ensures they can meet their legal duties for reporting breaches.</p>	<p>Process in place but does require a review to ensure full compliance.</p>	<p>Pension Section Officers</p>	<p>Partially met</p>	<p>Review the process and propose a report to Board to incorporate into Annual Process</p>
<p>This requirement should be included in processes</p>	<p>We write to scheme members where an employer has not fully complied with their statutory requirements, e.g.late signature of an admission agreement.</p>	<p>Pension Section Officers</p>	<p>Partially met</p>	<p>Review the process and propose a report to Board to incorporate into Annual Process</p>