

The Pensions Regulator (TPR) Code of Practice 14 - Governance and Administration of Public Service Pension Schemes

Compliance Statement - Governance

Code Section / Sub Section	Legal Requirements	TPR's Guidance	How we comply	Feb 2024 Update	Further Actions Required (if any)	Owner	
<b>Knowledge and understanding required by pension board members [30 - 60]</b>	<p>A member of the pension board of a public service pension scheme <b>must</b> be conversant with:</p> <p>a) the rules of the scheme</p> <p>b) any document recording policy about the administration of the scheme which is for the time being adopted in relation to the scheme</p> <p>A member of a pension board <b>must</b> have knowledge and understanding of:</p> <p>a) the law relating to pensions</p> <p>b) any other matters that are prescribed in regulations</p>	1	00	Requirements set out in LPB Constitution			Head of Governance
		2	Schemes should designate a person to take responsibility for 1 above [38]	Clerk as set out in the Authority's constitution			Head of Governance
		3	Schemes should prepare and keep an updated list of documents and legislation, with which they consider pension board members need to be conversant [41 & 46]	Member Handbook updated annually and provided to all Board and Authority members contains signposts to relevant documents. Documents and learning materials stored in an on line reading room			Head of Governance
		4	Clear guidance on the roles and responsibilities and duties of boards and its members should be set out in scheme documentation [47]	Set out in the Board's Constitution and Terms of Reference.			Head of Governance
		5	Schemes should assist pension board members to determine the degree of knowledge an understanding needed [48]	Training Needs Analysis conducted by the Clerk with support from the Board's Independent Adviser			Head of Governance
		6	Schemes should provide board members with the relevant training and support that they require [55]	Programme of internally organised seminars for all Board and Authority members, Pre Board meeting sessions with Independent Adviser. Specific external activities signposted and sufficient budget available to fund attendance.			Head of Governance
		7	Schemes should offer pre-appointment training or arrange for mentoring by existing board members [56]	1:1 induction session offered to new members with Director and also introductory conversation with the Independent Adviser.			Head of Governance

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		8 Pension Board members should undertake a personal training needs analysis and use a personalised training plan to document and address any identified gaps or weaknesses [57]	TNA undertaken with Clerk			Head of Governance
		9 Learning programs should be flexible, cover the type and degrees of knowledge and understanding required, reflect the legal requirements and be delivered with an appropriate timescale [58]	The Learning and Development Strategy is reviewed annually to determine the most appropriate mediums through which to deliver training on key issues - a key objective is to ensure it is delivered in a proportionate and understandable manner			Head of Governance
		10 Schemes should keep appropriate records of learning activities of board members [60]	Maintained by the Clerk			Head of Governance
<b>Conflicts of interest and representation [61 - 91]</b>	<p>In relation to the Pension Board, scheme regulations <b>must</b> include provision requiring the scheme manager to be satisfied :</p> <p>a) that a person to be appointed as a member of the Pension Board does not have a conflict of interest</p> <p>b) from time to time, that non of the members of the Pension Board has a conflict of interest.</p> <p>Scheme regulations <b>must</b> require each member or proposed member of a Pension Board to provide the scheme manager with such information as the scheme manager reasonably requires for the purposes of meeting the requirements referred to above.</p> <p>Scheme regulations <b>must</b> include provision requiring the Pension Board to include employer representatives and member representatives in equal numbers.</p>	1 Only potential conflicts of interest are identified for pension board members (actual conflicts of interest are prohibited) [68]	Conflicts policy in place and provided to new members and covered in 1:1 induction,			Head of Governance
		2 The 'Seven principles of public life' should be applied to all board members [70]	Reflected in the conflicts policy			Head of Governance
		3 Schemes should incorporate these principles into any codes of conduct (and across their policies and processes) and other internal standards for boards [70]	Reflected in the conflicts policy for the Board and the codes of conduct for Authority members and officers.			Head of Governance
		4 Schemes should set out clear guidance on the roles, responsibilities and duties of those pension boards and the members of those boards in scheme documentation [73]	Reflected in the constitution of the Board and the Constitution of the Authority.			Head of Governance
		5 Take professional legal advice when considering issue to do with conflict of interests [74]	Legal advice available when required through the monitoring officer initially and specialist advice can be called from the LGPS legal framework if necessary			Head of Governance
		6 Schemes should ensure that there is an agreed and documented conflicts policy and procedure that should be kept under regular review [76]	In place and reviewed in 2019.			Head of Governance
		7 Schemes should cultivate a culture of openness and transparency [78]	Very significant amount of information placed in the public domain through the Authority's website including details of policies and practices, corporate strategies reports and investment holdings			Head of Governance
		8 Board members should have a clear understanding of their role and the circumstances in which they may find themselves in a position of conflict of interest [78]	Delivered as part of the Appointment/Induction Process.			Head of Governance
		9 Board members should know how to manage potential conflicts [78]	<i>Process set out in the policy</i>			Head of Governance

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		10 Pension Board members should be appointed under procedures that require them to disclose any interest or responsibilities that could become conflicts of interest [80]	In place			Head of Governance
		11 All terms of engagement should include a clause requiring disclosure of all interests and responsibilities that could become conflicts of interest as soon as they arise [81]	Referenced in the Declaration of Interests form			Head of Governance
		12 All disclosed interests should be recorded [81]	Declarations process in place.			Head of Governance
		13 Schemes should consider what important matters or decisions are likely to be considered during, for example, the year ahead and identify and consider any potential or actual conflicts of interest [82]	A work programme for the forthcoming year is devised and whilst a fluid document provides for such scrutiny			Head of Governance
		14 Identify, evaluate and manage dual interests [84]	Identified via the statement of particulars form			Head of Governance
		15 Use a register of interests to record and monitor dual interests [84]	ref above			Head of Governance
		16 Capture decisions about how to manage potential conflicts of interest in their risk register or elsewhere [84]	Not specifically captured in the risk register (although effective operation of the Board is) how to manage conflicts is covered in the Policy.			Head of Governance
		17 The register of interest and other relevant documents should be circulated to the board for ongoing review [84]	For the Pensions Authority it is available on the Authority's website			Head of Governance
		18 The register of interest and other relevant documents should be published [84]	In place			Head of Governance
		19 Conflicts of interest should be included as an opening agenda item at board meetings and revisited during the meeting where necessary [85]	In place			Head of Governance
		20 Establish and operate procedures that ensure boards are not compromised by potentially conflicted members [86]	On an Authority level arrangements are in place to liaise with constituent councils Monitoring Officers to provide updated information where required. Annual exercise undertaken in establishing any such conflicts. Potential conflicts in relation to Board members would be considered as part of the appointment process			Head of Governance
		21 Be open and transparent about the way they manage potential conflicts of interest [87]	Any such scenario would be reported to the Authority. Advice provided where necessary.			Head of Governance
		22 Consider seeking professional legal advice when assessing any option when seeking to manage a potential conflict of interest [88]	The Authority through an SLA is able to call on the legal services dept of Barnsley MBC to offer advice in this area.			Head of Governance

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		23 Membership of boards should be designated with regard to proportionality, fairness and transparency and with the aim of ensuring that the board has the right balance of skills, experience and representation [91]	Make up of Board - split between Employer/Employee reps/sector reps/tu reps			Head of Governance
<b>Publishing information about schemes [92 - 99]</b>	The scheme manager for a public service scheme must publish information about the pension board for the scheme(s) and keep that information up-to-date.	1 Scheme managers must publish the information required about the pension board and keep that information up to date [95]	Relevant web pages maintained			Head of Governance
	The information must include: a) who the members of the pension board are	2 Schemes should also publish useful related information about the Pension Board (such as set out in 96 and 97)	<i>ref above</i>			Head of Governance
	b) representation on the board of members of the scheme(s) c) the matters falling within the pension board's responsibility	3 Have policies and processes to monitor all published data on an ongoing basis to ensure it is accurate and complete [98]	<i>ref above</i>			

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Compliance Statement - Managing Risks

Code Section / Sub Section	Legal Requirements	TPR's Guidance	How we comply	Feb 2024 Update	Further Actions Required (if any)	Owner	
<b>Internal controls [101 - 120]</b>	The scheme manager of a public service pension scheme must establish and operate internal controls. These must be adequate for the purpose of securing that the scheme is administered and managed in accordance with the scheme rules and in accordance with the requirements of the law.	1	Internal controls should include a clear separation of duties, processes for escalation and decision making and documented procedures for assessing risks, reviewing breached of the law and managing contributions to the scheme [103]	Constitution sets out clear scheme of delegation and decision making authorities		Full documentation of sub delegations to managers within Pensions Administration	Head of Governance
				Breaches policy in place			Assistant Director Pensions Head of Governance
				Information on breaches complaints compliments and appeals provided to each meeting of the Local Pension Board			Director Assistant Director Pensions Head of Governance
				Contributions collection information included in the annual report as required			Assistant Director Resources
		2	Internal controls should address significant risks that are likely to have a material impact on the scheme [105]	Corporate Risk Management Framework in place and risk register included within the Quarterly Report to the Authority with additional oversight from the Audit Committee and Local Pension Board	Corporate Risk Register comprehensively reviewed as part of the process for importing it into Pentana, Go live date missed but will be operational for 24/25 financial year. Risk Management Training provided to all managers with the intention of introducing a more operational level into the risk management process.	Completion of roll out of Pentana risk system	Team Leader Governance
		3	Sufficient time and attention should be spent on identifying, evaluating, and managing risks and developing and monitoring appropriate controls [105]	The review of the risk register is a standing item on the agenda for the monthly meetings of the Senior Management Team			SMT Team Leader Governance
		4	Schemes should carry out a risk assessment [106]	Annual full reassessment and rebasing of the risk register forms part of the process of updating the Corporate Strategy			SMT Team Leader Governance
		5	Schemes should record risks in a risk register and review it regularly [108]	See above			SMT Team Leader Governance
		6	Schemes should keep appropriate records to demonstrate compliance with legal requirements [108]	Records retention policy and associated GDPR policies in place	This area requires further development covering not just the TPR code but also other areas where it is necessary to demonstrate compliance (Fol responses Data Protection etc)	Develop more comprehensive approach to compliance reporting	Assistant Director Pensions Head of Governance
		7	Prioritise risks where the impact and likelihood of the risk materialising is high [109]	Reflected in both the risk management framework and the register itself			SMT Team Leader Governance
		8	Review any existing internal controls	Part of the ongoing process of business improvement and a consequence of ongoing internal and external audit work			Assistant Director Resources Head of Governance Team Leader Governance
9	Design internal controls to mitigate main risks and consider how best to monitor them [111]				SMT		
10	Schemes should periodically review the adequacy of internal controls [115]	Forms part of the annual internal audit plan and is also fundamental to the process for producing the Annual Governance Statement			Assistant Director Resources Head of Governance Team Leader Governance		
11	Internal or external audits and / or quality assurance processes should ensure that adequate internal controls are in place and being operated effectively [116]	Comprehensive internal and external audit arrangements in place overseen by an Audit Committee of the Authority			Assistant Director Resources Head of Governance Team Leader Governance		

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		12	Review internal controls when substantial changes take place or where a control has been found to be inadequate [116]	Forms part of routine custom and practice	Taken into account in recently approved resourcing proposals	Extend Lessons Learnt from projects to other areas such as complaints.	SMT Customer Feedback Officer (when in post)
		13	Internal controls that regularly assess the effectiveness of investment-related decision making	Independent monitoring of performance is in place and there is an independent overview of the investment process through the independent advisers. However, due to pooling decisions are now largely restricted to strategic allocations and rebalancing.			Director Assistant Director Investments
		14	Internal controls that regularly assess the effectiveness of data management and record keeping	Ongoing data improvement plan in place using common and conditional data scores to determine a focus for activity			Assistant Director Pensions
		15	Internal controls that ensure that new employers understand what member data is required and how it should be supplied [112]	New employer on boarding process includes an internal checklist of requirements.			Team Leader Support
		16	Internal controls that require internal or external auditors to audit any automated systems [112]	In place			Assistant Director Resources Head of Governance Team Leader Governance
		17	Internal controls to ensure that systems support the maintenance and retention of good member records [112]	DART software used to monitor quality of scheme member data			Assistant Director Pensions Head of ICT?
		18	Internal controls that ensure data are complete (e.g. undertake a data cleansing or member tracing exercise and review this on a regular basis (at least annually or at regular intervals that they consider appropriate) [112]	DART software used to monitor quality of scheme member data	Marginal improvements in conditional data scores at the latest review		Assistant Director Pensions
		19	Ensure that all staff completes information management training before they are given access to sensitive data	Forms part of induction process together with annual refresher			Head of Governance HR
		20	Ensure that member communications are reviewed regularly [112]	Regular communications such as Benefit Statements and newsletters are tested with the customer group.			Assistant Director Pensions
		21	Schemes should put in place systems and processes for making an objective assessment of the strength of an employer's covenant	Employers with no guarantor from tax-raising body were identified as part of the 2019 valuation preparations and individual funding discussions were held with impacted employers.	Discussions have resulted in the exit of a small number of non-guaranteed employers due to the improved overall funding level and with no significant cessation payments. This has also been taken into account in the realignment of responsibilities between teams within Pensions Administration.		Assistant Director Pensions Team Leader Support

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<b>Scheme record-keeping [122 - 146]</b>	<p>Scheme managers <b>must</b> keep records of information relating to:</p> <ul style="list-style-type: none"> <li>- member information</li> <li>- transactions</li> <li>- pension board meetings and decisions</li> </ul> <p>Legal requirements for this are set out in the Public Service Pensions (Record Keeping and Miscellaneous Amendments) Regulations 2014.</p> <p>Schemes <b>must</b> ensure that processes that are created to manage scheme member data meet the requirements of the relevant Data Protection Act(s) and the data protection principles.</p>	1	Schemes must keep records relating to member information, transactions and pension board meetings and decisions [122]	All Pension Board meetings are documented and minuted, with agendas and reports published publicly in advance.		Assistant Director Pensions Head of Governance	
		2	Schemes should be able to demonstrate to the Regulator, where required, that they keep accurate, up-to-date and enduring records [124]	Record-keeping monitored through the Data Improvement Plan and pro-actively managed using the DART tool.	Additional priority is attached to scheme member issues within the Corporate Strategy and specific additional resources have been identified to address data issues	Recruit additional resources and develop a prioritised plan of action alongside the plan to address processing backlogs	Assistant Director Pensions
		3	Schemes should establish and operate adequate internal controls to support record-keeping requirements [125]	All data changes in relation to individual scheme data are managed by a change control process.		Assistant Director Pensions	
		4	Scheme managers must ensure that member data across all membership categories specified in the Record Keeping Regulations is complete and accurate [126]	Record-keeping monitored through the Data Improvement Plan and pro-actively managed using the DART tool.		Assistant Director Pensions	
		5	Member data should be subject to regular data evaluation [126]	See above See above		Assistant Director Pensions Assistant Director Pensions	
		6	Scheme managers must keep specific member data to enable them to uniquely identify a scheme member and calculate benefits correctly [127]	See above		Assistant Director Pensions	
		7	Schemes should require employers to provide them with timely and accurate data and ensure that appropriate procedures and timescales are in place to do this [128 and 130]	Employers must provide individual scheme data on a monthly basis since 1 April 2018.	Targeted and prioritised action to improve the quality of initial submissions as part of the overall Administration Improvement Plan	Assistant Director Pensions	
			Individual query reporting has been developed to ensure that employers respond to queries in a timely manner.			Assistant Director Pensions	

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		8 Schemes should seek to ensure that employers understand the main events that require information to be passed to the Scheme [129]	Support and Engagement Team created from Administration Service restructure to improve employer engagement. Team offers training and support to employers. Employer Forum held annually.	Plans agreed to create a new Employer Services Team which will be a point of focus for all employer related activity	Recruit to new Team and develop additional guidance and training for employers	Assistant Director Pensions
		9 Schemes should be able to trace the flow of funds into and out of the scheme and reconcile these against expected contributions and scheme costs [131]	Collection of contributions is now driven directly from the individual monthly returns via Direct Debit so contributions paid must match individual member records. Employer contributions automatically calculated from valuation data to ensure accuracy.			Assistant Director Resources
		10 Records should be kept of any amounts due to the scheme that have been written off [132]	All write-offs on the pensioner payroll are managed by an agreed policy and reported on a monthly basis.			Assistant Director Resources
		11 In respect of keeping information about the pension board, schemes should keep records of pension board meetings, including decisions made, and should also keep records of key discussions [133]	All Pension Board meetings are documented and minuted, with agendas and reports published publicly in advance.			Head of Governance
		12 Scheme managers should also keep records of any decisions taken by members of the pensions board other than at a pension board meeting [134]	All decisions by Pension Board members are documented and minuted.			Head of Governance
		13 Records should be retained for as long as they are needed [135]	All records for Board meetings are retained indefinitely.			Head of Governance
		14 Schemes should have in place adequate systems and processes to enable the retention of records for the necessary time periods	All member records retained indefinitely.			Head of Governance
		15 Schemes should monitor data (based on a proportionate and risk based approach) on an ongoing basis to ensure it is accurate and complete [136, 137]	Record-keeping monitored through the Data Improvement Plan and pro-actively managed using the DART tool.			Head of Governance Team Leader Governance Assistant Director Pensions
		16 Schemes should carry out a data review exercise at least annually [138]	As above	Marginal improvements in data quality for conditional data recorded in the latest exercise		Assistant Director Pensions
		17 Schemes should continually review their data [138]	As above			Assistant Director Pensions
		18 Upon change of admin system, schemes should review and cleanse data records [140]	<i>NA. Would be addressed as part of any system migration.</i>			Assistant Director Pensions
		19 Schemes should put in place a data improvement plan where poor quality or missing data is identified [141]	Record-keeping monitored through the Data Improvement Plan and pro-actively managed using the DART tool.	Work to improve data quality is identified as a priority within the Administration Improvement Plan and resources have been identified to address this within the changes to the staffing structure of the administration service	Implement changes to the staffing structure	Assistant Director Pensions
		20 Schemes should reconcile member records with information held by the employer [142]	Monthly Returns process ensures records are consistent between employer and administering authority.			Assistant Director Pensions
		21 Schemes should ensure their processes are GDPR compliant and should understand their data protection responsibilities [143, 144]	Data flow mapping carried out and all staff provided with GDPR training.			Head of Governance Team Leader Governance



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		22 Schemes should be able to demonstrate that they keep records in line with all legal requirements that relate to record-keeping in public service pension schemes [145, 146]	All member records retained indefinitely.			Head of Governance Team Leader Governance
<b>Maintaining contributions [147 - 186]</b>	Employer contributions <b>must</b> be paid to the scheme in accordance with any requirements in the scheme regulations.  Where employer contributions are not paid on or before the date they are due under the scheme and the scheme manager has reasonable cause to believe that the failure is likely to be of material significance to the Regulator in the exercise of any of its functions, the scheme manager must give a written report of the matter to the regulator as soon as reasonably practicable.  Where employee contributions are not paid within the prescribed period, if the scheme manager has reasonable cause to believe that the failure is likely to be of material significance to the Regulator in the exercise of any of its functions, they <b>must</b> give notice of the failure to the Regulator and the member within a reasonable period after the end of the prescribed period.  Where there is a failure to pay employee contributions on an earlier date in accordance with scheme regulations, schemes should also consider their statutory duty under section 70 of the Pensions Act 2004 to assess and if necessary report breaches of the law.	1 Scheme managers should have effective procedures and processes in place to identify payment of failures that are - and are not - of material significance to the Regulator [150 - 151]	New Direct Debit collection process ensures that contributions are paid in a timely manner for all employers. Estimated collection rates apply where no monthly return available.		Reduce the proportion of estimated collections by ongoing education of employers	Assistant Director Pensions Assistant Director Resources
		2 Such procedures are likely to involve:  a) Developing a record to monitor the payment of contributions b) Monitoring the payment of contributions c) Managing overdue contributions d) Reporting payment failures that are likely to be of material significance to the Regulator [152]	Employer Costing system reports all early retirement costs to be invoiced to employers.  Contributions due and contributions received are recorded using EPIC system and main accounting system; contributions payments are reconciled monthly and non-payment or late payment identified & followed up with the employer. Escalation and penalties such as late payment interest used as required.			Assistant Director Pensions Assistant Director Resources
		3 Schemes should have a contributions monitoring record [155 - 157]	See above.			Assistant Director Pensions Assistant Director Resources
		4 Schemes should monitor contributions on an on-going basis [161]	See above.			Assistant Director Pensions Assistant Director Resources
		5 A risk based and proportionate monitoring approach should be used to identify employers and situations that present a higher risk of payment failure [162]				Assistant Director Pensions Assistant Director Resources
		6 Schemes should have a process in place to identify where payments are late or have been underpaid, overpaid or not at all [163]	Estimated collection rates apply where monthly return is late. Monitoring of late payment submissions. <i>Data on contributions due and payments received is reconciled and any under or over payments resolved with the employer.</i>			Assistant Director Resources Head of Finance
		7 Scheme managers must record and retain information on transactions (including any employer and employee contributions) [166]	All contributions data recorded via the Ledger and via the EPIC recording system.			Assistant Director Resources Head of Finance
		8 Where payment failure is identified, there should be a process to follow to resolve the issue quickly (including the suggested steps set out in the Code) [169]	Formal escalation process in place.			Assistant Director Pensions Assistant Director Resources
		9 Schemes should keep a record of their investigation and communications between themselves and the employers [170]	Correspondence recorded on UPM and Mimecast.			Assistant Director Pensions Assistant Director Resources

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		10 Schemes should have a process that is able to detect deliberate underpayment or non-payment or other fraudulent behaviour by an employer [171]	New Direct Debit collection process ensures that accurate contributions are paid and mitigates this risk.			Assistant Director Pensions Assistant Director Resources
		11 Schemes should maintain a record of their investigation and communications with an employer following payment failure	Correspondence recorded on UPM and Mimecast.			Assistant Director Pensions Assistant Director Resources
		12 Where schemes identify a payment failure, they should attempt to recover contributions within 90 days of their due date [174]	Part of contributions monitoring process.			Assistant Director Resources Head of Finance
		13 Where payment failure is identified, it should at least ask the employer the 3 questions set out in 175	Formal escalation process in place.			Assistant Director Resources Head of Finance
		14 Schemes should investigate the payment failure and use their judgement when deciding whether to report to the Regulator taking into account the wording of the Code [177]	Formal escalation process in place.			Assistant Director Pensions Assistant Director Resources
		15 Schemes should identify and report to the Regulator, as appropriate, any payment failures that may not be of material significance when taken individually, but which could indicate a systematic problem [181]	Formal escalation process in place.			Assistant Director Pensions Assistant Director Resources
		16 Schemes should consider whether it is appropriate to report payment failures of employer contributions to members where it is reported to the Regulator	Formal escalation process in place.			Assistant Director Pensions Assistant Director Resources
		17 In the case of an employer failing to pay employee contributions to the pension scheme, if the scheme manager has reasonable cause to believe the payment failure to be of material significance to the Regulator, the failure must be reported to the Regulator and members within a reasonable period [184]	Formal escalation process in place.			Assistant Director Pensions Assistant Director Resources
		18 Reports to the Regulator should be made in accordance with the Code	Formal escalation process in place.			Assistant Director Pensions Assistant Director Resources
<b>Providing information to members [187 - 211]</b>	The law requires schemes to disclose information about benefits and scheme administration to scheme members and others.  The Code summarises the legal requirements around:  a) Benefit Statements [188 - 195] b) Other information about scheme administration [196 - 197] c) Who is entitled to information [198 - 199] d) When basic scheme information must be provided [200 - 201] e) What information must be disclosed on request [202] f) How benefit statements and other	1 Managers of the scheme must ensure that scheme members and others are given information in accordance with the Disclosure Regulations 2013 and other legal requirements, unless they are an 'excluded person' [188 - 206]	Service level targets set for all case types to ensure compliance with disclosure Regulations.		Simplify reporting of compliance with the disclosure standards	Assistant Director Pensions
		2 Schemes should design and deliver communications to scheme members in a way that ensures they are able to engage with their pension [207]	Communications written in plain english and issued electronically. Members encouraged to register for the online portal on commencing membership. Hard copies available if no internet access. Ongoing engagement strategy to promote membership.			Assistant Director Pensions
		3 Information should be clear and simple to understand as well as being accurate and easily accessible [207]	<i>communications reviewed by customer groups.</i>			Assistant Director Pensions

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	information must be provided [203 - 206]					
	Schemes should also comply as appropriate with other legal disclosure requirements [211]					
		4 Schemes should attempt to make contact with their scheme members and, where contact is not possible, schemes should carry out a tracing exercise to locate the member and ensure that their member data are up-to-date [208]	Pensioner records screened via external tracing service. Individual tracing carried out for 'lost' members approaching retirement.			Assistant Director Pensions
		5 Where a person has made a request for information, schemes should acknowledge receipt if they are unable to provide information at that stage	UPM process created for general enquiries from members.			Assistant Director Pensions
		6 Schemes may encounter situations where the time period for providing information takes longer than expected. In these circumstances, schemes should notify the person and let them know when they are likely to receive the information [209]	UPM process created for general enquiries from members.			Assistant Director Pensions
		7 Scheme managers must provide information in accordance with the time periods specified in the 2013 Act and the Disclosure Regulations 2013 [209]	Service level targets set for all case types to ensure compliance with disclosure Regulations.	Service level targets have been revised from 1/4/2024 following a review of the deliverability of previous targets	Implement and report on new targets	Assistant Director Pensions
		8 Information should be readily available at all times to ensure that members are able to access it when they require [210]	Full scheme Information on main website and MyPension portal.			Assistant Director Pensions

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Compliance Statement - Resolving Issues

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<b>Internal dispute resolution [212-240]</b>	Scheme managers <b>must</b> make and implement dispute resolution arrangements that comply with the requirements of the law and help resolve pensions disputes between the scheme manager and a person with an interest in the scheme	1	Scheme managers must implement IDRPs arrangements that comply with the LGPS regulations and help resolve disputes [213 - 224]	Constitution sets out delegated authority for nominated adjudicators. Professional adviser engaged to support preparation of appeal decisions.			Director Assistant Director Pensions Head of Governance
		2	Schemes should publish and make IDRPs time limits readily available [225]	IDRP documentation available on website and send to scheme members on request.			Assistant Director Pensions
		3	Schemes should be satisfied that the time taken to reach a decision is appropriate to the situation and be able to demonstrate this [230 & 240]	Adjudicators and professional adviser fully conversant with time scales and processes.			Director Assistant Director Pensions Head of Governance
		4	Schemes should provide the applicant with regular updates on the progress of their investigation. They should notify the applicant where the time period for a decision is expected to be shorter or longer than the reasonable time period and let them know when they are likely to receive an outcome [232]	Adjudicators and professional adviser fully conversant with time scales and processes.			Director Assistant Director Pensions Head of Governance
		5	Scheme regulations or other documents recording policy about the administration of the scheme should specify internal dispute resolution arrangements [233]	<i>Reference to appeal process is included in all notifications of decisions to members.</i>			Assistant Director Pensions
		6	Schemes should focus on educating and raising awareness of their internal dispute resolution arrangements and ensuring that are implemented [233]	<i>Reference to appeal process is included in all notifications of decisions to members. Customer Centre staff trained on explaining complaints process.</i>			Assistant Director Pensions
		7	Schemes should ensure that the effectiveness of the arrangements is assessed regularly and be satisfied that those following the process are complying with the requirements set, which includes effective decision making [234]	Adjudicators are members of the Senior Management Team and therefore demonstrate the appropriate level of knowledge and understanding through wider governance processes.			Director Assistant Director Pensions Head of Governance
		8	Schemes should confirm and communicate their arrangements to members, for example, in the joining booklet [235]	Information on the complaints process issued to new members.			Assistant Director Pensions
		9	Schemes should make their arrangements accessible to potential applicants, for example by publishing them on a scheme website [235]	IDRP documentation available on website and send to scheme members on request.			Assistant Director Pensions
		10	Schemes should ensure they make the following information available to applicants: a) The procedure and processes to apply for a dispute to be resolved b) The information that an applicant must include c) The process by which any decisions are reached d) An acknowledgement once an application has been received [239]	IDRP documentation available on website and send to scheme members on request.			Assistant Director Pensions

The Pensions Regulator (TPR) Code of Practice 14 - Governance and Administration of Public Service Pension Schemes  
Compliance Statement - Resolving Issues

Code Section / Sub Section	Legal Requirements	TPR's Guidance	How we comply	Feb 2024 Update	Further Actions Required (if any)	Owner
<b>Reporting breaches of the law [241 - 275]</b>	Certain people are required to report breaches of the law to the Regulator where they have reasonable cause to believe that: a) a legal duty that is relevant to administration of the scheme has not been, or is not being, complied with b) the failure to comply is likely to be of material significance to the Regulator in the exercise of any of its functions	1	Schemes should be satisfied that those who are responsible for reporting breaches are made aware of the Code [244]	Reporting Breaches Procedure in place and published for the benefit of those responsible.		Assistant Director Pensions
		2	Training should be provided for scheme managers and pension board members [244]	Programme of internally organised seminars for all Board and Authority members, Pre Board meeting sessions with Independent Adviser. Specific external activities signposted and sufficient budget available to fund attendance.		Assistant Director Pensions Head of Governance
		3	All others under a statutory duty to report should ensure they have a sufficient level of knowledge and understanding to fulfil that duty [244]	Reporting Breaches Procedure in place and published for the benefit of those responsible.		Assistant Director Pensions Head of Governance
		4	Those with a statutory duty to report should establish and operate appropriate and effective procedures in regards to reporting breaches [245]	Reporting Breaches Procedure in place and published for the benefit of those responsible.		Assistant Director Pensions Head of Governance
		5	Those procedures should be in accordance with and take into account paragraphs 245 and 262 of the Code [245]	Reporting Breaches Procedure in place and published for the benefit of those responsible.		Assistant Director Pensions Head of Governance
		6	Reports made to the Regulator should be submitted in accordance with paragraphs 263 to 271 [263]	As appropriate		Assistant Director Pensions Head of Governance
		7	Procedures should reference whistleblowing protection and confidentiality [272 to 275]	Reporting Breaches Procedure covers whistleblowing protection		Assistant Director Pensions Head of Governance