



TPR General code of practice

South Yorkshire Pension Fund - Scheme Assessment

Prepared for: South Yorkshire Pensions Authority
South Yorkshire Pensions Authority
South Yorkshire Pension Board

Prepared by: Aon
Date: 7 February 2025

Introduction






TPR Code Compliance model

This report sets out how South Yorkshire Pension Fund complies with the Pension Regulator's (TPR) General code of practice (the Code) in relation to the management of the South Yorkshire Pension Fund which is part of the Local Government Pension Scheme (LGPS).

Note that the Code applies to governing bodies of all occupational, personal and Public Service Pension Schemes and therefore it is generic in nature. This document highlights all the key elements of the Code relevant to Public Service Pension Schemes and sets out whether South Yorkshire Pensions Authority is compliant in each of the Code's modules. There may be a number of requirements relating to these elements that are specifically stipulated within LGPS legislation and it is not the purpose of this compliance model to consider that level of detail.

Key

-  Compliant
-  Compliant in some but not all areas
-  Not currently compliant

PC Pension Committee (or equivalent the Authority in SYPA's case)

PB Local Pension Board

TPR The Pensions Regulator

LGPS Local Government Pension Scheme

Code TPR's General code of practice



The governing body

The governing body – at a glance



Board Structure and activities

Fully compliant in 3 out of 5 modules



2 questions are red and 2 questions are amber out of 30 questions.

Knowledge and understanding requirements

Fully compliant in 1 out of 2 modules



No questions are red and 2 questions are amber out of 20 questions.

Advisers and service providers

Fully compliant in 0 out of 1 module



No questions are red and 4 questions are amber out of 19 questions.

Risk Management

Fully compliant in 2 out of 6 modules



4 questions are red and 4 questions are amber out of 50 questions.

Scheme governance

Fully compliant in 0 out of 1 module



4 questions are red and 6 questions are amber out of 24 questions.

Essential actions

- Process manual to be documented setting out recruitment, succession planning etc (beyond what is in the Constitutions)
24Q3 - Target end of Q4
- Consider how to better implement the Equality Scheme within the recruitment practices. DEI scheme currently under review AD Investment Strategy lead on this - HGCS to inform on elected members
24Q3 - Target Feb 2025

- Develop tailored induction specifically focused on Chairs skills/expectations. This will also be built into specific role profiles for both chair and vice-chair.

24Q3 - Target end of Q4

- Develop a process to ensure regular reviews of skills/behaviour required of Chairs. Build into annual individual review tailored to chair.

Comments

General consensus is to put creating an Own Risk Assessment as lower priority whilst focusing on other areas of Code, and also to allow LGPS national guidance to perhaps be released in this area

The Administering Authority have selected to answer all questions within this section.

The Administering Authority have selected to include all questions when determining whether they comply with the Code within this section.

The governing body - changes



Changes since previous report (if relevant)

The charts below shows how many responses to the questions have changed Red, Amber, Green (RAG) status within each sub-section. If you click within the blue boxes it will take you to the relevant modules (which also records the previous answer and previous score).

Board structure and activities

Amber to Green
Red to Green **No RAG status changes from this review**
Red to Amber
Green to Amber
Amber to Red
Green to Red

Knowledge and understanding requirements

Amber to Green
Red to Green **No RAG status changes from this review**
Red to Amber
Green to Amber
Amber to Red
Green to Red

Advisers and service providers

Amber to Green
Red to Green **No RAG status changes from this review**
Red to Amber
Green to Amber
Amber to Red
Green to Red

Risk management

Amber to Green
Red to Green **No RAG status changes from this review**
Red to Amber
Green to Amber
Amber to Red
Green to Red

Scheme governance

Amber to Green
Red to Green **No RAG status changes from this review**
Red to Amber
Green to Amber
Amber to Red
Green to Red

The governing body

Board structure and activities



Essential Actions

Module	Question	Action
1 Recruitment and appointment to the governing body	1 Required	Process manual to be documented setting out recruitment, succession planning etc (beyond what is in the Constitutions) 24Q3 - Target end of Q4
2 Recruitment and appointment to the governing body	2 Good Practice	Consider how to better implement the Equality Scheme within the recruitment practices. DEI scheme currently under review AD Investment Strategy lead on this - HGCS to inform on elected members 24Q3 - Target Feb 2025
3 Appointment and role of the chair	3 Good Practice	Develop tailored induction specifically focused on Chairs skills/expectations. This will also be built into specific role profiles for both chair and vice-chair. 24Q3 - Target end of Q4
4 Appointment and role of the chair	4 Good Practice	Develop a process to ensure regular reviews of skills/behaviour required of Chairs. Build into annual individual review tailored to chair. 24Q3 - Target April 2025
5 Remuneration and fee policy	1 Good Practice	Ensure Contract Standing Orders articulates that the payments to advisers including independent advisers are covered as part of procurement process. 24Q3 - This is captured in the CSO's - Action Complete

Other Actions

Module	Question	Action
1 No Actions		

Knowledge and understanding requirements

Essential Actions





Module	Question	Action
1 Governance of knowledge and understanding	4	Develop individual training plans and skills matrix.
	Required	24Q3 - Target end of April 2025
2 Governance of knowledge and understanding	8	Develop individual training plans and skills matrix.
	Good Practice	24Q3 - Target end of April 2025
3 Governance of knowledge and understanding	9	Develop individual training plans and skills matrix.
	Good Practice	24Q3 - Target end of April 2025
4 Governance of knowledge and understanding	10	Develop individual training plans and skills matrix.
	Good Practice	24Q3 - Target end of April 2025
5 Governance of knowledge and understanding	11	Develop individual training plans and skills matrix.
	Good Practice	24Q3 - Target end of April 2025
6 Governance of knowledge and understanding	12	Develop individual training plans and skills matrix.
	Good Practice	24Q3 - Target end of April 2025
7 Governance of knowledge and understanding	13	Develop individual training plans and skills matrix.
	Good Practice	24Q3 - Target end of April 2025
8 Governance of knowledge and understanding	14	Develop individual training plans and skills matrix.
	Good Practice	24Q3 - Target end of April 2025

Other Actions

Module	Question	Action
1 Governance of knowledge and understanding	1	24Q3 - Recognise LPB are keen to do more bespoke training/individual training wishes (already in progress).
2 Governance of knowledge and understanding	3	24Q3 - Further work to be done in considering how to review and incorporate wider skills within the LPB (including consideration of EDI).

Advisers and service providers

Essential Actions



Module	Question	Action
1 Managing advisers and service providers	7 	Need to document and clarify who can request work and manage contracts. 24Q3 - Aim to progress during 2025
2 Managing advisers and service providers	8 	Need to document and clarify who can request work and manage contracts i.e. improved contract management. 24Q3 - Aim to progress during 2025
3 Managing advisers and service providers	13 	Need to incorporate a process to ensure improved contact management and regular SLA/KPIs, and better escalation processes. 24Q3 - Aim to progress during 2025
4 Managing advisers and service providers	16 	Work to be done to consider how robust contract provisions are and ensure everything fully incorporated into business continuity plan. 24Q3 - Target BCP March 2025. Contract management during 2025

Other Actions

Module	Question	Action
1 No Actions		

Risk management

Essential Actions

Module	Question	Action
1 Internal controls	3	Further work to be done in identifying single points of failure and ensuring internal controls are documented for these, as well as ensuring all administration tasks are documented (e.g. non-UPM areas). 24Q3 - Target July 2025
2 Internal controls	4	Further work to be done in identifying single points of failure and ensuring internal controls are documented for these, as well as ensuring all administration tasks are documented (e.g. non-UPM areas). 24Q3 - Target July 2025
3 Scheme continuity planning 	2	Develop new BCP covering full SYPA operations. 24Q3 - Work has started on this to be completed by end of Q4
4 Scheme continuity planning 	5	Further work to be carried out to get assurance on BCPs from all service providers. 24Q3 - To be progressed during 2025

5	Scheme continuity planning	Good Practice	10	Develop new BCP covering full SYPA operations. Work has started on this to be completed by end of Q4
6	Scheme continuity planning	Good Practice	11	Contingency plans for staffing shortages to be considered as part of new BCP development
7	Conflicts of interest		11	To be circulated as part of LPB pre-meet for transparency and information.

Other Actions

	Module	Question	Action
1	Identifying, evaluating and recording risks	2	24Q3 - At next review, will consider any further updates required as part of TPR General Code.
2	Conflicts of interest	1	Consider moving to one Policy covering all, rather than having a separate one for LPB. 24Q3 - this has been progressed ready for approval during Q4
3	Conflicts of interest	5	Looking to record details from declarations in a central spreadsheet.

Scheme governance

Essential Actions

	Module	Question	Action
1	No Actions		

Other Actions

	Module	Question	Action
1	No Actions		

The governing body



Modules

Board structure and activities

- Role of the governing body (1)
- Recruiting and appointment to the governing body (2,6)
- *Arrangements for member-nominated trustee appointments (7)*
- Appointment and role of the chair (5)
- Meetings and decision-making (1)
- Remuneration and fee policy (4)

Knowledge & understanding requirements

- Knowledge and understanding (3,6)
- Governance of knowledge and understanding (3,6)

Value for scheme members (DC only)

- *Value for members (7)*

Notes:

The numbers next to the module names above set out Aon's interpretation of the Code for Public Service Pension Schemes. Please note it should not be taken as legal advice.

(1) Applies

(2) Mostly applies

(3) Partially applies

(4) Good practice

(5) Mostly good practice

(6) Partially good practice

(7) Does not apply

Advisers and service providers

- Managing advisors and service providers (4)

Risk management

- Identifying, evaluating and recording risks (1)
- Internal controls (1)
- Assurance reports on internal controls (1)
- Scheme continuity planning (4)
- Conflicts of interest (3,6)
- Own risk assessment (4)
- *Risk management function (7)*

Scheme governance

- Systems of governance (4)





Funding and investment

Funding and investment – at a glance



Investment

Fully compliant in 1 out of 4 modules



3 questions are red and 5 questions are amber out of 37 questions.

Essential actions

- Terms of reference for Investment Panel to be created
24Q3 - Now developed and waiting Authority approval March 2025 - will change to yes at next review
- Ongoing reviews of AVCs to be commissioned and ensure happen regularly.
- SYPA intends to become a Signatory (October 2024 submission)
- Ensure climate risk is considered from an operational perspective is consider (2025/26).
Will be considered as part of business continuity plan during 2024/25.
24Q3 - Initial planning sessions have been initiated for BCP - target December 2025
- Ensure climate risk is considered from an operational perspective is consider (2025/26).
Will be considered as part of business continuity plan during 2024/25.
24Q3 - Initial planning sessions have been initiated for BCP - target December 2025

Comments

The Administering Authority have selected to answer all questions within this section.

The Administering Authority have selected to include all questions when determining whether they comply with the Code within this section.

Funding and investment - changes



Changes since previous report (if relevant)

The charts below shows how many responses to the questions have changed Red, Amber, Green (RAG) status within each sub-section. If you click within the blue boxes it will take you to the relevant modules (which also records the previous answer and previous score).

Investment

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

No RAG status changes from this review

Funding and investment



Investment

Essential Actions

Module		Question	Action
1 Investment governance	Good Practice	7	Terms of reference for Investment Panel to be created 24Q3 - Now developed and waiting Authority approval March 2025 - will change to yes at next review
2 Investment governance	Good Practice	13	Ongoing reviews of AVCs to be commissioned and ensure happen regularly.
3 Stewardship		3	SYPA intends to become a Signatory (October 2024 submission)
4 Climate change	Good Practice	3	Ensure climate risk is considered from an operational perspective is consider (2025/26). Will be considered as part of business continuity plan during 2024/25. 24Q3 - Initial planning sessions have been initiated for BCP - target December 2025
5 Climate change	Good Practice	4	Ensure climate risk is considered from an operational perspective is consider (2025/26). Will be considered as part of business continuity plan during 2024/25. 24Q3 - Initial planning sessions have been initiated for BCP - target December 2025
6 Climate change	Good Practice	5	Ensure climate risk is considered from an operational perspective is consider (2025/26). Will be considered as part of business continuity plan during 2024/25. 24Q3 - Initial planning sessions have been initiated for BCP - target December 2025

Other Actions

Module		Question	Action
1 Investment monitoring		8	24Q3 -Consider whether to expand monitoring to incorporate volatility and risk.

Funding and investment



Modules

Investment

- Investment governance (4)
- *Investment decision making* (7)
- Investment monitoring (4)
- Stewardship (6)
- Climate change (3,6)
- *Statement of investment principles* (6)*
- *Default arrangements and charge restrictions* (7)

Notes:

The numbers next to the module names above set out Aon's interpretation of the Code for Public Service Pension Schemes. Please note it should not be taken as legal advice.

(1) Applies

(2) Mostly applies

(3) Partially applies

(4) Good practice

(5) Mostly good practice

(6) Partially good practice

(7) Does not apply

* Note that for the Statement of investment principles module the Code references good practice for PSPSs. However, due to the overriding legal requirement to have an Investment Strategy Statement (ISS) in place we have not included any questions on this module but have referred to the ISS within the Investment governance module.





Administration

Administration – at a glance



Scheme administration

Fully compliant in 0 out of 1 module



1 question is red and 4 questions are amber out of 16 questions.

Information handling

Fully compliant in 1 out of 4 modules



2 questions are red and 5 questions are amber out of 42 questions.

IT

Fully compliant in 1 out of 2 modules



No questions are red and 3 questions are amber out of 17 questions.

Contributions

Fully compliant in 2 out of 3 modules



2 questions are red and 1 question is amber out of 13 questions.

Essential actions

- All tasks and processes to be reviewed as part of administration improvement plan

25Q4 - Some progress made - SharePoint being developed. Plan to complete by 31 December 2025

- All tasks and processes to be reviewed as part of administration improvement plan, together with an ongoing cycle of reviews and better use of performance data

25Q4 - Some progress - initial plan still in development

- As part of management information development, legal timescales will be monitored and reported.

25Q4 - Improvements in reporting information has been made - further development required linked to above

- Business continuity plan being developed during 2024/25

Comments

The Administering Authority have selected to answer all questions within this section.

The Administering Authority have selected to include all questions when determining whether they comply with the Code within this section.

Administration - changes



Changes since previous report (if relevant)

The charts below shows how many responses to the questions have changed Red, Amber, Green (RAG) status within each sub-section. If you click within the blue boxes it will take you to the relevant modules (which also records the previous answer and previous score).

Scheme administration

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

No RAG status changes from this review

Information handling

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red



IT

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

No RAG status changes from this review

Contributions

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

No RAG status changes from this review

Administration



Scheme administration

Essential Actions

Module	Question	Action
1 Planning and maintaining administration	3	All tasks and processes to be reviewed as part of administration improvement plan 25Q4 - Some progress made - SharePoint being developed. Plan to complete by 31 December 2025
2 Planning and maintaining administration	10	All tasks and processes to be reviewed as part of administration improvement plan, together with an ongoing cycle of reviews and better use of performance data 25Q4 - Some progress - initial plan still in development
3 Planning and maintaining administration	11	As part of management information development, legal timescales will be monitored and reported. 25Q4 - Improvements in reporting information has been made - further development required linked to above
4 Planning and maintaining administration	15	Business continuity plan being developed during 2024/25 25Q4 - Initial BCP sessions have taken place
5 Planning and maintaining administration	16	Consider whether any non-UPM processes are not documented 25Q4 - All LGA changes are tracked - continued to improve in this area but more detailed review ongoing.

Other Actions

Module	Question	Action
1 Planning and maintaining administration	3	

Information handling

Essential Actions

Module	Question	Action
1 Financial transactions	9	Data improvement plan, articulating actions and tracking against them, to be developed 25Q4 - Improvements have been made but investigations ongoing to put the plan in place
2 Transfers out	1	Ensure all transfer out procedures are documented, ensuring compliance with scam requirements. 25Q4 - Now yes - documentation updated, processes in place training delivered
3 Transfers out	2 a	Legal targets are still to be programmed/set up within UPM for ongoing monitoring. 25Q4 - Now yes- SLA's are within legal timeframe
4 Transfers out	3 b	Ensure all transfer out procedures are documented, ensuring compliance with scam requirements. 25Q4 - Now yes - all checks and compliances in place
5 Record keeping	3	Data retention timescales to be reviewed (including consideration of lawfully retaining data) and implemented 25Q4 - Still Partially
6 Record keeping	4	Review retention policies for legitimate purposes (as above) 25Q4 - Still Partially
7 Record keeping	17	Documenting and recording of breaches to be developed, as well as a formal escalation process to resolve issues with employers not meeting requirements. 25Q4 - Now yes - all actions in place
8 Data monitoring and improvement	1	Put in place Data Improvement Strategy and Data Improvement Plan with actions that are monitored. 25Q4 - Still partial - target end of July 2025
9 Data monitoring and improvement	4	Ensure Data Improvement Plan documents data reviews and their findings, and ongoing actions. 25Q4 - Still partial - target end of July 2025
10 Data monitoring and improvement	5	Put in place Data Improvement Strategy and Data Improvement Plan with actions that are monitored. 25Q4 - Some progress made but still no - target December 2025
11 Data monitoring and improvement	6	Ensure Data Improvement Strategy includes action/decisions relating to where data cannot be corrected 25Q4 - Some progress made but still no - target December 2025

Other Actions

Module	Question	Action
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1 Financial transactions	6	Develop KPIs for supplier payments
2 Record keeping	2 a	Ongoing work to improve data and clear backlogs
3 Record keeping	5	Complete review of need to retain microfiche historical records. Target December 2024 for solution. 25Q4 - No change

IT

Essential Actions

Module	Question	Action
1 Cyber controls	1	Create a specific cyber security policy. Also carry out review against TPR Cyber Guidance which is more detailed. 25Q4 - Target Sept 25
2 Cyber controls	8	Cyber hygiene guidelines to be reconsidered as part of review of these policies and documents during 2024. 25Q4 - Some progress made - target Oct 25
3 Cyber controls	9	Data/asset mapping to be updated to assist in identifying any potential target areas for cyber crime. Further work to done to incorporate cyber resilience testing for third parties/suppliers. 25Q4 - Initial project meeting are scheduled - Target date Dec 25

Other Actions

Module	Question	Action
1 No Actions		

Contributions

Essential Actions

Module	Question	Action
1 Resolving overdue contributions	1	Ensure a documented procedure for recording/monitoring/pursuing missing monthly schedules/contributions is in place (or any gaps in a current documented procedures)

2	Resolving overdue contributions	Required	3	Ensure any written procedure includes clear processes to identify fraudulent activity. 25Q4 - Still not met - target date December 2025
3	Resolving overdue contributions	Required	4	Ensure any written procedure includes clear escalation within SYPA, including when to report to TPR. 25Q4 - Still not met - target date December 2025

Other Actions

	Module	Question	Action
1	Monitoring contributions	5	25Q4 - Investigate ways to increase monitoring, perhaps through internal audit.

Administration

Modules

Scheme administration

- Planning and maintaining administration (1)

Information handling

- Financial transactions (1)
- Transfers out (2)
- Record-keeping (3,6)
- Data monitoring and improvement (1)

Notes:

The numbers next to the module names above set out Aon's interpretation of the Code for Public Service Pension Schemes. Please note it should not be taken as legal advice.

(1) Applies

(2) Mostly applies

(3) Partially applies

(4) Good practice

(5) Mostly good practice

(6) Partially good practice

(7) Does not apply

IT

- Maintenance of IT systems (1)
- Cyber controls (2,6)

Contributions

- Receiving contributions (3)
- Monitoring contributions (1)
- Resolving overdue contributions (1)





Communications and disclosure

Communications and disclosure – at a glance



Information to members

Fully compliant in 2 out of 5 modules



3 questions are red and 3 questions are amber out of 22 questions.

Public information

Fully compliant in 1 out of 2 modules



1 question is red and 1 question is amber out of 14 questions.

Essential actions

- Implement legal timescale monitoring within UPM.
25Q4 - No change - under review target December 2025
- Consider feasibility of reviewing all scheme member communications to meet Plain English standards
25Q4 - Still no - under review target December 2025
- Review digital inclusion.
24Q4 - Some progress - action plan in progress - target December 2025
- Ensure AVC statements issued by Prudential and Scottish Widows are issued within future legal timescales
25Q4 - Still partial - Engagement with AVC providers on this is being developed - Target December 2025
- Check on whether AVC providers are meeting legal requirements in relation to the information included on annual statements.

Comments

The Administering Authority have selected to answer all questions within this section.

The Administering Authority have selected to include all questions when determining whether they comply with the Code within this section.

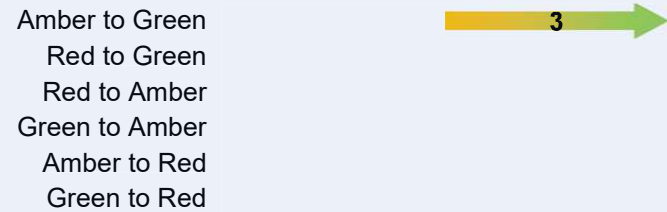
Communications and disclosure - changes



Changes since previous report (if relevant)

The charts below shows how many responses to the questions have changed Red, Amber, Green (RAG) status within each sub-section. If you click within the blue boxes it will take you to the relevant modules (which also records the previous answer and previous score).

Information to members



Public information



Communication and disclosure



Information to members

Essential Actions

Module	Question	Action
1 General principles for member communications	1 b Required	Implement legal timescale monitoring within UPM. 25Q4 - No change - under review target December 2025
2 General principles for member communications	2 Required	Consider feasibility of reviewing all scheme member communications to meet Plain English standards 25Q4 - Still no - under review target December 2025
3 General principles for member communications	3 Required	Review digital inclusion. 24Q4 - Some progress - action plan in progress - target December 2025
4 Benefit information statements (PSPS)	4 Required	Ensure AVC statements issued by Prudential and Scottish Widows are issued within future legal timescales 25Q4 - Still partial - Engagement with AVC providers on this is being developed - Target December 2025
5 Benefit information statements (PSPS)	5 Required	Check on whether AVC providers are meeting legal requirements in relation to the information included on annual statements. 25Q4 - Process still to be set up - Target December 2025
6 Notification of right to cash transfer sum or contribution refund	1 Required	Clear backlogs and then ensure that the notifications on rights and options are issued within 3 month legal timescale 25Q4 - Backlogs still ongoing - Target December 2025
7 Scams	1 Required	Ensure that all scam requirements are being followed 25Q4 - Action complete and processes now in place - Change from Partially to Yes
8 Scams	2 Required	Further training on scam management to be carried to the full team 25Q4 - Action complete and processes now in place - Change from Partially to Yes
9 Scams	4 Required	Ensure that all scam requirements are being followed 25Q4 - Action complete and processes now in place - Change from Partially to Yes

Other Actions

Module	Question	Action
1 No Actions		

Public information

Essential Actions

Module	Question	Action
1 Publishing scheme information (PSPS) Good Practice	2	Review and ensure information published meets the Codes requirements. 25Q4 - Target end of March 2025
2 Publishing scheme information (PSPS)	4 Required	Process to be developed to ensure all changes are made within one month. 25Q4 - Target end of March 2025
3 Dispute resolution procedures	2 a Required	Ensure employers are reminded of requirement to provide this information on a regular basis. 25Q4 - Now yes action closed as detail is covered on the website
4 Dispute resolution procedures Good Practice	10	As part of improved IDRPs reporting, ensure that the IDRPs timescales will be better adhered to and communication with members improved. 25Q5 - Now yes action complete

Other Actions

Module	Question	Action
1 No Actions		

Communication and disclosure



Modules

Information to members

- General principles for member communications (1)
- *Annual pension benefit statements (DC)* (7)
- *Summary funding and pension benefit statements (DB)* (7)
- Benefit information statements (PSPS) (1)
- Retirement risk warnings and guidance (1)
- Notification of right to cash transfer sum or contribution refund (2)
- *Chair's statement* (7)
- Scams (1)
- *Audit requirements* (7)

Public information

- Publishing scheme information (PSPS) (2,6)
- Dispute resolution procedures (2,6)

Notes:

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- (1) Applies
- (2) Mostly applies
- (3) Partially applies
- (4) Good practice
- (5) Mostly good practice
- (6) Partially good practice
- (7) Does not apply





Reporting to TPR

Reporting to TPR – at a glance



Regular reports

Fully compliant in 1 out of 1 module



No questions are red and no questions are amber out of 3 questions.

Whistleblowing- Reporting breaches of the law

Fully compliant in 0 out of 4 modules



4 questions are red and 3 questions are amber out of 11 questions.

Essential actions

- Ensure all breaches are identified and recorded (including administration legal timescales and late/estimated contributions)
25Q4 - Still partial - work ongoing target end of July 2025
- Ensure induction training highlights the personal responsibility about reporting significant breaches, as well as what breaches are/ensuring sharing procedure.
25Q4 - Still no - the updated policy will be taken to LPB in Q4
- Ensure induction training highlights the personal responsibility about reporting significant breaches, as well as what breaches are/ensuring sharing procedure.
25Q4 - Still no - pension officer induction to be reviewed - Target September 2025
- Ensure breaches log is updated to ensure assessments are carried out in line with procedure
25Q4 - still partial pending review of policy -

Comments

The Administering Authority have selected to answer all questions within this section.

The Administering Authority have selected to include all questions when determining whether they comply with the Code within this section.

Reporting to TPR - changes



Changes since previous report (if relevant)

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Regular reports

Amber to Green
Red to Green **No RAG status changes from this review**
Red to Amber
Green to Amber
Amber to Red
Green to Red

Whistleblowing – reporting breaches of the law

Amber to Green
Red to Green
Red to Amber 
Green to Amber
Amber to Red
Green to Red

Reporting to TPR



Regular reports

Essential Actions

Module	Question	Action
1 No Actions		

Other Actions

Module	Question	Action
1 No Actions		

Whistleblowing - reporting breaches of the law

Essential Actions

Module	Question	Action
1 Who must report Required	1	Ensure all breaches are identified and recorded (including administration legal timescales and late/estimated contributions) 25Q4 - Still partial - work ongoing target end of July 2025
2 Who must report Required	3	Ensure induction training highlights the personal responsibility about reporting significant breaches, as well as what breaches are/ensuring sharing procedure. 25Q4 - Still no - the updated policy will be taken to LPB in Q4
3 Who must report Required	4	Ensure induction training highlights the personal responsibility about reporting significant breaches, as well as what breaches are/ensuring sharing procedure. 25Q4 - Still no - pension officer induction to be received - Target September 2025
4 Decision to report Required	2	Ensure breaches log is updated to ensure assessments are carried out in line with procedure 25Q4 - still partial pending review of policy - Target June 2025
5 How to report Required	3	Ensure breaches log is updated to cover all breaches, not just those that are being reported 25Q4 - Moved to partially met pending approval of updated policy

6 Reporting payment failures	Required	1	Contribution procedures to be updated to include escalation and eventual reporting to TPR. 25Q4 - Still no - this will be covered in the breaches training (Pending approval of Policy)
7 Reporting payment failures	Required	2	Ensure breaches log is updated to cover all breaches, not just reportable ones. 25Q4 - Still no - this will be covered in the breaches training (Pending approval of Policy)

Other Actions

Module	Question	Action
1 No Actions		

Reporting to TPR



Modules

Regular reports

- Registrable information and scheme returns (1)

Whistleblowing - reporting breaches of the law

- Who must report (1)
- Decision to report (1)
- How to report (1)
- Reporting payment failures (1)

Notes:

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- (1) Applies
- (2) Mostly applies
- (3) Partially applies
- (4) Good practice
- (5) Mostly good practice
- (6) Partially good practice
- (7) Does not apply



The information set out in this report is based on the expectations set out in the Code, compared to your current practice and it is not a regulatory and compliance audit. The information is based on the responses by the Administering Authority to questions set by Aon based on information contained in the Code.

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